

Form CRS Disclosure

June 30, 2020

BRINKER CAPITAL, INC. (referred to below as “Brinker,” “we” or “us”)

We are 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 the 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?

We offer only investment advisory services to our clients. Our services include the following programs:

Core Asset Manager (“Core”) – a separately managed account “wrap fee” platform, which may also include mutual funds, ETFs and other pooled investment vehicles, as well as Brinker-managed asset allocation models. In *Core Guided*, Brinker has discretionary authority to hire and fire portfolio managers and make asset allocation changes. In *Core Select*, clients must approve our portfolio manager and product recommendations, but managers have full discretion to manage assets allocated to them. *Core* has a \$500,000 minimum.

Destinations – a discretionary Brinker-managed asset allocation program that uses our proprietary Destinations Funds (“*Destinations*”) or third-party mutual funds and/or ETFs (“*Destinations ETFh*”) to implement investment strategies with different risk and reward characteristics. *Destinations* has a \$10,000 minimum and *Destinations ETFh* has a \$25,000 minimum.

Personal Benchmark – a discretionary Brinker-managed account program utilizing Destinations Funds that allocates across investment strategies, by segregating assets into “buckets” that align with unique client goals (e.g., safety, accumulation) to help measure progress toward those goals. The account minimum is \$100,000.

Wealth Advisory – a customized service utilizing our *Core* platform that offers both non-discretionary and discretionary management and includes dedicated support to meet the needs of high-net worth investors and family offices with at least \$1 million of investable assets.

The Destinations Funds used in our *Destinations* and *Personal Benchmark* programs consist of 10 separate mutual funds for which we serve as adviser, with authority to hire, fire and allocate assets among professional unaffiliated investment managers, ETFs and mutual funds.

Once a client has selected one or more of the recommended portfolio managers or a specific discretionary investment strategy, we monitor the performance of the third party manager(s) and any fund investments and provide the client with quarterly performance reports.

For more information regarding our services and the types of investors we serve, see **Item 4- Advisory Services** and **Item 7 – Types of Clients** in Part 2A of our Form ADV (our “Firm Brochure”), which is available on our website at www.brinkercapital.com.

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?

We charge an investment advisory fee that covers our advisory services, the fees of portfolio manager(s), custodial services and brokerage commissions (unless a client chooses a per trade ticket charge option on certain securities trades). Our fee may also include a fee we pay to solicitors who act as the liaison between you and Brinker. Portfolio manager fees and custody and clearing costs are passed through directly without mark-up. Because our fee includes most custody and brokerage fees, it is higher than a typical asset-based advisory

fee that does not include these costs. More assets in an account usually means more fees, which creates an incentive for us to encourage you to add assets to your account.

We bill our fees quarterly in advance. Our fee does not cover certain expenses, such as SEC or stock exchange fees on security sales, special account fees imposed by the custodian, fees related to client special requests or internal management or operating fees or expenses imposed or incurred by a fund held in your account.

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 more information regarding our fees, see **Item 5 – Fees and Compensation** in our Firm Brochure.

Help me understand how these fees and costs might affect my investment. 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.

We have tried to eliminate or mitigate conflicts of interest inherent in our business. Under our fee schedule, the “Brinker Fee Component” (which is tiered based upon account size) is the same for all our programs. We receive an advisory fee from the Destinations Funds, but such fees are credited against, and offset, dollar for dollar, our advisory fee to the extent a client is invested in those funds.

For more information regarding conflicts of interest or potential conflicts of interest, and how we mitigate them see **Item 10 – Other Financial Industry Activities and Affiliations** and **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading** in our Firm Brochure.

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

How do your financial professionals make money?

Our sales personnel receive a base salary and commissions based on new assets brought under management, and therefore, are incented to bring in new clients and to encourage existing clients to increase assets in their accounts. Brinker portfolio managers receive a base salary and an annual bonus based on investment performance metrics tied to benchmarks, peer group performance and absolute return of the portfolios they manage. The performance metrics differ for *Destinations* and *Core* accounts.

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

No. A free and simple search tool to research our firm and our financial professionals is available on the SEC’s website at Investor.gov/CRS.

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

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?

You can obtain additional information regarding our firm on our website (www.brinkercapital.com). If you have any questions about the contents of this CRS or would like a current copy, please contact us at (610) 407-5500.