

Privacy Policy

Osaic, Inc. and its Affiliates — Osaic, Inc., Osaic Wealth, Inc., Osaic Services, Inc., Osaic Institutions, Inc., Osaic RIA, Inc., Osaic Advisory Services, LLC, Ladenburg Thalmann & Co., Inc., Ladenburg Thalmann Asset Management, and VISION2020 Wealth Management Corp., (collectively, "we," "our," "us," or "Osaic") care about your privacy and recognize the importance of protecting personal information. This Privacy Policy describes the types of personal information we may collect, including during your visit to our websites included in the below table ("Sites"), and when you communicate or interact with us or seek or use our products and services; how we use personal information; how we protect personal information; and how you can exercise options regarding personal information. Please note that some of our Sites have their own specific privacy policies. When that is the case, this Privacy Policy applies in addition to those policies.

Sites:

osaic.comltam.comthebreslingroup.commysuccessionplan.comnpim.comcareers.osaic.com

ladenburgfunds.com

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This Privacy Policy does not apply to employment and recruitment-related personal information collected from employees, job applicants, contractors, financial representatives, other non-employee workers, or similar individuals, who are residents of California, for whom we provide separate privacy policies and notices in the context of their employment, working, or professional relationship with Osaic. By visiting our Sites, or using our products or services, you consent to our collection and use of personal information as described in this Privacy Policy and in the Terms of Use, or the Terms and Conditions that apply. If you do not agree to this Privacy Policy or our Terms of Use, please do not use our Sites, products, or services.

Changes to this privacy policy

We may revise this Privacy Policy at our discretion and will update it periodically. We will post any material changes on this page and update the "Last Updated" date, so be sure to check back periodically. For material retroactive changes, we will notify you consistent with the law. Your continued use of our Sites and services after changes have been posted will constitute your acceptance of this Privacy Policy and any changes.

Personal Information we collect and purposes for which we may use it

The personal information we may collect about you depends on our relationship with you. For instance, if you are a client of ours, we will collect information about you to open and service your accounts. If you use our Sites, we may automatically collect information from your use of the Sites (see section below entitled Cookies and Similar Technology).

For purposes of this Privacy Policy, "personal information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include de-identified or aggregate information, or publicly available information lawfully available from governmental records.

Categories of personal information

Below we categorize types of personal information we have collected in the last 12 months. Depending on our relationship with you, and to the extent consistent with law, we may continue to collect these types of personal information and use it for the purposes listed further below. Please note that the examples of the types of information within these categories that may qualify as personal information are not intended to be comprehensive and that there may be overlap between categories.

We do not use sensitive personal information to infer characteristics about you and typically limit our use of sensitive personal information to (1) perform services, such as to provide benefits to our customers; (2) to resist deceptive, fraudulent, or illegal actions; and (3) to ensure the physical safety of our personnel, customers, visitors, and others.

With respect to each of the categories of data below, we may also disclose personal information with any person to whom we may transfer any of our rights or obligations under any agreement, or in connection with a sale, merger, or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or to any person who is otherwise deemed to be our successor or transferee. We may also collect and use information as described to you when collecting the information.

Categories of personal information obtained Our uses of personal information Contact information and other personal · Offering and providing products and services (including opening and servicing identifiers, such as name, postal and email accounts, conducting transactions, communicating, fulfilling requests, and address, phone number, unique personal responding to questions, providing information and events, making suitability identifier, account name, registration number, determinations, conducting administrative and managerial tasks associated with our tax identification number, Social Security client services, etc.), marketing our products and services, connecting individuals number, driver's license number, passport with other products and services. number, and similar identifiers. Operating our business; fulfilling contractual obligations; ensuring the security and sufficiency of our networks, systems, products, services, property, and personnel; monitoring, assessing, designing, and improving our operations, products, and services; managing risk. To comply with legal obligations, including to respond to regulatory or law enforcement requests and as required by applicable law, to comply with governmental regulations, and legal process, such as warrants, subpoenas, and court order. Supervising and providing compliance, educational, and licensing-related services, and practice support to representatives. Conducting internal investigations; preventing fraud; addressing disciplinary matters; establishing or defending legal claims or allegations; protecting property, personnel, or members of the public. Financial, commercial and benefits To perform services on behalf of the business, provided that the use of the consumer's information, such as records and personal information is reasonably necessary and proportionate for this purpose. information about personal property or Such business purposes include maintaining or servicing accounts, providing financial accounts, investments, products, customer service, processing, or fulfilling orders and transactions, verifying customer and services; purchasing or consuming information, processing payments, providing financing, providing analytic services, histories or tendencies; investment providing storage, or providing similar services on behalf of the business. objectives, risk tolerance, time horizon, To verify or maintain the quality of a product or, service that is owned, or controlled assets, holdings and financial interests, by the business, and to improve, upgrade, or enhance the service that is owned or income and compensation, expenses, tax controlled by the business, provided that the use of the consumer's personal information, transaction history, investment information is reasonably necessary and proportionate for this purpose. experience; other account information; information on savings, insurance, and retirement; other benefits-related information; and other commercial and financial information. Internet or electronic activity information To prevent, detect, and investigate security incidents that compromise the availability, and device and online identifiers, such as authenticity, integrity, and or confidentiality of stored or transmitted personal online identifier or device ID, or other information, provided that the use of the consumer's personal information is similar identifiers; information regarding reasonably necessary and proportionate for this purpose. interaction with a website, device, database, To perform services on behalf of the business, provided that the use of the consumer's or application, including time and duration personal information is reasonably necessary and proportionate for this purpose. of internet and network connections; Such business purposes include maintaining or servicing accounts, browsing history; and calls and emails sent and received. providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business. To verify or maintain the quality of a product or, service that is owned, or controlled by the business, and to improve, upgrade, or enhance the service that is owned or controlled by the business, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose. To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose.

Categories of personal information obtained	Our uses of personal information
Demographic, protected classification, and association information, such as date of birth/age, sex, marital status, race, gender, ethnicity, citizenship and visa status, military or veteran status; association- related information, such as whether an individual is related to someone who is employed in the securities industry, information about dependents, beneficiaries and parties related to an account, emergency contact information; and disability and health-related information.	 To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose. Regulatory registration.
Audio, electronic, visual, or similar information, including photographs, CCTV footage and other video event recordings, and voicemail and other telephone recordings (e.g., for call center support lines).	 To verify or maintain the quality of a product or, service that is owned, or controlled by the business, and to improve, upgrade, or enhance the service that is owned or controlled by the business, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose. To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose.
Education and professional background information, such as degrees, licenses, professional designations, or certificates sought or obtained; training records, transcripts, performance and talent management information; resumes, work history, firm element, job descriptions; references; compensation, bonus, stock-option information, and similar information; membership in professional bodies, appointments, gross dealer concession, outside business activities; publications and work product; discipline, conduct, absence records; and criminal history.	 To verify or maintain the quality of a product or, service that is owned, or controlled by the business, and to improve, upgrade, or enhance the service that is owned or controlled by the business, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose. To perform services on behalf of the business, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose. Such business purposes include maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business. Regulatory registration.
Inferences drawn from personal information to create a profile about an individual reflecting, for instance, preferences, characteristics, behaviors, and aptitudes, such as credit history and risk tolerance, and business development and practice analysis.	 To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services. To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted personal information, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose. To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose.
Other personal information provided to us or stored on our systems, such as information provided by email or in a phone call.	 To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services. To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted personal information, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose. To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose.

Categories of sensitive personal information obtained	Our uses of sensitive personal information
Government identifiers, including Social Security number, driver's license number, state identification card number, passport number.	To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
	 To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted personal information, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose.
	 To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose.
	 To ensure the physical safety of natural persons, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose.
	 For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, provided that the personal information is not disclosed to another third-party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business.
	To perform services on behalf of the business, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose. Such business purposes include maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business.
	 To verify or maintain the quality of a service that is owned or controlled by the business, and to improve, upgrade, or enhance the service that is owned or controlled by the business, provided that the use of the consumer's personal information is reasonably necessary and proportionate for this purpose.
	For purposes that do not infer characteristics about the consumer.
Biometric information, specifically fingerprint information	Regulatory registration.Criminal background checks for hiring purposes.
Health information, such as symptoms of COVID-19, vaccination status, COVID-19 diagnosis, COVID-19 related testing results, and whether you have or display certain symptoms	Office management. Potential legal obligations.

Disclosing personal information

We have in the last 12 months disclosed each of the categories of personal information above to parties outside of Osaic for a business purpose and may continue to do so.

We may disclose personal information internally and with the following types of parties:

- Service providers, contractors, and vendors, including to process transactions, maintain accounts, and provide information technology, marketing, and recruiting and human resources-related services
- Third-parties and non-affiliates, such as Financial Professionals, representatives, other financial institutions, credit bureaus, product sponsors, and business contacts and partners related to the provision or offering of products or services, human resources, and business operations, management, and administration
- Governmental authorities and other third-parties, such as self-regulatory organizations, to comply with applicable laws and legal requirements or in response to court orders, subpoenas, government inquiries, other legal processes, to defend against claims and allegations, or to protect property, personnel, or members of the public

- Members of the public and our clients when permitted by law, for instance, items of interest pertaining to our business (e.g., photographs taken at our events)
- If you are a financial professional, we may sell your personal information to other financial institutions for those financial institutions' own marketing efforts and purposes.
- Other parties to which you direct us to disclose personal information, or to which we inform you we may disclose your data, or to
 which we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our
 business or other transfer of our assets, whether voluntarily or by operation of law, or to any person who is otherwise deemed to be
 our successor or transferee

NOTE: You may interact with Financial Professionals, other financial institutions, or other third-parties (sometimes referred to as non-affiliates, which are companies not related to Osaic by common ownership or control) or direct us to disclose information with such parties as we provide products or services to you. Osaic may not control the data practices of such parties, and we recommend you review any applicable privacy policies for information about these parties' data practices.

Sources of personal information

We collect and receive the categories of personal information above from:

- Communications and interactions with individuals seeking to obtain or using our products and services or their agents
 and representatives, or other persons communicating or otherwise interacting with us
- Automated collection through our Sites, services, products, applications, databases, devices, information systems and networks, including through cookies and similar technology
- Osaic employees and other personnel
- Financial professionals, other financial institutions, product sponsors, clearing firms, intermediaries, business partners and contacts
- · Service providers, contractors, vendors, credit reporting agencies, background check companies
- · Individuals interested in positions with us or those referring them to us, such as recruiters or referral sources
- · Subscription information, research, and analytic services
- Public and government sources and records
- Social media platforms when you interact with our social media pages and accounts
- Records and property to which we have lawful access, e.g., device inventories for company property or documents stored
 on our systems

Retention period

We retain your personal information for as long as reasonably necessary and proportionate to fulfill the purposes outlined in this Privacy Policy. Our retention of your information is governed by applicable law. We may retain personal information for longer to honor your requests, as applicable, and to comply with legal, regulatory, accounting, or other obligations.

Individual rights with respect to personal information

Rights under federal law

Federal law gives consumers and customers, as those terms are defined in the Gramm-Leach-Bliley Act ("GLBA"), the right to limit some but not all sharing of their information by financial institutions like Osaic. Federal law also requires us to tell you how we collect, share, and protect your personal information. For information on the manner in which we may share your information if you are a client of Osaic, please see our privacy notices below. You may opt out of sharing as explained in these notices.

Osaic Wealth, Inc., Osaic Services, Inc. Osaic Institutions, Inc., Osaic RIA, Inc., Osaic Advisory Services, LLC, , Ladenburg Thalmann & Co., Inc., Ladenburg Thalmann Asset Management

Rights and additional information under state law (California)

If you are a resident of California, you may have rights under the California Consumer Privacy Act of 2018 ("CCPA") regarding your personal information. This section describes your CCPA rights and explains how to exercise those rights. In 2020, the California Privacy Rights Act ("CPRA") amended the CCPA in 2020. Except where specifically noted below, both the CCPA and the CPRA are collectively referred to as the CCPA in this Privacy Policy.

Much of the personal information that Osaic collects is exempt from the rights provided by CCPA. The rights under the CCPA described below do not apply, for instance, to personal information collected, processed, sold, or disclosed pursuant to the Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act. As a general matter, those laws apply to nonpublic personal information about individuals who obtain financial products or services primarily for personal, family, or household purposes. This section (8.B) therefore does not cover information falling with the scope of these exemptions or to which the CCPA's relevant provisions do not apply.

Access, deletion and correction rights under the CCPA

- Right to request disclosure of personal information we collect (access rights)

Individuals whose personal information is covered by the CCPA have a right to request that Osaic provide the information listed below. Our responses to these access requests will cover the personal information we have collected and maintain about the consumer on or after January 1, 2022, or for a shorter period if an exemption applies or if requested by the consumer.

- · The categories and sources of personal information that Osaic has collected about you.
- · The categories of sources from which Osaic collected your personal information.
- The business or commercial purposes for which Osaic collected and/or sold the personal information.
- · The categories of any third-parties with which Osaic disclosed the Personal information.
- The specific pieces of personal information Osaic collected over the past year.

Consumers may also submit a request for the following information:

- The categories of personal information, if any, Osaic has sold about you, the categories of third-parties to which
 Osaic sold that personal information, and the categories of personal information sold to each type of third-party; and
- The categories of personal information that we have disclosed for a business purpose, and the categories of third-parties to whom each category of personal information was disclosed for a business purpose.
- Right to request deletion of personal information we have collected (deletion rights)

Individuals whose personal information is covered by the CCPA may also request that we delete personal information covered by the CCPA that we maintain, subject to certain exemptions. Upon receiving and verifying such a request, Osaic will delete the personal information, unless that information is necessary for Osaic to complete the transaction for which we collected the information; to provide you with a good or service you requested, or reasonably anticipated within the context of Osaic's ongoing business relationship with you; to perform a contract Osaic entered into with you; to help ensure security and integrity (e.g., to prevent, detect, or investigate data security incidents); maintain the functionality and security of Osaic's systems; to comply with or exercise rights provided by the law; or to use the personal information internally in

ways that are compatible with the context in which you provided the information to Osaic, among other things. We may also retain information where another exception to the deletion requirements in the CCPA applies. Please note that if you request that your personal information be deleted, you may no longer be able to access or use certain parts of the Sites.

-Right to request correction of inaccurate personal information (correction rights)

If you determine that Osaic maintains inaccurate personal information about you, you have the right to request that Osaic correct that inaccurate personal information, considering the nature of the personal information and the purposes of the processing of the personal information. If Osaic receives a verifiable consumer request to correct inaccurate personal information, Osaic will use commercially reasonable efforts to correct the inaccurate personal information as directed by you. We will consider any documentation that you provide in connection with your right to correct whether provided voluntarily or as required by Osaic. We may require you to provide documentation if necessary to rebut our own documentation that the personal information at issue is accurate. We may delete the contested personal information as an alternative to correcting the information if the deletion of the personal information does not negatively impact you or you consent to the deletion.

- Right to Opt-Out of "Sale" and certain sharing practices. You have the right to opt-out of the sale or share of your personal information, as defined by California law. Please note that Osaic neither sells client data nor shares consumer data for cross-contextual behavioral advertising. In order for you or your authorized agent to exercise this right, please visit our "Do not sell my personal information" page.

How to exercise access, deletion, and correction rights

To exercise these CCPA rights, please <u>osaic.com/privacy-request</u> or contact Osaic at (866) 964-0599. You may also submit a request to Osaic in person through the financial representative that offered you Osaic services.

Our process for responding to CCPA requests

- VERIFYING REQUESTS

Depending on the nature of your request, we may ask you for additional information to verify your request and identity and a declaration attesting to your identity, signed under penalty of perjury.

- RESPONSE FORMAT

Responses to your CCPA requests are made through Osaic's online portal as well as by mail or electronic mail. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

- TIMELINE FOR RESPONDING

We endeavor to respond to a verifiable consumer request within the time periods provided by CCPA and CCPA regulations. We ordinarily process requests, within 45 days of its receipt. In some cases, we may extend this period to 90 calendar days. If we require more than 45 days, we will inform you or your authorized agent in writing of the reason we did so and the extension period. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded.

- USING AN AGENT

Requests by an authorized agent must include a written, notarized declaration which documents the authorized agent's authority to act on the consumer's behalf. The declaration must certify that (a) the authorized agent is a natural person over the age of 18 or a business entity, (b) the agent is authorized to make a request on behalf of the consumer, and (c) that such authorization is still in full force and effect. The declaration must further enclose an authorization to request personal information on behalf of the identified consumer along with a copy of the consumer's valid government- issued photo identification. A declaration must include the sentence "I UNDERSTAND THAT THE INFORMATION PROVIDED HEREIN IS TO BE RELIED UPON BY OSAIC TO RESPOND TO A CALIFORNIA CONSUMER PRIVACY REQUEST IN ACCORDANCE WITH THE LAW." An authorized agent must submit the written declaration to privacy@osaic.com and respond to any questions required for Osaic to verify the consumer's identity. The authorized agent may include, but we do not require, a copy of a valid power of attorney in order for you to use an authorized agent to act on your behalf. Please note that this subsection of the Privacy Policy does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.

Minors right to opt in

We do not knowingly sell the personal information of minors under 16 years of age.

Cookies and Similar Technology

Osaic and selected third-parties may use cookies and similar technologies to collect information through data analytics tools like Google Analytics and other third-party tracking pixels to improve your site experience and measure the use of our site. These technologies may collect information such as your internet browser type, IP address, device ID, operating system version, location, and demographics, as well as the areas of the sites you visit, what content you interact with, and the time of your visit. Your web browser can be set to allow you to control these technologies, such as whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to your browser. If your browser is set to reject cookies, websites that are cookie-enabled will not recognize you when you return to the website, and some website functionality may be lost. The Help section of your browser may tell you how to prevent your browser from accepting these technologies such as cookies. To find out more about cookies, visit www.aboutcookies.org. For more information about Google Analytics, please review the site "How Google uses data when you use our partners' sites or apps," located at www.google.com/policies/privacy/partners/. To opt out of Google Analytics specifically, please go to www.google.com/policies/privacy/partners/. To opt out of Google Analytics specifically, please go to www.google.com/policies/privacy/partners/. To opt out of Google Analytics specifically, please go to www.google.com/policies/privacy/partners/. To opt out of Google Analytics specifically, please go to www.google.com/dlpage/gaoptout.

Currently there is no industry standard for "Do Not Track" signals, which are options on your browser that tell website operators that you do not wish to have online activity tracked. Because there is no industry standard concerning what, if anything, websites should do when they receive such signals, we currently do not take action in response to these signals.

Non-discrimination

We are committed to complying with the law. If you exercise any of the rights explained in this Privacy Policy, we will continue to treat you fairly. You have a right not to be discriminated against for the exercise of the privacy rights conferred by the CCPA.

Accessibility

Osaic is committed to ensuring that our communications, such as our Sites, are accessible to individuals with disabilities. To submit accessibility-related requests or report barriers to accessibility, please contact us at (212) 551-5536 or contact privacy@osaic.com.

Modifying Account Information

If you have an account with us and you would like for us to change or update your information, please contact your Financial Professional or, if you are registered with eQuipt, you may log in and update your information on eQuipt.

Minors' Information

The Sites are not directed to minors under the age of 16, nor do we sell information about minors. If we learn that we have erroneously collected personal information of a child under 16, we will take steps to delete such information from our files as soon as possible.

How We Protect Personal Information

Osaic is committed to the security of your personal information. To protect your personal information from unauthorized access and use, we implement and maintain reasonable security measures that are intended to maintain the confidentiality of personal information. However, no security measures are infallible, and we cannot and do not guarantee that our safeguards will always work. Please always use caution when transmitting information, including over the internet, use strong and unique passwords that you do not also use on other online services, and notify us immediately of any concerns regarding your account or passwords.

International Transfers of Data

We are based in the United States. The information you submit to us and that we collect as a result of using our Sites will be transferred to the United States. By using our Sites, products, and services, you consent to the collection, international transfer, storage, and processing of your information. If it is illegal to access our Sites or transfer your data to the United States, please do not use our Sites.

Third-party Links

Our Sites may contain links to third-party websites. Please be aware that we are not responsible for the privacy practices of third-party websites. This Site offers no guarantees about the safety or suitability of websites featured on third-party links, and users who choose to follow such links do so at their own risk.

How to Contact Us

If you have any further questions, please contact us at: Osaic Inc., Attn: Privacy Office, 18700 N. Hayden Rd., Ste. 255, Scottsdale, AZ 85255 or (800) 821-5100; or privacy@osaic.com.

Securities and investment advisory services are offered through the firms: Osaic Wealth, Inc., Osaic Institutions, Inc., broker-dealers, registered investment advisers, and members of FINRA and SIPC. Securities are offered through Osaic Services, Inc. and Ladenburg Thalmann & Co., broker-dealers and members of FINRA and SIPC. Advisory services are offered through Ladenburg Thalmann Asset Management, Inc. and Osaic Advisory Services, LLC., registered investment advisers. Advisory programs offered by Osaic Wealth, Inc. are sponsored by VISION2020 Wealth Management Corp., an affiliated registered investment adviser.

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