Hypothetical Portfolio Performance Disclosures

Ally Invest Advisors Inc. (AIA) employs a disciplined investment process which seeks to construct a set of efficient portfolios for different levels of risk appetite. The strategies are diversified across a broad mix of asset classes, geographies, major market sectors, and segments. The performance displayed represents the hypothetical results using the total return benchmark indices that underly the exchange-traded funds (ETFs) selected for each portfolio. All returns assume reinvestment of dividends and capital gains, but do not consider the rebalancing of portfolios over time. The returns are calculated net of the AIA advisory fee (30 bps, or 0.30%, for market-focused portfolios and 0 bps for cash-enhanced portfolios) and net of the representative ETF expense ratios. Other fees or expenses may apply to the account of an individual client, which could reduce the performance quoted. The performance data shown represents past performance of a hypothetical portfolio and not the performance of actual portfolios. Past performance does not guarantee future results.

ANY COMPARISONS TO INDICES ARE PROVIDED FOR ILLUSTRATIVE PURPOSES ONLY. AN INDEX IS A BROADLY DIVERSIFIED, UNMANAGED GROUP OF SECURITIES, WHICH MAY INCLUDE ONLY LARGE CAPITALIZATION COMPANIES OR COMPANIES OF A CERTAIN SIZE. BROADLY BASED INDICES MAY BE SHOWN ONLY AS AN INDICATION OF THE GENERAL PERFORMANCE OF THE FINANCIAL MARKETS DURING THE PERIODS INDICATED. BECAUSE OF THE DIFFERENCES BETWEEN THE CLIENT ALLOCATIONS AND ANY INDICES SHOWN, WE CAUTION INVESTORS THAT NO INDEX IS DIRECTLY COMPARABLE TO THE PERFORMANCE SHOWN SINCE EACH INDEX HAS ITS OWN UNIQUE RESULTS AND VOLATILITY, AND SUCH INDICES, IF SHOWN, SHOULD NOT BE RELIED UPON AS AN ACCURATE COMPARISON.

Back-tested performance is provided for informational purposes only to indicate historical performance had the AIA Managed Portfolios and ETFs been available over the relevant time period. Actual investors may (and most likely will) experience different results from the hypothetical results shown. There is a potential for loss that is not reflected in the hypothetical information portrayed. The hypothetical back-tested performance results shown do not represent the results of actual trading using client assets but were achieved by means of the retroactive application of a hypothetical portfolio designed with the benefit of hindsight. There is no guarantee that the investment process will lead to positive results. Ally Invest Advisors does not guarantee any minimum level of investment performance or the success of any index portfolio or investment strategy. Asset allocation and diversification do not eliminate the risk of experiencing investment losses. Back-tested performance results have certain inherent limitations. Material economic and market events that might have occurred during the time period shown could have had an impact on any investment advisor’s decision-making. We assume the risk profile and target allocation would not have changed during the time period shown; however, an actual investor may have experienced changes to their portfolio plan in response to changing suitability profiles and investment objectives, particularly during the long-term period shown. Potential tax consequences resulting from trades are also not being considered.

In no way should the historical performance of the hypothetical portfolio be considered indicative or a guarantee of the future performance of an actual client’s portfolio with the same strategy. It also in no way should be viewed as a substitute for the actual portfolios recommended to individual clients. Actual results of an individual client may differ substantially from the historical performance shown for a hypothetical portfolio and may include an individual client incurring a loss.

Ally Invest Advisors Inc. ("Ally Invest Advisors") is a registered investment advisor. We provide managed investment portfolios to customers who self-select their risk and time horizon characteristics. Risks applicable to any portfolio are those associated with its underlying securities. Before you invest, you should carefully review and consider the investment objectives, risks, charges, and expenses of each exchange-traded fund (ETF) that is to be used within our Managed Portfolios. ETF trading prices may not necessarily reflect the next asset value of the underlying securities. For more information, see our Wrap Fee Program Brochure.