Third Seven Capital, LLC
Regulation Best Interest Disclosure

December 5, 2025

This guide summarizes important information concerning the scope and terms of the brokerage services offered and details the material conflicts of interest that may arise through our delivery of brokerage services to you. We encourage you to review this information, along with any applicable account agreement(s) and disclosure documentation you receive from us.

As you review this information, please note Third Seven Capital, LLC ("Firm") is registered with the U.S. Securities and Exchange Commission (SEC) as a broker-dealer and is a member of FINRA/SIPC. **The Firm does not offer investment advisory accounts or services**.

For more information on the differences between the brokerage services offered by the Firm and how they differ from investment advisory services, please review the Customer Relationship Summary (or Form CRS) available at http://www.thirdsevencapital.com/form-crs.

Our Form CRS contains important information about the types of services offered by the Firm, along with general information related to compensation, potential conflicts of interest, disciplinary actions and other reportable legal information.

Please carefully review and consider the information in each section below:

Brokerage Services

The Firm provides access to private offerings and 1031 exchanges via Delaware Statutory Trust as well as access to other private placements the firm may participate in as part of a selling group or as a private placement agent. The Firm acts in capacity of managing broker-dealer or private placement agent. The Firm may also act as part of the selling group. The capacity of which in which the firm acts is disclosed in the private placement memorandum and/or offering document.

Brokerage Account Types/Registrations

The Firm does not hold brokerage accounts for clients. The Firm does not monitor retail investors' accounts nor recommend any specific account types. The Firm does not accept discretionary authority over any assets or securities.

Incidental Brokerage Services

It is important for you to understand that when the firm's representatives make a recommendation, they are obligated to ensure it is in your best interest, considering reasonably available alternatives, and based on your stated investment objective, risk tolerance, liquidity needs, time horizon, financial needs, tax status, and other financial information you provide us. You may accept or reject any recommendation. It is also your responsibility to monitor the investments in your portfolio and encourage you to do so regularly. If you require on-going monitoring of your account or investments, you should seek out a financial advisor or advisory firm to discuss whether a fee-based advisory relationship is more appropriate for you. Please also consider that from time to time we may provide additional information and resources. This may include but is not limited to educational resources and sales and marketing materials. These services are provided as a courtesy to you. These activities are not designed to monitor any specific investment holdings in any brokerage accounts you may hold. You should not consider them a recommendation to trade or hold any securities.

Clearing Services
Third Seven Capital does not provide clearing services and does not carry customer accounts.

Understanding Risk
It is important for you to understand that all investments involve risk, including the risk that you may lose some, or all of your principal. Further, some investments involve more risk than other investments. Higher-risk investments may have the potential for higher returns but also for greater losses, potentially 100% of your commitment.

When you subscribe to a transaction, we ask that you fill out an investor suitability questionnaire, which will include your investment objectives. Our recommendations are based in part on your investment objectives. You should select the investment objectives and risk tolerance best aligned with your financial goals.

Over time and if your circumstances change, you may see the need to update these objectives to better reflect your financial requirements. Please inform us in writing of any changes as soon as applicable.

In addition to the above information, we also look to ascertain your risk tolerance, investment time horizons and any known liquidity needs. Risk tolerance means the amount of risk or loss you are willing and able to accept in order to achieve your investment goals, while your investment time horizon and liquidity needs provide information in regard to how long you are willing and or able to invest your money to achieve your stated goals. We encourage you to carefully consider your investment objectives before investing.

Our Brokerage Model and Products

Third Seven Capital (TSC) is a privately owned, boutique investment bank, specializing in alternative investments. We identify investment opportunities in early-stage private companies, late-stage private companies, real estate offerings and funds, enabling our investors to construct a diversified portfolio of private, uncorrelated holdings to complement their existing portfolios.

Third Seven Capital (through Four Springs Capital Markets) provides access to 1031 exchanges via Delaware Statutory Trust (DST) offerings as well as private offerings for Four Springs Capital Trust, among other investment solutions.

Brokerage Fees and Our Compensation

It is important to consider that while a brokerage relationship can be a cost-effective way of investing your assets, it may not be for everyone. Below are examples of the fees and costs involved in the brokerage accounts we offer.

Commission/ Fees
As explained above, when you subscribe to a transaction, the Firm will receive a commission based on the percentage outlined in the private placement memorandum or offering document. Transaction-based fees are outlined in the specific private placement memorandum and/or offering document. The commission/fee ranges from 1% to 10 % and are based on various factors.

Service Fees
Third Seven Capital does not charge annual or ongoing account fees and does not pass through any regulatory fees they are assessed.

Managing Broker-Dealer Fees: The Firm also acts as the managing broker-dealer for some issuers. This means the Firm will generally receive a percentage of the offering as compensation for administrating the offering as well as for the other broker-dealers selling the offering. The Firm may have an incentive to recommend offerings in which they receive additional compensation over other offerings they do not receive additional compensation.

Broker-Dealer re-allowance: Most offerings contain a separate fee payable to broker-dealers for performing due diligence and/or marketing. The fee may differ between offerings and thus incentivize TSC to recommend one offering vs another.

Conflicts of Interest

A conflict of interest is a situation in which we engage in a transaction or activity when our interest is materially averse to yours. The mere presence of a conflict of interest does not imply that harm to your interests will occur, but it is important that we acknowledge the presence of potential conflicts. Moreover, our regulatory obligations require that we establish, maintain, and enforce written policies and procedures reasonably designed to address conflicts of interest associated with our recommendations to you.

Our conflicts of interest are typically the result of compensation structures and other financial arrangements between the Firm, our representatives, our clients and third parties. The Firm receives various forms of compensation from our clients, and other third parties as described above. Securities rules allow for us, our representatives, and our affiliates to earn compensation when we provide brokerage services. However, the compensation that we receive from you may vary based upon the product you purchase, which creates a financial incentive to recommend investments and services that generate greater compensation to us. The Firm offers certain investment services and products in which the issuer of the security sets the commission that a broker-dealer may earn which may differ by offering and by representative.

The Firm also acts as the managing broker-dealer for some sponsors which means the Firm receives compensation for administrating the offering and for other broker-dealers selling the offering. The Firm may be incentivized to recommend offerings in which it is the managing broker-dealer over those offerings where it is not.

The Firm may also act as the manager of various special purpose vehicles created by the Firm, as a pass-through vehicle for issuers that want to minimize the number of investors participating in an offering. These special purpose vehicles may pay management fees and back-end compensation to the Firm as the sponsor of the special purpose vehicle, in addition to any placement agent commission the Firm and/or the Firm's representatives may receive for the special purpose vehicle ultimately investing in the offering.

The Firm is committed to taking appropriate steps to identify, mitigate and avoid conflicts of interest to ensure we act in your best interest when providing brokerage recommendations to you. Below you will find additional information related to our conflicts of interest. This information is not intended to be an all-inclusive list of our conflicts, but generally describes those conflicts that are most material to your brokerage relationship. In addition to this disclosure, conflicts of interest are disclosed to you in your private placement memorandum and/or offering document.

Additional information:

If you have any questions, you may call Third Seven Capital at **(212) 393 4680**.