

Popular Securities, LLC
Form Customer Relationship Summary
March 30, 2021

Introduction:

Popular Securities, LLC (“Popular Securities” or “Firm” “we” or “us”) is registered with the U.S. Securities and Exchange Commission (SEC) as both a broker-dealer and as an investment adviser. The Firm is also a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). The fees we charge for brokerage and investment advisory services differ, so it is important to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can Popular Securities provide me?

At Popular Securities, we offer brokerage and investment advisory services to retail investors. These two relationships differ:

Brokerage Services	Investment Advisory Services
<p>In a brokerage arrangement, you can buy or sell stocks, bonds, mutual funds, exchange traded funds, options, annuity contracts, and other investment products.</p> <p>We only offer nondiscretionary brokerage services, which means that we are not permitted to make any trades in your account without your prior approval.</p> <p>Under this arrangement, your financial professional may give you recommendations to buy, sell or hold securities, which you are free to accept or reject. Recommendations are based on information that you supply to your financial professional, including your investment objectives, risk tolerance, financial needs, and other considerations. Given the importance of these factors, you are responsible for providing us accurate and up-to-date information about yourself, and promptly advising us of any significant changes in your investment objectives, risk tolerance, financial or personal circumstances.</p> <p>You may also direct your financial professional to place specific orders on your behalf.</p>	<p>In an investment advisory arrangement, we offer investment management services to you through a third-party money management program.</p> <p>We will assist you with the initial selection of one or more separate account money managers and/or investment strategists through a mutual fund wrap fee program. Under these arrangements, you will grant trading discretion to the account money managers and/or investment strategists. Discretion means you give them authority to purchase and/or sell investments in your account, following the stated investment policy or strategy approved by you, without them needing to contact you to obtain specific trading authority. Alternatively, your financial professional could serve as your portfolio manager on a nondiscretionary basis. This means that you will make the ultimate decision regarding whether to make a purchase or sale.</p> <p>Additionally, we offer investment management services through certain fixed income money managers (“Fixed Income Managers”) outside the third-party money management program described above (the “Fixed Income Program”). If you choose to invest your assets in the Fixed Income Program, you will be required to enter into a separate agreement with the Fixed Income Manager which grants discretion to the Fixed Income Manager.</p>
<p>Popular Securities does not perform any ongoing account monitoring under a brokerage account arrangement.</p>	<p>As part of Popular Securities’ investment management services, we will discuss with you your financial situation and offer suggestions for one or more asset allocation portfolios consistent with your stated investment objectives and risk tolerance. We will monitor your account on an on-going basis. You are responsible for promptly informing us of any significant changes in your investment objectives, risk tolerance, financial or personal circumstances. We will periodically, but no less than annually, perform a formal analysis of your investment portfolio in light of your financial situation and market conditions, and implement or recommend, depending on whether your account is discretionary or nondiscretionary, any appropriate changes.</p>

Our brokerage services have some limitations, including:

- We do not recommend certain products in brokerage accounts, such as leveraged or inverse exchange traded funds. Additionally, if your account is serviced through our Service Center, we will only recommend to you a limited menu of fixed income products, mutual funds or traditional exchange traded funds.
- We have a minimum account requirement of \$50,000 for brokerage accounts. However, we may waive the minimum requirement if you maintain more assets in other related accounts or appear to have significant potential for increasing the assets in your account.

Our investment advisory services have some limitations, including:

- We do not offer certain products, such as leveraged or inverse exchange-traded funds.
- Financial professionals, when acting as portfolio managers, have access to a limited menu of mutual funds and exchange-traded funds where the Firm has access to qualitative or quantitative research.
- Certain financial professionals that hold specific professional designations may offer a broader menu of mutual funds and exchange-traded funds.
- Popular Securities' minimum initial account size requirement is \$50,000 for certain products/programs. Many products/programs may have a higher minimum requirement. However, we may waive the minimum requirement if you maintain more assets in other related accounts or appear to have significant potential for increasing your assets under management. While the minimum account size requirement may be negotiable, a lower than required minimum size may result in higher fees to you.

For additional information regarding our services, please see our Form ADV Part 2A brochure (items 4, and 7 of Part 2A) and additional disclosures titled Understanding how we are compensated available at <https://www.popular.com/en/popularone/services/investments/understandinghowwearecompensated>.

Questions about our services? Ask your financial professional:

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?

Given my financial situation, should I choose an investment advisory service or a brokerage service?

***Should I choose both types of services?
Why or why not?***

What fees and costs will I pay?

The fees and costs associated with your account depend on which service(s) you select:

Brokerage Services	Investment Advisory Services
<p>In a brokerage arrangement, we are compensated through a transaction-based fee, commonly referred to as a commission. You will pay us a fee every time you buy or sell an investment. The amount of the fee is based on the specific transaction and not the value of your account.</p> <p>With stocks or exchange traded funds, this fee usually appears as a separate charge. With other investments, such as bonds, this fee is typically included in the price you pay for the investment (called a markup or markdown). With mutual funds, this fee is typically called a load.</p> <p>The more transactions in your account, the more fees you will incur. We therefore have a financial incentive to encourage you to engage in transactions.</p> <p>You will also incur additional costs under certain circumstances, including charges for account inactivity, wire transfers, and account transfers, among others. Such</p>	<p>In an investment advisory arrangement, we are compensated through a set fee that is based on a percentage of the assets in the account.</p> <p>Popular Securities offers investment advisory services through third-party money management programs. The specific amount of the fee is determined on a case-by-case depending on the program(s) you select, as well as your particular circumstances and needs. Annual advisory fees received by Popular Securities for its services will be disclosed in your investment management agreement and/or statement of investment selection.</p> <p>The more assets there are in your account, the more you will pay in fees, and the Firm may therefore have an incentive to encourage you to increase the assets in your account.</p> <p>You will also incur additional costs under certain circumstances, for example, charges for wire transfers, account transfers, among others. Such additional costs are detailed in our disclosure document titled <u>Understanding how we are compensated</u>, which we provide to</p>

additional costs are detailed in our disclosure document titled Understanding how we are compensated, which we provide to customers when an account is opened. Such document is also available in our webpage.

customers when an account is opened. Such document and Form ADV Part 2A brochure are also available in our webpage.

In both a **brokerage** arrangement and an **investment advisory** arrangement, you will pay fees regardless of whether your investments make or lose money. These fees will reduce any amount of money you make on your investments over time. Please make sure you understand the fees associated with your account.

For additional information, please see Form ADV Part 2A brochure (Items 5.A., B., C.) and Popular Securities disclosure document titled Understanding how we are compensated. You can also visit our webpage at

<https://www.popular.com/en/popularone/services/investments/understandinghowwearecompensated>.

Questions about fees and costs? 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?

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment advisor? How else does your firm make money? What conflicts of interest do you have?

When we provide you with a recommendation as your broker-dealer or act as your investment adviser, 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 recommendations and investment advice we provide. Here are some examples to help you understand what this means.

Brokerage Services	Investment Advisory Services
<ul style="list-style-type: none"> • Proprietary products - are investments that we (or our affiliates) issue, sponsor, or manage. We and our affiliates make money on proprietary products, which may be similar to non-proprietary products (which may cost you less). • Revenue Sharing and Third-Party Payments - we can make extra money by selling you certain investments either because they are managed by someone related to our Firm or because they are offered by companies that share revenues with us or pay us to sell their investments. Your financial professional also receives more money if you buy these investments. • Principal Trading - we may buy and sell your investment through our own accounts (called "acting as principal") and we can earn a profit on these trades. • Financial professionals' license limitations – some financial professionals hold brokerage investment licenses that limit their ability to offer you all available products or services provided by the Firm. This presents a conflict of interest, as the financial professional can only offer a more limited menu of products compared to other financial professionals. • Product limitations - we do not recommend certain products, such as leveraged or inverse exchange-traded funds. Additionally, if your brokerage account is serviced through our Service Center, we will only recommend to you a limited menu of mutual funds or traditional exchange-traded funds. 	<ul style="list-style-type: none"> • Proprietary products - are investments that we (or our affiliates) issue, sponsor, or manage. We and our affiliates make money on proprietary products, which may be similar to non-proprietary products (which may cost you less). • Revenue Sharing, Solicitation Arrangements and Third-Party Payments - we can make extra money by selling you certain investments either because they are managed by someone related to our Firm or because they are offered by companies that share revenues with us or pay us to sell their investments. • Product limitations – we do not offer certain products, such as leveraged or inverse ETFs, in any of our advisory programs. Moreover, financial professionals, when acting as portfolio managers, have access to a limited menu of mutual funds and exchange-traded funds, for which the Firm has access to qualitative or quantitative research. Certain financial professionals hold professional designations that allow them to offer a broader menu of mutual funds and exchange-traded funds. This presents a conflict of interest for professionals without those designations, because they can only offer you a more limited menu of products compared to other financial professionals. • Due diligence trips – Financial professionals are sometimes invited to due diligence trips to managers' offices or other places based on assets levels of production with those managers, the expenses of which may be paid by managers. This may present a conflict of interest, as the financial professional may be inclined to offer products sponsored by such investment companies.

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<https://www.popular.com/en/popularone/services/investments/understandinghowwearecompensated>.

Questions about conflicts? Ask your financial professional:

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

How do your professionals make money?

In general, financial professionals receive cash compensation consisting of two components: a guaranteed monthly minimum draw and a production payout if it exceeds the monthly minimum draw. The production payout is a percentage, also called payout or grid rate, of the product related revenue that each financial professional generates during that month. The payout rate is based on production levels and ranges from 25% to 45%. Financial professionals working as part of a team that meets minimum production requirements can qualify for a higher grid rate (but not more than 45%) than they would receive if producing as an individual. Commissions and fees vary based on products sold.

Financial professionals are also eligible to receive certain financial compensation based on their overall production levels, net new assets and length of service.

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

Yes. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Questions about our history? Ask your financial professional:

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

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<https://www.popular.com/en/popularone/services/investments/understandinghowwearecompensated>. If you would like additional, up-to-date information or a copy of this disclosure, please call (787) 758-7400. Feel free to ask for your financial professional's Manager.

Additional Questions to ask? Ask your financial professional:

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?