

REASONABLY AVAILABLE ALTERNATIVES - RAA TOOL

Create New RAA with Soliciting FA

✓	Product
✓	Funding
✓	Participants
✓	Participant Details
	Features
	Feature Details
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Description:	SAMBAINANDL	Order ID:	IQQ-QBXE-BLS
Premium Amount:	\$150,000.00	State:	Florida
Client Account #:	101206101	Product:	Brighthouse Series VA

Identify product riders and programs.
Asterisks (*) indicate required fields.

Living Benefit	Rider Type / Marketing Name
<input type="checkbox"/>	Guaranteed Income Rider
<input type="checkbox"/>	Guaranteed Death Benefit Rider
<input type="checkbox"/>	Death Benefit Acceleration Rider
<input checked="" type="checkbox"/>	Death Benefit Waiver Rider
<input type="checkbox"/>	Death Benefit Portability Rider
<input type="checkbox"/>	Prorated Death Benefit Rider
<input checked="" type="checkbox"/>	Supplemental Death Benefit Rider
<input type="checkbox"/>	Asset Allocation
<input type="checkbox"/>	Asset Rebalancing
<input type="checkbox"/>	Dollar Cost Averaging

Reasonably Available Alternatives (RAA Tool)

[RAA Tool Procedures](#) | [Email help](#)

Get started

You can visit the [Standard of Care](#) page for more information on your obligations with respect to Reg BI and Reasonably Available Alternatives.

Your obligations

When making a securities recommendation in a brokerage account for a [Retail customer](#), as defined by the SEC, you must:

- Understand the client’s investment **profile, priorities, options** and **preferences**
- Provide **impartial and objective advise** that’s in the client’s best interest
- Not place your interests** or the Firm’s ahead of your client’s
- Ensure **fees and expenses** are reasonable
- Consider **reasonable available alternatives**

You must use this tool to evaluate and document your analysis when considering the following recommendatuons:

- Alternative Investments
- Annuities (excluding fixed)
- Primary structured investments

Cancel

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Premium Amount:	\$150,000.00	State:	Florida
Client Account #:	101206101	Product:	Brighthouse Series VA

Identify product
Asterisks (*) indicate required

1. Select best interest reason

2. Compare features and fees

3. Review and confirm

Investment objective	Capital appreciation	Security ID	N/A
Risk tolerance	Moderate	Security name	ABC SI Fund Name that is really long to show how text would wrap

Required actions

When completing the RAA on behalf of the soliciting Financial Advisor (FA) or Private Wealth Advisor (PWA), you must confirm each selection with the soliciting FA/PWA before submitting the analysis.

Select FA/PWA

Please select the Soliciting FA or PWA who is responsible for conducting the RAA analysis and directed you to complete the RAA tool.

Soliciting FA/PWA

Select

Confirm account type

The client also has an advisory account whether this product category is available. Please evaluate and confirm whether it's in the client's best interest to make this recommendation in their brokerage account of whether their advisory account should be used.

The follow must be considered when evaluating whether the advisory account should be used:

- Expected time horizon for this security
- Brokerage generally will be less costly with a longer-term hold
- The specific services expected for this security

After reviewing the information, I have determined that the investment should be purchased in the client's:

Brokerage account Advisory account

Cancel

Continue

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Cancel

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Identify products | RAA Tool Procedures | Email help

X

- 1. Select best interest reason

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C

Select FA/PWA

Soliciting FA/PWA

Confirm account type

The follow must be considered when evaluating whether the advisory account should be used:

- ☒ Brokerage account ☐ Advisory account

Select best interest reason

- Cancel

✓ Product

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Description:
Premium Annuity
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Reasonably Available Alternatives (RAA Tool)



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- ☒ 1. Select best interest reason
- ☐ 2. Compare features and fees
- ☐ 3. Review and confirm

Investment Features and Fee Comparison

Review the below chart of features and fees between the product categories, including your primary reason, to confirm that it supports your prior analysis of reasonably available alternatives and cost. For more information on ETFs and Mutual Funds you can use [Investment Screener](#).

	Your recommendation	Available alternatives	
	Hedge Funds	ETFs	Mutual Funds
Investment features			
Potential for growth orientation or income generation above traditional markets...	Yes ⓘ	--	--
Liquidity	Sometimes	Yes	Yes
Active management	Yes	Sometimes	Yes
Client fees			
Upfront fees	Up to 3.00% ⓘ	Up to 2.50% ⓘ	A shares: Up to 2.50% ⓘ C shares: No client fee ⓘ
Ongoing fees	Management fee: Typically, up to 2.50% ⓘ Feeder participation funds Up to 1.00% ⓘ	Passively managed: TER (Avg): 0.38% Actively managed: TER (Avg): 0.61%	A shares: Mgmt. fee (Avg): 0.56% Payment to distributor (Avg): 0.25% C shares: Mgmt. fee (Avg): 0.56% Payment to distributor (Avg): 1.00%
Performance based fees	Typically, up to 20.00% of profit after high water mark ⓘ	N/A	N/A
Withdrawal fees	Typically, up to 5.00% early withdrawal fee ⓘ	Up to 2.50% ⓘ	No client paid fee A shares: Hold for 12-18 mos ⓘ C shares: Hold at least 1 yr ⓘ

Proceed with recommendation?

If I am the FA/PWA, I have reviewed the above information and confirm that it supports my analysis. I have determined that I will proceed with this recommendation to my client. If I am completing this at the direction

Cancel

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Description:
Premium Annuity
Client Account

Identify product
Asterisks (*) indicate

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- ☒ 1. Select best interest reason
- ☐ 2. Compare features and fees
- ☐ 3. Review and confirm

	Your recommendation	Available alternatives	
	Hedge Funds	ETFs	Mutual Funds
Investment features			
Potential for growth orientation or income generation above traditional markets... ⓘ	Yes	--	--
Liquidity	Sometimes	Yes	Yes
Active management	Yes	Sometimes	Yes
Client fees			
Upfront fees	Up to 3.00% ⓘ	Up to 2.50% ⓘ	A shares: Up to 2.50% ⓘ C shares: No client fee ⓘ
Ongoing fees	Management fee: Typically, up to 2.50% ⓘ Feeder participation funds Up to 1.00% ⓘ	Passively managed: TER (Avg): 0.38% Actively managed: TER (Avg): 0.61%	A shares: Mgmt. fee (Avg): 0.56% Payment to distributor (Avg): 0.25% C shares: Mgmt. fee (Avg): 0.56% Payment to distributor (Avg): 1.00%
Performance based fees	Typically, up to 20.00% of profit after high water mark ⓘ	N/A	N/A
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Proceed with recommendation?

If I am the FA/PWA, I have reviewed the above information and confirm that it supports my analysis. I have determined that I will proceed with this recommendation to my client. If I am completing this at the direction of the FA/PWA, I have confirmed the FA/PWA has considered the above information and has determined to proceed with this recommendation to the client.

☒ Yes ☐ No

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Description: SAMBAINANDL

Order ID: IQQ-QBXE-BLS

Premium Amount: \$100,000.00

Client Account: 101-363636-580

Identify product: LIVESAVINGS

Asterisks (*) indicate required fields

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Guaranteed Investment Contract

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Guaranteed Withdrawal Benefit

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Donor Cost Averaging

Reasonably Available Alternatives (RAA Tool)

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✓ 1. Select best interest reason

✓ 2. Compare features and fees

○ 3. Review and confirm

Summary

Client information

Client brokerage account	101-363636-580
Client name	Jane Smith
Investment objective	Capital appreciation
Risk tolerance	Moderate

Product information

Product	Alternative investments
Product category	Hedge funds
Security ID	1234567890
Security description	ABC Hedge Fund Name that is really long to show how text would wrap

Soliciting FA/PWA

Johnathan Hernandez (12345)

Account type selected

Brokerage

Best interest reason selected

Potential for low correlation with traditional markets including; lower portfolio volatility, increased risk-adjusted returns, and reduced reliance on any one company, sector, country, etc.

Required actions

Attestation

☐ I am completing this at the direction of the FA/PWA who will be making this recommendation and have confirmed they considered the potential risks, rewards and costs associated, reasonably available alternatives, and the client's investment profile. Additionally, they confirmed the recommendation is in the client's best interest and does not place their or the Firm's interest ahead of the client's.

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Description:

SAMBAINANDL

Order ID:

IQQ-QBXE-BLS

Premium Amount:

\$150,000.00

State:

Florida

Client Account #:

101206101

Product:

Brighthouse Series VA

Identify products
Asterisks (*) indicate

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✓ Your RAA analysis has been submitted. Select Modify to make changes or Close to return and complete your order.

Summary

Details

RAA ID	101098	Created/Last modified by	Jane Smith (OG547)
Expiration	June 15, 2024	Creation	March 6, 2025

Client information

Client brokerage account	101-363636-580
Client name	Jane Smith
Investment objective	Capital appreciation
Risk tolerance	Moderate

Product information

Product	Alternative investments
Product category	Hedge funds
Security ID	1234567890
Security description	ABC Hedge Fund Name that is really long to show how text would wrap

Soliciting FA/PWA Johnathan Hernandez (12345)

Account type selected Brokerage

Account type selected Brokerage

Best interest reason selected Potential for growth orientation or income generation above traditional market expectations, incorporating active trading strategies that may include the ability to use leverage and shorting.

Modify

Close

☒ 1. Select best interest reason ☐ 2. Compare features and fees ☐ 3. Review and confirm

Visit the [Standard of Care](#) page for more information of the FA's/PWA's obligations with respect to Reg BI and Reasonably Available Alternatives.

Product information

Product	Alternative investments
Product category	Hedge funds
Security ID	N/A
Security name	ABC SI Fund Name that is really long to show how text would wrap

When completing the RAA on behalf of the soliciting Financial Advisor (FA) or Private Wealth Advisor (PWA), you must confirm each selection with the soliciting FA/PWA before submitting the analysis.

If you are completing this at the direction of the soliciting FA or PWA who is responsible for conducting the RAA analysis, please select their name.

Johnathan Hernand...

The client also has an advisory account whether this product category is available. Please evaluate and confirm whether it's in the client's best interest to make this recommendation in their brokerage account or whether their advisory account should be used.

Continue

Description:

SAMBAINANDL

Premium Amount:

Client Account:

Order ID:

IQQ-QBXE-BLS

Identify product

Asterisks (*) indicate required fields

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✓ 1. Select best interest reason

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Summary

Client information

Client brokerage account	101-363636-580
Client name	Jane Smith
Investment objective	Capital appreciation
Risk tolerance	Moderate

Product information

Product	Alternative investments
Product category	Hedge funds
Security ID	1234567890
Security description	ABC Hedge Fund Name that is really long to show how text would wrap

Soliciting FA/PWA

Johnathan Hernandez (12345)

Account type selected

Brokerage

Best interest reason selected

Potential for low correlation with traditional markets including; lower portfolio volatility, increased risk-adjusted returns, and reduced reliance on any one company, sector, country, etc.

Required actions

Attestation

I acknowledge that as part of determining whether to make this recommendation, I considered the potential risks, rewards and costs associated, reasonably available alternatives, and the client's investment profile. I confirm this recommendation is in the client's best interest and does not place my or the Firm's interest ahead of the client's.

Cancel

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