## Introduction

Winslow Capital Management, LLC ("WCM") is registered with the Securities and Exchange Commission ("SEC") as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. Throughout this document, you will find “conversation starters”. These are questions you may want to ask your financial professional in connection with the services you are seeking.

## What investment services and advice can you provide me?

We offer investment advisory services to retail clients directly and through managed account programs ("programs") (wrap fee and dual contract) sponsored by broker-dealers and other financial intermediaries ("sponsors"). Our investment advisory services are based on the particular investment strategy you select, subject to account restrictions and guidelines we agree to follow. A sponsor’s program limits our menu of investment strategies. You and/or your sponsor are responsible for determining if the strategy, services and program you select are appropriate given your overall financial situation and investment objectives, and for providing us with any relevant account information and/or investment restrictions. You should review our Form ADV Part 2A Brochure and your sponsor’s Brochure for your program (if applicable) and consider the advantages and disadvantages of the program for your particular needs.

When we manage an account on a **discretionary** basis, we decide which securities to buy and sell for the strategy (subject to any restrictions and guidelines from you or your sponsor we agree to follow) and we direct trading for your account. We also provide advice on a **non-discretionary** basis, where a sponsor makes the ultimate decision to buy or sell investments and directs the trading for your account. As part of our standard services, we regularly monitor the **discretionary** accounts we manage for compliance with the stated investment strategy guidelines, and we generally review accounts on an exception basis. Our account minimums and other requirements vary depending on the strategy and program.

*For additional information*, please see Items 4, 7 and 13 of WCM’s Form ADV Part 2A brochure (attached hereto or available at [https://adviserinfo.sec.gov/firm/brochure/106940](https://adviserinfo.sec.gov/firm/brochure/106940)).

### Conversation Starters

- “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?”
- “Given my financial situation, should I choose an investment advisory service? Why or why not?”

## What fees will I pay?

You will pay an **asset-based fee**, which is based on a percentage of assets under our management and is generally payable quarterly. The more assets there are in your account, the more you will pay in fees, and we therefore have an incentive to encourage you to increase the assets in your account. If you are in a **wrap fee program**, you pay an asset-based fee for advice, equity trading through the sponsor, custody and reporting. If you are in a **dual contract program** where you sign separate agreements with a sponsor and WCM, you typically pay WCM, the sponsor and your custodian separate fees and you pay trading costs and fees. If you own mutual funds or exchange traded funds, you will also pay your share of the fund’s advisory and administrative fees. We do not charge performance-based fees where the advisory fee varies depending on the performance of the account to retail clients. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

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*This Form CRS is intended for retail investors only. Form CRS defines a "retail investor" as a natural person or legal representative of such natural person, who seeks to receive or receives services primarily for personal, family, or household purposes.*
**For additional information**, please see Item 5 of WCM’s Form ADV Part 2A brochure (attached hereto or available at [https://adviserinfo.sec.gov/firm/brochure/106940](https://adviserinfo.sec.gov/firm/brochure/106940)).

**Conversation Starter.** Ask your financial professional –

- “**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?**”

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**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

**When we act as your investment adviser,** we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are examples to help you understand what this means.

We charge our clients different fees, which is a conflict of interest for us because we have an incentive to favor accounts that pay us higher fees.

If we invest your assets in funds that we or our affiliate manage, we or our affiliate will earn more fees than if we had invested your assets in unaffiliated funds. This additional income is a conflict of interest for us. We have incentives to recommend or invest in affiliated funds, because when our funds grow in size, they are potentially more efficient to manage and attractive to other investors.

**For additional information,** please see Items 4, 10 and 11 of WCM’s Form ADV Part 2A brochure (attached hereto or available at [https://adviserinfo.sec.gov/firm/brochure/106940](https://adviserinfo.sec.gov/firm/brochure/106940)).

**Conversation Starter.** Ask your financial professional –

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

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**How do your financial professionals make money?**

Please consult your program sponsor or its representatives to find out how the financial professionals who advise you about our products and services make money. We pay our investment team members who manage your account a base salary and annual bonus. Investment team members also typically participate in profits interest and other incentive plans that seek to align their interests with the success of our clients and the firm. We pay our wholesaling teams who sell our products and services to sponsors a base salary and quarterly incentive payments.

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

Yes for our firm. No for our financial professionals. Visit [www.Investor.gov/CRS](https://www.Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

**Conversation Starter.** Ask your financial professional –

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

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**Additional Information**

**For additional information about our investment advisory services,** please visit [www.nuveen.com](https://www.nuveen.com) or the SEC’s website at [www.adviserinfo.sec.gov](https://www.adviserinfo.sec.gov). If you would like additional, up-to-date information or a copy of this disclosure, please contact us at (312) 917-7700 or (800) 257-8787.

**Conversation Starter.** Ask your financial professional –

- “**Who is my primary contact person? Who can I talk to if I have concerns about how this person is treating me?**”
- “**Is he or she a representative of an investment adviser or broker dealer?**”

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