

March 12, 2021

Client Relationship Summary

Form CRS

Introduction	<p>Arvest Investments, Inc., doing business as Arvest Wealth Management (AWM), is registered with the Securities and Exchange Commission (SEC) as both a broker-dealer and an investment adviser and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC).</p> <p>Brokerage and investment advisory services and fees differ, and it is important for <i>you</i> to understand these differences.</p> <p>Free and simple tools are available to research firms and financial professionals at <a href="http://www.Investor.gov/CRS">www.Investor.gov/CRS</a>, which also provides educational materials about broker-dealers, investment advisers and investing.</p>
Definitions	<p><b>Broker-Dealer:</b> A person, or company, in the business of buying and selling securities-stocks, bonds, mutual funds, and certain other investment products-on behalf of its clients (as broker), for its own account (as dealer), or both.</p> <p><b>Investment Adviser:</b> An individual, or company, who is paid for providing advice about securities to its clients.</p> <p><b>Retail Investor:</b> A natural person, or the legal representative of such natural person, who seeks to receive or receives services primarily for personal, family or household purposes.</p>

What investment services and advice can you provide me?

AWM offers both brokerage and investment advisory services to *retail investors*.

<p>Our <b>brokerage</b> services include cash and margin accounts; offering investment recommendations (except for self-directed brokerage accounts) and buying and selling securities either on a solicited or unsolicited basis. Products available in self-directed accounts and through our Solutions Center may be limited. In any case, you retain the investment authority and will always decide on what to buy and sell. We do not continuously monitor your brokerage account investments.</p> <p>Our firm does not have proprietary brokerage products or minimum account size or investment amounts, other than those required by individual product providers.</p>	<p>Our <b>advisory</b> services include providing advice on a regular basis, wrap fee programs, investment management and financial planning. You may choose from programs that allow us or selected third-party money managers, to buy and sell securities in your account without asking you in advance (discretionary basis) or, if you prefer, we can provide you advice and execute your instructions, but you make the ultimate decision on securities to buy and sell (non-discretionary basis).</p> <p>Our discretionary programs and investment advice cover a limited number of investments. Other firms could provide advice on wider range of programs and investments, some of which might have lower costs.</p> <p>We continuously monitor advisory accounts and require at a minimum a documented annual (calendar year) review with our advisory clients.</p> <p>Minimum investment and account maintenance of \$50,000 is required with some programs having higher minimums.</p>
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For additional Information, please see AWM's Regulation Best Interest Disclosures, [Form ADV](#), [Part 2A of Form ADV-Firm Brochure](#) (Items 4 and 7) and [ADV Part 2A-Appendix 1-Wrap Fee Program Brochure](#) (Items 4.A. and 5). Ask us for a free copy of these documents. You may also access the ADV documents at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) .

**Conversation Starters: Ask your financial professional –**

- **Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?**

<p>What fees will I pay?</p>	<p><b>Brokerage Service Fees:</b></p> <ul style="list-style-type: none"> <li>Transaction fees (commissions) are charged when you buy or sell securities. You will be charged more when there are more trades in your account; therefore, we may have an incentive to encourage you to trade often.</li> </ul> <p><b>Other Fees and Costs:</b></p> <ul style="list-style-type: none"> <li>Account and service fees are also charged and are enumerated in our “Schedule of Miscellaneous Account and Service Fees”. These charges are in addition to transaction changes and include among others: annual custody fees, account termination and transfer charges, outgoing wire and express mail charges and trade extension and technical liquidation charges.</li> <li>Product specific fees related to investments such as mutual funds, unit investment trusts and variable annuities, which are enumerated in their prospectuses or other disclosure documents which are provided to you as applicable.</li> <li>Margin interest charges as applicable and described in the Margin Disclosure.</li> </ul>	<p><b>Investment Advisory Service Fees:</b></p> <ul style="list-style-type: none"> <li>Our investment advisory fees include ongoing asset-based fees and fixed fees as described in our Form ADV Part 1A, Item 5.E., which is available at <a href="http://www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>.</li> <li>Asset-based fees associated with our wrap fee program cover most transaction costs and fees to our custodian and clearing firm/broker-dealer in addition to our fees for investment advisory services; therefore, they are higher than a typical stand-alone asset-based advisory fee.</li> <li>You should understand that the more assets there are in your advisory account, the more you will pay in fees; therefore, we may have an incentive to encourage you to increase the assets in your account.</li> </ul> <p><b>Other Fees and Costs:</b></p> <ul style="list-style-type: none"> <li>Although most transaction, account custody and maintenance fees are reflected within our client advisory fee, some other fees enumerated in the “Schedule of Miscellaneous Account and Service Fees” are not, including: Account transfer and termination fees, outgoing wire and express mail charges.</li> <li>Product specific fees such as internal fees for mutual funds, unit investment trusts and exchange traded funds.</li> <li>Margin interest charges as applicable and described in our <a href="#">Margin Disclosure, Requirements and Interest Charges document</a>.</li> </ul>
<p>Additional Information on Fees</p>	<p><b>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.</b></p> <p>More detailed information may be found in our: Regulation Best Interest Disclosures, , <a href="#">Part 2A of Form ADV-Firm Brochure</a> (Item 5); <a href="#">ADV Part 2A-Appendix 1-Wrap Fee Program Brochure</a> (Item 4) and our current “<a href="#">Schedule of Miscellaneous Account and Service Fees</a>”.</p>	
<p>Conversation Starter</p>	<p>Ask your financial professional – <b>Help me to 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?</b></p>	
<p><b>What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?</b></p> <ul style="list-style-type: none"> <li><i>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 conflict with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice we provide you. Here are some examples to help you understand what this means.</i></li> <li><b>Examples of Ways We Make Money and Conflicts of Interest.</b></li> </ul>		

**A. Brokerage Services** – In addition to commissions received for transactions, examples where we also receive compensation include:

1. Revenue Sharing,
2. Third Party Payments, and
3. Principal Trading

Revenue sharing is where a sponsor of an investment or another third-party (such as an intermediary) shares revenue that they have earned on investments made by our clients. Third party payments are compensation we receive from third parties when we recommend or sell certain investments. Receipt of this additional compensation creates conflicts in that they could influence business practices in order to take maximum advantage of these opportunities. Principal trading is where we buy or sell securities to you from our own accounts.

**B. Investment Advisory Services** – In addition to fees received for investment advisory advice and/or management of account accounts, examples where we also receive compensation include:

1. Revenue Sharing,
2. Third Party Payments, and
3. Proprietary Portfolio Management Programs.

Proprietary products or programs are those that are issued, sponsored, or managed by our firm or our affiliates. AWM's wrap fee program includes certain programs that are managed by our investment advisor representatives. This creates a potential conflict in that proprietary programs are generally more profitable to our firm and our investment advisory financial professionals' salaries are based in part on the revenues they generate for our firm.

<p><b>Conversation Starter</b></p>	<p>Ask your financial professional about conflicts of interest—  <b>How might your conflicts of interest affect me, and how will you address them?</b></p> <p><b>For additional information</b>, please review our Regulation Best Interest Disclosures, Form ADV Part 2A and Part 2A-Appendix-1 brochures located at:  <a href="https://www.arvest.com/documents-and-resources/awm-disclosures">https://www.arvest.com/documents-and-resources/awm-disclosures</a></p>
<p><b>How do your financial professionals make money?</b></p>	<p>Our financial professionals generate revenues to our firm through brokerage account commissions and fees from the sales of securities, investment advisory account asset based and fixed fees, and distribution or trail fees from the sale of mutual funds and money market sweep programs. Compensation for AWM financial professionals and conflicts of interest are addressed below.</p> <p><b>Senior Investment Client Advisors and Investment Client Advisors Level Two</b>          These are salaried employees who are dually registered as broker-dealer registered representatives and investment advisor representatives. Senior Investment Client Advisors status is obtained by reaching predetermined levels of average annual total and reoccurring revenue generation during a rolling thirty-six months period and by recommendation of their manager. Investment Client Advisors Level Two associates have not achieved the predetermined standards required of a Senior Client Advisor but both categories of AWM associates receive production-based salaries, calculated twice per year. Their production (i.e., the revenues they generate to our firm) during the six-months measurement period is applied to our progressive payout grid to establish the production-based salary for the next six-month period. This calculation method, combined with the three-month calculation and waiting period, results in advisors beginning to receive compensation as early as three and as late as nine months after the month in which Firm revenue was earned, mitigating conflicts of interest related to compensation.</p> <p>Underwritten insurance product revenues and investment advisory account fee-based revenues are applied to our progressive payout grid at the greater of 40% or the Client Advisor's attained level in establishing their production-based salary. This potential increased payout creates a conflict of interest in that it may provide Client Advisors with an incentive to recommend these products and accounts.</p> <p>Any bonus opportunities are calculated based on a twelve-month measurement period and in a manner that these financial professionals receive any production-based potential bonuses two to fourteen months <i>after</i> related firm revenues have been earned, once again mitigating conflicts of interest related to their compensation.</p> <p>Although the salaried status of these financial professionals, the time lag between production and calculation and determination of salaries and bonuses, and the progressive nature of our grid are designed to mitigate conflicts and to encourage our financial professionals to make recommendations and provide advice based on your best interests, a conflict of interest still exists because their compensation is production-based and may include an incentive to offer products and services that maximize production levels.</p>

<p>How do your financial professionals make money? (Continued)</p>	<p><b>Other Financial Professionals</b> Our Investment Client Advisors Level One, Retirement Plan Advisors and Relationship Managers, and Solutions Center Advisors are salaried employees who are dually registered as broker-dealer registered representatives and investment advisor representatives. Investment Client Advisors Level One typically have less tenure in the securities industry, or with our firm, than Senior Client Advisors or Investment Client Advisors Level Two. Retirement Plan Advisors and Relationship Managers provide various services to retirement plan sponsors. Solutions Center Advisors work within teams at our home office to provide services to assigned clients and to provide support for the activities of our Investment Client Advisors. Salaries are the chief component of compensation for these financial professionals. Their salaries are based upon responsibilities assigned, skill level, and performance. Periodic bonus opportunities are available and are typically based upon service standards, referrals and in some cases advisor production. Although the salaried status of our financial professionals is designed to mitigate conflicts and to encourage our financial professionals to make recommendations and provide advice based on your best interests of our clients, a conflict of interest still exists as the periodic bonus opportunities may include an incentive to offer products and services that maximize production levels.</p>
<p>Do you or your financial professionals have legal or disciplinary history?</p>	<p>Yes.</p> <p><b>Search Tools:</b></p> <p>Visit <a href="http://www.investor.gov/CRS">www.investor.gov/CRS</a> for a free and simple tool to research us and our financial professionals.</p>
<p><b>Conversation Starter</b></p>	<p>Ask your financial professional – <b>As a financial professional, do you have any disciplinary history? For what type of conduct?</b></p>
<p>Additional Information</p>	<p><b>For additional information about our services</b>, please ask our financial professional and/or resource our Firm’s disclosures website page located at: <a href="https://www.arvest.com/documents-and-resources/awm-disclosures">https://www.arvest.com/documents-and-resources/awm-disclosures</a></p> <p>If you would like additional, up-to-date information of this disclosure please call our Solutions Center Department at 888-916-2121 or you may obtain from the disclosure website page listed above.</p>
<p><b>Conversation Starter</b></p>	<p>Ask your financial professional – <b>Who is my primary contact person? Is he or she 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?</b></p>

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Investment products and services provided by Arvest Investments, Inc., doing business as Arvest Wealth Management, member FINRA/SIPC, an SEC registered investment adviser and a subsidiary of Arvest Bank. Securities offered and cleared through Pershing, LLC, a BNY Mellon company, member NYSE/SIPC. Investment Products: Not a Deposit | Not Guaranteed by the Bank or its Affiliates | Not FDIC Insured | Not Insured by Any Federal Government Agency | May Go Down in Value.