

## Regulation Best Interest

## Potential Conflicts of Interest

### New Accounts

#### Introduction

Windward Capital Management Company (Windward) is registered with the Securities and Exchange Commission (SEC) as a Registered Investment Advisor (RIA). Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisors, and investing.

#### What investment services do we provide?

The sole business of Windward is to provide fee-based investment supervisory services to all of its clients. Investment advisory fees are calculated as a percentage of assets under management. All clients' portfolios are managed on a discretionary basis, as authorized by our clients in the Windward management agreement. Windward offers equity, balanced, and fixed income management services.

Windward offers advice on the following: equity securities, including exchange-listed securities, securities traded over-the-counter and convertible bonds; foreign issues; warrants; corporate debt securities (other than commercial paper); commercial paper; certificates of deposit; municipal securities; investment company securities, including mutual fund shares; and United States government securities.

Windward does specific analysis of each client's individual investment experience, sophistication, and needs to determine which investment strategy would be suitable for the client. If desired, clients may also impose restrictions on investment, including requesting to have equities selected that reflect a social or environmentally sensitive investment strategy.

We conduct reviews of client portfolios on a daily, weekly, and monthly basis. The stated minimum for our accounts is \$200,000.00; we may make exceptions for clients whose aggregate assets total greater than the minimum.

#### Potential Conflicts of Interest

Windward has an affiliate broker/dealer, S.L. Reed & Company (SLR), and our representatives are also registered representatives with SLR. As discussed above, Windward's sole offering is our Investment Advisory services, at the management rates discussed in Form CRS. However, other products or services offered by SLR may provide us or our representatives with different levels or types of compensation. They may therefore have incentive to offer certain products or types of investments.

## **How We Eliminate or Mitigate Conflicts of Interest**

During our discussions with you regarding opening a new account, we discuss the various options for your investment account. We discuss and document, at minimum:

- Your investable assets, and what proportion such assets comprise your overall assets.
- Your overall investment profile, including your investment objectives, time frame, and level of investment experience and sophistication.
- Your desire for a discretionary investment advisory account versus a self-directed option.
- The overall potential costs and fees of an advisory account versus a per transaction fee arrangement, and other fees and expenses.
- Ease of access to funds, and ease of transfer between funds.
- Reputation, strength, and range of services provided by the custodial company.
- Tax treatment and ability to provide tax advantaged handling in the various account types.
- Any other relevant factors, including your personal preferences.

We believe the information collected in this discussion will provide us with the ability to help you make an informed choice as to the type of account that is in your best interest.