Client Relationship Summary Self-Directed Brokerage

March 14, 2023

Axos Invest LLC is registered with the Securities and Exchange Commission ("SEC") as a broker-dealer and is a member of the Financial Industry Regulatory Authority ("FINRA"), Municipal Securities Rulemaking Board ("MSRB"), and the Securities Insurance Protection Corporation ("SIPC"). Brokerage and investment advisory services and fees differ, and you need to understand the differences. This Client Relationship Summary provides details about our brokerage services, fees, and other important information.

Free and simple tools are available for investors to research firms and financial professionals at <u>Investor.gov/CRS</u>. You can also find educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Axos Invest LLC offers brokerage services to retail investors through our online trading program and affiliated and unaffiliated registered investment advisers. Through Axos Invest LLC, you can purchase and sell equities (stocks), options, exchange-traded and mutual funds, and corporate bonds.

These brokerage services are non-discretionary, meaning that you, our customer, decide on the purchase and sale of your investments. Axos Invest LLC will not monitor your investments at any point, even if they are investments that you buy/sell using Axos Invest LLC's brokerage services. Furthermore, Axos Invest LLC, while providing these services, will not make any recommendations to you at any time as to which investments to purchase or sell. Investment advisory services are provided through our affiliated investment adviser, Axos Invest, Inc. (Axos Invest) typically for a fee, and documents describing these advisory services can be found at https://www.axos.com/invest/managed-portfolios, including Axos Invest's, client relationship summary.

Suppose you receive our brokerage services through your registered investment adviser. There is no minimum investment amount to open a taxable account through our online trading program (\$100 minimum for a tax-deferred IRA). In that case, you should consult with your registered investment adviser to determine if they have any account minimums or minimum investment amounts for the services we provide to your investment advisory account.

For additional information about our services, please visit our website at <u>www.axosinvest.com</u>.

What fees will I pay?

The fees and costs associated with your account are typically charged on a transactional basis. For instance, if you purchase a security on one day and sell the security five days later, you may receive a charge for the purchase and the processing of the sale.

In addition, if you hold mutual funds or exchange-traded funds in your account, you may be subject to administrative and marketing fees, sales charges, and management fees. For these investment products, you should review the fees and costs in the

Conversation Starters Ask our customer service line these questions to learn more:

- Given my financial situation, should I choose a brokerage service? Why or why not?
- > 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?

Conversation Starter

Please help me understand how fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and cost, and how much will be invested for mo? prospectus before making any purchase.

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

For additional information, please refer to our fee schedule at <u>https://www.axosbank.</u> <u>com/Legal/Disclosures.</u>

What are your legal obligations to me when providing recommendations? How else does your firm make money, and what conflicts of interest do you have?

We *do not* provide recommendations. 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 services we provide you. Here are some examples to help you understand what this means:

- Our firm makes money based upon a percentage of the fees or costs paid by you to our clearing firm. These fees include custodial fees, margin interest costs, transaction costs, and other processing fees.
- The higher the number of transactions, the higher the charge to you. If you receive our services through a registered investment adviser, the more you or your adviser trades, the more your trading activity may generate higher fees and costs. This creates an incentive for Axos Invest LLC to encourage you or your investment adviser to trade more often.

Conversation Starter

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

We address these conflicts by providing you with a detailed fee schedule, which shows the total cost of charges to you. We disclose this to you in our account packet when you open your account. Any future updates to the fee schedule will be disclosed when the new schedule is made available.

For additional information, please refer to our website at https://www.axosbank.com/Legal/Disclosures.

How do your financial professionals make money?

Our financial professionals are compensated by salary, which is the only compensation our financial professionals receive. Our financial professionals do not receive compensation based upon the following factors: the amount of client assets they service, the time and complexity required to meet a client's needs, the product sold, product sales commissions, or revenue the firm earns from the financial professional's advisory services or recommendations.

If our compensation structure materially changes in the future, we will disclose any conflicts of interest to you at that time.

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

Yes. Please visit <u>Investor.gov/CRS</u> for a free and simple search tool to research our firm and financial professionals.

For additional information about Axos Invest LLC or to request a copy of this relationship summary, please visit <u>https://www.axosbank.com/Legal/Disclosures</u>. You may also call 866-585-6755 or e-mail us at <u>support@axosinvest.com</u> to request up-to-date information, a copy of this relationship summary, or any concerns about our service.

Conversation Starters

- As a financial professional, do you have any disciplinary history? For what type of conduct?
- Who is my primary contact person? Are they a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

Exhibit A – Material Changes to the Customer Relationship Summary

February 14, 2023

This is an update to the version of the Customer Relationship Summary, dated March 1, 2022. The following change was made: The firm has updated its legal or disciplinary history to "Yes."

March 14, 2023

The following changes were made: The firm discusses its relationship with Axos Invest Inc., its account monitoring methods, and that clients will pay fees and costs whether they make or lose money on their investments.