



## BEST INTEREST DISCLOSURE STATEMENT

**Hastings Capital Group, LLC** (“Hastings”, “we”, “our”, “us”) is a broker-dealer registered with the Securities and Exchange Commission (“SEC”) and a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). The SEC has enacted [Regulation Best Interest](#) (“Regulation BI”) to help protect retail investors<sup>1</sup>. Hastings is committed to complying with Regulation BI and is providing these additional disclosures to explain our approach when acting as your broker-dealer.

Please review this summary together with our [Customer Relationship Summary](#) (“Form CRS”), on file with the SEC, and other important disclosures linked below, available at [SkyBridge.com/Disclosures](#) or provided to you by Hastings (together, our “Best Interest Disclosure”).<sup>2</sup> We welcome any questions you may have about this information.

### STANDARD OF CARE

Regulation BI is an SEC regulation that applies to Hastings and our financial professionals when acting as broker-dealers on behalf of retail investors. When we provide you with a recommendation to open an account; buy, sell or explicitly hold a security, or pursue an investment strategy, we are required to **act in your best interest** at the time the recommendation is made, without placing our financial or other interests ahead of yours.

When we act in this broker-dealer capacity, we do not monitor your account or investments, nor do we update past recommendations that we have made to you. We may voluntarily review your investment profile and your account holdings for the purpose of determining whether to provide an explicit recommendation to you; however, this does not constitute an advisory service.

At or before the time of a recommendation, we will provide full and fair disclosure of all material facts about the scope and terms of our relationship with you, and all conflicts of interest that are associated with the recommendation, so that you are able to make an informed decision. The following sections summarize material facts including information about our brokerage services, the risks associated with the products we offer, and conflicts of interest associated with our recommendations. This document should be reviewed in conjunction with our [Customer Relationship Summary](#) and the additional disclosures described below.

### OUR PRODUCTS AND SERVICES

Hastings offers qualified retail investors<sup>1</sup>, high net-worth individuals and institutions access to alternative investment opportunities, principally interests in pooled investment vehicles managed by our **advisory affiliate, SkyBridge Capital II, LLC** (“SkyBridge”).<sup>3</sup> Such vehicles principally invest in portfolio funds managed by third-party investment managers that employ a variety of alternative investment strategies; we also act, on an execution-basis only, for certain funds directly managed by SkyBridge and, from time to time, may serve on a limited “finder”-only basis for select third-party funds. Vehicles that follow alternative investment strategies are often described “hedge funds” (whether hedged or not) and the SkyBridge-managed pooled investment vehicles that invest in them are called “funds of hedge funds”. In addition, we offer a privately placed REIT and digital asset funds, also managed by SkyBridge. Our financial professionals primarily offer recommendations to buy, sell or hold securities issued by SkyBridge-managed vehicles and

PRODUCTS WE OFFER	TYPE OF OFFERING	OUR ROLE
Mutual funds ( <i>currently, funds of hedge funds</i> )	Closed-end management investment companies registered under the Investment Company Act of 1940	Principal underwriter ( <i>best efforts</i> ), wholesaler, retailer
Private funds ( <i>including funds of hedge funds, a private REIT, digital asset and third-party funds</i> )	Private placements exempt from SEC registration	Broker-dealer ( <i>including execution-only and limited “finder”-only basis</i> )
Assets or securities of a business organization ( <i>approved for offer on a case-by-case basis</i> )	Private placements exempt from SEC registration	Finder or broker ( <i>best efforts</i> )

1 A “retail investor” is a natural person, or the legal representative of such natural person, who seeks to receive or receives services primarily for personal, family or household purposes. This disclosure is provided to comply with the SEC’s Regulation Best Interest disclosure requirements regarding services to retail investors.

2 This disclosure is provided to comply with the SEC’s Regulation Best Interest requirements. It does not create or modify any agreement, relationship or obligation between you and Hastings. Please consult your Hastings agreements for all terms and conditions controlling your account and relationship with us.

3 SkyBridge Capital II, LLC (“SkyBridge”) is an investment adviser registered with the SEC. SkyBridge is affiliated with Hastings through common ownership and supervised persons.

provide administrative support services for your account. Hastings does not offer advisory services or provide account monitoring. No recommendations are made when we act on an execution-basis only or “finder”-only basis.

**The products we offer are limited.** Other than the specified SEC-registered funds of hedge funds, Hastings does not offer mutual funds, nor do we offer publicly traded stocks or bonds. As a result, other firms will offer a greater range of potential investment opportunities.

For more information on SkyBridge’s advisory business, including its clients, fees and compensation, conflicts of interest, disciplinary information and risks associated with investing, among other things, please refer to the SkyBridge Form ADV brochure on file with the SEC at [AdviserInfo.SEC.gov](http://AdviserInfo.SEC.gov) or [SkyBridge.com/Disclosures](http://SkyBridge.com/Disclosures).

## ▶ INVESTMENT RISKS

SkyBridge-managed products are designed to serve as core hedge fund holdings with the goal of providing additional diversification to an overall investment portfolio.

- **These products primarily consist of funds of hedge funds**, with an objective of capital appreciation. In doing so, SkyBridge funds of hedge funds seek to realize attractive risk-adjusted returns, net of fees and expenses, over a three- to five-year investment horizon. To achieve its investment objective, SkyBridge seeks to allocate fund assets across a diverse set of hedge fund strategies. **Any potential diversification does not ensure against partial or complete loss of investment and there is no guarantee or assurance that these objectives will be achieved.**

Accredited retail investors should consider investing in SkyBridge funds of hedge funds if you are:

- ▶ following asset allocation principles;
- ▶ seeking greater diversification in your overall portfolio; or
- ▶ seeking exposure to opportunistic, active trading strategies.

However, an investment in SkyBridge funds of hedge funds is not suitable for all investors. Investors must understand that:

- ▶ performance can be volatile;
- ▶ there is a risk of loss of principal due to leverage, short-selling or other speculative investment practices, including risk of entire principal loss;
- ▶ there is limited liquidity due to the fact that liquidity is obtained exclusively through limited periodic tender offers or redemption windows;
- ▶ the investment time horizon is expected to be a minimum of three to five years;
- ▶ there are conflicts of interest; and
- ▶ diversification does not assure a profit or protect against a loss.

The specific risk factors vary with each fund of hedge fund product and are detailed in each product’s offering materials. The risks associated with an investment in SkyBridge Multi-Adviser Hedge Fund Portfolios LLC are set forth in the fund’s [prospectus](#) on file with the SEC, primarily under the headings “Types of Investments and Related Risks” and “Other Risks”. The risks associated with an investment in SkyBridge G II Fund, LLC are set forth in the fund’s [prospectus](#) on file with the SEC, primarily under the headings “Types of Investments and Related Risks” and “Other Risks”. We also offer certain funds of hedge funds on a “private placement” basis under Rule 506(b) of [Regulation D](#), available only to investors who are both “qualified purchasers” and “accredited investors” under SEC rules; the risks for those investments are set forth in the applicable private placement memorandum.

- **Hastings offers certain other products.** Hastings acts on an execution-basis only, for certain funds directly managed by SkyBridge and, from time to time, may serve on a limited “finder”-only basis for select third-party funds and makes no recommendation regarding the purchase or sale of such interests. The investment objectives and risk factors for such investments and any other product offerings are set forth in the applicable private placement memorandum.

Notwithstanding the risks of investment, because of the potential for SkyBridge funds to generate attractive returns we believe that making such investments will tend to be return enhancing, and therefore in the best interests of qualified investors who are willing to take risks (including the risk of total loss), have long investment time horizons and do not need immediate liquidity from the investment. As a result, we make available information about investment opportunities in such funds, and may make recommendations to investors regarding such investments. Any individual SkyBridge fund investment may result in a gain or loss.

## CONFLICTS OF INTEREST

We have an incentive to encourage you to invest in funds managed by our affiliate SkyBridge given that both we and SkyBridge benefit financially from your investments. A portion of the fees SkyBridge earns from the SkyBridge funds in connection with its advisory services is paid to us. In addition, the SkyBridge Multi-Adviser Hedge Fund Portfolios LLC fund pays us a fixed fee to serve as principal underwriter and a shareholder servicing fee that varies with fund assets, which we either re-allow to placement agents or retain to compensate us for the shareholder services we perform for our clients. We therefore have an incentive to encourage you to trade in proprietary products over third-party products.

We seek to address our conflicts of interest through policies and procedures requiring Hastings financial professionals to act in your best interest, by maintaining reasonable supervisory processes and by disclosing known conflicts at the websites below and in the applicable product's offering materials.

Our financial professionals are also employees of SkyBridge and are thus required to comply with various rules and regulations applicable to SkyBridge as an SEC registered investment adviser. For example, all Hastings financial professionals are subject to the SkyBridge Code of Ethics, located at [SkyBridge.com/Disclosures](http://SkyBridge.com/Disclosures). When our financial professionals are providing brokerage recommendations, they are acting on behalf of Hastings. Our financial professionals do not provide advisory services to retail investors on behalf of Hastings or SkyBridge.

## ADDITIONAL INFORMATION

If you have any questions about Hastings Capital Group, LLC or the investment products we offer through SkyBridge, our advisory affiliate, please call our financial professionals at 888-759-2730 (toll free within the U.S.) or send an email to [Hastings@SkyBridge.com](mailto:Hastings@SkyBridge.com).

For more information, please visit the websites below.

- **Hastings Capital Group, LLC** <http://SkyBridge.com/Disclosures>

  - ▶ Hastings BrokerCheck report <https://brokercheck.finra.org/firm/summary/142998>
- **SkyBridge Capital II, LLC** <http://SkyBridge.com/Disclosures>

  - ▶ SkyBridge Form ADV filings <https://AdviserInfo.SEC.gov/firm/summary/148152>
- **Regulatory Resources**

  - Investor.gov <https://Investor.gov>
  - Securities and Exchange Commission ("SEC") <https://www.SEC.gov>
    - ▶ Investor Alerts and Bulletins <https://www.SEC.gov/Investor/Alerts>
    - ▶ Investment Adviser Public Disclosure <https://AdviserInfo.SEC.gov>
  - Financial Industry Regulatory Authority ("FINRA") <https://www.FINRA.org>
    - ▶ Investor Alerts <https://www.FINRA.org/Investors/Alerts>
    - ▶ FINRA BrokerCheck Reports <https://BrokerCheck.FINRA.org/>
  - Securities Investor Protection Corporation ("SIPC") <https://www.SIPC.org>