Affiliate Referral & Third-Party Provider Conflicts

Disclosure for referrals to affiliated firms, connected providers, and third-party service relationships.

Effective July 8, 2026 - v1.0

Protocol Wealth may recommend that a client consider services from a firm, provider, platform, custodian, counterparty, software vendor, professional adviser, or affiliated or connected business. This disclosure supplements Form ADV Part 2A, the Client Advisory Agreement, and any specific written referral or conflict disclosure.

Nature of the Conflict

A conflict may exist where Protocol Wealth or its personnel have a financial, ownership, referral, operational, professional, software, vendor, or other relationship with a recommended provider. Even where Protocol Wealth receives no referral fee, the relationship may create an incentive, appearance of incentive, or operational preference.

Client Choice

Clients are not required to use any affiliated firm, connected provider, broker, custodian, platform, OTC counterparty, software provider, attorney, CPA, insurance professional, or other third party recommended by Protocol Wealth. Clients may choose an unaffiliated provider, request alternatives, or decline the referral without penalty.

Compensation

Any provider fees are separate from Protocol Wealth advisory fees unless a signed agreement states otherwise. If Protocol Wealth or its personnel receive referral compensation, revenue sharing, commissions, ownership distributions, software fees, or other compensation related to a recommendation, that compensation must be separately disclosed.

Certain associated persons of Protocol Wealth are also registered representatives of Finalis Securities LLC, member FINRA/SIPC, and may receive commission-based compensation when acting in that separate capacity.

Third-Party Responsibility

Protocol Wealth does not guarantee a third party’s performance, solvency, cybersecurity, legal compliance, pricing, availability, tax treatment, or investment outcome. Clients should review third-party agreements, fee schedules, privacy policies, custody terms, risk disclosures, and account documents before engaging a provider.

Fiduciary Commitment

Protocol Wealth is a fiduciary when providing investment-advisory services and must act in the client’s best interest. Recommendations involving conflicts are evaluated under that fiduciary obligation and the firm’s compliance program.