

Steele Capital Management, Inc. (SMC) has been registered with the Securities and Exchange Commission as an investment advisory firm since 1995. Investment advisory services and fees differ from those offered through a brokerage firm and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

SCM assists clients with long-term investment plans that are guided by documented client goals, constraints and risk profiles. To this end, SCM makes initial investment recommendations only after thoroughly analyzing your risk tolerance, goals and financial situation. Once SCM has established an appropriate investment portfolio for you based on these guiding factors, SCM then meets with you at least annually to review any changes to your situation that may require adjustments to your investment portfolio. Although SCM does have certain investment strategies that it seeks to execute for all of its clients, SCM will tailor its advisory services to your individual needs and preferences. SCM makes financial planning available to its investment management clients for no additional cost. This service provides guidance in the areas of retirement planning, estate planning, education funding, tax planning, cash flow analysis, and Social Security maximization.

In our investment portfolio management, we will continuously monitor your investment accounts over which you provide us with such authority and provide advice. When you engage us for portfolio management services, you will sign an advisory agreement that may or may not give us discretionary authority to determine the investment to buy and sell in your account. You may impose reasonable restrictions on our discretionary authority, which must be provided to us in writing and accepted by us. If you prefer, you may retain discretion and make the ultimate decision regarding the investments we purchase or sell in your account. Our services may also include the recommendation or selection of other investment managers. Portfolio performance reporting is provided quarterly and there is a minimum initial and ongoing account size for portfolio management services.

Prior to receiving advisory services, you are required to enter into a written agreement with SMC setting the terms and conditions of the advisory relationship. More detailed information about our services is available in our Form ADV Part 2A, specifically under Item 4, "Advisory Business."

Ask us:

Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What fees will I pay?

Fees and costs affect the value of your account over time. You will pay fees and costs whether you make or lose money on your investments. It is important to make sure that you understand what fees and costs you are paying. Our fees are clearly outlined in our advisory agreement and in our Form ADV Part 2A, under Item 5, "Fees and Compensation."

SCM's advisory relationships are administered through a quarterly asset-based fee based on the value of the advisory account. The asset-based fee reduces the value of your account and will be deducted from your investment portfolio. Transaction fees through your custodian are not included in our advisory asset-based fee.

Some investments may also impose additional fees that will reduce the value of your investment over time, such as mutual funds.

Our fees vary and are negotiable. The fee you pay will depend, for example, on the complexity of the services you receive and the amount of assets in your account. The amount paid to our firm and your financial professional does not vary based on the type of investment we select on your behalf.

Ask us: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means:

- The more assets you have in the advisory account, the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees.
- Some of our advisors are also licensed insurance agents and would receive commissions on purchases of insurance products.

We benefit from the advisory services we offer you. Additional information about these conflicts are provided in our Form ADV Part 2A under Item 4, "Advisory Business" and Item 10, "Other Financial Industry Activities and Affiliations."

Ask us: How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Mostly our financial professionals are paid a salary. A few have elected to be paid a portion of the advisory fee paid by clients they referred. Those individuals that are also licensed insurance agents receive commission payments from the purchase of insurance products in addition to their salary.

Do you or your financial professional have legal or disciplinary history?

Yes. Our financial professionals do have legal and disciplinary events. Visit <u>www.investor.gov</u> for a free and simple search tool to research our firm and our financial professionals.

Ask us: As a financial professional, do you have any disciplinary history? For what type of conduct?

For additional information on our investment advisory services, please see our Form ADV Form 2A by contacting us at 800-397-2097 to request up-to-date information and/or a copy of this Customer Relationship Summary.

Ask us: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?