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McKinley Capital Management, LLC is an SEC-registered investment adviser that provides advisory services. This document is a summary of the types of services we provide and how you pay for these services. For additional information and tools to research firms and financial professionals visit Investor.gov/CRS. You can also find educational materials about broker-dealers, investment advisers and investing at this site.

What investment services and advice can you provide me?

We offer investment advisory services to retail and institutional investors. As part of these services, we manage equity investment portfolios for individuals and high-net worth individuals. McKinley Capital also provides portfolio management services to wrap fee programs.

As part of its services, McKinley Capital's portfolio managers review strategy targets, investment goals and objectives on a regular basis.

McKinley Capital provides advisory services to clients on a discretionary basis. This means that McKinley Capital has the authority to determine, without obtaining client consent, the securities to be bought or sold and the amount of securities to be bought or sold in the client's account. In all cases, however, such discretion is exercised consistent with the stated investment objectives as part of the investment advisory Agreement with McKinley Capital. Any stated investment objectives, guidelines, limitations or restrictions imposed by the client will be documented as part of the account opening process and/or indicated in our Agreement. However, the client is made aware that any restrictions will affect the account's projected performance returns.

McKinley Capital manages U.S. and international equity investment portfolios. The investment strategy for a specific client is based upon a client's objectives and risk profile which are discussed during the initial and subsequent client meetings.

McKinley Capital's minimum opening account balance ranges from \$150,000 to \$250,000 depending on the product. The firm will consider accepting a lower initial account balance in certain situations. For additional information, see Item 4 – Advisory Business (pages 4-11) of McKinley Capital's ADV Part 2A (Brochure) which can be accessed [here](#).

Key questions to ask:

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How 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?

What fees will I pay?

McKinley Capital charges an asset-based management fee for its advisory services which clients pay whether they make or lose money on their investments. McKinley Capital bills management fees in advance for each quarter for individual accounts. The advisory fee does not include fees related to brokerage commissions, transaction fees, and other related account costs and expenses including but not limited to, custodial fees, transfer taxes, wire transfer and electronic fund fees, and other taxes and fees. McKinley Capital's advisory fees are asset-based. Thus, the greater the asset level in an advisory account, the more the client will pay in fees. Thus, the firm may have an incentive to encourage clients to increase their assets and deposits in the account. Depending on the arrangements, McKinley Capital will deduct the management fee from the account each quarter or may bill the client directly. Other fees and costs are also deducted from the account and will appear on the quarterly statement received from the client's broker and/or custodian bank. Fees and costs will reduce the amount of money made on investments over time. Clients should make certain they fully

understand fees and costs. A detailed breakdown of McKinley Capital's fee structure is available on Form ADV Part 2A, Item 5- Fees and Compensation, and accessible [here](#).

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? How much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as the client's investment adviser, we must act in the client's best interest and not put our interest ahead of the client's. McKinley Capital's primary goal is that of successfully investing client assets in customized portfolios and partnerships in both the public and private investment markets. In the pursuit of this objective, a conflict of interest may occasionally arise between a single client's interests and those of the firm's other business interests. For example, financial and research resources may be reallocated to fund new ventures, or the firm may be required to forgo a specific opportunity due to preexisting client obligations. McKinley Capital receives other benefits, referred to as "soft dollars", through multiple arrangements entered into with third parties. "Soft dollars" refers to the practice of using broker commission dollars to pay for trading and research related goods or services and trade execution. A portion of the client's broker commission is credited as "soft dollars" which McKinley Capital exchanges for certain products, including: research calls, research reports, meetings with analysts, investment conferences, and investment research data. This creates an inherent conflict of interest. When broker commissions relating to client transactions are used to obtain research or other products or services, McKinley Capital receives a benefit for which it does not have to pay. Thus, McKinley Capital has an incentive to select a broker-dealer based on McKinley Capital's interest in receiving the research or other products or services, rather than on the clients' interest in potentially receiving a lower commission. Using "soft dollars" can result in clients having to pay higher commissions than those charged by other broker-dealers in return for these benefits. A detailed list of these soft-dollar programs is included in McKinley Capital's ADV Part 2A accessible [here](#).

Clients should understand that other conflicts may arise at any time due to unanticipated and/or unplanned situations.

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

How do your financial professionals make money?

McKinley Capital employees are compensated through management fees paid by advisory clients, including both individual and institutional clients.

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

Yes. A free and simple search tool to research us and our financial professionals is available at investor.gov/CRS.

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

Additional information about our investment advisory services and an up-to-date copy of the relationship summary is available by contacting us at (907) 365-9557 or the Chief Compliance Officer at dlamb@mckinleycapital.com

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?