



MMA Securities LLC

MMA Prosper WiseSM Firm Brochure

Form ADV Part 2A

1166 Avenue of the Americas, New York, NY 10036

March 27, 2025

Previously Revised on March 30, 2024

This brochure provides information about the qualifications and business practices of MMA Securities LLC (“MMA Securities”). If you have any questions about the contents of this brochure, please contact us at (212) 345-5000. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

You can find more information about MMA Securities on the SEC’s website at www.adviserinfo.sec.gov. References herein to MMA Securities as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.

Material Changes

Item 2

Within 120 days of the end of MMA Securities' fiscal year, we will provide you with a summary of material changes, if any, describing only material changes to this Brochure since the last annual update. In addition, if material changes occur throughout the year, we will promptly furnish you with a summary of those changes. Any summary of material changes will also include instructions for you to obtain a complete copy of the Brochure at no charge if you wish.

Since the last revision dated March 30, 2024, MMA Securities ("MMAS") has not made any material changes to this brochure.

Full Brochure Available

Clients wishing to receive a complete copy of our current Brochure can request a copy at no charge by contacting its investment adviser representative or the Compliance Department at: (212) 345-5000. Additional information about MMA Securities also is available on the SEC's website at www.adviserinfo.sec.gov.

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MMA Securities' Advisory Business

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MMA Securities LLC ("MMA Securities") was established in February 1998 and its investment adviser registration was effective on July 7, 2015. MMA Securities is wholly owned by Marsh Insurance & Investments LLC ("MIIC") which is an indirect wholly owned subsidiary of Marsh & McLennan Companies, Inc. ("MMC"). MMC is a public corporation listed on the New York, Chicago, and London stock exchanges (ticker symbol: MMC). MMC's website address is www.mmc.com.

MMA Securities provides investment advisory and consulting services to employer-sponsored retirement plans. These services include comprehensive consulting services by assisting plans in establishing and/or maintaining a consistent and ongoing documented process of prudent oversight and due diligence.

Through our plan participant advice services, MMA Prosper WiseSM, plan sponsors can make available to their plan participants a variety of financial-related content and personalized experiences to support them on their retirement journey.

MMA Securities provides information in separate disclosure brochures for its other advisory services. If clients would like more information on our other services and programs, clients should contact MMA Securities for a copy of the disclosure brochure that describes those services or programs or go to www.adviserinfo.sec.gov.

Overview of MMA Prosper WiseSM Services

MMA Prosper WiseSM services (the "Services") provide plan participants with access to an online self-service educational experience and, if selected by the plan sponsor, access to one-on-one advice by MMA Securities licensed professionals. The Services include, but is not limited to:

- Unlimited access to the MMA Prosper Wise.com website experience
- Unlimited virtual one-on-one financial coaching
- Financial well-being assessment including budgeting
- Money personality assessment
- Personalized educational content
- Retirement analyzer
- Gamified experience

The plan sponsor retains MMA Securities to provide the Services for the plan's individual plan participants. After the Services are made available to plan participants, the plan participants may make their own independent decision to use the Services and schedule virtual coaching sessions by enrolling through the MMA Prosper WiseSM portal (www.mmaprosperswise.com). MMA Securities does not recommend the Services in a fiduciary capacity to either the plan sponsors or plan participants. Plan participants are required to read and accept the standard MMA Prosper WiseSM Participant Acknowledgement and other disclosures such as Form ADV Parts 2A (Disclosure Brochure) and 2B (Brochure Supplements) and Privacy Notice. Copies of these disclosures are provided when a plan participant first enrolls in a virtual coaching session with an adviser of MMA Securities. Currently, MMA Securities' investment recommendations under MMA Prosper WiseSM are limited to investment options available in the participant's plan such as mutual funds and bank collective trust funds. Plan participants are free to accept or reject any investment recommendations provided through the MMA Prosper WiseSM service offering. Participants are solely responsible for the implementation of any investment recommendations provided, and the services provided by MMA Securities in conjunction with the MMA Prosper WiseSM program expressly exclude the ongoing monitoring or supervision of the participant's account. There is no guarantee provided by any party that participation in any of the Services will result in a profit.

In providing the Services, financial professionals of MMA Securities will operate exclusively in their capacities as investment adviser representatives and, in providing the one-on-one financial coaching service only, MMA Securities will act as a fiduciary, as defined under Section 3(21) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). No investment adviser representatives of MMA Securities will act in their separate capacities as registered representatives of a broker-dealer in rendering the Services.

As of December 31, 2024, approximately One Hundred Fifty (150) plans have signed up for MMA Prosper WiseSM which gives access to an estimated 120,000 participants to the Services.

If clients would like more information on assets advised or managed by MMA Securities on our other services and programs, clients should contact MMA Securities for a copy of the disclosure brochure that describes those services or programs or go to www.adviserinfo.sec.gov.

Fees and Compensation

Item 5

Fees

MMA Securities charges a fixed annual fee for MMA Prosper WiseSM services only to plans or plan sponsors. Individual plan participants are not responsible for paying any fees directly to MMA Securities, regardless of whether they sign up for MMA Prosper WiseSM services or not. Fees for MMA Prosper WiseSM services when unbundled from other services may be assessed on the basis of (1) an annual fixed fee, generally based upon the number of retirement plan participants, (2) plan asset based fees, or (3) a per participant fee. For relationships where the use of MMA Prosper WiseSM is bundled with other advisory services, the types of fee structures previously mentioned are still utilized, but with, the total charge covering all services provided.

Plan sponsors may negotiate the fees. The specific manner in which fees are charged by MMA Securities is established in the client's written agreement with us. Expenses such as travel will be billed separately to clients at cost, unless otherwise agreed to in the client agreement.

Our fees are dependent on such factors as the number of plan participants, the location of the client and whether travel is required, and other factors. As a result, we do not have a standard fee schedule or table that applies to all plans.

Our fees are typically billed on a quarterly basis in arrears, unless otherwise agreed to in the client agreement. Fees can be invoiced directly to the plan sponsor or can be paid through the plan's expense reimbursement account if the plan's governing document allows for such expenses to be paid by the plan. Our billing methods vary, at times, based on specific agreements between us and clients.

All fees paid to us for MMA Prosper WiseSM services are in addition to the fees and expenses that are paid, where applicable, to us for separate investment and non-investment consulting services to qualified and non-qualified retirement plans. Depending on the agreements with clients, the fees for MMA Prosper WiseSM services, at times, are bundled with an advisory arrangement and payable based on assets. If clients would like more information on our other services and programs, clients should contact MMA Securities for a copy of the disclosure brochure that describes those services or programs or go to www.adviserinfo.sec.gov.

Other Fees and Costs Incurred by You

All fees paid to us for advisory or consulting services are separate from the fees and expenses charged to you or the plan by the plan administrator and to shareholders of mutual fund shares by the mutual funds or by the investment adviser managing the portfolio. Our fees do not include fees charged by plan vendors and other plan service providers but you will incur brokerage and other transaction costs and will be responsible for other fees that are charged directly to you or the plan by the applicable vendor or provider. Clients should review and consider the fees charged by us, as well as the fees charged by any plan vendor or service provider (e.g., investment companies, insurance companies, transfer agents, custodians, and administrators) to evaluate the advisory service that MMA Securities is providing. Some investments (such as mutual funds) impose additional fees that will reduce the value of the investment over time. A complete explanation of the expenses charged by the mutual funds is contained in each mutual fund's prospectus.

Please see Item 12 of this brochure for a discussion of our brokerage practices.

Potential Conflicts of Interest

MMA Securities will receive additional compensation from the plan or the plan sponsor if the plan sponsor contracts with MMA Securities to make the Service available to all plan participants. This creates a potential conflict of interest because MMA Securities is incentivized to recommend the Services to its clients in anticipation of additional income. To eliminate this conflict, our investment adviser representatives will not recommend the Services in a fiduciary capacity to either the plan sponsors or plan participants. The clients will use their independent judgment to contract with MMA Securities for the Services; and after the Services are made available to plan participants, the plan participants will make their own independent decision to use the Services.

When a plan participant uses the Services for one-on-one coaching, MMA Securities recommends, when appropriate, the plan participant increase contributions or utilize other savings or investment strategies. If MMA Securities also provides investment advisory services to the retirement plan and receives a fee based on the total plan asset balance, MMA Securities will, where applicable, receive additional fees for the separate investment advisory services as a result of MMA Securities' recommendations, because the plan participant's additional contributions can result in a higher plan asset balance.

While providing MMA Prosper WiseSM service, if requested by the plan participant, our professionals will provide, at times, information on other professionals associated with MMA Securities or our affiliates. Thus, a potential conflict of interest

exists between the interests of the plan participant and MMA Securities and its affiliates, creating an incentive for MMA Securities to mention additional services offered by its or its affiliates' professionals, rather than on a client's needs. We manage the potential conflict of interest by ensuring that the information is provided solely upon a plan participant's specific request and needs. The client is under no obligation to engage the services of any professional. The client retains absolute discretion over all these decisions and is free to accept or reject any referral from MMA Securities.

We strive to recognize the success of our professionals and present some representatives, at times, with cash bonus and non-cash awards and recognitions, which can be interpreted as a type of incentive. Some of our professionals are eligible to receive cash bonus or non-cash benefits based on the totality of many different performance factors. These bonuses, awards and benefits present a conflict of interest because the professionals have an incentive to generate more revenues for MMA Securities. To mitigate this conflict, we operate a formal performance appraisal and reward system, designed to take many factors into account (i.e., not only success in achieving revenue goals) when determining an individual's remuneration and non-cash benefits.

At times, third-party providers give our professionals gifts up to a total value of \$100 per provider per year, consistent with industry regulations. At times, our professionals receive invitations to attend training events and seminars or participate in virtual learning programs, where travel expenses, accommodation or training expenses are paid for by the sponsoring fund company. This creates a conflict of interest to the extent that this causes our professionals to prefer those third parties that provide these non-cash incentives. We address these conflicts of interest by requiring that prospective attendees seek approval prior to attending such events, by monitoring key policies and deploying mandatory training to personnel, and by disclosing our practices to ensure you make a fully informed decision.

In addition to the mitigation efforts described above, MMA Securities has policies, procedures and codes in place to minimize the above conflicts, including our Code of Ethics "The Greater Good", personal securities trading policies, gifts and entertainment policies and outside business activity policies. Please see Item 11 of this brochure for a discussion of our code of ethics, participation or interest in client transactions and personal trading.

[Mutual Fund Share Class Selection / Mutual Fund and Exchange Traded Fund No Transaction Fee Networks](#)

Mutual Funds typically offer multiple share classes available for investment based upon certain eligibility and/or purchase requirements. For instance, in addition to the more commonly offered retail mutual fund share classes (typically, Class A, B and C shares), mutual funds may also offer institutional or advisor share classes (the "lower cost share classes") or other share classes that are designed for purchase in an account enrolled in investment advisory programs. These lower cost share classes usually have a lower expense ratio than other shares classes. In addition, lower cost share classes often do not charge a 12b-1 fee. The Firm will utilize the most appropriate mutual fund share classes for its portfolio allocations available to it. Regardless, clients may still be invested in funds with higher internal expenses when no lower cost share classes for a fund are available at the custodian or the client is not eligible due to investment minimums or other requirements.

Clients, when participating in certain sponsored programs or our management services, should understand that a transaction charge for mutual fund and exchange traded fund ("ETF") purchases and redemptions may occur in accordance with the appropriate custodial agreement. The applicable transaction charge varies depending on the amount of recordkeeping fees received by the custodian / broker-dealer from the mutual fund or ETF and/or whether the sponsor of the mutual fund or ETF participates in a No Transaction Fee ("NTF") Network. When an NTF mutual fund or ETF is purchased in a client's account, the NTF fund's sponsor directs a payment to the custodian / broker-dealer on behalf and for the benefit of the client that is used exclusively as a credit to defray the bona fide transaction charge obligations of the client's account. When an NTF fund is sold, the custodian / broker-dealer waives the transaction charge to the investment adviser representative ("IAR"). Each custodian which provides execution and custodial services to the Firm has a version of an NTF fund network specific to them and could vary across custodians.

Clients should understand the cost to the IAR of transaction charges may be a factor the IAR considers when selecting securities and determining whether to place transactions in accounts. Specifically, the IAR has a financial incentive to select NTF funds to avoid paying or to lower the transaction charges. While these transaction charges are not passed to the Client, this does create a conflict of interest. Clients should consider this conflict when monitoring the purchase of NTF funds as all such conflicts may have an impact on the investment performance of accounts.

Clients also should be aware that certain NTF funds have higher ongoing internal expenses that can be used to offset payments made by sponsors for transaction charge waivers, and this can reduce the investment returns over time relative to other share classes of the same fund.

Performance-Based Fees and Side by Side Management

Item 6

MMA Securities does not receive performance-based fees (fees based on a share of capital gains on or capital appreciation of your assets).

Types of Clients

Item 7

MMA Securities provides investment and non-investment consulting services to qualified and non-qualified retirement plans sponsored by corporations, not-for-profit organizations, and governmental entities. If retained by plan sponsors, we also provide certain participant advisory services, including MMA Prosper WiseSM, to a plan's individual plan participants. If clients would like more information on our other advisory services and programs, clients should contact MMA Securities for a copy of the disclosure brochure that describes those services or programs or go to www.adviserinfo.sec.gov.

Methods of Analysis, Investment Strategies and Risk of Loss

Item 8

Under the MMA Prosper WiseSM service offering, we provide individualized non-discretionary investment recommendations to plan participants.

Methods of Analysis

Under the MMA Prosper WiseSM program, before any guidance and/or advice is given to plan participants, MMA Securities professionals ("MMA Prosper WiseSM coaches") will become as familiar as possible with plan participants. We will discuss the following with each plan participant who signs up for the one-on-one financial coaching service: his or her current age, target retirement age, current salary, plan balance, current allocation, spouse/partner, and other expected retirement income. We will consider all qualified plan money and personal funds as well as retirement income goals, expected salary increases, expected annual returns and social security estimates. When time permits, coaches will also review the many aspects of the MMA Prosper WiseSM financial wellness website to further understand the plan participant's "money personality" and demonstrate the many benefits of the site.

MMA Prosper WiseSM coaches will be familiar with all aspects of plan participant's qualified retirement plan, including, among others, eligibility, contribution amounts, matching formula, investment options (including the plan's Qualified Default Investment Alternatives), contribution types (Pre-tax, Roth, and after-tax), loan and withdrawal options and distribution options at retirement/termination.

Material Risks

MMA Securities' investment strategies and methods of analysis do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. Recommendations of MMA Securities provided during the one-on-one financing coaching sessions are based upon information provided by the plan participants and/or information provided by the retirement plan. Although the information collected by MMA Securities is believed to be reliable, MMA Securities does not independently verify this information.

While we follow a rigorous process in making investment recommendations, investments are inherently risky. Investing in any securities, including mutual funds, involves a risk of loss of both income and principal that plan participants should be prepared to bear. Risks associated with mutual fund analysis include the risk that a fund's performance track record may not be an accurate predictor of its future investment performance. An investment's future performance may differ substantially from its historical performance and as a result, may incur a loss. Additionally, mutual fund managers may deviate from their stated investment style, objective, or strategy. Also, a fund's expenses may increase, which would adversely affect fund performance. Past performance is no guarantee of future results. Additionally, the plan provider may make changes from time to time with respect to the investment options available in the plan.

Neither MMA Securities nor its financial professionals guarantee that the recommendations will result in achieving the retirement income goal. Neither MMA Securities nor its financial professionals can guarantee that negative returns can or will be avoided in any of the recommendations.

You should consider the benefits of a well-balanced and diversified investment portfolio. This is because market or other economic conditions that cause one category of assets to perform very well often cause another category to perform below

average. Diversification does not guarantee investment returns and does not eliminate the risk of loss.

Below are some of the common factors that can produce a loss in a client's account and/or in a specific investment product, asset category or even in all asset categories:

- **Interest rate risk:** This is the risk that fluctuations in interest rates generally cause investment values to fluctuate.
- **Market risk:** External factors independent of a security's particular underlying circumstances may impact its value. The value of a mutual fund may drop in reaction to tangible and intangible events and conditions, such as a political or social event or an economic condition.
- **Inflation risk:** Inflation means a dollar today buys more than a dollar next year. When inflation is present, your purchasing power typically decreases at the rate of inflation.
- **Currency risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country.
- **Reinvestment risk:** The risk that future proceeds from investments may be reinvested at a potentially lower rate of return is reinvestment risk. This risk primarily relates to fixed income securities.
- **Business risk:** Risks associated with a particular industry or a specific company may impact the value of investments.
- **Capitalization Risk:** Small-cap and mid-cap companies may be hindered due to limited resources or less diverse products or services, and their stocks have historically been more volatile than the stocks of larger, more established companies.
- **Concentration risk:** This is the risk of loss because your money is concentrated in one investment or type of investment. When you diversify your investments, you spread the risk over different types of investments, industries and geographic locations.
- **Credit risk:** This is the risk that the entity or company that issued the investment will run into financial difficulties and will not be able to pay the interest or repay the principal at maturity.
- **Liquidity risk:** Liquidity means the ability to readily convert an investment into cash. Assets with many purchasers are generally more liquid.
- **Financial risk:** This risk means that a company with excessive borrowing or that takes significant business risks to generate profit is typically at a greater risk of financial difficulty or failure.
- **Horizon risk:** This is the risk that your investment time horizon may be shortened due to a foreseen or unforeseen event, thus requiring you to sell the investment(s) that you were expecting to hold for a longer term. If you must sell at a time when the markets are down, you may lose money.
- **Manager risk:** This is the risk that an actively managed mutual fund, exchange traded fund, or closed-end fund's manager will fail to execute the fund's stated investment strategy.
- **Category or Style Risk:** During various periods of time, one category or style may underperform or outperform other categories and styles.
- **Exchange-traded funds:** Exchange-traded funds present market and liquidity risks, as they are listed on a public securities exchange and are purchased and sold via the exchange at the listed price, which price will vary based on current market conditions and may deviate from the net asset value of the exchange-traded fund's underlying portfolio. There may also be a lack of an active market for certain funds, and/or losses from trading in secondary markets.
- **Target Date Funds:** Generally, the asset allocation of each target date fund will change on an annual basis with the asset allocation becoming more conservative as the fund nears the target retirement date. The target date is the approximate date when investors plan to start withdrawing their money. The principal value of the fund(s) in a plan's lineup is not guaranteed at any time, including at the time of the target date and/or withdrawal.
- **Money Market Fund:** An investment in a money market fund is not insured or guaranteed by the FDIC or any other government agency. Although some money market funds such as U.S. Government money market funds strive to preserve the value of the investment at \$1.00 per share, it is possible to lose money by investing in a money market fund. Additionally, other money market funds may operate under new rules and regulations permitting such funds to have a "floating" value per share which may be more or less than \$1.00 per share depending on market conditions, as well as impose liquidity/redemption fees for large or frequent withdrawals.

For more complete information about any of the mutual funds or investment product available within the retirement plan, please contact your retirement plan service provider.

Disciplinary Information

Item 9

MMA Securities and our management persons have not been involved in any legal or disciplinary actions that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. Management Persons are individuals with the power to exercise, directly or indirectly, a controlling influence our management or policies, or to determine the general investment advice given to our clients.

Other Financial Industry Activities and Affiliations

Item 10

a. Other Financial Industry Activities

MMA Securities is registered as a general securities broker-dealer with the SEC, and is a member of the Financial Industry National Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation. As a broker-dealer, MMA Securities provides, among other services, limited brokerage services related to retail mutual funds, variable life insurance and annuities.

Certain representatives of MMA Securities are also personnel of affiliated entities. These entities are described in Item 10(b) of this Brochure. The affiliated entities of MMA Securities have, in certain instances, sharing arrangements with MMA Securities. These arrangements include sharing of office space, support personnel and the associated shared expenses for such. It is important to note that in providing the Services, financial professionals of MMA Securities will operate exclusively in their capacities as investment adviser representatives. No investment adviser representatives of MMA Securities will act in their separate capacities as registered representatives of a broker-dealer or in their capacity(ies) with the affiliated entities listed in rendering the Services.

As described more fully in Item 5, certain of MMA Securities' representatives, in their individual capacities, are licensed insurance agents, and will, when appropriate, recommend the purchase of certain insurance-related products on a commission basis. This activity is infrequent and not material to MMA Securities' advisory business.

The recommendation by MMA Securities' representatives to purchase a commissionable insurance product presents a potential conflict of interest, as the receipt of commissions provides an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from MMA Securities' representatives. Clients are reminded that they have the option to purchase securities and/or insurance products through other, non-affiliated registered representatives and/or insurance agents.

b. Affiliations

Marsh & McLennan Agency LLC

Marsh & McLennan Agency LLC ("MMA"), a licensed insurance agency, is an indirect owner and affiliate of MMA Securities. Subject to the program's requirements, employees of MMA Securities' affiliates, including MMA's employees, can participate in the referral program of MMA Securities described in Item 14.

Marsh LLC

Marsh LLC ("Marsh"), a licensed insurance agency, is an indirect owner and affiliate of MMA. Subject to the program's requirements, employees of MMA Securities' affiliates, including Marsh's employees, can participate in the referral program of MMA Securities described in Item 14.

MMA Asset Management LLC

The Firm and MMA Asset Management LLC ("MMA AM") are affiliated companies whose ultimate parent is Marsh & McLennan Companies, Inc. MMA AM is a SEC registered investment adviser, primarily engages in wealth management services with certain investment advisory and consulting services to employer-sponsored retirement plans clients.

Mercer Investments LLC and Mercer Global Investments Canada Limited

Mercer Investments LLC and Mercer Global Investments Canada Limited are affiliated investment advisory firms under common ownership of MMA Securities LLC's ultimate parent, Marsh & McLennan Companies, Inc.

Precept Advisory Group LLC

Precept Advisory Group LLC is an affiliated advisory firm under common ownership with the ultimate parent of MMA Securities LLC, Marsh and McLennan Companies, Inc. For the disclosures of Precept Advisory Group LLC, please refer to its Form ADV Part 2A brochure which may be obtained at www.adviserinfo.sec.gov.

Empower Advisory Group, LLC (“EAG”) is not affiliated with MMA Securities; for its disclosures, please refer to its Form ADV Part 2A brochure which may be obtained at www.adviserinfo.sec.gov.

Code of Ethics, Participation, or Interest in Client Transactions and Personal Trading

Item 11

MMA Securities has adopted a stringent Code of Ethics, which sets out high ethical standards of conduct for our employees consistent with our duty of loyalty, fairness and good faith toward our clients. The Code of Ethics has specific sections regarding insider trading, protecting confidentiality, compliance with federal and state securities laws, avoiding and identifying conflicts of interest, and personal securities transactions. A copy of this Code of Ethics is available upon request.

Our Code of Ethics also includes policies and procedures regarding personal securities transactions. These procedures require the reporting of securities transactions by our employees, ongoing monitoring of securities transactions and the prohibition on the use of material non-public information. We do not recommend clients transact in securities in which we have a material financial interest.

At times, representatives of MMA Securities buy or sell securities for their personal accounts. Note that MMA Securities does not typically recommend to its advisory clients that they purchase or sell individual securities other than interests in commingled investment vehicles such as mutual funds, collective trusts, limited partnerships and limited liability companies. As indicated above, MMA Securities has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of MMA Securities’ supervised employees. Neither MMA Securities nor any associated person recommends buys or sells for client accounts, securities in which MMA Securities or any related person has a material financial interest. MMA Securities manages the potential conflicts by requiring that any transaction be made in compliance with the MMA Securities Code of Ethics and by monitoring personal securities activity by MMA Securities personnel through the review of personal trade activity via electronic surveillance tools by the MMA Securities Compliance Department.

Associated and supervised persons will provide services to entities considered publicly traded at certain times. In order to mitigate the actual conflicts of interest that will arise from these relationships, persons who service these relationships or supervise those efforts, are prohibited from transacting in any securities of the publicly traded entity during the entirety of the servicing relationship. The publicly traded entities are maintained on a “watch list” and MMA Securities will monitor the personal trading accounts of access persons via technology solutions to monitor and address potential violations to this prohibition.

Conflict Awareness

The identification, avoidance or management, and mitigation of conflicts of interest is an ongoing process. MMA Securities believes that it creates a conflict-aware environment through its operational practices, governance and oversight processes, communications with clients, disclosure reviews, peer review procedures, and its ongoing training, monitoring, and testing. Core to this process are the following elements:

Code of Conduct — Personnel are required to comply with Marsh McLennan’s Code of Conduct, The Greater Good, as a condition of employment. The Greater Good has clear requirements and guidelines for dealing with ethical matters, including conflicts of interest.

Gifts and Entertainment Policy — Personnel are required to comply with a gifts and entertainment policy, which is designed to ensure that they are not unduly influenced by the receipt of gifts, meals, or entertainment. MMA Securities has adopted a gifts and entertainment policy designed to manage and mitigate the risks of the giving and receiving of gifts and entertainment.

Confidentiality Obligations — Employees are made aware of their obligations to protect client confidentiality and to comply with insider trading and related, applicable laws and regulations.

Personal Investing Reporting — Certain employees of MMA Securities are also subject to policies governing their personal investing as required by applicable laws and regulations, which in general require certain personal investments be reported.

Directorships and Outside Positions – Personnel are required to seek approval before accepting and holding positions outside of MMA Securities that create potential conflicts of interest.

Referrals Among Affiliated Companies – Personnel of MMA Securities may refer Clients of the Firm to other affiliates for additional services. Such referrals will be done while considering the ethical matters regarding conflicts of interest as defined in the MMA Securities Code of Ethics and the Marsh McLennan “The Greater Good”.

Failure of personnel to comply with the requirements of the MMA Securities Code of Ethics and all laws, rules and regulations applicable to MMA Securities’ business may result in disciplinary action by MMA Securities.

Empower Advisory Group, LLC (“EAG”) is not affiliated with MMA Securities; for its disclosures, please refer to its Form ADV Part 2A brochure which may be obtained at www.adviserinfo.sec.gov.

Brokerage Practices

Item 12

We do not select or recommend a broker-dealer for a client’s transactions. We do not have any formal or informal soft-dollar arrangements and do not receive any soft-dollar benefits.

Review of Accounts

Item 13

To the extent requested by a plan participant, MMA Securities’ representatives remain available to provide virtual financial coaching to the plan participant. However, the MMA Prosper WiseSM service does not include regular or ongoing account reviews or monitoring. All plan participants are advised that it remains their responsibility to advise MMA Securities of any changes in their investment objectives and/or financial situation. All plan participants are encouraged to review investment objectives and the account performance on an annual basis.

Plan participants are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the plan’s broker-dealer/custodian, administrator, or record-keeper for the plan accounts.

Client Referrals and Other Compensation

Item 14

Other than the disclosure in Item 5, we do not receive an economic benefit from a non-client for providing investment advice or advisory services to our clients. The total compensation received by MMA Securities is only based on the amount of adviser fee agreed to by MMA Securities and the client.

MMA Securities maintains a referral program engaging affiliated referral partners and certain supervised persons for the purpose of obtaining client referrals in accordance with Rule 206(4)-3 of the Advisers Act. The compensation paid to these referral partners is paid, where applicable, by an affiliated entity and will, where applicable, consist of a cash payment stated as a percentage of the Firm’s advisory fee, but will, where applicable, include cash payments determined in other ways. To avoid any potential or apparent conflict of interest, these referral partners cannot act in the capacity of a fiduciary under ERISA or the Advisers Act.

Custody

Item 15

MMA Securities does not maintain custody of client funds or securities.

Investment Discretion

Item 16

MMA Securities does not take discretion in regard to any participant assets or accounts in connection with the MMA Prosper WiseSM service offering. Plan participants are free to accept or reject any investment recommendations provided by through the Services.

Certain retirement plans separately engage MMA Securities for investment or non-investment consulting services with respect to investment options (non-discretionary or discretionary as agreed with the client) pursuant to a written agreement. If clients would like more information on our other services and programs, clients should contact MMA Securities for a copy of the disclosure brochure that describes those services or programs or go to www.adviserinfo.sec.gov.

Voting Client Securities

Item 17

MMA Securities does not vote client securities. Accordingly, we have not adopted a proxy voting policy. Clients will receive proxies or other solicitations directly from their custodian. We do not provide advice with respect to securities solicitations.

Financial Information

Item 18

MMA Securities will not require you to pay more than \$1,200 in fees more than six months in advance of receiving services, therefore, we are not required to provide a balance sheet. In the event of a billing method requiring the delivery of a balance sheet, one will be provided upon the delivery of the firm required disclosures, including this Brochure.

In any event where specific agreements between us and clients require such prepayment, or we solicit such prepayment from a client of more than \$1,200 in fees more than six months in advance, we will be required to provide you with a balance sheet and disclose any financial condition that could impair our ability to meet our contractual commitments to you. MMA Securities must also disclose whether we have been the subject of a bankruptcy proceeding.

We have no financial condition to disclose to you and have never been the subject of bankruptcy proceeding.