

Form CRS Customer Relationship Summary

April 2026

Introduction

Brighton Securities Corp. is registered with the Securities and Exchange Commission (SEC) both as a Registered Investment Advisor and as a Broker-Dealer. As a Broker-Dealer, we are also a member of Financial Industry Regulatory Authority (FINRA) (which regulates us and other Broker-Dealers) the Securities Investor Protection Corporation (SIPC) and Municipal Securities Rulemaking Board (MSRB).

Brokerage and advisory services and fees differ, and it is important for the retail investor to understand the differences. There are simple tools available to use at (Investor.gov/CRS), a website maintained by the SEC. These tools can provide you with educational materials about Broker-Dealers, Investment advisors and investing.

This relationship summary provides information to help you make an informed decision about whether or not to invest with a registered representative and/or investment adviser associated with Brighton Securities and will answer the following questions:

- What investment services and advice can you provide me?
- What fees will I pay?
- What are your legal obligations to me when providing recommendations as my broker-dealer, or when acting as my investment adviser?
- How else does the firm make money and what conflicts of interest do you have?
- How do your financial professionals make money?
- Do you or your financial professionals have legal or disciplinary history?
- Where can I find additional information?

Terms to know

- A **broker-dealer** is a firm that acts as an intermediary between buyers and sellers of securities for which they will usually receive a commission and may purchase or sell those securities in/out of their own account.
- An **investment adviser** is generally any person or group that provides investment advice or conducts securities analysis in exchange for a fee.
- A **trusted contact person** is a person you may designate to receive communication from us, if we are concerned about possible fraud on your account, and to confirm certain information about you from time to time, including your contact information, health status, and identity of legal guardians, trustees, and holders of power of attorney from you.

What investment services and advice can you provide me?

Brighton Securities offers brokerage and investment advisory services to individual retail investors, trusts, estates, small businesses and retirement plans. Some of our associated persons are not dually registered with the broker-dealer and the registered investment advisor and may not be able to offer both types of services. You should carefully consider which type of service(s) are right for you and your situation.

You can find detailed information about our brokerage services in our Regulation Best Interest Disclosure and detailed information about our advisory services in our Firm Brochure (ADV Part II A). Both documents are available on our website disclosures page at www.brightonsecurities.com/disclosures. Additionally, you may call us at 585-473-3590 if you would like additional information.

Below is a summary of the main types of services we offer and their features.

Brokerage Services

In a brokerage account, Brighton Securities charges a transaction-based commission every time you buy or sell an investment such as a mutual fund, equity, stock, bond, exchange traded fund, option contract, real estate investment trust, or certificate of deposit. We typically do not have investment authority over your brokerage account, so you retain full control over all

trading decisions. We may recommend investments and educate clients about various products and services, but you are responsible for making your own investment decisions in a brokerage relationship. We do not monitor your brokerage account on an ongoing or periodic basis. If we notice something unusual, we will attempt to notify you or your trusted contact person, but this is not a monitoring service.

Investment Advisory Services

Brighton Securities offers investment advisory services, including financial planning and wrap fee programs, and these services are tailored to your individual needs. Advisory accounts are charged an ongoing asset-based fee that covers continuous investment advice, development of a personal investment policy, and portfolio management aligned with that policy. Financial planning, estate planning, portfolio management, college saving, and tax planning services are included as part of the advisory fee.

During an initial meeting, your adviser will review your overall financial picture, which may include relevant financial background, future goals, family considerations, and retirement and estate needs. Your adviser will then present recommendations for your input, and you are expected to remain actively involved in the process so that together you and your adviser can shape the plan that best meets your needs. If needed, and as mutually agreed, you may place reasonable restrictions on certain types of investments within your account. Your adviser monitors your investments on an ongoing basis, and you receive regular written reports showing your investments, rate of return, and profits and losses. You meet with your adviser at regular intervals to review your progress and discuss any updates that may be helpful. The frequency of meetings is agreed upon between you and your adviser at the start of the relationship and may be updated over time if a more (or less) frequent cadence would benefit you.

Brighton Securities offers advisory services on both a non-discretionary basis, where you decide which investments to buy or sell, and on a discretionary basis, where Brighton Securities or a program manager may buy and sell investments in your account without obtaining prior approval. Discretion is granted by you in writing and is limited to the purchase or sale of securities.

Limited Investment Offering: We provide access to a broad range of investments and offer advice on a wide variety of products. We do not sell proprietary products, and we do not restrict our recommendations to a narrow set of investments. Although we strive to make available offerings that are most useful to our clients, we cannot access every investment in the market, nor can we monitor every possible investment option. Some investments are available only to certain types of clients, so there may be products you cannot access even if you express interest.

Account Minimums and Other Requirements: Brighton Securities does not set account minimums, but some third-party investments and products do. Depending on your account type and investment strategy, you may not be able to access every investment or product we make available. You may open an investment account with us in any amount and we will continue to maintain it if it has a positive balance. If your account becomes too small for us to provide services that meet your best interests, we may recommend transferring your investments to another firm.

Conversation Starters – Questions you might wish to ask when considering our services:

- 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?

What fees will I pay?

Brokerage Service Fees are transaction-based fees investors pay every time they buy or sell an investment. This fee, commonly referred to as a commission, is based on the specific transaction and not the value of your account. This fee can be charged in many ways, including as a separate and distinct fee, included as a part of the purchase of the security, or in the case of mutual funds as an embedded cost of the fund. Some investments, such as variable annuities, may impose additional fees that will reduce the value of the investment over time. In addition, investors may have to pay additional fees, such as a surrender charge, when you sell certain types of investments. We may charge you additional fees, disclosed in your account agreement and in an annual mailing. Commissions may be based upon the size of the trade and are charged on a per trade basis, thus if you make frequent trades in your brokerage account, you will tend to pay higher fees than a client who trades infrequently. Consequently, from a cost perspective, it may or may not be beneficial to you to incur a transaction-based fee based on the frequency of trading in your account and whether or not you buy and hold.

Investment Advisory Services are ongoing fees paid in regular periods based on the total value of the advisory account (inclusive of both cash and investments). Advisory accounts in our wrap programs charge an annual asset-based fee that generally ranges from 0.25% to 3.00%, depending on the program you choose, your account value, and the services you

request. Your adviser may negotiate your fee based on your individual circumstances. This fee covers advisory, execution, custodial, and reporting services, and Brighton Securities receives a portion of the wrap fee for the services we provide. You may also pay internal expenses charged by the mutual funds or other products in which you invest, and certain account service fees may apply. Program fees are typically charged quarterly in advance as described in your program agreement.

We also offer mutual fund direct advisory accounts sponsored by mutual fund companies. These accounts charge an annual advisory fee that generally ranges from 0.25% to 2.00%, and Brighton Securities receives a portion of that fee. You may also pay internal mutual fund expenses and standard account service fees.

Depending on the types of advisory services you select, we might charge you on an hourly basis or a fixed fee. We will inform you about such alternative fee arrangements prior to your incurring them.

Other Fees and Costs: Fees and costs are incurred when conducting business under either our broker dealer or our registered investment adviser. On the brokerage side, such fees may include a commission or a contingent deferred sales charge (CDSC) when you purchase a mutual fund or insurance product, or a mark-up or mark-down when transacting in fixed income assets. Additional categories of the most common fees and costs incurred by retail investors, that may impact brokerage and advisory, can include custodian fees, account maintenance fees, internal fees related to mutual funds and variable annuities, and other transactional fees and product-level fees.

Additional Information: You can find more detailed information about our brokerage services fees and commissions in our Regulation Best Interests Disclosure and our advisory services fees in Items 5 and 6 of our Firm Brochure (ADV Part IIA) both available on our website, (brightonsecurities.com/disclosures).

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money clients make on their investments over time.

Please make sure you understand what fees and costs you are paying.

Conversation Starters – Questions you might wish to ask when considering our services:

- Help me understand how these fees and costs might affect my investments.
- If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?
- How might your conflicts of interest affect me, and how will you address them?

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment advisor? How else does the firm make money and what conflicts of interest do you have?

Standard of Conduct: When we provide you with a recommendation as your broker-dealer or act as your investment adviser, we must act in your best interest and not place our interests ahead of yours. Because we are compensated when you invest through us, and because certain products or programs pay us differently, we have financial incentives that may create conflicts of interest. You should understand these conflicts because they may affect the advice and recommendations we provide.

Examples of Ways We Make Money and Conflicts of Interest: We have an obvious incentive for you to become our client which creates either commissions or advisory fees for our firm. We earn commissions in brokerage accounts, and compensation can vary based on the investment you select. This creates an incentive to recommend investments or transactions that generate higher compensation. In brokerage accounts, more frequent trading results in more commissions, which is a conflict of interest. In advisory accounts, we charge an asset-based fee, so we benefit when you increase the assets you hold with us. Fee levels and program features can vary across advisory programs, which may create an incentive to recommend one program over another.

Other Conflicts of interest that could impact retail investors include (fully outlined in our ADV part IIA and REG BI):

- Our financial professionals could receive variable compensation based upon brokerage services or investment advisory services that they provide to you
- Our financial professionals may earn additional compensation based upon their role in the sales of certain products such as direct funds, annuities and life insurance.
- IRA Rollover advice: Retirement plan participants seeking advice on what to do with their plan assets should compare plan costs with the fees for investment options, trades, annual account fees and any termination costs before rolling to an IRA.
- Cash Sweep: Brighton Securities receives revenue from our clearing firm when cash in your brokerage account is held in the cash sweep program. Because we may earn more when cash remains in the sweep program rather than

being invested in alternatives such as money market funds, this creates a conflict of interest. In an advisory account, cash held in the sweep program, money market funds, or certificates of deposit may earn interest that is lower than the advisory fee you pay. This means your net return on cash may be low or even negative. Because advisory fees are charged on your total account value, including cash, this creates a conflict of interest because we continue to receive our fee when your assets remain uninvested.

- We receive additional economic benefits from our clearing firm, First Clearing, which creates conflicts of interest because these incentives may encourage us to keep using First Clearing rather than seek alternative clearing arrangements that could have lower costs or different features. This includes a \$3 million upfront payment tied to a clearing contract extending through 2030 and potential recruiting support up to \$500,000 annually. Other economic benefits we may receive include a portion of certain service fees charged to your account and a portion of the interest earned on margin balances and priority credit line balances.
- Some advisers act as portfolio managers in the Firm's PIM wrap program and receive a flat salary for performing portfolio management services. This compensation arrangement may influence an adviser's recommendation of the PIM program when compared with other programs the Firm offers.
- Brighton Securities has an affiliated tax business. Brighton Securities may compensate our employees with a flat referral payment when they refer clients to Brighton Securities or to Brighton Securities Tax and Accounting. These payments do not increase the fees you pay, but they create an incentive to refer you to our affiliated firm. Clients are under no obligation to use any affiliate services, and the relationship is fully disclosed.

Brighton Securities does not aim to be the lowest cost provider for every investment product, and at times the services we provide may result in a fee or commission that is higher than what some other broker-dealers or registered investment advisors may charge.

We do not create product specific sales contests or quotas, and we do not pay advisers more for recommending one product, service, or account type over another. We do not sell proprietary products. We work to identify and manage conflicts through supervision, disclosure, and ongoing oversight intended to ensure that recommendations and advice are made in your best interest.

Additional Information: You can find more detailed information about conflicts of interest related to our brokerage services in our Regulation Best Interests Disclosure and our advisory services described in Item 11 of our Firm Brochure (ADV Part IIA) both available on our website, (brightonsecurities.com/disclosures). As well you may request a copy of our Firm's Code of Ethics which we may provide on a case by case basis.

Conversation Starters – Questions you might wish to ask when considering our services:

- How might your conflicts of interest affect me, and how will you address them?
- 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 advisor or a broker-dealer? Whom can I talk to if I have concerns about how this person is treating me?

How do your financial professionals make money?

Our financial professionals receive a combination of salary and a percentage of the fees or commissions generated from the services provided to clients. In addition, our financial professionals may be provided a standard benefits package including insurance and retirement benefits among others. Our financial professionals' compensation is negotiated by us and them and may reflect seniority, experience, management responsibilities, the types of clients they manage, the complexity of the services they offer and other factors. Some advisors receive a bonus based on meeting certain production goals. Our financial professionals may experience conflicts of interest that arise from the compensation model. For example, a client with stable, long-term plans and significant assets under management may be more attractive as a client than a client who generates less income through frequent smaller trades. We and our financial professionals try to identify all such conflicts of interest and minimize them to the extent possible, in order to work in the best interests of our clients at all times.

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

Yes. For information, you may go to <https://www.investor.gov/CRS>, input "Brighton Securities" and click on "Get Details" either under "Brokerage Firm" or "Investment Adviser Firm" – they will take you BrokerCheck, and our Form ADV or, SEC Summary Report respectively, where you can review disclosures.

Where can I find additional information?

You can always ask your Brighton Securities financial adviser for more information and request a copy of this relationship summary. We also welcome your call at 585-473-3590 or a visit to our offices in Rochester, Batavia or Lockport.