PROVISION	SECTION IN FRANCHISE AGREEMENT	SUMMARY
		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, 2025, we had 351 franchised Brightway Locations. The agency level data presented below sets forth the financial performance of certain subsets of these franchised Brightway 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 351 franchised Brightway Locations open as of December 31, 2025, but excluding any Brightway Locations that did not employ at least one "full-time" Producer during the 2025 calendar year, defined as a Producer who sold a minimum of 50 policies in 2025. Producers who did not sell a minimum of 50 policies in 2025 are excluded from this Table in order to include only those individuals who have New Business production as a meaningful part of their jobs.

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 AND NEW BUSINESS PRODUCTION BY PRODUCER COUNT (2025)[1,2,3,4]

Table 1-A reflects average Gross Commissions earned by the 272 Brightway Locations with at least one full calendar year of operations, grouped by the number of Producers during the 2025 calendar year. A total of 78 Locations open as of December 31, 2025 were excluded because they were not open and operating for the entire 2025 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.

Table 1-A: Commission by Producer Count

Gross Commission Revenue by Number of Producers						
Category	**Top 25% Average Revenue**	**Average Revenue**	**Bottom 25% Average Revenue**	**Median Revenue**	**High**	**Low**
1 Producer	$244,171	$98,913	$15,350	$63,601	$761,853	$2,077
2 Producers	$528,018	$224,283	$42,992	$138,134	$921,757	$14,153
3 Producers	$1,302,992	$620,172	$139,177	$512,497	$2,384,181	$6,362
4 Producers	$1,456,105	$782,157	$321,438	$650,930	$3,032,774	$59,938
5+ Producers	$3,282,953	$1,739,710	$624,281	$1,544,605	$5,519,649	$307,384

Table 1-B reflects average New Business policy production by the 272 Brightway Locations with at least one full calendar year of operations, grouped by the number of Producers during the 2025 calendar year. A total of 78 Locations open as of December 31, 2025 were excluded because they were not open and operating for the entire 2025 calendar year. We consider a Brightway Location to be fully staffed once it has at least three Producers.

Table 1-B: New Business Production by Producer Count

New Business Policy Production by Number of Producers						
Category	**Top 25% Average Production**	**Average Production**	**Bottom 25% Average Production**	**Median Production**	**High**	**Low**
1 Producer	304	138	11	118	544	0
2 Producers	500	260	79	229	809	24
3 Producers	1,082	539	184	452	1,780	16
4 Producers	1,297	732	349	606	1,936	189
5+ Producers	2,938	1,599	633	1,315	5,566	509

TABLE 2
NEW BUSINESS POLICY PRODUCTION BY FULL-TIME PRODUCERS (2025)[5]

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 2025 calendar year, and which employed at least one full-time Producer during calendar year 2025, defined as a Producer who sold a minimum of 50 policies in 2025.

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 409 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 2025, in order to include only those individuals who have New Business production as a meaningful part of their jobs. Every Brightway Location has at least one licensed producer associated with the agency at all times, and accordingly no Brightway Locations were categorically excluded on the basis of having no associated producer(s).

Category	Top 25%	Average	Bottom 25%	Median	High	Low
New Business Policies Sold per Producer in 2025	608	279	84	200	3,316	50
New Business Annualized Premium per Producer	$1,447,773	$672,724	$198,810	$488,859	$4,602,023	$51,495
Number of Producers	104	409	103	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 2025, as well as Producers hitting other premium thresholds.

Million Dollar Producers	
Number of Full-Time Producers with $2m+ in Annualized Premium	14
Number of Full-Time Producers with $1m+ in Annualized Premium	61
Number of Full-Time Producers with $500,000 to $1m in Annualized Premium	128
Number of Full-Time Producers with less than $500,000 in Annualized Premium	206

TABLE 3
SUMMARY OF ANNUALIZED PREMIUM BY AGENCY OWNER (2025)[1,6]

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 260 Agency Owners operating the 272 Brightway Locations for the 2025 calendar year. A total of 78 Locations open as of December 31, 2025 were excluded because they were not open and operating for the entire 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, 2025	Number of Agency Owners	Number of Multi-Unit Location Owners	Number of Locations
Over $50M	1	0	1
Between $25M & $50M	9	4	14
Between $15M & $25M	16	4	20
Between $10M & $15M	14	1	15
Between $5M & $10M	31	0	31
Between $1M & $5M	90	2	92
Under $1M	99	0	100

FOOTNOTES TO ALL ITEM 19 TABLES

1. Tables 1-A, 1-B, and 4 show the results of all 272 Included Locations that commenced operations and received commissions by December 31, 2025, and were open and operating for the entire 2025 calendar year.

2. In Table 1-A, of the 119 Brightway Locations with 1 Producer in 2025, 12 out of 119 (10%) exceeded the Top 25% Average Commission Revenue, 38 out of 119 (32%) exceeded the Average Commission Revenue, and 102 out of 119 (86%) exceeded the Bottom 25% Average Commission Revenue.

   In Table 1-A, of the 48 Brightway Locations with 2 Producers in 2025, 5 out of 48 (10%) exceeded the Top 25% Average Commission Revenue, 18 out of 48 (38%) exceeded the Average Commission Revenue, and 41 out of 48 (85%) exceeded the Bottom 25% Average Commission Revenue.

   In Table 1-A, of the 43 Brightway Locations with 3 Producers in 2025, 3 out of 43 (7%) exceeded the Top 25% Average Commission Revenue, 17 out of 43 (40%) exceeded the Average Commission Revenue, and 37 out of 43 (86%) exceeded the Bottom 25% Average Commission Revenue.

   In Table 1-A, of the 27 Brightway Locations with 4 Producers in 2025, 3 out of 27 (11%) exceeded the Top 25% Average Commission Revenue, 10 out of 27 (37%) exceeded the Average Commission Revenue, and 24 out of 27 (89%) exceeded the Bottom 25% Average Commission Revenue.

   In Table 1-A, of the 35 Brightway Locations with 5+ Producer in 2025, 5 out of 35 (14%) exceeded the Top 25% Average Commission Revenue, 13 out of 35 (37%) exceeded the Average Commission Revenue, and 30 out of 35 (86%) exceeded the Bottom 25% Average Commission Revenue.

3. In Table 1-B, of the 119 Brightway Locations with 1 Producer in 2025, 13 out of 119 (11%) exceeded the Top 25% Average New Business Production, 49 out of 119 (41%) exceeded the Average New Business Production, and 97 out of 119 (82%) exceeded the Bottom 25% Average New Business Production.

   In Table 1-B, of the 48 Brightway Locations with 2 Producers in 2025, 4 out of 48 (8%) exceeded the Top 25% Average New Business Production, 21 out of 48 (44%) exceeded the Average New Business Production, and 43 out of 48 (90%) exceeded the Bottom 25% Average New Business Production.

   In Table 1-B, of the 43 Brightway Locations with 3 Producers in 2025, 4 out of 43 (9%) exceeded the Top 25% Average New Business Production, 13 out of 43 (30%) exceeded the Average New Business Production, and 40 out of 43 (93%) exceeded the Bottom 25% Average New Business Production.

   In Table 1-B, of the 27 Brightway Locations with 4 Producers in 2025, 2 out of 27 (7%) exceeded the Top 25% Average New Business Production, 9 out of 27 (33%) exceeded the Average New Business Production, and 25 out of 27 (93%) exceeded the Bottom 25% Average New Business Production.

   In Table 1-B, of the 35 Brightway Locations with 5+ Producer in 2025, 3 out of 35 (9%) exceeded the Top 25% Average New Business Production, 15 out of 35 (43%) exceeded the Average New Business Production, and 31 out of 35 (89%) exceeded the Bottom 25% Average New Business Production.

4. The Gross Commission Revenue presented in Table 1-A 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).

5. Of the 409 Producers included in Table 3, 32 out of 409 (8%) exceeded the Top 25% Average New Business Policies Sold, 146 out of 409 (36%) equaled or exceeded the Average New Business Policies Sold, and 364 out of 409 (89%) equaled or exceeded the Bottom 25% Average New Business Policies Sold.

   Of the 409 Producers included in Table 3, 39 out of 409 (10%) exceeded the Top 25% Average New Business Annualized Premium, 143 out of 409 (35%) equaled or exceeded the Average New Business Annualized Premium, and 357 out of 409 (87%) equaled or exceeded the Bottom 25% Average New Business Annualized Premium.

6. The average "Tenure" of the Included Locations in each subset of Table 4, defined as the length of time the Brightway Location was open as of the end of the 2025 calendar year, is as follows:

Annualized Premium for Calendar Year Ending December 31, 2024	**Average Tenure (years)**
Over $50M	18
Between $25M & $50M	15
Between $15M & $25M	13
Between $10M & $15M	15
Between $5M & $10M	13
Between $1M & $5M	7
Under $1M	3

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. 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, 2023, 2024, and 2025

Location Type	Year	Locations at Start of Year	Locations at End of Year	Net Change
Franchised	**2023**	285	333	+48
	2024	333	337	+4
	2025	337	351	+14
Company-Owned	**2023**	2	2	0
	2024	2	3	+1
	2025	3	3	0
Total	**2023**	287	335	+48
	2024	335	340	+4
	2025	340	354	+14

Table No. 2 - Transfers of Locations from Franchisees to New Owners
For Fiscal Years Ended December 31, 2023, 2024, and 2025
(Other than to Brightway or its Affiliates)

State	Year	Number of Transfers
Florida	**2023**	7
	2024	1
	2025	1
Georgia	**2023**	1
	2024	0
	2025	0
Michigan	**2023**	0
	2024	1
	2025	0
Missouri	**2023**	1
	2024	0
	2025	0
Total	**2023**	9
	2024	2
	2025	1