



FORM ADV PART 2A

JUNE 14, 2019



CROSSMARKGLOBAL.COM

Crossmark Global Investments, Inc.

Form ADV Parts 2A and 2B

Revised June 14, 2019

Form ADV Part 2A

Crossmark Global Investments, Inc.

June 14, 2019 This **Brochure** provides information about the qualifications and business practices of Crossmark Global Investments, Inc. (**Crossmark**). If you have any questions about the contents of this Brochure, please contact us at 713-260-9000 or email info@crossmarkglobal.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Crossmark is registered with the Securities and Exchange Commission which oversees its investment management activities. Registration with the Securities and Exchange Commission does not imply a certain level of skill or trading. Our oral and written communications are intended to provide you with information which you may use to determine to hire or retain us to provide investment advice.

Additional information about Crossmark is also available on the SEC's Website at www.adviserinfo.sec.gov.

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Item 2 Material Changes

The date of our last Brochure was July 30, 2018. **The updates made in this Brochure update the discussion regarding how we periodically review accounts. We have made no material changes in the products and services that we offer, our investment advice and management processes, or the way that we manage our business.**

Pursuant to SEC Rules, we will provide you with:

- An updated annual brochure that includes a summary of any material changes to the brochure during the course of the previous business year within 120 days of the close of our business fiscal year;
- A summary of material changes within 120 days of the close of our business fiscal year that includes an offer to provide a copy of the full annual updated brochure and information on how you may obtain the brochure from us;
- An interim amendment to the brochure if new information in response to Item 9 of Part 2A regarding disciplinary information is available; and
- An interim amendment resulting from any material change that could affect the relationship between you and us.

We will provide, **free of charge**, a new brochure any time at your request, or as may become necessary based on material changes.

Currently, our Brochure may be requested by contacting our office at 1-800-262-6631. You may also receive this and any other disclosure documents via electronic delivery, where allowed, by signing and returning to us an Authorization to Deliver Disclosure and Other Documents Electronically.

Additional information about Crossmark is also available via the SEC's website at www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with Crossmark who are registered or are required to be registered, as investment adviser representatives of Crossmark.

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Item 4 Advisory Business

Crossmark is a privately owned SEC-registered investment adviser established in 1987 and headquartered in Houston, Texas. We provide investment advice and discretionary investment management services to individual and institutional clients. We primarily offer our services through managed account platforms maintained by unaffiliated financial intermediaries. We also serve as the investment advisor to the series portfolios of Steward Funds, Inc. (the **Steward Funds**), which are available to both individual and institutional investors. Crossmark is wholly owned by Crossmark Global Holdings, Inc. (**Crossmark Global Holdings**), which is also a privately owned company.

As used in this Brochure, the words **firm, we, our,** and **us** refer to Crossmark; and the words **you, your,** and **client** refer to you as either a client or prospective client of Crossmark.

Crossmark provides model driven investment advice and discretionary investment management services. We rely on your financial intermediary to review your goals and objectives in developing an investment program tailored to meet those investment needs and objectives. Institutional clients may develop their own investment programs tailored to meet their investment needs and objectives. The investment strategies that we offer may be selected by you or your financial intermediary to achieve certain objectives included in your overall investment program. As the client, you may impose reasonable restrictions on our ability to invest in certain securities, types of securities, or industry sectors.

Crossmark provides asset allocation, investment advice, and discretionary investment management services that cover equity securities, options on equity securities, corporate debt instruments, government and agency securities, municipal securities, mutual funds, and exchange traded funds (**ETFs**). The specific investment style chosen for each client should be based on the goals, objectives, and individual needs of the client. Any client may, outside of any relationship with Crossmark, make direct investments in the Steward Funds.

Crossmark manages the Steward Funds' assets based on the investment goals and objectives outlined in each Fund's prospectus. Before investing in a mutual fund, you should refer to the fund's prospectus and Statement of Additional Information (**SAI**) for important information regarding the Fund's investment objective, risks, charges, expenses, and additional disclosures regarding the management of the fund. For the Steward Funds, these documents are available on-line at www.stewardfunds.com

As of March 31, 2019, Crossmark had discretionary assets under management of approximately \$4.771 billion and \$0 non-discretionary assets under management.

Item 5 Fees and Compensation

Advisory Fees in General

The fees that we charge for the services provided to you vary depending on several factors, which include:

- The type of service we provide to you
- The asset class in which you are invested
- The size of your account
- The complexity of your investment program

Depending on the type of relationship we have with you, we may request that you authorize and direct the custodian of your account to pay our fees directly to us from the assets in your account. However, it is your option to authorize this process, and if you do not approve of the direct deduction from your account, we will submit periodic invoices directly to you or the custodian as you request.

In the event your agreement with Crossmark is terminated for any reason by either of us, our fee is pro-rated for the portion of a quarter that the portfolio is being managed by us. This pro-rated period will include any termination notice required to be given under your investment advisory agreement. There is no penalty for terminating an agreement. You may either pay these fees directly to Crossmark or authorize deduction of the fees from the account.

You should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Our employees and their family members, as well as persons affiliated with indirect owners of Crossmark, may be charged a lower fee for us to manage their accounts.

Wrap Fee Programs

Crossmark provides investment advisory services to clients of national and regional broker-dealers and investment advisers through programs, commonly called *wrap fee* programs, in which the client has executed an all-inclusive investment services agreement with the broker-dealer or investment adviser (the **wrap sponsor**) for a single all-inclusive fee based on a percentage of the client's assets (a **wrap fee**). The wrap fee typically covers fees to the investment adviser and execution by the sponsor of all portfolio transactions. In addition, the wrap sponsor typically provides some or all of the following services:

- recommends selection of the investment adviser;
- pays the advisory fee from the client account;
- monitors and evaluates the performance of the investment adviser; and
- provides custodial services for the account's assets.

The advisory fees paid by wrap sponsors to Crossmark under these programs generally range from 0.20% (20 bps) to 0.60% (60 bps) of client assets under management.

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Dual Contract Managed Accounts

Crossmark also provides investment advisory services to clients of broker-dealers in which the client enters into an investment advisory agreement directly with Crossmark for management of the client's portfolio, and the client enters into a separate agreement with the broker-dealer for provision of brokerage, custodial, portfolio monitoring and evaluation services. In these programs the client pays the broker-dealer a fee for its services and separately pays fees to Crossmark, which range from 0.20% (20 bps) to 0.60% (60 bps), of client assets under management.

Separately Managed Accounts

Crossmark also provides investment advisory services to clients under which the client enters into an investment advisory agreement directly with Crossmark for management of the client's portfolio. Crossmark receives advisory fees based upon a percentage of the assets under management, generally calculated and payable quarterly in advance. Fees are based on account asset values on the last business day of the previous quarter, although some accounts may be charged quarterly in arrears. We may require a minimum account size and we may require a minimum annual fee to open an account with us.

The fee that you are being charged by us for the investment management of your assets is exclusive of, and in addition to, brokerage commissions, transaction fees, custodial fees, and any other related costs and expenses. We do not receive any portion of these commissions, fees, other costs and expenses. Fees may be negotiable on a client-by-client basis depending on a number of factors, including the type and nature of services to be provided, the amount of assets to be managed, and/or anticipated future additional assets. The specific annual fee schedule for fees charged by us is identified in the contract between you and us.

The fees paid to Crossmark vary based on the factors discussed above and range from 0.20% (20 bps) to 0.60% (60 bps) of client assets under management.

For institutional clients with accounts exceeding \$1 million in regulatory assets under management, the fees paid to Crossmark vary based on the factors discussed above and range from 0.075% (7.5 bps) to 0.20% (20 bps), with a minimum quarterly fee of \$2,500.

Mutual Fund and ETF Fees

A portion of your account assets that we manage may be invested in mutual funds and/or ETFs, including the Steward Funds. All mutual funds incur certain expenses that are borne by their shareholders; these expenses include fees for investment advice, portfolio administration, shareholder servicing, and in the case of funds that have adopted distribution plans under SEC Rule 12b-1, distribution and marketing. Details regarding these fees can be found in each fund's prospectus and statement of additional information. With respect to the Steward Funds, some of these fees are paid to Crossmark and its affiliates.

No mutual fund fees are credited against the advisory fee being charged by Crossmark to manage your account, but the overall level of fees being incurred by you is considered in the selection of appropriate investments for your account.

The fees paid by the Steward Funds to Crossmark and its affiliates range from 0.33% (33 bps) to 0.46% (46 bps) of client assets under management.

Non-Standard Accounts

There are accounts managed by Crossmark that were opened prior to the adoption of these fee rates that may have fee rates higher or lower than the ranges outlined above. There may also be accounts opened in the future with fee rates higher or lower than these ranges, with variations based on factors outlined above.

Item 6 Performance-Based Fees and Side-by-Side Management

Crossmark does not provide any services for performance-based fees. Performance-based fees are those based on a share of capital gains on capital appreciation of the assets of a client.

Item 7 Types of Clients

Crossmark provides investment management services to individuals, institutions, and regulated investment companies. Institutional clients may include, but are not limited to, corporations, trusts, endowments, religious organizations, other not-for-profit enterprises, employee benefit plans, and governmental entities.

We have minimum account sizes that vary based on:

- The type of service we provide to you
- The asset class in which you are invested
- The complexity of your investment program

We may not agree to manage an account if the assets invested are insufficient to implement the investment program desired by the client. Minimum account requirements will differ among clients.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

- **Quantitative Analysis** seeks to understand behavior by using complex mathematical and statistical modeling, measurement, and research. When a securities analyst focuses on a corporation's financial data in order to project potential future performance, the process is called quantitative analysis. This methodology involves looking at profit-and-loss statements, sales and earnings histories, and the statistical state of the economy rather than at more subjective factors such as management experience, employee attitudes, and brand recognition. The primary risk in using quantitative analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.
- **Fundamental Analysis** involves an assessment of the fundamental financial condition and competitive position of a company. This approach generally involves an analysis of the financial condition, capabilities of management, earnings, new products and services, as well as the company's markets and position versus its competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.
- **Technical Analysis** involves the examination of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of various quantitative-based calculations, variation metrics and charts to identify market patterns and trends which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Crossmark will be able to accurately predict such a reoccurrence.
- **Cyclical Analysis** is similar to technical analysis in that it involves the assessment of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that Crossmark is recommending. The risks with cyclical analysis are similar to those of technical analysis.

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Risks Associated with All Forms of Analysis

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investment Strategies

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance and time horizons, among other considerations:

Equity Strategies

Covered Call Income

Crossmark's Covered Call Income strategy is a *Buy-Write* strategy, also called a *covered call* strategy—an investment approach in which the investor buys a stock or a basket of stocks and writes (or sells) call options that 'cover' the stock position. The strategy can be used to enhance portfolio returns under certain market conditions and to reduce volatility. In down markets, the option premium received cushions the price decline in an equity portfolio. The trade-off is that in strong equity markets, the upside potential of the equity investment is limited.

Global Equity Income

Crossmark's Global Equity Income strategy invests in U.S. and non-U.S. dividend-paying stocks that have demonstrated a higher yield within their respective sectors, increasing dividends and favorable earnings growth. We invest in the common stocks of companies that represent a broad spectrum of the global economy. Although the strategy invests primarily in large cap stocks, it is also able to invest in mid-cap and small-cap stocks. The non-U.S. investments are primarily in the form of depositary receipts which are U.S. dollar denominated instruments representing securities of non-U.S. issuers that are traded in the U.S. and in non-U.S. markets.

Large Cap Core Growth

Crossmark's Large Cap Core Growth strategy seeks to provide investors with high quality, large capitalization core and growth stocks while at the same time explicitly controlling for portfolio risk. This strategy combines objective, quantitative analytics with subjective stock evaluation. The universe of available investments screened using several measures which fall under five basic criteria: free cash flow, rising earnings estimates, quality of earnings, relative strength, and stock valuation.

Custom Equity Indexation

Crossmark's Custom Equity Index strategy provides long-term investors with a separately managed portfolio of stocks designed to closely track the total return of a benchmark index while applying client-specified constraints to the portfolio. These constraints often include social, ethical or financial criteria. Index portfolios can offer a cost effective approach for achieving diversified market exposure and the possibility of excellent relative returns over time. The strategy utilizes a quantitative methodology that combines a multifactor risk model with an optimization algorithm to create a portfolio that minimizes tracking error relative to its targeted index benchmark.

Fixed Income Strategies

Current Income

Crossmark's Current Income strategy is designed for investors who are focused on optimizing their bond portfolios for income. Clients who utilize this product invest in bonds primarily for the potential of high levels of interest income, while maintaining investment grade credit quality. We utilize investment grade corporate bonds, mortgage-backed securities, agencies and preferred stocks to achieve the objective.

Fixed Income

Crossmark's Fixed Income strategy seeks to provide income and capital appreciation together with capital preservation through the management of high quality domestic bonds. The strategy offers investors a separately managed account consisting of government, agency and investment quality corporate bonds. Our fixed income approach is based on the belief that superior long-term returns can be achieved with less-than-market risk by focusing on high quality securities, and by adding value through active duration management, selective rotation of market sectors, and the securities within those sectors.

Intermediate Fixed Income

Crossmark's Intermediate Fixed Income strategy seeks to provide capital preservation, current income and capital appreciation opportunities through investment in intermediate maturity bonds. This style assumes less interest rate sensitivity and will often provide less current income than our fixed income strategy. The portfolio allocation includes investments in U.S. Treasury, agency and investment grade corporate issues.

Municipal Fixed Income

Crossmark's Municipal Fixed Income strategy seeks to maximize after tax income and preserve capital. We attempt to reduce risk levels in portfolios by managing duration and utilizing "A" and higher rated bonds which are not subject to the alternative minimum tax (AMT). Crossmark's Municipal Bond strategy is available for national, state specific or customized portfolios.

Blended and Custom Strategies

Balanced Portfolios

Crossmark's Balanced strategy has been created for the investor who seeks growth over time and also desires current income. The strategy utilizes stocks and U.S. domestic, investment grade, primarily intermediate-duration bonds.

Custom Asset Allocation

Crossmark's custom asset allocation process provides the client the ability to create a custom asset allocation portfolio using stocks, bonds, mutual funds and ETFs to meet their specific income and growth objectives.

Risks Associated with All Investment Strategies

The analysis of securities investments requires subjective assessments and decision-making by experienced investment professionals. However, there is a risk of an error in judgment. An investment in securities is subject to investment risks including interest rate risk, market risk, inflation risk, currency risk, liquidity risk, business risk, financial risk, and the possibility of the loss of some, or all, of the principal amount invested. There can be no assurance that Crossmark will be successful in meeting the client's investment objective. Crossmark's ability to choose suitable securities has a significant impact on the ability of Crossmark to achieve any selected investment objective.

Risks Associated with Option Writing

Options are not suitable for every investor. Writing call options to generate income and to potentially hedge against market declines by generating option premiums involves risk. These risks include, but are not limited to, potential losses if equity markets or an individual equity security do not move as expected, and the potential for greater losses than if these techniques had not been used. If the market price of a security increases, a call option written against that security limits the gain that can be realized. And, there are significant differences between the securities and options markets that could result in an imperfect correlation between these markets, causing a given transaction not to achieve its objectives.

Item 9 Disciplinary Information

None to report.

Item 10 Other Financial Industry Activities and Affiliations

Crossmark is affiliated with the following companies, each of which is wholly owned by Crossmark Global Holdings:

- Crossmark Distributors, Inc. (**Crossmark Distributors**), a FINRA-registered broker/dealer that serves as the underwriter and distributor for the Steward Funds. See more information regarding Crossmark Distributors below.
- Crossmark Wealth Management, LLC (**Crossmark Wealth**), an SEC-registered investment adviser that provides investment advice and discretionary investment management services to direct clients. Certain directors, officers, and employees of Crossmark also serve as directors and officers of Crossmark Wealth.
- Crossmark Consulting, LLC (**Crossmark Consulting**), a consulting company that provides portfolio analytics and social screening services to Crossmark and the Steward Funds. Certain directors, officers, and employees of Crossmark also serve as directors and officers of Crossmark Consulting.

Steward Funds

Crossmark and its affiliates also provide other distribution and administrative services to the Steward Funds. And, certain directors, officers, and employees of Crossmark also serve as directors and officers of the Steward Funds. Crossmark directors, officers, and employees who serve as directors and officers of the Steward Funds receive no separate compensation from the Steward Funds for the services they provide.

Crossmark Distributors

Crossmark Distributors receives fees from the Steward Funds for distribution and shareholder services under plans adopted pursuant to Rule 12b-1 under the Investment Company Act of 1940. These fees are generally re-allotted to other broker/dealers and financial intermediaries who sell Steward Fund shares and service shareholder accounts. Crossmark also receives fees from the Steward Funds for administrative, compliance, and shareholder services. Some of these fees are also re-allotted to broker/dealers and financial intermediaries who service shareholder accounts.

Certain directors, officers, and employees of Crossmark also serve as directors, officers, and registered representatives of Crossmark Distributors. The business operations of Crossmark Distributors are limited to acting as the underwriter and distributor of the Steward Funds. The activities of its associated persons are limited to marketing and wholesaling the Steward Funds.

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Crossmark's Shared Services Platform

Crossmark does not believe these relationships create material conflicts of interest between Crossmark and its clients. Crossmark and its affiliates employ an integrated staffing and resource plan that is intended to ensure that appropriate levels of staffing and infrastructure support exist to undertake the obligations of each company to its clients. Individual directors, officers, employees, and registered representatives are compensated based on commensurate skills and experience as well as performance. Compensation programs are designed to avoid potential conflicts of interest between the companies and their clients as well as to avoid potential conflicts between clients.

If Crossmark recommends the Steward Funds to a client or utilizes investments in the Steward Funds within a client's account, Crossmark takes into consideration the fees paid by the Steward Funds to Crossmark and its affiliates in evaluating the overall reasonableness of the fee charged to the client.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Crossmark has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Crossmark and our personnel owe a duty of loyalty, fairness, and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code of Ethics.

The purpose of our Code of Ethics is to reinforce the fiduciary principles that govern the conduct of our firm and the actions of our advisory personnel. Each member of the firm is instructed to act in the best interests of all of our clients, to avoid any real or potential conflicts of interest and to conduct their personal activities with the utmost integrity.

Crossmark's Code of Ethics has been distributed to all members of the firm. The Code of Ethics generally covers:

- Standards of business conduct
- Compliance with federal securities laws
- Review and/or approval of personal securities transactions
- Obligation to report violations
- Annual employee certification

The Code of Ethics includes specific policies and procedures covering:

- Disclosure and monitoring of personal securities accounts of employees.
- Preclearance of personal securities trades by access persons where such trades do not fall into certain pre-defined exempt categories.
- Preclearance of certain business gifts as well as limitations on business gifts and entertainment (given and received).
- Preclearance of certain political contributions.

The Code of Ethics also includes our policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that any such information may not be used in a personal or professional capacity.

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Finally, the Code of Ethics also contains relevant oversight, enforcement, and recordkeeping provisions.

A copy of our Code of Ethics is available to our clients and prospective clients. You may request a copy by email sent to info@crossmarkglobal.com, or by calling us at 713-260-9000 or by contacting us (toll-free) at 1-800-262-6631.

Interest in Client Transactions

Crossmark and its employees are prohibited from engaging in principal transactions with clients. A principal transaction is one in which Crossmark, acting on behalf of our own account, buys or sells a security to a client.

We also do not permit agency cross transactions. An agency cross transaction is one in which our firm acts as a broker for both the buyer and seller of a security. Crossmark and our affiliates are not restricted from forming additional investment funds, entering into other investment advisory relationships, or engaging in other business activities, even though such activities may be in competition with a client (including the Steward Funds) and/or may involve substantial time and resources of Crossmark and its affiliates. Potentially, such activities could be viewed as creating a conflict of interest in that the time and effort of our management team and employees will not be devoted exclusively to the business of existing clients.

As noted above, investments in the Steward Funds may be recommended by Crossmark and may be utilized as investments within a client's account.

Personal Trading

Crossmark's Code of Ethics is designed to assure that the personal securities transactions by our employees and the activities and interests of our employees will not interfere with:

- making decisions in your best interests; and
- implementing such decisions while, at the same time, allowing our employees to invest for their own accounts.

Crossmark employees may purchase or sell securities in their personal accounts that we may have an interest in or subsequently invest in.

Because situations like these may represent actual or potential conflicts of interest, we have established the following policies and procedures as part of our Code of Ethics to ensure we comply with our regulatory obligations and to provide you, other clients, and other potential clients, with full and fair disclosure of such conflicts or potential conflicts of interest:

- No principal or employee of our firm may put his or her own interest ahead of the interest of your account(s).
- No principal or employee of our firm may buy or sell any security for their personal portfolio(s) where their decision is based on information received because of their employment unless the information is available to the investing public.
- We may prohibit or require prior approval for any IPO or private placement investments by any employee or related persons of the firm.
- Our employees, and anyone associated with our firm that has access to our investment recommendations (Access Persons) must obtain approval for opening securities accounts, must report securities holdings upon becoming Access Persons and annually thereafter, and must provide quarterly transaction reports or duplicate account statements.
- Certain security purchase and/or sale transactions by Access Persons must be approved prior to placing the order.

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- Any employee who violates any of these restrictions may be subject to varying levels of disciplinary action, including termination.

We maintain all records regarding personal securities transactions as required by SEC Rule 204A-1, under the Investment Advisers Act of 1940 (the **Advisers Act**).

Item 12 Brokerage Practices

Research and Soft Dollar Benefits

It is the Firm's policy, that in instances where it chooses to utilize soft dollars for the procurement of eligible research services from a broker/dealer or a third party in connection with client securities transactions, it will do so in accordance with the safe harbor afforded by Section 28(e) of the Securities Exchange Act of 1934.

We believe that most research we obtain generally benefits several or all of the relevant categories of accounts we manage, as opposed to solely benefiting one account. Normally research services obtained through transactions in common stocks or bonds may benefit those accounts managed by Crossmark which invest in both common stocks and bonds.

Crossmark has entered into soft dollar agreements for eligible research, research-related products and other brokerage services which assist us in our investment decision making, trading, and trade settlement and reconciliation processes. Our policy is to receive soft dollar credits only with respect to accounts for which we exercise brokerage discretion. When Crossmark utilizes soft dollars, we may be using brokerage commissions generated from your trades to purchase the above referenced items. It is possible that the research, research products, and other brokerage services purchased using your commission dollars may also benefit other clients who have not generated an equal amount or, in some cases, any commissions through transactions. Conversely, you may also benefit from the research, research products, and other brokerage services we receive due to the commissions generated by other clients even though your account did not generate any commissions.

Examples of such eligible research products and services include advice, both directly and in writing, as to the value of the securities, the advisability of investing in, purchasing or selling securities, and the availability of securities or purchasers or sellers of securities, as well as furnishing analyses and reports concerning issuers, industries, securities, economic factors and trends, portfolio strategy and the performance of accounts. Eligible brokerage services, for this purpose, include effecting securities transactions and, between the time the order is transmitted and the securities are delivered or credited to the applicable Crossmark account, performing functions incidental to the transaction (such as clearance, settlement, and custody) or required in connection therewith by rules of the SEC or applicable self-regulatory organizations and in accordance with relevant SEC guidance. Products and services related to trade execution, trade settlement, and reconciliation processes are also eligible.

There are also instances in which eligible products and services may be used by some employees within the firm for functions that are not covered by the safe harbor afforded by Section 28(e). In these cases, the firm assesses the overall use of the products and services to make a good faith determination as to the portion of the usage that is covered by the safe harbor and pays for the remaining portion from its own funds.

In selecting broker/dealers and in negotiating commissions, in addition to price and brokerage and research products and services provided, we consider among other factors the firm's reliability and the quality of its execution services on a continuing basis.

There may also be instances in which the Firm receives some benefit simply by utilizing certain broker/dealers based on the amount of assets, including those directed by the client, which are maintained with those broker/dealers. These benefits are available to all investment advisory firms who meet the broker/dealer minimum guidelines. In some cases,

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we receive research and services from some broker/dealers that while not covered in a soft dollar agreement, nonetheless, may be a benefit to our firm. Without this arrangement with these broker/dealers, we might be compelled to purchase the same or similar services at our own expense.

As a result of receiving these services for no additional cost, we may have an incentive to continue to use or expand the use of such broker/dealers. We have examined this potential conflict of interest when we chose to enter into these relationships and have determined that the relationships are in the best interests of our clients and satisfy our client obligations, including our duty to seek best execution.

You may pay a commission that is higher than another qualified broker/dealer might charge to effect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker/dealer's services, including the value of research provided, execution capability, commission rates and responsiveness.

Accordingly, while we will seek competitive rates, to the benefit of you and other clients, we may not necessarily obtain the lowest possible commission rates for your specific account transactions. Although the investment research products and services that may be obtained by us will generally be used to service all of our clients, a brokerage commission paid by you may be used to pay for research that is not used in managing your specific account.

Large retail broker/dealers may also provide us products and services that assist us in managing and administering your account(s). These include software and other technology that:

- provides access to your account data including trade confirmations and account statements;
- facilitates trade execution and allocation of aggregated trade orders for multiple client accounts;
- provides research, pricing and other market data;
- facilitates payment of our fees from client accounts; and
- assists with back-office functions, recordkeeping, and client reporting.

We may also receive other services intended to help us manage and further develop our business enterprise. These services may include:

- compliance, legal and business consulting;
- publications and conferences on practice management and business planning; and
- access to employee benefit providers, human capital consultants and insurance providers.

Large retail broker/dealers may also make available third-party vendors for some of the services rendered to us. These broker/dealers may discount or waive fees they would otherwise charge for some of these services, or they may pay all or a part of the fees of the third-party providing these services to our firm. These broker/dealers may also provide benefits such as educational events or occasional business entertainment of our personnel.

In evaluating whether to recommend that you custody your assets at one of these broker/dealers, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider. Thus, this decision is not based solely on the nature, cost or quality of custody and brokerage services provided by the broker/dealer. This may create a potential conflict of interest.

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Best Execution

For accounts for which Crossmark is given authority to select brokers and negotiate commission rates, our policy in selecting brokers is to seek best execution. In determining best execution, we will consider research and brokerage services provided by the firm in addition to price and other factors. This may involve paying a commission to a broker, dealer or exchange member on a transaction that exceeds the commission that Crossmark might have obtained if the transaction had been executed through another broker, dealer or exchange member if it is determined by us in good faith that the amount of commission is reasonable in relation to the value of research and brokerage services provided by such broker, dealer or exchange member. Such research must provide lawful and appropriate assistance to us in carrying out our investment decision-making responsibilities.

Directed Brokerage

Where Crossmark has discretionary authority, we may determine without consultation with the client on a transaction-by-transaction basis, the securities to be bought or sold, and the amount of securities to be bought or sold, subject to and in accordance with the investment objective and investment restrictions of the client. We manage both accounts in which Crossmark is given authority by the client to select brokers and negotiate commissions, and accounts in which the client designates the broker-dealer to which brokerage should be directed.

You are under no obligation to use any particular broker/dealer. We are regularly asked if we would recommend a particular broker/dealer. Because we have established relationships with several broker/dealers and receive services as outlined in the section titled "Research and Soft Dollar Benefits", and they are firms whom we feel can provide our customers with high quality service, we may suggest them. However, you are free to use any broker/dealer that you may choose.

If you allow us to choose the broker/dealer for your account, your investment management agreement with us will reflect that you are providing us with the authority to determine the broker/dealer to use. In addition, you will also be allowing us to choose the commission costs that will be charged to you for these transactions.

You may change your broker/dealer at any time, as well as amend or revoke discretionary authority at any time by providing us with written notice.

If you should request that we utilize a specific broker/dealer that is someone we do not utilize on a regular basis you should be aware that your choice may interfere with our ability to "batch" or combine your trades with other client trades. This may impact the price at which your security is bought or sold and may impact the commission cost you pay for your order.

Brokerage for Client Referrals

Crossmark does not receive client referrals in exchange for using any particular broker/dealer.

Trade Aggregation and Allocation

Transactions for each client account will be effected independently unless we decide to purchase or sell the same securities for multiple clients at approximately the same time **and** from the same brokerage firm. At that point, Crossmark may, **but is not obligated to**, combine or "batch" your orders with orders of other clients and Crossmark employees. The process of combining these orders often allows us to negotiate more favorable commission rates. We also can allocate equitably among you, other clients, and employees the differences between prices, commissions, and other transaction costs that we and you may not have received had each order been placed independently. This allows you to receive the average price paid or received as well as to share in the purchase or sale pro-rata in the event that an order is only partially completed. We will not receive any additional compensation as a result of aggregating these orders.

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Crossmark may choose not to aggregate orders. Reasons that we may not aggregate orders may include:

- Only a small percentage of an order is completed and thus the shares may be assigned to the account with the smallest order or position, or that is out of line with respect to a security or sector weightings.
- Allocations may be given to one account when that account has investment limitations which restrict it from purchasing other securities which are expected to produce similar investment results.
- If an account reaches an investment guideline limit and cannot participate in an allocation which may occur due to unforeseen changes in account assets after an order is placed.
- Sale allocations may be given to accounts that are low in cash.
- When a pro rata allocation would result in a *de minimis* allocation in one or more accounts.
- In the case where a proportion of an order is filled in all accounts, shares may be allocated to one or more accounts on a random basis.

Wrap Fee Program Considerations

Owners of accounts which are involved in wrap programs and client-directed brokerage accounts designate a registered representative of the wrap sponsor or broker-dealer through whom portfolio transactions in their account will be effected.

Transactions in wrap program accounts are effected “net” (meaning without commission) and a portion of the fee paid by the client to the wrap sponsor is generally considered as being in lieu of commissions. Transactions for client-directed brokerage accounts are most often effected net, but the client may choose to have transactions effected with a commission charged per transaction at a schedule that he/she may negotiate with his/her brokerage firm. Because Crossmark, for client-directed brokerage accounts, is required to execute transactions only with the broker-dealer selected by the client, we will not be free to seek best price and execution by placing transactions with other brokers and dealers and may not be able to obtain discounted rates for the client by combining his transactions with those of other clients for trading as a block; therefore, these clients may not necessarily obtain commission rates as favorable as other Crossmark clients.

You may wish to satisfy yourself that the broker-dealer offering the wrap program can provide adequate price and execution of most transactions. You should also consider that, depending upon the level of the fee charged by the wrap sponsor or the broker-dealer, the amount of portfolio activity in your account, the value of custodial and other services which are provided under the arrangement, and other factors, the fee may or may not exceed the aggregate cost of such services if they were to be provided separately and if Crossmark were free to negotiate commissions and seek best execution of transactions for your account. A conflict of interest may exist between our duty to obtain the most favorable commission rates and its receipt of future referrals from your broker-dealer or wrap fee sponsor.

Item 13 Review of Accounts

Client accounts are managed using pre-defined investment strategy models (described above) chosen by the client in consultation with a qualified broker/dealer, investment adviser, or other investment consultant (the client’s intermediary). We monitor how each account tracks the chosen model portfolio. Reviewing deviations from the model help us identify style drift and opportunities to rebalance accounts.

Changes in a client’s investment objectives, cash flow needs, risk tolerance, or time horizon should be discussed with the client’s intermediary. Such changes may lead to a decision to change the investment strategy model used to manage the client’s assets.

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In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer or custodian, we make available reports summarizing account performance and balances.

Item 14 Client Referrals and Other Compensation

Crossmark has entered into contractual arrangements with individuals who may solicit clients for Crossmark. The arrangements are made in writing pursuant to Rule 206(4)-3 under the Advisers Act. Rule 206(4)-3 requires, among other things, that the solicitor, at the time of his solicitation, provide the client with a copy of this brochure. The solicitor must also provide the client with a separate document describing the solicitation arrangement, disclosing any affiliation between Crossmark and the solicitor, any compensation for solicitation and whether advisory fees for solicited clients are higher than those for other clients due to compensation paid to the solicitor.

Item 15 Custody

Crossmark does not generally maintain custody of client cash or securities. However, depending on the type of relationship that we have with you, we may request that you direct your account custodian to allow Crossmark to debit your management fees directly from your account(s). The approval of the direct debit of fees is solely your choice. You have no obligation to allow us to do so.

If you agree to allow us to direct debit fees from your account(s), we will require authorization in writing from you. Each billing period we will notify your qualified custodian of the amount of the fee to be deducted from your account(s). On at least a quarterly basis, your account custodian will send to you and us a statement showing all transactions, including management fees disbursed from your account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted from your account, it is important for you to carefully review the custodial statements to verify the accuracy of the calculation, among other things. You should contact us directly if you believe there may be an error in your statement.

In addition to the periodic statements that you receive directly from your custodians, we may also send or provide via electronic format, account statements directly to you on a periodic basis based on the requirements of your agreement.

In the event that you receive a statement from Crossmark, we urge you to carefully compare the information provided on the statements you receive from us to the statements you receive from the custodian to ensure that all account transactions, including the debit of management fees, holdings and values are correct and current.

Item 16 Investment Discretion

Generally, we accept both discretionary and non-discretionary accounts. We may request that we be given discretionary authority from the outset of our advisory relationship so that we may provide discretionary asset management services for your accounts. However, you may deny such authority and request that we manage your account on a non-discretionary basis. If we do manage your account on a discretionary basis and that authority is denied or revoked in the future we may, at our sole discretion, choose to terminate any advisory relationship with you.

When you agree to give us discretionary authority we can place trades in your account without contacting you prior to each trade to obtain your permission.

Our discretionary authority includes the ability to do the following without contacting you:

- determine the security to buy or sell; and/or
- determine the amount of the security to buy or sell.

In all cases this discretion is to be used in a manner consistent with the stated investment objectives for your account. When we select securities and determine the amounts of those securities to buy or sell we will observe the policies,

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limitations or restrictions which you may have given us to follow.

You give us discretionary authority when you sign a discretionary investment management agreement with our firm and you may limit this authority by giving us written instructions in advance of entering into an agreement. You may also limit this authority at any time after entering into an agreement while that agreement remains in effect by once again providing us with written instructions. These limitations and other instructions will become a part of your permanent file. Examples include restrictions against owning certain stocks and bonds and limitations on the percentage of cash held at any one time.

Item 17 Voting Client Securities

Crossmark has adopted and implemented written proxy voting policies and procedures (“Proxy Voting Procedures”) which are designed to reasonably ensure that Crossmark votes proxies in the best interest of its advisory clients for whom it has voting authority.

The Proxy Voting Procedures describe the positions we generally take in voting proxies on particular issues and require us to keep records noting the reasons for any vote that differs from its stated policies. Crossmark’s guidelines address matters that are commonly submitted to shareholders of a company for voting, such as issues relating to corporate governance, auditors, the board of directors, capital structure, executive and director compensation, and mergers. As specified in the Proxy Voting Procedures, Crossmark’s Proxy Officer is obligated to maintain records of all votes received, all votes cast and other relevant information.

The Proxy Voting Procedures also provide that, in the event a particular proxy vote would involve a conflict between the interests of Crossmark and its affiliates, and those of one or more clients of Crossmark, Crossmark may select one of the following procedures for voting the proxies:

- arranging for the proxies to be voted in proportion to votes of security holders who are not Crossmark clients;
- referring the voting decision to the client; and
- obtaining a waiver of the conflict from the client to permit voting in accordance with Crossmark’s established voting policies.

You may obtain a copy of our Proxy Voting Policy or information about how we voted client proxies by contacting us (toll-free) at 1-800-262-6631.

Crossmark may provide tailored proxy voting with respect to accounts that meet certain minimum investment requirements.

Item 18 Financial Information

Registered investment advisers, such as Crossmark, are required to provide you with certain financial information or disclosures about their financial condition.

- Crossmark has no financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients; and
- Crossmark has not been the subject of a bankruptcy proceeding.

We do not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance, therefore we have no material additional financial disclosures.

Item 19 Privacy Policy

WE ARE COMMITTED TO PROTECTING YOUR PRIVACY

Crossmark appreciates the privacy concerns and expectations of our customers. We are committed to maintaining a high level of privacy and confidentiality when it comes to your personal information and we use that information only as permitted by law. This privacy policy contains information about how we fulfill this commitment to you. In compliance with government regulations, we will provide this notice to you annually.

OUR COMMITMENT TO YOU

We value the trust of our customers and will continue to recognize the importance of holding your personal financial information as confidential.

We will use information responsibly in order to protect you from fraud, offer you improved products and services and comply with legal obligations.

We will maintain accurate customer information and respond promptly to customer requests to correct information.

We will require companies with which we do business to use our customer information appropriately and to safeguard the confidentiality of such information.

COLLECTION OF INFORMATION

We collect nonpublic personal information about you from the following sources:

- Information that we receive from you personally on applications, forms, or other correspondence, such as your name, address, phone number, social security number, and e-mail address.
- Information about your transactions with us, such as your account holdings and transaction history.

DISCLOSURE OF INFORMATION

We do not disclose any information about our customers or former customers to third parties except to the extent necessary to service your account, as permitted by law.

WE PROTECT NON-PUBLIC PERSONAL INFORMATION ABOUT FORMER CUSTOMERS

If you decide to close your account(s), we will continue to adhere to the privacy policies and practices described in this notice. As permitted by law, we may disclose your non-public personal information to affiliates of Crossmark and to third parties involved in the maintenance of your account(s).

WE HAVE SAFEGUARDS IN PLACE

We have safeguards in place to protect the confidentiality, security and integrity of your non-public personal information. We restrict access to non-public personal information to those who need to know that information in order to service your account. We maintain physical, electronic and procedural safeguards that comply with government requirements to guard non-public personal information.

We appreciate the opportunity to serve your investment needs. We pledge to follow the policies, safeguards and guidelines as described in this notice and to protect the confidentiality of your information. Your relationship is very important to us, and we will take great care to honor these commitments to you.

For more information about Crossmark's privacy policies, please call (800) 262-6631.

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FORM ADV PART 2B SUPPLEMENTAL BROCHURE

ITEM 1

Crossmark Global Investments, Inc.

15375 Memorial Drive, Suite 200

Houston, Texas, 77079

(713)260-9000

www.crossmarkglobal.com

Michael L. Kern, III, CFA

Ryan E. Caylor

Melville L. Cody

Jim Coppedge

Victoria L. Fernandez

Patrick N. Garboden

Gina Garcia

Brandon Hutchison

Andrew J. Jacobson

Tiffany Nunn

Arthur G. Smith

Paul C. Townsen

Zachary P. Wehner

John R. Wolf

This brochure supplement provides information about the above named professionals that supplements the Crossmark Global Investments, Inc. (**Crossmark**) brochure. You should have received a copy of that brochure.

Please contact us by email at info@crossmarkglobal.com if you did not receive Crossmark's brochure or if you have any questions about the contents of this supplement.

Additional information about the above named professionals is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 Educational Background and Business Experience

The qualifications of persons who will be involved in the investment advisory services will be examined for excellence in training, experience and professional reputation. While no set criteria exist for every individual to be employed, persons with account responsibilities will generally have degrees in finance, business or significant relevant experience.

Some persons involved in the investment field will hold certain professional designations. Some Individuals employed by Crossmark may hold the Chartered Financial Analyst (CFA) or Certified Financial Planner (CFP) designation. The minimum qualifications for each of these designations are summarized below.

A Chartered Financial Analyst (CFA Charterholder) must pass three six-hour exams (Levels I, II, III) covering a broad-based curriculum of investment principles, meet certain professional and ethical requirements, and become a regular member of the CFA Institute.

A Certified Financial Planner (CFP) is issued by the Certified Financial Planner Board of Standards in the United States to individuals who are required to have a bachelor's degree from an accredited college or university and to pass the CFP Certification Examination, complete the core education requirements, and meet ethics and continuing education requirements.

The name, year of birth, formal education and business background for the persons involved in investment advisory services for Crossmark are detailed below:

Michael L. Kern, III, CFA President & CEO Birth Year: 1973

Education: Wayne State University, BS in Finance and Business Economics

Business:

2017 to Present Crossmark Wealth Management, LLC

2015 to Present Crossmark Consulting, LLC

2015 to Present Crossmark Distributors, Inc.

2015 to Present Crossmark Global Holdings, Inc.

2015 to Present Crossmark Global Investments, Inc.

1996 to 2015 Stout Risius Ross, Inc.

Ryan E. Caylor Senior Research Analyst Birth Year: 1986

Education: Tulane University, BSM in Finance
Tulane University, Master of Accounting
Tulane University, Master of Finance

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Business:

2016 to Present	Crossmark Distributors, Inc.
2016 to Present	Crossmark Global Investments, Inc.
2013 to 2016	Tudor, Pickering, Holt & Co.
2011 to 2013	PricewaterhouseCoopers

Melville L. Cody

Senior Portfolio Manager

Birth Year: 1954

Education:

University of Texas, BA in Finance
University of Texas, MBA

Business:

2009 to Present	Crossmark Global Investments, Inc.
2009 to 2012	Capstone Financial Solutions, LLC
2005 to 2012	Roger H. Jenswold & Company, Inc.

Jim Coppedge

General Counsel & Chief Compliance Officer

Birth Year: 1968

Education:

Texas A&M University, BBA in Finance
St. Mary's University School of Law, JD

Business:

2017 to Present	Crossmark Consulting, LLC
2017 to Present	Crossmark Distributors, Inc.
2017 to Present	Crossmark Global Holdings, Inc.
2017 to Present	Crossmark Global Investments, Inc.
2017 to Present	Crossmark Wealth Management, LLC
2007 to 2015	American International Group, Inc.
1999 to 2007	Invesco, Ltd.
1992 to 1999	USAA

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Victoria L. Fernandez **Chief Market Strategist** **Birth Year: 1973**

Education: Rice University, BA,
Mays Business School, Texas A&M University, MBA

Business:
2012 to Present Crossmark Global Investments, Inc.
1994 to 2012 Fayeze Sarofim

Patrick N. Garboden **Senior Portfolio Manager** **Birth Year: 1957**

Education: University of Oregon School of Business

Business:
2008 to Present Crossmark Global Investments, Inc.
2008 to 2012 Capstone Financial Solutions, LLC

Gina Garcia **Senior Trader** **Birth Year: 1962**

Education: The Art Institute of Houston

Business:
2000 to Present Crossmark Global Investments, Inc.
1990 to 2000 Syscom Development

Brandon Hutchison **Trader** **Birth Year: 1993**

Education: Michigan Technological University, BS in Finance

Business:
2017 to Present Crossmark Global Investments, Inc.
2016 to 2017 Quicken Loans

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Andrew J. Jacobson **Chief Operating Officer** **Birth Year: 1972**

Education: University of Michigan, BBA
Pepperdine University, MBA

Business:
2016 to Present Crossmark Consulting, LLC
Crossmark Global Investments, Inc.
Crossmark Wealth Management, LLC
2011-2016 Calvary Community Church
1993 to 2010 Ally Bank

Tiffany Nunn **Senior Investment Analyst** **Birth Year: 1972**

Education: New Mexico State University, BA in Psychology

Business:
2007 to Present Crossmark Consulting, LLC
2007 to Present Crossmark Global Investments, Inc.

Arthur G. Smith **Managing Director, Distribution and Marketing** **Birth Year: 1962**

Education: Nazareth College of Rochester, BS in Business Administration
University of Rochester, MBA

Business:
2018 to Present Crossmark Distributors, Inc.
2018 to Present Crossmark Global Investments, Inc.
2016 to 2018 Managing Partner, VIRE Consulting
2009 to 2016 Managing Director, Mitsubishi UFJ Financial Group, Inc. (MUFG)

Paul C. Townsen **Managing Director** **Birth Year: 1971**

Education: Incarnate Word University, BBA in Finance

Business:
1993 to Present Crossmark Global Investments, Inc.

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Zachary P. Wehner

Portfolio Manager

Birth Year: 1988

Education:

Southern Methodist University, BBA in Accounting

Southern Methodist University, BA in History

University of Houston, MBA

University of Houston, JD

Business:

2014 to Present

Crossmark Global Investments, Inc.

2017 to Present

Crossmark Distributors, Inc.

John R. Wolf

Managing Director - Equity Investments

Birth Year: 1961

Education:

Hofstra University, BBA in Accounting

Manhattan College, MBA in Finance

Business:

2008 to Present

Crossmark Consulting, LLC

1996 to Present

Crossmark Distributors, Inc.

1996 to Present

Crossmark Global Investments, Inc.

Item 3 Disciplinary Information

There are no legal or disciplinary actions to report on any of the aforementioned professionals.

Item 4 Other Business Activities

As noted above, certain directors, officers, and employees of Crossmark also serve as directors, officers, and registered representatives of various Crossmark affiliates and the Steward Funds.

Crossmark does not believe these relationships create material conflicts of interest between Crossmark and its clients. Crossmark and its affiliates employ an integrated staffing and resource plan that is intended to ensure that appropriate levels of staffing and infrastructure support exist to undertake the obligations of each company to its clients. Individual directors, officers, employees, and registered representatives are compensated based on commensurate skills and experience as well as performance. Compensation programs are designed and monitored to avoid potential conflicts of interest between the companies and their clients as well as to avoid potential conflicts between clients.

The following individuals who are listed above also serve as directors, officers, and registered representatives of various Crossmark affiliates and/or the Steward Funds:

- **Michael L. Kern, III, CFA**, serves as the President and CEO of each of the Crossmark affiliates identified above and as President and Treasurer of the Steward Funds. He is also a registered representative and principal of Crossmark Distributors.
- **Ryan Caylor** is a registered representative of Crossmark Distributors.
- **Melville Cody** serves on the investment committee of Crossmark Wealth and as an officer of the Steward Funds.
- **Jim Coppedge** serves as the General Counsel and Chief Compliance Officer of each of the Crossmark affiliates identified above and as Chief Compliance Officer of the Steward Funds. He is also a registered representative and principal of Crossmark Distributors.
- **Victoria Fernandez** serves on the investment committee of Crossmark Wealth and as an officer of the Steward Funds.
- **Patrick Garboden** serves as the liquidity officer for the Steward Funds and is a registered representative of Crossmark Distributors.
- **Arthur Smith** serves as Managing Director, Distribution and Marketing for Crossmark Distributors and the Steward Funds.
- **Paul Townsen** serves as an officer of the Steward Funds.
- **Zachary Wehner** serves on the investment committee of Crossmark Wealth and as an officer of the Steward Funds and is a registered representative of Crossmark Distributors.
- **John Wolf** serves as an officer of the Steward Funds and as a Director, registered representative and registered principal of Crossmark Distributors.

Crossmark directors, officers, and employees who serve as directors and officers of the Steward Funds receive no separate compensation from the Steward Funds for the services they provide.

The business operations of Crossmark Distributors are limited to acting as the underwriter and distributor of the Steward Funds. The activities of its associated persons are limited to marketing and wholesaling the Steward Funds.

Crossmark Consulting, LLC (**Crossmark Consulting**) is a consulting firm that provides securities research services, compliance services and administrative services to Crossmark and its clients, including the Steward Funds.

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Crossmark Wealth Management, LLC (**Crossmark Wealth**) is an SEC registered investment adviser that provides financial planning and discretionary investment management services to direct clients.

Item 5 Additional Compensation

None of the above mentioned professionals receive any additional compensation from non-clients for providing advisory services.

Item 6 Supervision

The following individuals comprise Crossmark's Management Team:

- Michael Kern
- Jim Coppedge
- Victoria Fernandez
- Andrew Jacobson
- Arthur Smith
- Paul Townsen

All other professionals listed in this brochure are supervised by the Management Team. The Management Team can be reached at 800-262-6631.