

PROVISION	SECTION IN FRANCHISE AGREEMENT	SUMMARY
u. Dispute resolution by arbitration or mediation	Section 24(b) and 24(c)	You must bring all disputes before our President/CEO prior to bringing a claim before a third party. After exhausting this internal dispute resolution procedure, at our option, all claims or disputes between you and us must be submitted first to non-binding mediation in Duval County, Florida, in accordance with the American Arbitration Association's Commercial Mediation Rules then in effect (subject to state law). The parties will not be required to first attempt to mediate a controversy, dispute, or claim through mediation if the underlying controversy, dispute or claim concerns an allegation that a party has violated (i) any federally protected intellectual property rights in the Licensed Marks, the Brightway System, or in any Confidential Information; or (ii) any of the restrictive covenants contained in the Franchise Agreement.
v. Choice of forum	Section 24(d)	You may file suit in the state or federal court of the county where we have our principal place of business (currently, Duval County, Florida, or the United States District Court for the Middle District of Florida). We may file suit in either of such courts, or any other court in which jurisdiction and venue are proper (subject to state law).
w. Choice of law	Section 24(a)	Florida law applies (subject to state law).

**ITEM 18:
PUBLIC FIGURES**

We do not use any public figure to promote our franchise.

**ITEM 19:
FINANCIAL PERFORMANCE REPRESENTATIONS**

The FTC's Franchise Rule permits a franchisor to provide information about the actual or potential financial performance of its franchised and/or franchisor-owned outlets, if there is a reasonable basis for the information, and if the information is included in the disclosure document. Financial performance information that differs from that included in Item 19 may only be given if: (1) a franchisor provides the actual records of an existing outlet you are considering buying; or (2) a franchisor supplements the information provided in this Item 19, for example, by providing information about possible performance at a particular location or under particular circumstances.

This Item sets forth certain historical revenue, production and related information for Brightway Locations. We believe that the following financial data has been compiled using generally accepted accounting principles. Written substantiation of the data used in preparing the information found in this Item 19 will be made available upon reasonable request. As of December 31, 2024, we had 338 franchised Brightway Locations. The agency level data presented below sets forth the financial performance of certain subsets of these franchised Brightway Locations.

In prior years, Brightway offered two different types of franchise models: (a) the Office Agency franchise model, where one or more individuals operate from a professional office space; and (b) the Retail Agency franchise

model, where three or more individuals operate from retail office space. This year, we have consolidated our offering into a single model where individuals can operate from either professional office space or retail space, and we are permitting existing Retail Agencies to relocate to a professional office space.

Tables 1 and 3 include data for the 270 Brightway Locations that commenced operations prior to December 31, 2023, and were open and operating for the entire 2024 calendar year (the “Included Locations”).

For the broader purposes of Item 19, “Producer” is defined as an individual who sells property and casualty insurance in Brightway Locations, including owners, as identified in Brightway’s internal database. Table 2 presents data for certain Producers of the 338 franchised Brightway Locations open as of December 31, 2024, but excluding any Brightway Locations that did not employ at least one “full-time” Producer during the 2024 calendar year, defined as a Producer who sold a minimum of 50 policies in 2024. Producers who did not sell a minimum of 50 policies in 2024 are excluded from this Table in order to include only those individuals who have New Business production as a meaningful part of their jobs.

Table 4 includes data for the 280 Brightway Locations that commenced operations prior to August 1, 2024, and were open and operating for the entire 12-month measurement period ending July 31, 2025 (the “Table 4 Locations”). Table 5 includes data for the 55 Brightway Locations that commenced operations no earlier than January 1, 2016, and were open and operating for at least a 5-year period as of July 31, 2025 (the “Table 5 Locations”).

All Tables in this Item also exclude one franchised agency that is authorized to sell certain insurance products outside of our normal lines of business, and is not representative of the franchise offered under this Disclosure Document.

TABLE 1
GROSS COMMISSION REVENUE GENERATED BY BRIGHTWAY LOCATIONS BY PRODUCER COUNT (2024)^{1,2,3}

The information below reflects average Gross Commissions earned by the 270 Included Locations with at least one full calendar year of operations, grouped by the number of Producers during the 2024 calendar year. We consider a Brightway Location to be fully staffed once it has at least three Producers. Please note that these figures reflect the Gross Commissions generated by a Brightway Location before Brightway retains its applicable percentage of New and Renewal Business Commissions. See Item 6 for more information.

Gross Commission Revenue by Number of Producers						
Category	Top 25% Average Revenue	Average Revenue	Bottom 25% Average Revenue	Median Revenue	High	Low
1 Producer	\$266,014	\$93,737	\$10,967	\$45,908	\$1,221,537	\$545
2 Producers	\$605,220	\$244,388	\$19,084	\$169,309	\$1,390,823	\$5,749
Fully-staffed (3+ Producers)	\$2,082,043	\$906,320	\$196,604	\$655,298	\$4,909,765	\$20,374

TABLE 2
NEW BUSINESS POLICY PRODUCTION BY FULL-TIME PRODUCERS (2024)⁴

Table 2 includes the number of New Business policies and New Business Annualized Premiums generated by full-time Producers of any Brightway Location that was open and operating during the 2024 calendar year, and which employed at least one full-time Producer during calendar year 2024, defined as a Producer who sold a minimum of 50 policies in 2024.

New Business Annualized Premium is defined as the amount of premium customers pay for a new policy in one year; if a policy is issued in a six-month term, the premium amount is doubled. Included in Table 2 are 481 Producers who owned or were employed by the subset of Brightway Locations described above. Table 2 excludes any Producers who did not sell a minimum of 50 policies in 2024, in order to include only those individuals who have New Business production as a meaningful part of their jobs.

Category	Top 25%	Average	Bottom 25%	Median	High	Low
New Business Policies Sold per Producer in 2024	483	221	68	158	3,015	50
New Business Annualized Premium per Producer	\$1,178,177	\$537,603	\$156,185	\$393,934	\$4,271,505	\$60,559
Number of Producers	120	481	120	1	1	1

We also track how many of our active full-time producers are “Million Dollar Producers,” meaning that they generated more than \$1,000,000 in New Business Annualized Premiums in 2024.

Million Dollar Producers	
Number of Full-Time Producers with \$1m+ in Annualized Premium	62
Number of Full-Time Producers with \$500,000 to \$1m in Annualized Premium	120
Number of Full-Time Producers with less than \$500,000 in Annualized Premium	299

TABLE 3
SUMMARY OF ANNUALIZED PREMIUM BY AGENCY OWNER (2024)^{1,5}

Table 3 provides a snapshot of the size of the book of business associated with each of the Included Locations, which is a commonly-referenced metric used in the insurance industry to determine agency size. “Annualized Premium” is defined as the amount of premium customers pay for policies in one year; if a policy is issued in a six-month term, the premium amount is doubled.

The information presented immediately below shows the Annualized Premium of the 254 Agency Owners operating the 270 Included Locations for the 2024 calendar year. The Annualized Premium of our multi-unit owners are combined because our multi-unit owners are permitted to share business across their locations, and the number of multi-unit owners in each subset are shown below. The column presenting data for Number of Agency Owners shows the count of individual owners, some of whom are multi-unit owners, who fall within a premium range. The column presenting data for Number of Locations shows the total number of Locations

operated by Agency Owners who fall within a certain premium range and does not indicate that each Location falls within this premium range.

Annualized Premium for Calendar Year Ending December 31, 2024	Number of Agency Owners	Number of Multi-Unit Location Owners	Number of Locations
Over \$50M	1	0	1
Between \$25M & \$50M	8	4	13
Between \$15M & \$25M	15	4	19
Between \$10M & \$15M	16	3	19
Between \$5M & \$10M	32	1	33
Between \$1M & \$5M	76	3	79
Under \$1M	106	0	106

TABLE 4
AVERAGE PRODUCTION BASED ON NUMBER OF PRODUCERS IN AGENCY (August 2024 – July 2025)^{1,6}

Table 4 provides an overview of the number of New Business policies sold by a Brightway Location, segmented by the number of Producers that sold New Business policies for the Brightway Location during the measurement period of August 2024 through July 2025 (the “Table 4 Measurement Period”). The information below shows the average and median number of New Business policies sold during this timeframe by each subset of the 280 Table 4 Locations that were open and operating for the entire Table 4 Measurement Period. For each Table 4 Location, if there was a different number of Producers at the start of the Table 4 Measurement Period and the end of the Table 4 Measurement Period, the starting and ending numbers of Producers were averaged to determine which row the Table 4 Location would be placed in the Table below.

Number of Producers	Number of Brightway Locations	Average New Business Production	Median New Business Production
1	118	156	103
2	57	285	194
3	41	540	467
4	32	875	677
5+	32	1,860	1,730

TABLE 5
AVERAGE PRODUCTION RAMP-UP OF TENURED BRIGHTWAY AGENCIES (August 2024 – July 2025)^{1,7}

Tables 5-A and 5-B show the average ramp-up in terms of both policies in force (PIF) as well as Annual Gross Commission Revenue for Brightway Locations during their first five (5) years of operation. Please note that these

figures reflect the Gross Commissions generated by a Brightway Location before Brightway retains its applicable percentage of New and Renewal Business Commissions. See Item 6 for more information.

Please note that Tables 5-A and 5-B only include information for Brightway Locations that opened no earlier than January 1, 2016 and were open for a minimum of five (5) years as of July 31, 2025, as this Table is intended to capture the full ramp-up of tenured locations that completed their initial Franchise Agreement term. There are 55 Table 5 Locations.

Table 5-A shows the average, median, high, and low number of PIF for the Table 5 Locations during their first five (5) full years of operation (each number reflects the average, median, high or low within the applicable year).

Table 5-A

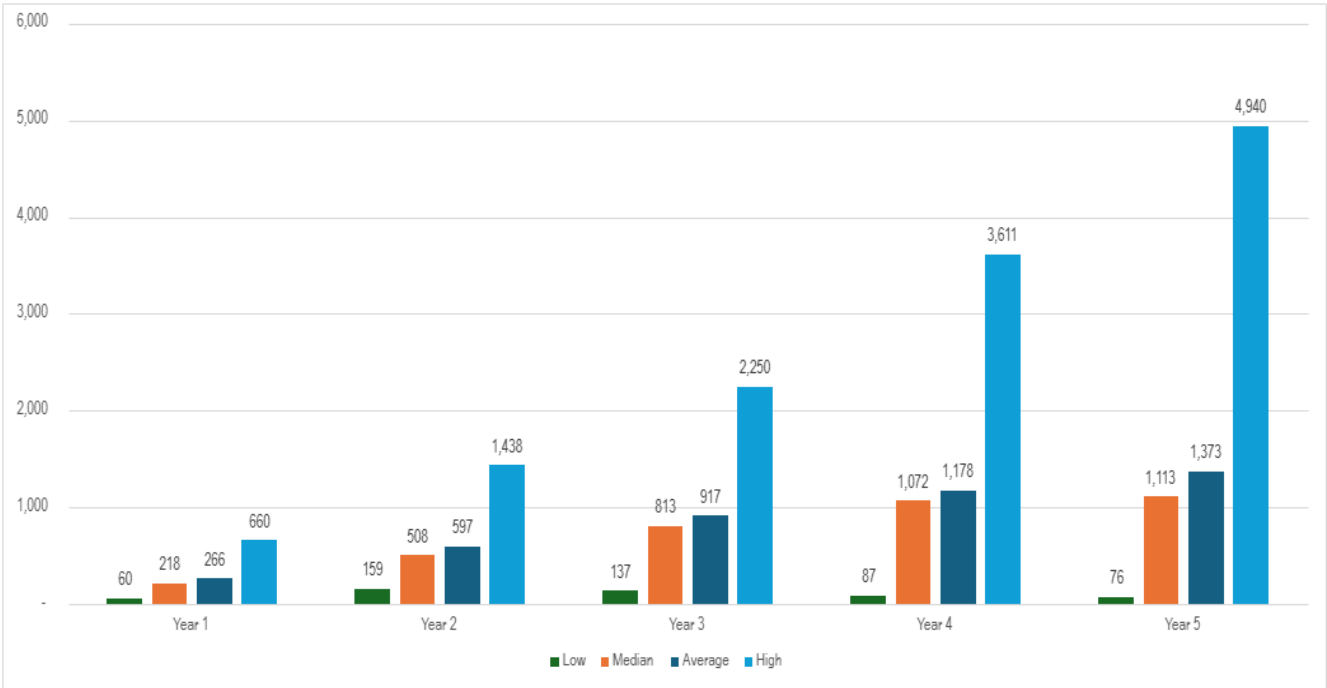
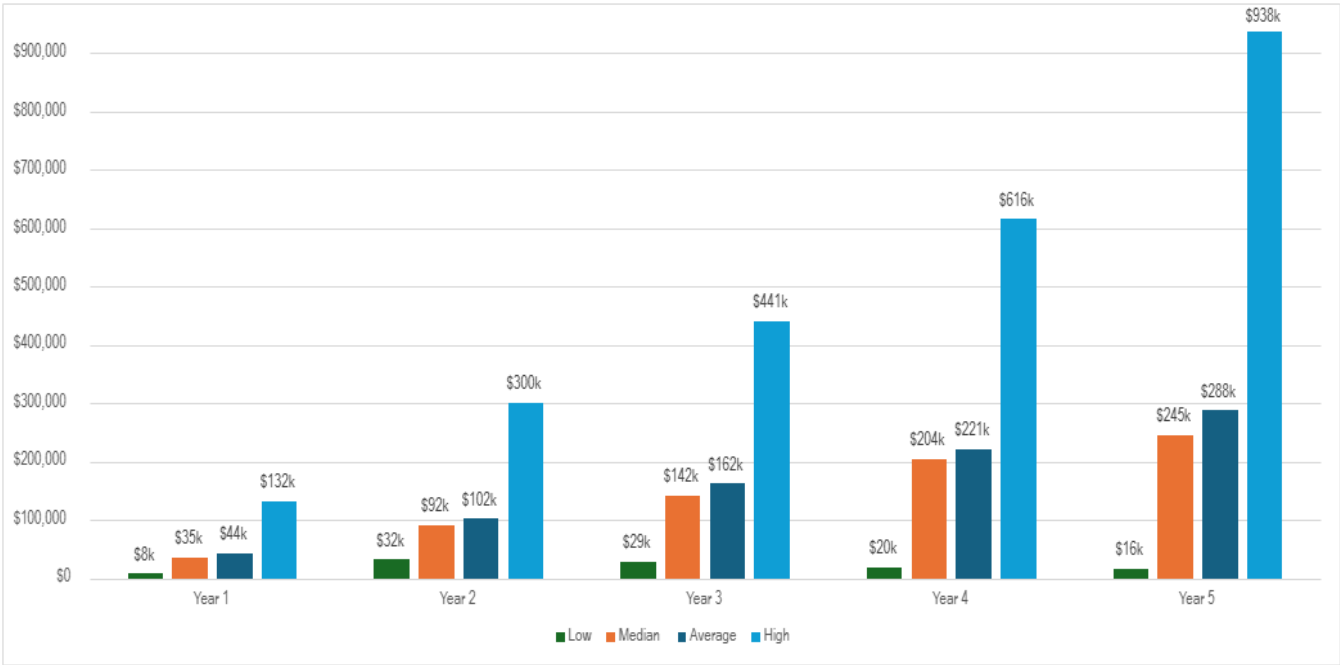


Table 5-B shows the average, median, high, and low Gross Commission Revenue for the Table 5 Locations during their first five (5) full years of operation (each number reflects the average, median, high or low within the applicable year).

Table 5-B



FOOTNOTES TO ALL ITEM 19 TABLES

1. Tables 1 and 3 show the results of all 270 Included Locations that commenced operations and received commissions by December 31, 2024, and were open and operating for the entire 2024 calendar year. Table 4 shows the 280 Table 4 Locations that commenced operations by August 1, 2024, and were open and operating for the entire period between August 1, 2024, and July 31, 2025. Table 5 shows the 55 Table 5 Locations that commenced operations on or after January 1, 2016, and were open and operating for at least five years as of July 31, 2025.
2. In Table 1, of the 119 Brightway Locations with 1 Producer in 2024, 9 out of 29 (31%) exceeded the Top 25% Average Commission Revenue, 31 out of 119 (26%) exceeded the Average Commission Revenue, and 16 out of 29 (55%) exceeded the Bottom 25% Average Commission Revenue.

In Table 1, of the 41 Brightway Locations with 2 Producers in 2024, 3 out of 10 (30%) exceeded the Top 25% Average Commission Revenue, 15 out of 41 (37%) exceeded the Average Commission Revenue, and 5 out of 10 (5%) exceeded the Bottom 25% Average Commission Revenue.

In Table 1, of the 110 Brightway Locations with 3+ Producers in 2024, 10 out of 27 (37%) exceeded the Top 25% Average Commission Revenue, 36 out of 110 (33%) exceeded the Average Commission Revenue, and 16 out of 27 (59%) exceeded the Bottom 25% Average Commission Revenue.

3. The Gross Commission Revenue presented in Table 1 is the portion of the amounts paid by Contracted Companies to Brightway for the sale of policies. This is the “gross” commission amount, prior to Brightway deducting its percentage of New Business and Renewal Business commissions (as described in more detail in Item 6 of this Disclosure Document).
4. Of the 481 Producers included in Table 2, 42 out of 120 (35%) exceeded the Top 25% Average New Business Policies Sold, 179 out of 481 (37%) equaled or exceeded the Average New Business Policies Sold, and 54 out of 120 (45%) equaled or exceeded the Bottom 25% Average New Business Policies Sold.

Of the 481 Producers included in Table 2, 39 out of 120 (33%) exceeded the Top 25% Average New Business Annualized Premium, 171 out of 481 (36%) equaled or exceeded the Average New Business Annualized Premium, and 61 out of 120 (51%) equaled or exceeded the Bottom 25% Average New Business Annualized Premium.

5. The average “Tenure” of the Included Locations in each subset of Table 3, defined as the length of time the Brightway Location was open as of the end of the 2024 calendar year, is as follows:

Annualized Premium for Calendar Year Ending December 31, 2024	Average Tenure (years)
Over \$50M	16
Between \$25M & \$50M	12
Between \$15M & \$25M	12
Between \$10M & \$15M	13
Between \$5M & \$10M	11
Between \$1M & \$5M	7
Under \$1M	2

6. Of the 118 Brightway Locations with 1 Producer during the Table 4 Measurement Period, 54 out of 118 (46%) exceeded the Average New Business Production set forth in Table 4. Of the 57 Brightway Locations with 2 Producers during the Table 4 Measurement Period, 23 out of 57 (40%) exceeded the Average New Business Production set forth in Table 4. Of the 41 Brightway Locations with 3 Producers during the Table 4 Measurement Period, 17 out of 41 (41%) exceeded the Average New Business Production set forth in Table 4. Of the 32 Brightway Locations with 4 Producers during the Table 4 Measurement Period, 11 out of 32 (34%) exceeded the Average New Business Production set forth in Table 4. Of the 32 Brightway Locations with 5+ Producers during the Table 4 Measurement Period, 12 out of 32 (38%) exceeded the Average New Business Production set forth in Table 4.

7. Of the 55 Table 5-A Locations: (a) 20 out of 55 (36%) Table 5-A Locations exceeded the Average Year 1 PIF, (b) 23 out of 55 (42%) Table 5-A Locations exceeded the Average Year 2 PIF, (c) 24 out of 55 (44%) Table 5-A Locations exceeded the Average Year 3 PIF, (d) 23 out of 55 (42%) Table 5-A Locations exceeded the Average Year 4 PIF, and (e) 22 out of 55 (40%) Table 5-A Locations exceeded the Average Year 5 PIF.
8. Of the 55 Table 5-B Locations: (a) 20 out of 55 (36%) Table 5-B Locations exceeded the Average Year 1 Gross Commissions, (b) 21 out of 55 (38%) Table 5-B Locations exceeded the Average Year 2 Gross Commissions, (c) 20 out of 55 (36%) Table 5-B Locations exceeded the Average Year 3 Gross Commissions, (d) 21 out of 55 (38%) Table 5-B Locations exceeded the Average Year 4 Gross Commissions, and (e), 21 out of 55 (38%) Table 5-B Locations exceeded the Average Year 5 Gross Commissions.

GENERAL NOTES TO ITEM 19

1. **Some Agency Owners have earned the above amounts. Your individual results may differ. There is no assurance that you will earn as much.**
2. We suggest that you consult your financial advisor or accountant concerning the preparation of your financial projections, including any applicable taxes that you may incur in operating a Brightway Location.
3. Other than the preceding financial performance representation, Brightway Insurance, LLC does not make any financial performance representations. We also do not authorize our employees or representatives to make any such representations either orally or in writing. If you are purchasing an existing Brightway Location, however, we may provide you with the actual records of that Brightway Location. If you receive any other financial performance information or projections of your future income, you should report it to our management by contacting the Compliance Department at compliance@brightway.com or at our corporate offices at Brightway Insurance, LLC, 5011 Gate Parkway, Building 200, Suite 200, Jacksonville, Florida 32256, 904-483-3584, the Federal Trade Commission, and the appropriate state regulatory agencies.

ITEM 20: OUTLETS AND FRANCHISEE INFORMATION

Table No. 1 - Systemwide Location Summary
For Fiscal Years Ended December 31, 2022, 2023, and 2024

Location Type	Year	Locations at Start of Year	Locations at End of Year	Net Change
Franchised	2022	287	285	-2
	2023	285	335	+50
	2024	335	338	+3
Company-Owned	2022	2	2	0
	2023	2	2	0
	2024	2	3	+1
Total	2022	289	287	-2
	2023	287	337	+50
	2024	337	341	+4