

Introduction

First Citizens Asset Management, Inc. ("FCAM") is registered with the Securities and Exchange Commission ("SEC") as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Easy-to-use, free tools are available to investors to help them research firms and financial professionals at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisors, and investing.

What investment services and advice can you provide to me?

We offer investment advisory services to retail investors. Our advisory services include wrap fee programs and financial planning. All transactions in our wrap fee accounts are performed by the selected portfolio manager on a discretionary basis. If we accept discretionary authority to act on your behalf, we will make investment decisions without discussing them with you in advance. Discretion is triggered when you grant it and remains in effect until you revoke it. The investments selected are based on your individual investment profile, which is established at account opening. Wrap fee accounts generally have a minimum initial investment of \$25,000, although some portfolio managers may have higher minimums.

As a part of our standard service offering, ongoing account monitoring is provided for all advisory accounts. Your advisor will meet with you regularly to discuss the performance of your account, as well as your investment goals, and work with you to design a strategy to achieve them.

Conversation Starters: Ask Your Financial Professional

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

For additional information, please see the disclosure documents specific to your transactions, Form ADV, Part 2A Brochure (Items 4 and 7 of Part 2A or Items 4.A and 5 of Part 2A Appendix 1) and other applicable documents.

What fees will I pay?

If you open an advisory account, you will pay an ongoing asset-based fee for the duration of your account relationship. This varies based on the size of your account and the specific strategy selected. Other account types may offer a lower level of services which may result in lower costs. Certain investments that may be held in your advisory account, typically mutual funds, also charge internal expenses which may impact the value of your account over time.

The strategies offered by FCAM are determined by the money managers we approve to work with our clients. Other firms may offer a different or wider selection of managers and strategies, some of which may have lower costs.

Asset based fees create a conflict of interest between you and FCAM because we have an incentive to encourage you to consolidate your assets with us. The increase in account size could result in a lower management fee, but our overall compensation would increase.

You will pay fees and costs whether you make or lose money in your account. Fees and costs will reduce the amount of money you make on your investments over time. Please make sure you understand the fees and costs you are paying.

Conversation Starters: Ask Your Financial Professional

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?

For additional information, please see our <u>Form ADV, Part 2A Brochure</u> (Items 5.A-D) and other applicable documents, such as prospectuses and contract documents, and disclosure documents related to your investments.

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

When we act as your investment advisor, 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 are some examples to help you understand what this means:

Your advisor has the ability to discount the fees you pay on certain investments or advisory programs. These discounts create a conflict of interest between your interests and the firm's because the firm's compensation is negatively impacted when fees are discounted.

Conversation Starters: Ask Your Financial Professional

How will your conflicts of interest affect me and how will you address them?

Proprietary Products: FCAM manages an advisory account platform of proprietary investment models that are primarily offered to clients of affiliated entities, First Citizens Investor Services Inc. ("FCIS"), a registered broker-dealer and investment adviser and SBV Wealth LLC ("SVBW"), a registered investment adviser. Investment decisions in these models are made by a committee of FCAM associates who may be registered representative of FCIS. As manager, the firm receives additional compensation for investments in these models.

In addition to the above payments, the companies we do business with may offer to pay or reimburse expenses related to training, marketing, and educational efforts for advisors. This could include training, seminars, or other events for the purposes of informing the advisors about their products. This may create a conflict of interest as your advisor may be more likely to recommend a product to you if they have learned more about these products by participating in these types of events.

For additional information please see our full <u>Form ADV, Part 2A Brochure</u>, and the disclosure documents for your specific transactions.

How do your financial professionals make money?

FCAM advisors' compensation is determined by a number of factors, but is generally determined by the following criteria:

- A percentage of the revenue generated from advisory fees in accounts handled by the advisor. This percentage increases as the amount of overall revenue generated increases.
- In addition, some advisors are eligible for incentive or bonus compensation based on quantitative measures such as growth in assets under management, qualitative measures such as completion of professional development activities, or a combination of the two.
- FCAM's compensation is "product agnostic", meaning an FCAM advisor earns the same percentage of revenue regardless of the investment product chosen.
- Revenue generated in accounts not meeting a certain minimum investment amount may not be paid to your advisor. This does not establish a minimum account size for retail customers but may create a conflict of interest since your advisor has an incentive to encourage you to invest a greater amount, or consolidate additional assets with, FCAM.

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

Yes, we have additional legal and disciplinary events. Visit <u>investor.gov/CRS</u> for a free and simple search tool to research our firm and our financial professionals.

Conversation Starters: Ask Your Financial Professional

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

Additional Information

For additional information about FCAM and our advisors, please be sure to visit <u>Investor.gov</u>, brokercheck.finra.org. and our website at <u>firstcitizens.com</u>. For additional information on our advisory services, see our <u>Form ADV</u>, <u>Part 2A Brochure</u>, on Investor.gov, and refer to the brochures and supplements your financial professional provides.

To report a problem to the SEC, visit <u>investor.gov</u> or call the SEC's toll-free investor assistance line at (800) 732-0330. To report a problem to FINRA, visit <u>finra.org</u> and select "File a Complaint" under "For Investors."

If you have a problem with your investments, account, or financial professional, contact us at 100 E Tryon Rd, Mail code DAC 19, Raleigh NC, 27603. Phone: 800-223-0205

First Citizens Asset Management, Inc.