HBW Advisory Services LLC
FORM CRS - March 27, 2024

HBW Advisory Services LLC is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

What investment services and advice can you provide me?
We offer the following investment advisory services to retail investors: **Financial Planning Services; Asset Management Services; Financial Consulting Services; Selection of Other Advisers.**

Account Monitoring: If you open an investment account with our firm, as part of our standard Asset Management service we will monitor your investments on a daily basis. For clients who engage us for any other services besides Asset Management services, we will not monitor your account unless specified in the advisory agreement.
Investment Authority: We manage investment accounts on a ***discretionary*** basis whereby ***we will decide*** which investments to buy or sell for your account. We have discretion to select, retain or replace third-party managers to manage your accounts. We may also offer ***non-discretionary*** investment management services whereby we will provide advice, but ***you will ultimately decide*** which investments to buy and sell for your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.
Investment Offerings: We offer advice on the following types of investments or products: equity securities, private markets, corporate debt securities (other than commercial paper), certificates of deposit, municipal securities, variable annuities, mutual fund shares, U.S. government securities, options contracts on securities, money market funds, REITs and ETFs.
Account Minimums and Requirements: In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your account if it falls below a minimum size which, in our sole opinion, is too small to manage effectively.

Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Items 4, 7, and 8 by clicking this link https://adviserinfo.sec.gov/firm/brochure/143665.

Key Questions to Ask Your Financial Professional

- **Given my financial situation, should I choose an investment advisory service? Why or Why Not?**
- **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?**

What fees will I pay?
The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services.

- **Asset Based Fees -** Payable quarterly in arrears for standard Asset Management services. In limited circumstances, fees may be billed monthly rather than quarterly; fees may be based on account balance at the end of a billing period instead of an average daily balance; or fees may be billed in advance rather than arrears. The specific fee and the methodology by which the fee is calculated will be specified in the Investment Advisory Agreement executed with our firm. Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value which creates a conflict especially for those accounts holding illiquid or hard-to-value assets;
- **Hourly Fees -** Payable as specified in the advisory agreement you sign with our firm. A portion of fees may be payable up-front based on an estimate of hours required for services with the balance due upon completion of services, or quarterly in arrears for on-going services.
- **Subscription Fees -** Payable monthly;
- **Fixed Fees -** Payable as specified in the advisory agreement you sign with our firm;
- **Other Advisory Fees -** In addition to the above fees, we are also compensated by the receipt of a portion of fees paid to a third party advisor, when applicable.

Examples of the most common additional fees and costs applicable to our clients are:

- Custodian and account maintenance fees;
- Advisory fees charged by third party money managers, which are separate and apart from our fees;
- Fees related to mutual funds and exchange-traded funds;
- Transaction charges when purchasing or selling securities; and
- Other product-level fees associated with your investments.

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.

For detailed information, refer to our Form ADV Part 2A, Items 5 and 6 by clicking this link https://adviserinfo.sec.gov/firm/brochure/143665.

Key Questions to 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?**

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 some examples to help you understand what this means.

- *Third-Party Payments:* Persons providing advice on behalf of our firm are registered representatives with a broker- dealer. These persons receive compensation in connection with the purchase and sale of securities or other investment products. Compensation earned by these persons is separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend investment products based on the compensation received rather than solely based on your needs.
- *Third-Party Payments*: Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products. Insurance commissions are separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs.

Key Questions to Ask Your Financial Professional

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

Refer to our Form ADV Part 2A Brochure by clicking this link https://adviserinfo.sec.gov/firm/brochure/143665 to help you understand what conflicts exist.

How do your financial professionals make money?

The financial professionals servicing your account(s) are compensated in the following ways: a portion of the assets under management fees charged to clients. Financial professionals' compensation is based on the amount of client assets they service; the products sold (i.e. differential compensation); and the revenue the firm earns from the person's services or recommendations. This compensation represents a conflict of interest in that our financial professionals have a financial incentive to refer clients to our firm. Our financial professionals will also make money in their capacities as registered representatives and as insurance agents, as described above.

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

Yes, our firm or our financial professionals currently have legal or disciplinary history to disclose. Visit Investor.gov/CRS for a free and simple research tool.

Key Questions to Ask Your Financial Professional

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

You can find additional information about your investment advisory services and request a copy of the relationship summary at 800-473-3856 or click the link provided https://adviserinfo.sec.gov/firm/brochure/143665.

Key Questions to Ask Your Financial Professional

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

Joel D. Broersma, CFP®

3333 Deposit Rd. NE, Ste 250, Grand Rapids MI 49546
(616) 682-4604

HBW Advisory Services LLC

2655 1st Street, Ste. 250, Simi Valley CA 93065
(800) 473-3856

October 18, 2024

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Joel D. Broersma that supplements the HBW Advisory Services LLC brochure. You should have received a copy of that brochure. Please contact HBW Advisory Services LLC if you did not receive HBW Advisory Services LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Joel D. Broersma is available on the SEC's website at www.adviserinfo.sec.gov. [1]

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Educational Background and Business Experience

Form ADV Part 2B, Item 2

Joel D. Broersma
Year of Birth: 1971
Formal Education after High School:

- Professional Education & Licensing: Insurance, Investments, Property & Casualty, Health, Mortgages, Registered Investment Advisor, Enrolled Agent, 1996 to Present

Business Background for the Previous Five Years:

- Silver Oak Securities, Inc., Registered Representative, 10/2024 to Present
- Cetera Advisors Networks LLC, Registered Representative/Investment Advisor Representative, 6/2017 to 10/2024
- Pathway Financial Design, Owner, 10/2004 to Present
- Broersma & Associates, LLC, Owner, 10/2004 to Present
- HBW Insurance & Financial Services, Inc., dba HBW Partners, Agent, 10/2004 to Present
- HBW Securities LLC, Registered Representative, 1/2006 to 6/2017
- HBW Advisory Services LLC, Investment Advisor Representative, 3/2008 to Present

Certifications:
CERTIFIED FINANCIAL PLANNER™ ['CFP']: Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who complete a CFP Certification Examination as well as meet the following prerequisites: bachelor's degree from an accredited college or university and three years of full time personal financial planning experience. In order to qualify, the candidate must complete a CFP-board registered program or hold one of the following titles: CPA, ChFC, Chartered Life Underwriter (CLU), CFA, PhD in business economics, Doctor of Business Administration or Attorney's License. Once issued, the candidate is required to complete 30 hours of continuing education every two years and must continuously meet the standards administered by CFPBS.

Disciplinary Information

Form ADV Part 2B, Item 3

A. In the past 10 years, Joel D. Broersma has not been convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses by a criminal or civil action in a domestic, foreign or military court of competent jurisdiction.

In the past 10 years, Joel D. Broersma has not been named as the subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses as a criminal or civil action in a domestic, foreign or military court of competent jurisdiction.

No domestic, foreign or military court of competent jurisdiction has ever found Joel D. Broersma to have been involved in a violation of an investment-related statute or regulation; or was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

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B. Joel D. Broersma has never been found by the SEC, any other federal regulatory agency, any state regulatory agency, any foreign financial regulatory or a self-regulatory organization (SRO) in any proceeding to have caused an investment-related business to lose its authorization to do business; or to have been involved in a violation of the SRO's rules.

Joel D. Broersma was not barred or suspended from membership or from association with other members, or was not expelled from membership; otherwise significantly limited from investment-related activities; or fined more than $2,500.

Joel D. Broersma does not have any other proceeding in which a professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct. Nor has Joel D. Broersma resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a proceeding.

Other Business Activities

Form ADV Part 2B, Item 4

Joel D. Broersma is registered as a Registered Representative/Investment Advisor Representative of Silver Oak Securities, Inc. Silver Oak Securities, Inc. is under separate ownership from any other named entity. HBW Advisory Services LLC clients may be offered various securities through Silver Oak Securities, Inc., which may result in Joel D. Broersma receiving compensation from Silver Oak Securities, Inc..

A. Independent insurance sales are offered through HBW Insurance & Financial Services, Inc., dba HBW Partners, an affiliated company of HBW Advisory Services LLC, but separate entities of each other. Business is marketed under the name of Pathway Financial Design, LLC. Sales of Property & Casualty products offered through the Broersma & Associates, LLC agency. Joel D. Broersma is a licensed insurance agent.

B. Joel D. Broersma is President of HBW Partners Tax Services LLC an affiliated company of HBW Advisory Services LLC, but separate entities of each other. This business activity provides a substantial source of income and involves a substantial amount of time.

Additional Compensation

Form ADV Part 2B, Item 5

Joel D. Broersma's compensation is fee based and cannot accept any type of economic benefits from anyone who is not a client for providing advisory services. Economic benefits include awards, other prizes, and bonuses that are based at least in part, on the number or amount of sales or client referrals. Economic benefits do not include the supervised person's regular salary.

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Supervision

Form ADV Part 2B, Item 6

Supervision is by Todd Penrod, Chief Compliance Officer of HBW Advisory Services LLC., from the offices at 2655 1st Street, Ste. 250, Simi Valley, CA 93065, phone number 800-473-3856. The services offered by Joel D. Broersma will consider client's risk tolerance by using a questionnaire to determine Asset Allocation and recommend models/strategies for investment planning based on the risk tolerance score results. Todd Penrod reviews all accounts for suitability before they are opened. Clients are reminded quarterly to update HBW Advisory Services LLC of any changes in their risk tolerance. Todd Penrod monitors all model/strategies offered by Joel D. Broersma on a regular basis.

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www.hbwadvisory.com

November 13, 2025

FORM ADV PART 2
BROCHURE

This brochure provides information about the qualifications and business practices of HBW Advisory Services LLC. If you have any questions about the contents of this brochure, please contact us at (800) 473-3856. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about HBW Advisory Services LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for HBW Advisory Services LLC is 143665.

Item 2 Material Changes

Since the filing of our latest annual updating amendment, dated November 18, 2024, we have made the following material changes:

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Item 4 Advisory Services

HBW Advisory Services LLC (HBW) is an investment adviser registered with the U.S. Securities and Exchange Commission. The company was formed on March 13, 2007 and is domiciled in the State of California. HBW Insurance & Financial Services, Inc. owns 73.5% of HBW. The following paragraphs describe our services and fees. Refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs.

As used in this brochure, the words "we," "our," "HBW," and "us" refer to HBW Advisory Services LLC and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

Asset Management Services
HBW offers discretionary asset management services, and in limited circumstances may also offer non-discretionary asset management services. HBW will consider the client's risk tolerance by using a questionnaire to determine asset allocation and recommend models/strategies for investment planning based on the risk tolerance score results and client’s investment objectives.

For HBW's discretionary asset management services, clients are required to grant HBW discretionary authority to manage the account. Subject to a grant of discretionary authorization, HBW has the authority and responsibility to formulate investment strategies on clients' behalf. Discretionary authorization will allow HBW to determine the specific securities, and the amount of securities, to be purchased or sold for the account without obtaining approval prior to each transaction. HBW will also have discretion over the broker or dealer to be used for securities transactions in the account. Discretionary authority is typically granted by the investment advisory agreement that is signed with HBW, a power of attorney, or trading authorization forms.

As part of the asset management services, HBW may use one or more sub-advisers to manage a portion of the account on a discretionary basis. The sub-adviser(s) may use one or more of their model portfolios to manage accounts. HBW will regularly monitor the performance of client accounts managed by sub-adviser(s), and may hire and fire any sub-adviser without client's prior approval as part of discretionary asset management services. HBW may pay a portion of the advisory fee to the sub-adviser(s); clients may pay HBW a higher advisory fee as a result of any sub-advisory relationships.

In providing asset management services, HBW may, under limited circumstances and at its sole discretion, accept client restrictions on the specific securities or the types of securities that may be held in the account.

HBW will consider client's risk tolerance by using a questionnaire to determine asset allocation and recommend models/strategies for investment planning based on the risk tolerance score results.

In certain circumstances, clients may request that assets be held at outside custodians with whom HBW does not have a relationship. As a result HBW may not be able to provide the same benefits that are provided to accounts where the assets are maintained at custodians with whom HBW has an established relationship.

Financial Planning and Consulting
HBW offers a variety of financial planning and consulting services to individuals, families and other clients regarding the management of their financial resources based upon an analysis of the client’s current situation, goals, and objectives. These services can range from broad-based financial planning to consultative or single subject planning. Financial plans are based on the client's financial situation at

the time HBW presents the plan, and on the financial information provided by the client. Clients must promptly notify HBW if their financial situation, goals, objectives, or needs change. Planning and consulting services include but may not be limited to one or more of the following areas:

Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Mortgage/Debt Analysis, Insurance Analysis, and other Business and Personal Financial Planning. See details for certain services below.

Retirement Planning. HBW will make a systematic plan for client to use by setting aside income for client's future retirement. Clients will need to provide data such as number of years until retirement, approximate income desired in retirement, current assets available for retirement, and/or qualified social security benefits to be considered in order to receive a meaningful plan.

Investment Planning & Asset Allocation.
This service is offered by HBW and will consider client's risk tolerance by using a questionnaire to determine asset allocation and recommend models/strategies for investment planning based on the risk tolerance score results.

Estate Planning.
Limited estate planning is offered by HBW which is usually as a result of an attorney's recommendation. HBW recommends clients with complicated estate tax issues consult the advice of an attorney. HBW does not offer legal or tax advice.

College Planning.
HBW will make a systematic plan for future college expenses by analyzing a client's future college needs with data collected regarding these needs such as number of years till college, type of college, scholarship opportunities, money already set aside for college, and other relevant data.

Selection of Other Advisers
HBW may recommend that clients use the services of a third party money manager ("TPMM") to manage all, or a portion of, their investment portfolio. After gathering information about client financial situation and objectives, HBW may recommend that the client engage a specific TPMM or investment program. Factors that are taken into consideration when making these recommendation(s) include, but are not limited to, the following: the TPMM's performance, methods of analysis, fees, client financial needs, investment goals, risk tolerance, and investment objectives. HBW will monitor the TPMM(s)' performance to ensure its management and investment style remains aligned with the client's investment goals and objectives.

Selection of Co-Advisor Management
HBW may recommend that clients use the services of a Co-Advisor to manage all, or a portion of, their investment portfolio. After gathering information about the client's financial situation and objectives, HBW may recommend the client execute an agreement with HBW and a specific Co-Advisor. Factors that are taken into consideration when making these recommendation(s) include, but are not limited to, the following: the Co-Advisor's performance, methods of analysis, fees, client financial needs, investment goals, risk tolerance, and investment objectives. HBW will monitor the Co-Advisor's performance to ensure its management and investment style remains aligned with the client's investment goals and objectives.

Online Portfolio Management Platform
HBW has partnered with Betterment LLC, registered investment adviser, to offer portfolio management services through the Betterment Institutional online wrap-fee platform ("Program"). This Program allows clients to create and/or choose portfolios diversified among ETFs. HBW will assist the client in

selecting investments based on the client's risk profile. Betterment LLC will then manage the client's portfolio on a discretionary basis. Clients will receive a separate wrap-fee program brochure (Betterment Appendix 1 - Wrap Brochure), which they should refer to for specific details about the Program. Clients will also separately enter an agreement with Betterment LLC, granting them discretionary authorization to buy and sell, when to buy and sell, and in what amounts, in accordance with client's investment parameters, without obtaining client's prior consent or approval for each transaction. HBW assumes discretionary authority to rebalance the client portfolio. Client also enters into a discretionary arrangement with HBW.

Sub-Advisory Services to Registered Investment Advisers
HBW offers sub-advisory services to unaffiliated third party money managers (the "Primary Investment Adviser"). As part of these services, HBW will provide model portfolios, which the Primary Investment Adviser selects for their clients. HBW will not directly manage the Primary Investment Adviser's individual client accounts. The Primary Investment Adviser will be responsible for selecting the appropriate model for its clients.

Types of Investments.
HBW offers advice on equity securities, mutual funds, EFTs, and variable annuities. Additionally, HBW may advise clients on various types of investments based on their stated goals and objectives. HBW may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship. HBW does not participate in wrap fee programs.

Assets under Management
As of September 30, 2025, HBW provides continuous management services for $1,705,116,249 in client assets on a discretionary basis and $42,253,073 in client assets on a non-discretionary basis.

Item 5 Fees and Compensation

Asset Management Fees
HBW charges an annual fee based on a percentage of assets under management, not to exceed 2.00%. The actual fee to which the client is subject will be specified on the Investment Advisory Agreement executed with our firm. The actual fee is contingent based on the assets under management with the firm, the complexity of investments, client objectives and other related factors. Fees could vary based on the investment adviser representative managing the account. Client accounts may be householded for purposes of calculating fees. The fee is typically payable quarterly in arrears based on the client's average daily account balance for the prior quarter. If the agreement is executed at any time other than the first day of the calendar quarter, fees will apply on a pro rata basis, which means that the fees are payable in proportion to the number of days in the quarter.

In limited circumstances, HBW may bill fees differently than what's described above. For example, fees may be billed monthly rather than quarterly; fees may be based on account balance at the end of a billing period instead of an average daily balance; or fees may be billed in advance rather than arrears. The specific fee and the methodology by which the fee is calculated will be specified in the Investment Advisory Agreement executed with our firm.

HBW will deduct its fee directly from client accounts through the qualified custodian holding the funds and securities. Fees will only be deducted when the client has given HBW written authorization permitting the fees to be paid directly from the client's account. Further, the qualified custodian will deliver an account statement to the client at least quarterly. These account statements will show all disbursements from the account. Clients are encouraged to review all statements for accuracy.

*Under certain circumstances HBW offers combined ongoing financial planning and asset management services at a fixed rate of up to $10,000 depending on the size, complexity and hours estimated to complete the project. Fees are payable quarterly in arrears.

Client may rescind the client agreement within five (5) business days after its effective date, by giving written notice to Financial Advisor or HBW. If the client rescinds within five (5) business days, the contract will be terminated without compensation to HBW.

Either the client or HBW may terminate the contract by giving written notice to the other. Clients may terminate their agreement at any time. Please allow ten business days to process the written notice and cancel the application. Clients will be responsible to pay compensation for all services rendered under the agreement until the effective date of termination, or the date written notice of termination is received by HBW or Financial Advisor. In the event the client terminates an asset management relationship prior to the end of the quarter, pro-rated quarter fees will be assessed to the date of termination.

Financial Planning and Consulting Fees
Depending on the financial planning services contracted for, HBW charges either a fixed fee up to $2,500 or an hourly rate of up to $300 per hour. The fee is negotiable depending upon the complexity and scope of the plan and/or service, the client's financial situation and objectives. An estimate of the total time/cost will be determined at the start of the advisory relationship. In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, HBW will notify the client and request approval of any additional fee.

HBW will not require prepayment of a fee more than six months in advance and in excess of $1,200.

At the firm's discretion, HBW may offset the financial planning fees to the extent the client implements the financial plan through the Asset Management Service.

Financial planning fees are negotiable and payable quarterly in arrears. Clients may terminate the financial planning agreement by providing written notice to the firm.

Fees for Selection of Other Advisers
HBW does not charge a separate fee for the selection of other advisers. The firm will share in the advisory fee paid directly to the TPMM. The advisory fee paid to the TPMM is established and payable in accordance with the brochure provided by each TPMM to whom clients are referred. These fees may or may not be negotiable. HBW's compensation may differ depending upon the individual agreement the firm has with each TPMM. As such, a conflict of interest exists where the firm or persons associated with the firm have an incentive to recommend one TPMM over another TPMM with whom the firm has more favorable compensation arrangements or other advisory programs offered by TPMMs with whom the firm has less or no compensation arrangements.

Fees for Co-Advisor Management
HBW will execute a tri-party agreement with client and Co-Advisor which will determine and disclose the fee charged to a client. HBW's compensation may differ depending upon the individual agreement the firm has with each Co-Advisor. As such, a conflict of interest exists where the firm or persons associated with the firm have an incentive to recommend one Co-Advisor over another.

Online Portfolio Management Platform Fees
The annual fee for Online Portfolio Management will not exceed 1.50%. HBW's annual portfolio management fee is billed and payable quarterly in arrears based on client's average daily account balance for the prior quarter. If the management agreement is executed at any time other than the first day of a calendar quarter, HBW's fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which client is a client.

Betterment LLC will share in a portion of the advisory fee client pays to HBW. Client will be required to sign an agreement directly with Betterment LLC as well as a discretionary agreement with HBW. Clients may terminate the advisory relationship with Betterment LLC according to the terms of agreement with Betterment LLC. Clients should review Betterment LLC's brochure for specific information on how to terminate their advisory relationship with them and how the client may receive a refund, if applicable. Clients should contact Betterment LLC directly for questions regarding the advisory agreement with Betterment LLC. Clients should also refer to the Betterment LLC Appendix 1 – Wrap Brochure, for a complete discussion of fees and expenses associated with this Program.

Sub-Adviser Fees
HBW may act as a sub-adviser to unaffiliated third parties. Currently the firm offers services to Midland National Life Insurance Co (MNL) and is compensated by MNL 35 basis points per year prorated quarterly for those services. HBW may enter into future sub advisory agreements in the future.

Subscription Services
HBW offers subscription services for company sponsored retirement plans. HBW has entered into an agreement with 401kwealthengine.com to provide investment advice for plan participants. The subscription price is $35/month of which HBW is compensated $16/month.

Additional Fees and Expenses
As part of HBW's investment advisory services, clients may invest in mutual funds and exchange traded funds. The fees that clients pay to HBW for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Clients will also incur transaction charges and/or brokerage fees when

purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom the account transactions are executed. HBW does not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost, clients should review all the fees charged by mutual funds, exchange traded funds, the firm, and others. For information on HBW's brokerage practices, refer to the *Brokerage Practices* section of this brochure.

Mutual Fund Share Classes
Mutual funds are sold with different share classes, which carry different cost structures. Each available share class is described in the mutual fund's prospectus. When we purchase, or recommend the purchase of, mutual funds for a client, we select the share class that is deemed to be in the client's best interest, taking into consideration cost, tax implications, and other factors. When the fund is available for purchase at net asset value, we will purchase, or recommend the purchase of, the fund at net asset value. We also review the mutual funds held in accounts that come under our management to determine whether a more beneficial share class is available, considering cost, tax implications, and the impact of contingent deferred sales charges.

Compensation for the Sale of Securities or Other Investment Products
Persons providing investment advice on behalf of HBW may be registered representatives with an independent broker-dealer that's under separate ownership and not affiliated with HBW. Such registration will be disclosed in the individual investment adviser representative's Form ADV Part 2B disclosure brochure. This presents a conflict of interest and gives registered representatives' incentive to recommend investment products or services offered by broker-dealer based on the compensation received, rather than on client needs. Registered representatives receive compensation directly from broker-dealer if clients purchase investment products or services offered by broker-dealer. Registered representatives may also receive commission-based compensation in connection with the purchase and sale of insurance and securities, including 12b-1 fees. This compensation is separate from any HBW advisory fees. HBW prohibits registered representatives from charging fees on commission based products. Clients are under no obligation, contractually or otherwise, to purchase investment products or services offered by broker-dealer.

Persons providing investment advice on behalf of HBW may also be licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell. Insurance commissions earned by these persons are separate to HBW's advisory fees. HBW prohibits insurance agents from charging fees on commission based insurance products. Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the firm.

IRA Rollover Considerations
As part of HBW's investment advisory services, the firm may recommend that clients withdraw assets from their employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that HBW will manage on the client's behalf. If the client elects to roll the assets to an IRA that is subject to HBW's management, an asset based fee will be charged as set forth in the agreement executed with the firm. This practice presents a conflict of interest because persons providing investment advice on HBW's behalf have an incentive to recommend a rollover for the purpose of generating fees based compensation rather than solely based on client needs. Clients are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if clients do complete the rollover, they are under no obligation to have the assets in an IRA managed by HBW. Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are

available, clients should consider the costs and benefits of:

An employee will typically have four options:

1. Leaving the funds in the employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change HBW encourages clients to speak with a CPA and/or tax attorney.

Clients should consider the following, when considering whether to roll over retirement funds into an IRA managed by HBW:

1. Determine whether the investment options in the employer's retirement plan address your needs or whether you might want to consider other types of investments.
    1. Employer retirement plans generally have a more limited investment menu than IRAs.
    2. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
    1. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
    2. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age73.
6. If you are separating from service with your employer between the ages 55 and 59.5 you may withdraw money from a 401k penalty free.
7. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
    1. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
8. You may be able to take out a loan on your 401k, but not from an IRA.
9. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
10. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
11. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that the client understand the differences between these types of accounts and to decide whether a rollover is best for their circumstances. Prior to proceeding, if a client has questions, they are encouraged to contact their investment adviser representative, or call HBW's main number as listed on the cover page of this brochure.

When HBW provides investment advice regarding a client's retirement plan account or individual retirement account, HBW is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way HBW makes money creates some conflicts with a client's interests, so HBW operates under a special rule that requires our firm to act in our client's best interest and not put our interest ahead of a client. Under this special rule's provisions, HBW must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of clients when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that Diversified gives advice that is in our client's best interest;
- Charge no more than is reasonable for our services; and
- Give clients basic information about conflicts of interest.

HBW benefits financially from the rollover of client assets from a retirement account to an account that our firm manages or provides investment advice, because the assets increase HBW’s assets under management and, in turn, our advisory fees. As a fiduciary, HBW only recommends a rollover when we believe it is in a client's best interest.

Item 6 Performance-Based Fees and Side-By-Side Management

HBW does not accept any performance-based fees.

Item 7 Types of Clients

HBW generally provides investment advice to individuals. Individuals make up more than 75% of all the accounts held at HBW. HBW also provides advisory services to businesses, trusts, estates, charitable organizations, pension and profit sharing plans. Requirements for opening and maintaining accounts for certain investments may be imposed by the custodians at the platform or other third party investment advisors managing the account. Generally, HBW does not require a minimum dollar amount to open and maintain an advisory account.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

HBW believes that no single investment philosophy is right for everyone. Further, we believe that different philosophies may capture market returns at different times. A classic buy and hold approach is often best in increasing markets and a tactical asset allocation approach is often best when the markets reach historic valuations. For many investors a blended approach may make sense. An example would be a portfolio that uses a tactical asset allocation that, along with fixed income allocations, helps mitigate downside risk, by typically investing in broadly diverse asset classes that may help capture market returns in rising markets.

The relatively few strategies which are managed directly by HBW (rather than third parties) share common core principals. That core principal can be defined as a commitment to the pursuit of the highest quality assets we can find, whether those are individual stocks, mutual funds or ETFs. And we define quality in terms of liquidity, profitability, growth, durability, and capital stewardship.

HBW's most basic belief and guiding principle is in providing our advisors and clients the tools they need to stay the course, to stick to their financial plans, to seek control of the factors that form the basis of all other investment success: saving, asset protection through insurance, and tax planning. We also believe our clients' relationship with their advisor is among their most important assets when times are challenging.

At HBW we select TPMM's that employ strategic, tactical and alternative asset strategies in an attempt to minimize investment risk and market loses. At HBW we believe that avoiding large losses is more important than trying to capture all of the upside. We believe in diversifying by asset class and by investment strategy. We use multi-manager platforms to accomplish this. Of course all investing involves the risk of losing principal that clients should be prepared to bear.

In addition to our primary use of TPMM's on our multi manager platform, HBW also has solicitor agreements with a wide variety of TPMM's that our HBW Representatives can utilize.

HBW offers brokerage accounts where the HBW representative may use their own investment strategies. These investment strategies are closely monitored by HBW and are designed to offer customized investment portfolios for clients. All clients are required to complete a thorough risk tolerance, investment objective questionnaire and must be a suitable investor for the respective strategies. Clients are reminded quarterly to update HBW if their risk tolerance has changed. Upon receipt of any change the representative may reallocate the clients assets.

Investing in any securities involves risk of loss and clients of HBW should be prepared to take this risk.

Each investment strategy offered through HBW TPMM's is unique and involves material risks that are described in detail on fact sheets available for each strategy. Since most investment strategies offered through HBW TPMM's involve tactical or absolute return style investing performance can be uncorrelated to major market indices. Therefore investment risk is shifted from market performance to money manager's skill. While HBW selects and monitors TPMM's that we believe can achieve prudent risk-adjusted investment results there is no assurance that the skill of the TPMM's will achieve desired results. Most investment strategies employed by our TPMM's will involve moving assets to fixed income or cash positions during periods of high market volatility to preserve principal. Some investment strategies will employ the use of inverse investments in an attempt to make gains in down markets. Use of inverse investments can result in losses during 'up' markets. The use of fixed income or cash positions can result in lack of participation in market 'up' sides. Therefore the defensive techniques of cash or inverse investments can lead to losses if the TPMM's employ them in periods of 'up' markets. Therefore performance of these types of investments is largely dependent on the skill of the TPMM's and may not be correlated with major market indices. Further, due to the frequent trading of securities employed by these types of strategies, the majority of capital gains will be short term capital gains which are taxed as ordinary income. Since ordinary income tax rates are typically higher than long term capital gains rates, clients utilizing these strategies should consider adverse tax consequences for non-tax qualified accounts. This adverse tax ramification is not a factor for qualified accounts such as IRA's, Simples, 401(k)'s, Roth's, SEP's, etc. Since these strategies involve frequent trading, to avoid increased brokerage and other transaction fee costs, HBW utilizes an asset based custody trading platform for its tactically managed accounts. This trading platform helps contain brokerage and transaction costs. HBW offers a brokerage platform for less frequently traded accounts were trades are transaction fee based.

Private placement offerings are speculative, involve unique risks, and are not suitable for all clients. Private placements are intended for experienced and sophisticated investors who are willing to bear the high economic risks of the investment. You could lose your entire investment. You will not be able to sell the securities you invest in as easily as you would a publicly traded stock. You may have to hold your investment indefinitely. Important risks of the investment can include: loss of all or a substantial portion of the investment due to leveraging, short-selling or other speculative investment practices; lack of liquidity in that there may be no secondary market for the investment and none expected to develop; volatility of returns; restrictions on transferring interests in the investment; potential lack of diversification and resulting higher risk due to concentration of trading authority when a single adviser is used; absence of information regarding valuations and pricing; delays in tax reporting; less regulation and higher fees than mutual funds; risks associated with the operations, personnel, and processes of the manager of the funds investing in alternative investments. You should read and understand the information provided to you regarding the investment, including any offering memorandum or private placement memorandum that describes the investment. Pay particular attention to any risk factors that are described to you. In addition, you should carefully consider the terms of any subscription agreement or other agreements you have to enter into for the investment.

In some cases, HBW may recommend structured products. A structured product, also known as a market-linked product, is generally a pre-packaged investment strategy based on derivatives, such as a single security, a basket of securities, options, indices, commodities, debt issuances, and/or foreign currencies, and to a lesser extent, swaps. Structured products are usually issued by investment banks or affiliates thereof. They have a fixed maturity and have two components: a note and a derivative. The derivative component is often an option. The note provides for periodic interest payments to the investor at a predetermined rate, and the derivative component provides for the payment at maturity. Some products use the derivative component as a put option written by the investor that gives the buyer of the put option the right to sell to the investor the security or securities at a predetermined price. Other products use the derivative component to provide for a call option written by the investor that gives the buyer of the call option the right to buy the security or securities from the investor at a predetermined price. A feature of some structured products is a "principal guarantee" function, which offers protection of principal if held to maturity. However, these products are not always Federal Deposit Insurance Corporation insured; they may only be insured by the issuer, and thus have the potential for loss of principal in the case of a liquidity crisis, or other solvency problems with the issuing company. Investing in structured products involves a number of risks including but not limited

to: fluctuations in the price, level or yield of underlying instruments, interest rates, currency values and credit quality; substantial loss of principal; limits on participation in any appreciation of the underlying instrument; limited liquidity; credit risk of the issuer; conflicts of interest; and, other events that are difficult to predict.

We may use artificial intelligence ("AI") in our business operations, in order to promote operational efficiency and augment our client service. We currently do not knowingly utilize AI in our investment selection process or to formulate the specific investment advice we render to you. AI models are highly complex and may result in output that is incomplete or incorrect. Our use of AI may include certain third-party technologies aimed at driving operational efficiency by automating meeting prep, meeting notes, CRM updates, meeting recap notes, task management, and other client service related functions. We believe the use of this technology allows us to reduce administrative time, prepare for client engagement, and improve overall client experience. The use of AI poses risks related to the challenges the Company faces in properly managing its use. Content generated by AI technologies may be deficient, inaccurate, or biased, and the use of AI tools may lead to errors in decision-making. Use of AI tools could also pose risks related to the protection of client or proprietary information. Such risks may include the exposure of confidential information to unauthorized recipients, violation of data privacy rights, or other data leakage events. For example, in the case of generative AI, if confidential information, including material non-public information or personal identifiable information is input into an AI application, such information is at risk of becoming part of a dataset accessible by other AI applications and users. The regulatory environment relating to AI is rapidly evolving and could require changes in our adoption and implementation of AI technology in the future. The use of AI may also expose us to potential litigation risk or regulatory risk.

Item 9 Disciplinary Information

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures under this item.

Item 10 Other Financial Industry Activities and Affiliations

Recommendation of Other Advisers
HBW may recommend that clients use a third party money manager ("TPMM") based on their needs and suitability. HBW will receive compensation from the TPMM for recommending that clients use their

services. These compensation arrangements present a conflict of interest because HBW has a financial incentive to recommend the services of the third party adviser. Clients are not obligated, contractually or otherwise, to use the services of any TPMM recommended. Refer to the *Advisory Business* section above for additional disclosures on this topic.

Arrangement with Independent Broker-Dealer
Persons providing investment advice on behalf of HBW may be registered representatives with an independent broker-dealer that's under separate ownership and not affiliated with HBW, as disclosed in the individual representative's Form ADV Part 2B disclosure brochure. Registered representatives may have an incentive to recommend investment products or services offered by broker-dealer based on the compensation received, rather than on client needs. Registered representatives will receive compensation directly from broker-dealer if clients purchase investment products or services offered by broker-dealer. Registered representatives may also receive commission-based compensation in connection with the purchase and sale of insurance and securities, including 12b-1 fees for the sale of investment company products. This compensation is separate from any HBW advisory fees and clients should be aware that the receipt of additional compensation creates a conflict of interest that may impair registered representatives' when making recommendations. HBW puts the interest of its clients first as part of our fiduciary duty as a registered investment adviser. HBW prohibits registered representatives from charging advisory fees on products for which they have earned commission. Clients are under no obligation, contractually or otherwise, to purchase investment products or services offered by broker-dealer.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Standard of Conduct:
HBW and its personnel subscribe to a strict code of ethics that requires the interests of the advisory client be placed above everything else. All activities conducted by HBW on behalf of advisory clients must benefit the client. A complete copy of HBW's code of ethics is listed below. The Investment Advisers Act of 1940 imposes a fiduciary duty on investment advisers and as such HBW has a duty of utmost good faith to act solely in the best interests of each of our clients. Our clients entrust us with their funds which in turn places a high standard on our conduct and integrity. Our fiduciary duty compels all employees to act with the utmost integrity in all of our dealings. This fiduciary duty is the core principal underlying the Code of Ethics and the personal trading policy, and represents the expected basis of all of our dealings with our clients

This Code of Ethics consists of the following core principles:

1. The interests of clients will be placed ahead of HBW's or any employee's own investment interests.
2. Employees are expected to conduct their personal securities transactions in accordance with the personal trading policy and will strive to avoid any actual or perceived conflict of interest with the client. Employees with questions regarding the appearance of a conflict with a client should consult with the CCO before taking action that may result in an actual conflict.
3. Employees will not take inappropriate advantage of their position with HBW.
4. Employees are expected to act in the best interest of each of our clients.
5. Employees are expected to comply with all federal and state securities laws and strict adherence to the policy manual will assist the employee in complying with this important requirement.

A copy of the Code of Ethics will be provided to any client of prospective client upon request.

Participation or Interest in Client Transactions
Neither HBW nor any persons associated with the firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices
HBW or persons associated with the firm may buy or sell the same securities that are recommended to clients or securities in which clients are already invested. A conflict of interest exists in such cases because HBW has the ability to trade ahead of the client and potentially receive more favorable prices than the client will receive. To mitigate this conflict of interest, it is the firm's policy that neither HBW nor persons associated with the firm shall have priority over any client account in the purchase or sale of securities.

Block Trading
HBW or persons associated with the firm may buy or sell securities for clients at the same time HBW or persons associated with the firm buy or sell such securities for their own account. HBW may also combine our orders to purchase securities with client orders to purchase securities ("block trading"). Refer to the *Brokerage Practices* section in this brochure for information on block trading practices.

Item 12 Brokerage Practices

HBW has made arrangements with several custodial broker-dealers to provide execution and custodial services at reasonable and customary rates that are believed to be in the client's best interests. HBW will add additional broker-dealer platforms or change a broker-dealer if it deems necessary based on a variety of factors such as cost, accuracy, and timeliness of trades, capacity, and service. Representatives have research available to them on the broker-dealer website or other outside sources, but such research is obtained without a "soft dollar benefit" arrangement. HBW does not pay additional fees for any research. HBW does not direct client transactions to a particular broker-dealer in return for client referrals or for any other incentive which may not be in the best interest of the client's needs.

Under limited circumstances, and at the firm's sole discretion, HBW may permit clients to direct brokerage. Directed brokerage may cost the client more money because HBW does not have the ability to negotiate commission rates and expenses.

Betterment Online Portfolio Management Platform
HBW requires that clients who participate in HBW's online portfolio management platform use MTG, LLC dba Betterment Securities ("Betterment Securities"), a registered broker-dealer, member SIPC, as the qualified custodian. HBW is independently owned and operated and is not affiliated with Betterment Securities. Betterment Securities will hold client's assets in a brokerage account and buy and sell securities when HBW and/or client instructs them to. While HBW recommends that clients use Betterment Securities as custodian/broker, the client will decide whether to do so and will open an account with Betterment Securities by entering into an account agreement directly with them. HBW does not open the account for the client, although HBW may assist the client in doing so. If the client does not wish to place their assets with Betterment Securities, then HBW cannot manage the client's account on Betterment Institutional (defined below).

For HBW clients' accounts that Betterment Securities maintains, Betterment Securities generally does not charge the client separately for custody services, but is compensated as part of the Betterment Institutional platform fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. HBW has determined that having Betterment Securities execute trades is consistent with HBW's duty to seek "best execution" of client's trades. Best execution means the most favorable terms

for a transaction based on all relevant factors, including those listed above.

Betterment Securities serves as broker dealer to Betterment Institutional ("Betterment Institutional"), an investment and advice platform serving independent investment advisory firms like HBW. Betterment Institutional also makes available various support services which may not be available to Betterment's retail customers. Some of those services help HBW manage or administer clients' accounts, while others help HBW manage and grow HBW's business. Betterment Institutional's support services are generally available on an unsolicited basis (HBW doesn't have to request them) and at no charge to us. Following is a more detailed description of Betterment Institutional's support services:

- SERVICES THAT BENEFIT CLIENT. Betterment Institutional includes access to a range of investment products, execution of securities transactions, and custody of client assets through Betterment Securities. Betterment Securities' services described in this paragraph generally benefit client and client's account.

- SERVICES THAT MAY NOT DIRECTLY BENEFIT CLIENT. Betterment Institutional also makes available to HBW other products and services that benefit HBW, but may not directly benefit client or client's account. These products and services assist us in managing and administering HBW clients' accounts, such as software and technology that may:

    - Assist with back-office functions, recordkeeping, and client reporting of HBW's clients' accounts.
    - Provide access to client account data (such as duplicate trade confirmations and account statements).
    - Provide pricing and other market data.
    - Assist with back-office functions, recordkeeping, and client reporting.

- SERVICES THAT GENERALLY BENEFIT ONLY HBW. By using Betterment Institutional, HBW will be offered other services intended to help HBW manage and further develop HBW's business enterprise. These services include:

    - Educational conferences and events.
    - Consulting on technology, compliance, legal, and business needs.
    - Publications and conferences on practice management and business succession.

- *HBW's INTEREST IN BETTERMENT SECURITIES' SERVICES.* The availability of these services from Betterment Institutional benefits HBW because HBW does not have to produce or purchase them. In addition, HBW doesn't have to pay for Betterment Securities' services. These services may be contingent upon HBW committing a certain amount of business to Betterment Securities in assets in custody. HBW may have an incentive to recommend that client maintain client's account with Betterment Securities, based on HBW's interest in receiving Betterment Institutional and Betterment Securities' services that benefit HBW's business rather than based on client's interest in receiving the best value in custody services and the most favorable execution of client's transactions. This is a potential conflict of interest. HBW believes, however, that HBW's selection of Betterment Securities as custodian and broker is in the best interests of HBW's clients. HBW's selection is primarily supported by the scope, quality, and price of Betterment Securities' services and not Betterment Institutional and Betterment Securities' services that benefit only HBW.

Item 13 Review of Accounts

REVIEWS: Managed accounts are reviewed quarterly. Account transactions are reviewed daily. Financial planning accounts are reviewed annually. The calendar is the triggering factor. Accounts at TPMMs are reviewed when HBW receives their statements - usually quarterly. Unscheduled review may occur as needed or if the client requests such.

REVIEWERS: Todd Penrod reviews or designates someone to review all client accounts at this time. Reviews are performed on a portfolio analysis basis.

REPORTS: Clients of HBW receive quarterly reports from account custodians, mutual funds or other TPMMs showing account values. Clients receive confirmations of all transactions unless they choose to opt out.

Item 14 Client Referrals and Other Compensation

HBW holds occasional training events for our representatives. At these events other Third Party Money Managers (TPMM) are invited to attend to train our representatives about their products, in return for a speaking slot on the agenda a cost will be imposed to them. This cost offsets the cost of the event. EQIS Capital is an Investment Advisor who provides economic benefits to HBW. Their compensation is based on a percentage of the assets of their platform. In both instances this is a conflict of interest and is mitigated by our representatives by acting in the best interest of the client and by our Standard of Conduct stated earlier. TCA provides economic benefits to HBW. TCA provides to HBW an annual marketing budget to offset training of HBW reps and other marketing projects. This is a conflict of interest and is mitigated by our representatives by acting in the best interest of the client and by our Standard of Conduct stated earlier.

HBW receive a non-economic benefit from Betterment Institutional and Betterment Securities in the form of the support products and services it makes available to HBW and other independent investment advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit HBW, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to HBW of Betterment Institutional and Betterment Securities' products and services is not based on HBW giving particular investment advice, such as buying particular securities for HBW's clients.

HBW or its associated persons have entered into agreements whereby HBW compensates certain web-based service providers for client referrals that may result in the provision of investment advisory services by HBW. Both HBW and the third-party promoter must comply with the requirements of the jurisdictions in which they operate, and with Rule 206(4)-1 under the Advisers Act. A referred individual receives a copy of this brochure along with any applicable disclosure statements. The third-party promoter that makes the referral to HBW will receive a fixed referral fee or may charge a subscription fee for HBW's participation in their referral program. Such compensation is paid pursuant to a written agreement with the third-party promoter and may be terminated by either party at any time. A client will not pay additional fees because of this referral arrangement and the cost of any such referral fee will be borne entirely by HBW. A promoter has a financial incentive to recommend HBW for advisory services. This creates a conflict of interest; however, referred individuals are not obligated to retain HBW for advisory services. Comparable services and/or lower fees may be available through other firms. Promoters that refer business to more than one investment adviser may have a financial incentive to recommend advisers with more favorable compensation arrangements.

Item 15 Custody

As paying agent for the firm, an independent custodian will directly debit client account(s) for the

payment of advisory fees. This ability to deduct its advisory fees from client accounts causes HBW to exercise limited custody over funds or securities. HBW does not have physical custody of any of client funds and/or securities. Client funds and securities will be held with a qualified custodian. Clients will receive account statements from the qualified custodian(s) holding the funds and securities at least quarterly. The account statements from the custodian(s) will indicate the amount of HBW's advisory fees deducted from the account(s) each billing period. Clients should carefully review account statements for accuracy.

Asset Transfer and/or Standing Letter of Authorization
HBW, or persons associated with HBW, may affect asset/fund transfers from client accounts to one or more third parties designated, in writing, by the client without obtaining written client consent for each separate, individual transaction, as long as the client has provided us with written authorization to do so. Such written authorization is known as a Standing Letter of Authorization ("SLOA"). An adviser with authority to conduct such third party asset/fund transfers has access to the client's assets, and therefore has custody of the client's assets in any related accounts.

Based on an SEC no-action letter, HBW does not have to obtain a surprise annual audit, as would otherwise be required by reason of having custody, as long as HBW meets the following criteria:

1. You provide a written, signed instruction to the qualified custodian that includes the third party's name and address or account number at a custodian;
2. You authorize us in writing to direct transfers to the third party either on a specified schedule or from time to time;
3. Your qualified custodian verifies your authorization (e.g., signature review) and provides a transfer of funds notice to you promptly after each transfer;
4. You can terminate or change the instruction;
5. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
6. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
7. Your qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

HBW hereby confirms that it meets the above criteria.

Item 16 Investment Discretion

Before HBW can buy or sell securities on behalf of its client, they must first sign a discretionary management agreement and the appropriate trading authorization forms. For clients who engage HBW for non-discretionary asset management, HBW will obtain specific approval from a client before executing securities transactions on behalf of the client.

Item 17 Voting Client Securities

HBW will not vote proxies on behalf of client advisory accounts. At the client's requests, the firm may offer advice regarding corporate actions and the exercise of proxy voting rights. If clients own shares of applicable securities, they are responsible for exercising their right to vote as a shareholder.

In most cases, clients will receive proxy materials directly from the account custodian. However, in the event the firm receives any written or electronic proxy materials, they will be forwarded directly to the client.

Item 18 Financial Information

HBW does not have any financial condition or impairment that would prevent them from meeting its contractual commitments to its clients. HBW does not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, does not require the prepayment of more than $1,200 in fees six or more months in advance. Therefore, the firm is not required to include a financial statement with this brochure.

Item 19 Requirements for State-Registered Advisers

HBW is a federally registered investment adviser; therefore, not required to respond to this item.

Item 20 Additional Information

Your Privacy
HBW views protecting client private information as a top priority. Pursuant to applicable privacy requirements, HBW has instituted policies and procedures to ensure that client personal information is kept private and secure.

HBW does not disclose any nonpublic personal information to any non-affiliated third parties, except as permitted by law. In the course of servicing the account, HBW may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

HBW restricts internal access to nonpublic personal information about clients to employees, who need that information in order to provide products or services. The firm maintains physical and procedural safeguards that comply with regulatory standards to guard client nonpublic personal information and to ensure its integrity and confidentiality. HBW will not sell information about the client or their accounts to anyone. HBW does not share client information unless it is required to process a transaction, at client request, or required by law.

Clients will receive a copy of the Firm's privacy notice prior to or at the time of signing an advisory agreement with HBW. Thereafter, the Firm will deliver a copy of the current privacy policy notice to its clients on an annual basis. Contact the main office at the telephone number on the cover page of this brochure with any questions regarding this policy.

If a client decides to close their account(s) HBW will adhere to its privacy policies, which may be amended from time to time.

If the firm makes any substantive changes in it privacy policy that would further permit or require disclosures of private information, the firm will provide the client with written notice. Where the change is based on permitted disclosures, clients will be given an opportunity to direct HBW as to whether such disclosure is acceptable. Where the change is based on required disclosures, HBW will only receive written notice of the change. Clients may not opt out of the required disclosures.

Please contact our main office at the telephone number on the cover page of this brochure if you have questions about our privacy policies.

Trade Errors
In the event a trading error occurs, HBW's policy is to restore the account to the position it should have

been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

Class Action Lawsuits

HBW does not determine if securities held by its clients are the subject of a class action lawsuit or whether they are eligible to participate in class action settlements or litigation nor does the firm initiate or participate in litigation to recover damages on its clients' behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held in their accounts.