

Introduction

Kestra Investment Management, LLC (referred to as “we” or “us”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Kestra IM provides discretionary sub-advisory, investment management and investment advisory services indirectly to retail clients through intermediaries such as affiliated investment advisors and affiliated trust companies (Affiliated Professionals). These Affiliated Professionals provide their services to clients through Programs they develop. We do not offer services directly to any clients of Affiliated Professionals. The Affiliated Professionals and their investment adviser representative (IAR) work with their client to collect information about their financial situation, risk tolerance, investment objectives, investment time horizon and any other information deemed necessary for their evaluation of the clients.

Services are provided through Platform Providers (such as Envestnet or Envestnet/Tamarac) whereby Kestra IM is an investment manager chosen by the Affiliated Professionals to manage some or all a client’s assets. Our services are not offered directly to clients. They are offered only with the involvement of an Affiliated Professionals and their IARs who will work with their clients to collect information regarding the client’s financial situation, risk tolerance, investment objectives, and investment time horizon. This information helps the Affiliated Professionals and IAR determine whether our management services are appropriate given the client’s goals and circumstances and they will help guide their clients in the selection of an appropriate portfolio or portfolios of investments (each a Portfolio) that are consistent with their investment objectives. The Affiliated Professionals provides ongoing advice about the selection or replacement of a Portfolio.

We act as the Portfolio Manager of the Portfolios and structure both strategic and tactical Portfolios with approaches for both taxable and retirement accounts to address various client needs. Within each Portfolio we will invest in equities, mutual funds and/or exchange traded funds (ETFs) on a discretionary basis. We are responsible for selecting the securities within the Portfolio and making changes as needed. In some cases, we may hire another third-party, unaffiliated investment advisor to provide us with recommendations for structuring Portfolios from an asset allocation and/or security selection standpoint. Even when this happens, we are still responsible for the discretionary management of the Portfolio and the third-party investment advisor is not authorized to place transactions in the Portfolios. We review our Portfolios on a periodic basis and rebalance assets when it meets our rebalancing criteria. It is possible that Portfolios will not be rebalanced if our thresholds for rebalancing are not met or exceed our thresholds at the time of the review. Portfolio Management Services require minimum investment of \$5,000 to \$25,000 depending on the Portfolio selected.

Additional information about our portfolio management services is available in our Form ADV Part 2A Brochure (see Items 4 and 7). If you need a copy of our Brochure, please contact us at 844-553-7872.

➤ QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- 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 licenses, education and other qualifications? What do these qualifications mean?

What fees will I pay?

Clients of the Affiliated Professionals are charged a Portfolio Management Fee that includes the fee for our management services. Our fee is negotiated and agreed upon between us and the Affiliated Professionals and ranges from 0.00% to 0.50% of the market value of the Portfolio. The Disclosure Documents and Agreements provided by the Affiliated Professionals detail the specific client costs and fee payment criteria. Portfolio Management Fees are deducted from the Affiliated Professionals’ client Portfolio by the account custodian and reflected on the custodian’s account statement. The Portfolio Management Fee paid by the Affiliated Professionals’ clients also includes the Program Fee charged by the Program Provider (i.e. Envestnet/Tamarac) for providing administrative and trading support. In addition, a portion of the fee is used to offset the cost of trading through the custodians, advisory fee billing, performance reporting and the technology provided by the Program Provider. In certain situations where we charge a Portfolio Manager Fee of 0.00%, we will receive a portion of the fee received by the Program Provider. Further information about the fees can be found in the Affiliated Professionals and Program Provider’s Disclosure Brochures.

Certain products have their own fees and charges, some of which are paid to our affiliate broker-dealers. This incentivizes us to choose these products over other products that do not pay or pay less of these fees and charges. For more information about these fees, please see your Advisor’s disclosure brochures or the product offering document or prospectus.

You will also incur, as applicable, charges imposed by the custodian or another third-party including, but not limited to: custodian fees; retirement account maintenance fees; fees related to mutual funds and exchange-traded funds; asset-based fees and other transactional fees and product-level fees. Your custodian will share a portion of these fees with our affiliated broker-dealers and in some cases your Advisor.

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.

Additional information about fees and expenses is available in our Form ADV Part 2A Brochure (see Item 5). If you need a copy of our Brochure, please contact us at 844-553-7872.

➤ **QUESTIONS TO 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 acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we 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 investment advice we provide you. Here are some examples to help you understand what this means.

Certain product providers share the revenue they earn with your Advisor and our affiliated broker-dealers, or with your custodian which in turn shares revenue with your Advisor and our affiliated broker-dealers, when we invest in those products in your portfolio. This incentivizes us to invest in products that make these payments over those that do not or share less.

Certain persons providing investment advice on behalf of our firm are registered representatives with Kestra Investment Services, LLC, a securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. These persons will not conduct securities transactions through the broker-dealer nor receive any compensation from the purchase or sale of any security on behalf of Kestra IM.

Additional information about our conflicts of interest is available in our Form ADV Part 2A Brochure. If you need a copy of our Brochure, please contact us at 844-553-7872.

➤ **QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

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

How do your financial professionals make money?

Our revenue is from the portfolio manager fees and program fees we collect. Our financial professionals are paid a salary and are also eligible to receive a discretionary bonus.

Our financial professionals may also receive additional compensation from mutual fund or ETF product sponsors, unaffiliated third-party investment advisers, and custodians such as: nominal gifts, an occasional dinner or ticket to a sporting or entertainment event, educational publications, conferences and events, technology, compliance, legal and practice management consulting. This compensation incentivizes the financial professional to maintain or place more business in specific products.

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

No. You may visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research us and our financial professionals. You may also visit this site for information regarding your Advisor's and our affiliated broker-dealers' legal and disciplinary history.

➤ **QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

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

No, our firm and our financial professionals currently do not have any legal or disciplinary history to disclose.

Additional information

You can find additional information about our investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching our CRD # 3177111. You may also contact our firm at (844)-553-7872.

➤ **QUESTIONS TO 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?

For additional information about our services, or to request up-to-date information or a copy of this disclosure, please call 844-553-7872.

Kestra Investment Management, LLC - Relationship Summary Exhibit (Form CRS)
November 6, 2023

Exhibit to Form CRS

Kestra Investment Management, LLC is required to update its Form CRS when information in the Form CRS becomes materially inaccurate. This Exhibit summarizes the following material changes to the firm's Form CRS, implemented on November 6, 2023:

Our portfolios now include equity securities.