

ITEM 1. COVER PAGE



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FORM ADV PART 2A DISCLOSURE BROCHURE MARCH 31, 2025

This disclosure brochure provides information about the qualifications and business practices of RWA Private Wealth ("RWA"), a division of RWA Wealth Partners, LLC. If you have any questions about the contents of this brochure, please contact compliancegroup@rwawealth.com.

RWA Wealth Partners, LLC is a registered investment adviser with the United States Securities and Exchange Commission ("SEC"). Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an investment adviser provide you with information from which you determine to hire or retain the investment adviser. The information in this disclosure brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about RWA Wealth Partners, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2. MATERIAL CHANGES

MATERIAL CHANGES

This Brochure replaces the previous Brochure dated March 30, 2024, for RWA Wealth Partners, LLC. This section summarizes only the material changes to the Brochure and does not describe all the changes made in this Brochure.

The previous Brochure provided information about the business practices, fees and potential conflicts of interest for RWA Wealth Partners, LLC. Within RWA Wealth Partners, LLC there are two separate divisions that provide advisory services. The two divisions have materially different business practices, fees and potential conflicts of interest for clients and potential clients to consider. This Brochure clearly outlines the business practices, fees and potential conflicts of interest that clients and potential clients of RWA Private Wealth should consider.

ITEM 4. ADVISORY BUSINESS

- Revised to accurately describe the history of RWA Wealth Partners, LLC and RWA Private Wealth.
- Revised and reorganized to describe the services offered by RWA Private Wealth and the fees charged for these services.

ITEM 12. BROKERAGE PRACTICES

- Reorganized to concisely and clearly describe RWA Private Wealth's relationships with its Recommended Custodians and the potential conflicts of interest these relationships create.

ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION ITEMS

- Added language to accurately disclose the conflicts of interest that can arise from the manner in which employees of RWA Wealth Partners are compensated.

ITEM 16. INVESTMENT DISCRETION

- In 2025, RWA began offering class action litigation monitoring, claim filing, and claim payment distribution services for the securities maintained in new accounts opened at Fidelity or Schwab.

ITEM 17. VOTING CLIENT SECURITIES

- In 2025, RWA began offering Proxy Voting services to new clients utilizing RWA's Recommended Custodians.

ITEM 3. TABLE OF CONTENTS

ITEM 1. COVER PAGE	1
ITEM 2. MATERIAL CHANGES	2
ITEM 3. TABLE OF CONTENTS.....	3
ITEM 4. ADVISORY BUSINESS	4
ITEM 5. FEES AND COMPENSATION	7
ITEM 6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT	9
ITEM 7. TYPES OF CLIENTS	9
ITEM 8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS.....	10
ITEM 9. DISCIPLINARY INFORMATION	13
ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS.....	14
ITEM 11. CODE OF ETHICS, INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING.....	14
ITEM 12. BROKERAGE PRACTICES.....	15
ITEM 13. REVIEW OF ACCOUNTS	18
ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION	18
ITEM 15. CUSTODY.....	20
ITEM 16. INVESTMENT DISCRETION	20
ITEM 17. VOTING CLIENT SECURITIES	21
ITEM 18. FINANCIAL INFORMATION	21

ITEM 4. ADVISORY BUSINESS

Adviser Investments, LLC was founded in 1994 and registered with the SEC in 2012.

In 2022, Adviser Investments, LLC acquired Polaris Wealth Advisory Group, LLC, a registered investment advisor based in California. In 2023, Adviser Investments, LLC acquired Ropes Wealth Advisors, LLC, a registered investment advisor based in Boston, Massachusetts.

On November 1, 2023, Ropes Wealth Advisors and Polaris Wealth Advisory Group terminated their registrations with the SEC and merged with Adviser Investments, LLC under the new name RWA Wealth Partners, LLC. Ropes Wealth Advisors continued to operate under the brand Ropes Wealth Advisors, a division of RWA Wealth Partners. The former Adviser Investments and Polaris Wealth Advisory Group began operating under the brand RWA Wealth Partners.

Beginning in 2025, Ropes Wealth Advisors rebranded as RWA Family Office, a division of RWA Wealth Partners, LLC. The former Adviser Investment and Polaris businesses operating as RWA Wealth Partners, were rebranded to RWA Private Wealth, a division of RWA Wealth Partners, LLC.

This Brochure is intended for clients and prospects of RWA Private Wealth (“RWA”). A separate brochure is available for clients and prospects of RWA Family Office.

RWA Wealth Partners, LLC (“the Firm”) is principally owned by certain investment vehicles advised by Summit Partners, L.P., an investment adviser registered with the SEC.

RWA has a legacy of offering commonsense wealth management solutions for individuals and families. Today, RWA offers coordinated financial planning, institutional quality investment management and integrated tax planning.

INVESTMENT MANAGEMENT

Investment Philosophy

RWA’s investment approach is based on the belief that asset allocation is the single largest driver of long-term investment returns. RWA provides investment advice to help clients increase their chances of meeting their investment goals by allocating among asset classes in an attempt to improve the overall return of a client’s portfolio and to mitigate risk. RWA’s goal is to smooth out return streams over time and create a long-term investment strategy that is revised only with a change in client circumstances. Shorter-term tactical asset allocation decisions in response to market movements or outlook are made by RWA to refine a portfolio’s long-term strategy.

Investment Platform

RWA employs an open architecture investment platform, which provides investment exposure to a full range of asset classes via mutual funds, exchange traded funds (“ETFs”) and separate accounts managed by third parties registered investment advisers. RWA also recommends investments in privately offered pooled investment vehicles, such as hedge funds, private equity funds or other similar vehicles (collectively and together with mutual funds and ETFs, “Investment Funds”) for clients who are qualified to invest in those funds and for whom these investments are otherwise deemed to be appropriate. RWA utilizes both active and index-oriented investment vehicles, depending on its judgment of the efficiency of an asset class. RWA trades individual stocks or fixed income securities for client portfolios in fulfillment of their investment objectives.

Investment Management Services

RWA works with each client to develop and execute an appropriate investment strategy for each portfolio. This includes establishing an investment objective and an appropriate asset allocation that is aligned with the client’s investment goals and constraints. Clients are permitted to impose reasonable investment

restrictions on investing in certain securities or types of securities. For instance, certain clients request to exclude certain asset classes, or individual securities, while other clients choose to customize their portfolio for impact investing. RWA also provides security research, monitoring, and diversification strategies to clients with concentrated equity holdings.

It is important to note, that if a client assigns investment management of their 401(k) account to RWA and the 401(k) plan does not allow client directed brokerage, RWA's investment advice will be limited to selecting from the 401(k) plan's investment options.

Customized Fixed Income and Cash Management

RWA offers high quality fixed income and cash management portfolios customized to each client's tax status, state of residence, and cash flow needs. RWA seeks to design each portfolio to deliver preservation of capital, reliable income stream and competitive total return. RWA focuses on disciplined, expert yield curve management and individual security selection, while targeting short-and intermediate-term maturity bonds, with a premium placed on high liquidity and low volatility. RWA employs extensive internal credit analysis to identify attractive sectors and individual bonds and has a network of over 100 fixed income dealers to execute trades. This approach seeks to provide the opportunity to capitalize on market inefficiencies to maximize total return potential, and to avoid taking on elevated credit or interest rate risk.

RWA Capital

The Firm offers internally managed tactical and fundamental investment strategies under the brand, RWA Capital, a division of RWA Wealth Partners, LLC. RWA Capital uses both fundamental analysis and proprietary, quantitative investment processes. For certain investment strategies, tactical asset allocation computer modeling processes are utilized to guide investment strategies and attempt to manage portfolio risk.

These strategies are available to be recommended by RWA to clients as part of their overall asset allocation. When RWA chooses to utilize a strategy offered by RWA Capital for a client, it only does so when it is in the best interest of the client. The client is not charged any investment management fees by RWA Capital.

Institutional clients can also engage the Firm and access these investment strategies as sub-advised portfolios or model portfolio recommendations. Model portfolio recommendations are typically provided under the terms of a data provider agreement or signal provider agreement. As a model portfolio provider, RWA Capital designs, monitors, and updates the model portfolios recommendations; however, the institutional client implements the model portfolio recommendations. Unlike sub-advised portfolio accounts, the Firm does not have investment discretion or trading authority to implement model portfolio recommendations, therefore is not responsible for the client's implementation of any model portfolio recommendations.

FINANCIAL PLANNING

At RWA, financial planning is provided to help each client understand their overall financial situation and help the client set and map out a course to determine and meet financial objectives. A typical financial plan includes any or all of the following: cash flow analysis and budgeting; debt management; retirement planning; disability, long-term care, life and other insurance needs.

INTEGRATED TAX PLANNING

Tax optimization is fully integrated in financial planning advice, investment management solutions and the implementation and execution of estate planning techniques.

Tax preparation and filing services are offered by RWA Tax Solutions, LLC, a wholly owned subsidiary of the Firm. Tax preparation and filing services are available for individuals, trusts, and other legal entities

under a separate agreement and at an additional cost. RWA also coordinates tax planning strategies with external accountants

COORDINATION OF CUSTODY SERVICES

All client funds and securities are held with independent qualified custodians. Clients can choose the independent qualified custodian where their assets are held; however, in many instances, RWA recommends a qualified custodian to provide custody services that include arranging for the safekeeping of assets. RWA generally recommends Fidelity Investments (“Fidelity”) or Charles Schwab (“Schwab”), collectively (“Recommended Custodians”) to act as the qualified custodian for client accounts.

LEGACY PLANNING

RWA works to educate clients on estate planning topics and will help coordinate the creation, review or revision of estate planning documents with legal professionals.

RETIREMENT PLAN ADVISORY SERVICES

RWA provides investment advisory services to employer-sponsored retirement plans. Depending on the type of retirement plan and the services agreed to, services can include discretionary investment management services for plan assets, selection of investment options for plan participants, development and maintenance of model portfolios for plan participants, and general investment education for participants.

ASSETS UNDER MANAGEMENT

As of December 31, 2024, the total amount of client assets under management by RWA was \$9,573,992,680. The amount of client assets managed on a discretionary basis was \$9,570,904,073 and the amount of client assets managed on a nondiscretionary basis was \$3,088,607.

As of December 31, 2024, the total amount of client assets under management by the Firm was \$17,255,241,142. The amount of client assets managed on a discretionary basis by the Firm was \$16,893,557,571 and the amount of client assets managed on a nondiscretionary basis by the Firm was \$361,683,571.

ITEM 5. FEES AND COMPENSATION

FEES FOR INVESTMENT MANAGEMENT

RWA's standard fee is the following:

Account Size	Annual Fee
Up to \$500,000	1.25%
Next \$1,500,000	1.00%
Next \$3,000,000	0.80%
Next \$5,000,000	0.60%
Next \$15,000,000	0.50%
Over \$25,000,000	Negotiable

RWA's standard custom fixed income and cash management fee is the following:

Annual Fee Based on Market Value of Managed Assets
0.20%

Investment management fees charged by RWA are negotiable and can be different than those set forth in the standard fee schedule noted above. In certain circumstances, RWA charges a flat or fixed fee, discounts fees or waives fees. Further, employees of RWA ("Affiliated Persons") typically receive services from RWA at a discount from the standard fee schedule or at no charge. Investment management fees for existing clients may vary depending upon the agreed fee at the commencement of the relationship. Each client's agreed upon fees are set forth in the Investment Management Agreement.

RWA deducts the fee automatically from most client accounts each calendar month in arrears based on the average daily market value of assets. RWA typically aggregates accounts within the same client relationship and with the same fee schedules for fee calculation purposes; therefore, the actual fee rate assessed on each account each month may be less than 1/12 of the agreed upon annual fee rate. For certain client accounts, RWA deducts fees quarterly in arrears. In certain circumstances (i.e., retirement accounts), RWA sends the client an invoice for its investment management fee. The fee commences on the date the client's investment management agreement is effective or on the date the client account is funded thereafter. The initial fee is prorated if the fee does not commence on the first business day of the month.

If RWA's services terminate other than on the last day of a calendar month, the fee will be pro-rated to cover the period from the beginning of the calendar month through the date of termination. If the client is charged fees quarterly and RWA's services terminate other than on the last day of the calendar quarter, the fee will be pro-rated to cover the period from the beginning of the calendar quarter through the date of termination.

RWA is entitled to retain as part of its fee any de minimis cash balance of \$5 or less remaining in or added to each account after each account has closed and its assets have been distributed.

Financial planning, professional estate and trust services, tax planning services, and coordination of custody services described above are all included in the investment management fee.

RWA Capital

The fees for internally managed investment strategies are included in the investment management fee.

Fees typically range between 0.25% and 1.00% annually for institutional clients who engage the Firm as a sub-advisor or utilize models recommended by the Firm.

Fees for Retirement Plan Advisory Services

For advisory services to employer-sponsored retirement plans, fees are negotiated on a case-by-case basis in accordance with the services required by the plan. Such fees are payable quarterly in arrears and as agreed to with the particular plan client based upon either the market value of the retirement plan's assets at the end of the quarter or the average daily market value of the retirement plan's assets for the calendar quarter.

Valuation of Assets

The valuations of marketable securities are made by the qualified custodian holding the assets and the qualified custodian follows its standard valuation procedures. Valuations of private funds and partnerships are based upon the valuations made by the manager or general partners of the private funds or partnerships, or by third party independent accountants or auditors of the private funds or partnerships. RWA takes the valuation of assets and the calculation of its asset-based fees seriously; however, RWA clients should verify whether the correct fees are being applied to a client's account. A client's statement from the qualified custodian reflects all amounts disbursed from the client's account, including the amount of any investment management fee paid to RWA or any investment management fee paid to any separate account manager.

ADDITIONAL FEES AND EXPENSES

Certain fees or charges are imposed by third parties in connection with investments made on behalf of a client's account, as described below. These fees will differ depending on the client's custodian as well as the types of investments and other transactions in the client's account. RWA's fees are exclusive of, and in addition to, any such applicable commissions, fees or costs, and RWA does not receive any portion of these fees.

Investment Fund Fees and Expenses

Investment Funds generally include an embedded expense ratio composed of a management fee and/or carried interest, and other administrative and operating expenses. Therefore, client investments in Investment Funds are subject to these fees. Additionally, some Investment Funds impose fees directly at the time of a transaction, including sales charges, redemption, exchange, and account fees ("Shareholder Fees"). Payment of Shareholder Fees varies depending upon a client's custodial arrangement, as described below in Brokerage and Custodial Fees. An explanation of the fees and expenses paid by each Investment Fund is contained in that fund's offering document. It is important to note that in recommending these investments, RWA examines the performance and attributes of the Investment Funds on a net-of-fee basis.

Brokerage and Custodial Fees

Brokerage and custodial fees vary depending on the client's custodian. These fees typically include brokerage commissions, Shareholder Fees for Investment Funds, and custodial fees (e.g., wire transfer and electronic fund processing fees). Certain qualified custodians have specific terms or fees when trading with an affiliated broker-dealer and different brokerage fees charged by a non-affiliated broker-dealer. Certain qualified custodians also impose additional fees ("trade-away fees") for trading with alternative broker-dealers. Other

qualified custodians have specific Shareholder Fees for certain types or series of Investment Funds. These fees are charged by and paid to the qualified custodian, broker-dealer or Investment Fund company, as applicable. RWA does not charge any brokerage fee or custodial fee and does not receive any portion of these fees paid to custodians, broker-dealers or Investment Funds.

For each client account, the trading desk takes into consideration any applicable terms, fees, and commission schedule imposed by the qualified custodian and executes trades through the most cost-effective broker-dealer consistent with execution quality. Please see Item 12 below for a more detailed discussion of brokerage practices.

Donor Advised Fund Fees

If client assets are allocated to a donor advised fund, the client will be responsible for paying all fees charged by the fund on those assets in addition to the RWA investment management fee. The fund will arrange for the payment of its own fees, typically from the liquidity portion of a client's allocation.

External Separate Account Manager Fees

For certain qualified clients, RWA engages external third-party investment managers to manage a portion or all of the client's assets, instead of buying shares of an Investment Fund. This can be a cost-effective approach for clients who can meet the minimum investment requirements of the external investment managers. If RWA engages an external third-party manager to manage a client's assets, the client is responsible for paying all fees charged by the third-party manager on those assets, in addition to RWA's investment management fee.

Tax Preparation and Filing Fees

RWA does not prepare and file taxes. RWA Tax Solutions can be separately engaged to provide tax returns for an additional fee.

ITEM 6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

"Performance-Based Fees" are fees that include a percentage of the capital gains or capital appreciation of client investments. RWA does not charge performance-based fees.

"Side-by-Side Management" refers to the management of multiple accounts with similar investment strategies and different fee structures. An adviser with side-by-side management has an incentive to allocate better performing assets to the performance-based fee accounts rather than fixed or asset-based fee accounts because the adviser stands to earn a larger fee.

Because RWA does not charge performance-based fees, side-by-side management conflicts do not apply to RWA. RWA takes into consideration performance-based fees and side-by-side management when evaluating managers.

ITEM 7. TYPES OF CLIENTS

RWA offers investment management services to individuals, families and their related entities, including trusts, charitable organizations and business entities. RWA also provides investment management and advisory services to retirement and profit-sharing plans.

Certain internal investment strategies, managed under the brand RWA Capital, are also offered to unaffiliated investment advisers, broker-dealers, TAMPs and institutions.

RWA generally requires a minimum aggregate account value of \$500,000. Accounts in one household can be combined to meet this minimum. The minimum relationship size requirement can be waived at RWA's discretion.

ITEM 8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

INVESTMENT MANAGEMENT PROCESS

RWA's investment advisory services take a client-centered approach that begins with the identification of each client's individual goals and objectives, risk tolerance, tax situation, holding structures and other individual factors in order to establish an appropriate investment objective and long-term asset allocation investment strategy. The implementation of the recommended investment strategy can be customized for that client's individual circumstances.

RWA's open architecture investment platform provides investment exposure to a full range of asset classes to fulfill each client's investment strategy through mutual funds, ETFs, and separate accounts managed internally or by unaffiliated third parties. RWA also recommends investments in privately offered pooled investment vehicles, such as hedge funds, private equity funds or other similar vehicles for clients who are qualified to invest in those funds and for whom these investments are otherwise deemed to be appropriate. RWA utilizes both active and index-oriented investment vehicles, depending on its judgment of the efficiency of an asset class. From time to time, RWA also trades individual stocks and fixed income securities for client portfolios in fulfillment of their investment strategies.

RWA uses a quantitative screening process to identify investment managers and appropriate investment vehicles from a vast array of choices for asset allocation strategies. These quantitative factors include screening prospective managers based on information ratio trends, consistency of strategy, holdings and returns-based stylistic analysis, and net after-tax returns. RWA then evaluates the managers that pass the quantitative screen on a qualitative basis. Qualitative measures include management tenure, firm ownership, and a personal interview with the manager to confirm the investment process and commitment to the investment strategy. Managers are evaluated on an ongoing basis and replaced as necessary.

RWA also offers asset allocation model strategies using external investment managers that consider environmental, social and governance ("ESG") factors in their investment process. In addition to considering the client's specific risk and return requirements, tax situation, and other assets, these investment strategies can be further tailored to seek a client's individual ESG goals. RWA generally applies the same quantitative and qualitative standards used in evaluating the traditional investment strategies but also evaluates each manager's ESG factors as part of the manager due diligence and selection process.

RWA relies on each client to promptly notify their client team in writing of any material changes to the client's financial condition including, but not limited to, investment objective, risk tolerance, net worth, annual income, and investment time horizon.

KEY RISKS OF RWA'S INVESTMENT STRATEGIES

Below is a summary of potentially material risks for the most common RWA investment strategies used, the methods of analysis used and/or the particular types of investments typically held in client accounts. The risks noted below are applicable to Investment Funds purchased for client accounts, separate accounts managed by third parties and any investment holdings overseen directly by RWA portfolio management personnel. The following risk factors do not purport to be a complete list or explanation of the risks involved in an investment.

All investing involves a risk of loss that clients should be prepared to bear, including the risk that the entire amount invested can be lost. The investment strategies offered by RWA could lose money over short or long periods of time. There are no assurances that RWA's investment strategies will succeed, and RWA cannot give any guarantee that it will achieve the investment objectives it establishes for a client or that any client will receive a return of its original investment.

Market and Economic Risk. An account's investment value can decline due to changes in general economic and market conditions. A security's value held in an account can change in response to developments

affecting entire economies, markets or industries, including changes in interest rates, political and legal developments, general market volatility, natural disasters or public health issues such as epidemics or pandemics, and geopolitical events such as war and terrorism.

Inadvertent Concentration. There can be no assurance that the selection of the multiple managers and/or Investment Funds will result in an effective diversification of investment approaches. In addition, different Investment Funds and separate account managers can each acquire significant positions in the same investment, resulting in an inadvertent concentration by RWA in such investment, which can subject the investments of clients to more extreme changes in value than would be the case if the client assets were more widely diversified.

Investment and Trading Risks. All securities investments risk the loss of capital and no guarantee or representation is made that RWA's program will be successful. Certain Investment Funds and separate account managers recommended by RWA utilize such investment techniques as trading in put and call options and other derivatives, limited diversification, the use of leverage and short sales. These practices can, in certain circumstances, increase the risk of loss of capital.

Equity Investments. Clients can participate in equity securities investments. Stock market prices of securities can be adversely affected by many factors, such as an issuer's having experienced losses, the lack of earnings or the issuer's failure to meet the market's expectations with respect to new products or services. Stock prices can also be affected by factors wholly unrelated to the value or condition of the issuer. If the stock market declines in value, client portfolios are likely to decline in value. Furthermore, a focus on certain types of stocks (such as small or large capitalization) and styles of investing (such as value or growth) subjects client portfolios to the risk that their performance can be lower than the performance of portfolios that focus on other types of stocks or that have a broader investment style (such as the general market).

Short Sales. Some of the Investment Funds and separate accounts RWA recommends participate in short sales. A short sale involves the sale of a security that is not held in an account in the expectation of purchasing the same security (or a security exchangeable therefor) at a later date at a lower price. To make delivery to the buyer, the seller must borrow the security and the seller is obligated to return the security to the lender, which is accomplished by a later purchase of the security by the seller. A short sale involves the risk of a theoretically unlimited increase in the market price of the security sold short, which could result in an inability to cover the short position and a theoretically unlimited loss to the seller. In addition, there is the risk that the securities borrowed in connection with a short sale must be returned to the securities lender on short notice. If a request for return of borrowed securities occurs at a time when other short sellers of the security are receiving similar requests, a "short squeeze" can occur. The seller may be compelled to replace borrowed securities previously sold short with purchases on the open market at a disadvantageous time, possibly at prices significantly in excess of the proceeds received in originally selling the securities short.

Foreign Investments. Some of the Investment Funds and separate accounts RWA recommends invest in non-U.S. securities and other instruments denominated in non-U.S. currencies and/or securities traded outside of the United States. These investments present certain risks not typically associated with investing in United States securities or property. These risks include unfavorable currency exchange rate developments, restrictions on repatriation of investment income and capital, imposition of exchange control regulation by the United States or foreign governments, confiscatory taxation, diplomatic developments, such as the imposition of economic sanctions against a particular country or countries, organizations, entities and/or individuals, and economic or political instability in foreign nations. In addition, there is typically less publicly available information about certain non-U.S. companies than would be the case for comparable companies in the United States, and certain non-U.S. companies are not subject to accounting, auditing and financial reporting standards and requirements comparable to or as uniform as those of U.S. companies. These risks are accentuated in emerging markets, where financial markets are generally less developed and transparent and where political and economic instabilities are often more pronounced.

Debt Securities. Clients can participate in the purchase and/or sale of unrated or below investment-grade debt securities, which are subject to greater risk of loss of principal and interest than higher-rated debt securities. These investments can include debt securities that rank junior to other outstanding securities and

obligations of the issuer, which can have a superior claim for repayment from that issuer's assets. Further, some debt securities are not protected by financial covenants or limitations on additional indebtedness. In addition, evaluating credit risk for foreign debt securities involves greater uncertainty because credit rating agencies throughout the world have different standards, making comparison across countries difficult. Fixed-income securities are also subject to the risk that the securities could lose value because of interest rate changes. For example, bonds tend to decrease in value if interest rates rise. Fixed income securities with longer maturities sometimes offer higher yields but are subject to greater price shifts as a result of interest rate changes than fixed-income securities with shorter maturities.

Environmental, Social and Governance Matters. RWA offers asset allocation model strategies using external investment managers who invest across a broad variety of ESG methodologies. While ESG is only one of the many factors such a manager will consider in making an investment, there is no guarantee that the manager will invest in companies that create positive ESG impact while enhancing long-term shareholder value and achieving financial returns. Considering ESG qualities when evaluating an investment may result in the selection or exclusion of certain investments based on the manager's view of certain ESG-related and other factors and carries the risk that the manager may underperform funds that do not take ESG-related factors into account. Consideration of ESG factors may affect the manager's exposure to certain companies, sectors, regions, countries or types of investments, which could negatively impact the manager's performance depending on whether such investments are in or out of favor. Applying impact investing goals to investment decisions is qualitative and subjective by nature, and there is no guarantee that the criteria utilized by the manager, or any judgment exercised by the manager will reflect the beliefs or values of any particular investor. ESG-related practices differ by region, industry and issue and are evolving; therefore, ESG-related practices or the manager's assessment of such practices may change over time.

Leverage. Some of the Investment Funds and separate accounts RWA recommends employ leverage in their management of assets. Leverage tends to magnify both the positive impact of successful investment decisions and the negative impact of unsuccessful investment decisions on an investment strategy's performance.

Derivatives. Clients can participate in investments in derivatives. These are financial instruments that derive their performance from the performance of an underlying index or asset. Derivatives can be volatile and involve various types and degrees of risks, depending upon the characteristics of a particular derivative. Derivatives typically entail investment exposures that are greater than their initial cost would suggest, meaning that a small investment in a derivative could have a large potential impact on the performance of a portfolio. Portfolios could experience losses if derivatives do not perform as anticipated or are not correlated with the performance of other investments being hedged by the derivatives, or if they cannot be liquidated because of an illiquid secondary market. Derivatives also typically make a portfolio less liquid and difficult to value, especially in declining markets. The benefit of a derivatives transaction can be lost if the counterparty fails to honor contract terms.

Counterparty Risk. To the extent that clients participate in investments in swaps, "synthetic" or derivative instruments, repurchase agreements, certain types of options or other customized financial instruments, or, in certain circumstances, non-U.S. securities, client accounts are indirectly subjected to the risk of non-performance by the other party to the contract. This risk includes credit risk of the counterparty and the risk of settlement default. This risk differs materially from the risks involved in exchange-traded transactions, which generally are supported by guarantees of clearing organizations, daily mark-to-market and settlement and segregation and minimum capital requirements applicable to intermediaries. Transactions entered directly between two counterparties generally do not benefit from these protections and expose the parties to the risk of counterparty default.

Commodity Trading. Some of the Investment Funds and separate accounts RWA recommends participate in commodities trading. The prices of commodities and all derivative instruments, including futures and options contract prices, are highly volatile. Price movements of commodities, futures and options contracts are influenced by, among other things, changing supply and demand relationships, domestic and foreign governmental programs and policies, national and international political and economic events, interest rates and governmental monetary and exchange control programs and policies. Moreover, certain commodity

exchanges limit fluctuations in commodity futures contract prices during a single day by regulations referred to as “daily price fluctuation limits” or “daily limits.” During a single trading day, no trades can be executed on these exchanges at prices beyond the daily limit. Commodity futures contract prices have occasionally moved the daily limit for several consecutive days with little trading. Similar occurrences could prevent an account from promptly liquidating unfavorable positions and subject the client account to substantial losses.

Cybersecurity Risk. RWA, service providers to the Investment Funds and separate accounts RWA recommends, and other market participants increasingly depend on complex information technology and communications systems to conduct business functions. These systems are subject to a number of different threats or risks that could adversely affect clients and their portfolios, despite the efforts of RWA and the service providers to adopt technologies, processes and practices intended to mitigate these risks and protect the security of their computer systems, software, networks and other technology assets, as well as the security, confidentiality, integrity and availability of information belonging to clients and their portfolios. Similar types of operational and technology risks are also present for the companies in which the portfolios invest, which could have material adverse consequences for such companies, and may cause the portfolios’ investments to lose value.

Private Fund Investments. As previously noted, client investments can include hedge funds, private equity funds, and other private pooled investment vehicles. In addition to the other risks noted in this section, all of which apply to any private fund investment, these vehicles also carry additional potential risks, including the following:

Liquidity Risk. RWA cannot guarantee its ability to redeem client assets from a private fund in a timely manner. Private fund vehicles often retain the ability to delay part or all of a client’s redemption under a variety of circumstances.

Transparency Risk. RWA is limited in its ability to monitor the investment activities of private funds. Private fund managers often limit the information that they disseminate regarding individual fund investments and are not subject to the same reporting standards applicable to funds that are registered with the applicable regulatory authorities.

Valuation Risk. RWA relies upon the managers and/or administrators to private funds to provide accurate valuation information pertaining to clients’ capital balances. As noted above, RWA generally has limited information regarding the holdings of the private funds in which client accounts are invested and is normally unable to independently verify or scrutinize valuations provided by the administrators or managers to these private funds.

Lack of Regulatory Oversight. Private funds typically operate under one or more exemptions from registration with the applicable regulatory authorities. Additionally, some investment managers to private funds are exempt from registration with the applicable regulatory authorities. Accordingly, private funds and their managers are often subject to little, if any, direct scrutiny from any regulatory authority.

Return of Balances Previously Redeemed. Under extraordinary circumstances, following a redemption from a private fund, the client could be required to return all or a portion of the redemption proceeds it received from the private fund to such private fund. For instance, if the private fund later determines that its net asset value was previously misstated, a client could be required to return the applicable portion of the redemption proceeds to the extent required by applicable law or the private fund’s organizational or offering documents. Other circumstances, such as indemnification obligations, could also require a client to return the proceeds to a private fund.

Other risks may be applicable. Please speak with your wealth advisor to learn more about the particular risk characteristics of your specific investment account(s).

ITEM 9. DISCIPLINARY INFORMATION

RWA does not have legal or disciplinary events that RWA believes are material to a client’s or prospective client’s evaluation of RWA’s advisory business or the integrity of the management of RWA or the Firm.

ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

There are various divisions of the Firm including, RWA Family Office, RWA Private Wealth and RWA Capital.

RWA Family Office also provides coordinated financial planning, institutional quality investment management and integrated tax planning to clients. RWA Family Office and RWA Private Wealth refer clients to each other based on the complexity of the client's needs. A separate disclosure brochure is available for clients and prospects of RWA Family Office.

RWA Capital provides sub-advisory and model portfolio services. When RWA chooses to utilize a strategy offered by RWA Capital for a client, it only does so when it is in the best interest of the client. The client is not charged any investment management fees from RWA Capital.

RWA provides investment advisory services to individuals, families, and their related entities, including trusts and estates, as well as charitable organizations and business entities. Employees of RWA often serve as trustee, executor, or LLC Manager to many of these trusts, estates, charitable organizations, and business entities. RWA typically works with the law firm Hall & Diana LLC for trust and estate planning legal services for a truly integrated wealth management offering.

Martin Hall and Brenda Diana, employees of RWA, are also partners of the law firm Hall & Diana LLC. RWA typically recommends Hall & Diana LLC to clients seeking legal counsel and Hall & Diana LLC typically recommends RWA to legal clients seeking investment advisory services. Whenever RWA or Hall & Diana LLC recommends the other, clients are encouraged to evaluate other investment advisers or law firms, as the case may be, and make an independent judgment. It is important to note that Hall & Diana LLC is not affiliated with RWA or the Firm, and there are no fee sharing arrangements or other remuneration for client recommendations between Hall & Diana LLC and RWA.

RWA Tax Solutions, LLC, a wholly owned subsidiary of the Firm, offers fiduciary and personal tax return preparation and filing services to clients. These services are separate from any investment advisory services and are offered at an additional cost to clients. RWA typically recommends the services of RWA Tax Solutions to its clients. RWA is incentivized to recommend RWA Tax Solutions to clients, because fees generated by such services accrue to the Firm. Whenever RWA recommends RWA Tax Solutions, clients are encouraged to evaluate other tax service providers.

ITEM 11. CODE OF ETHICS, INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

SUMMARY OF CODE OF ETHICS

RWA's employees are subject to the Firm's Code of Ethics (the "Code") which describes the Firm's fiduciary duty to RWA clients and sets standards for business conduct. The following is a summary of the key provisions of the Code:

- Scope – The Code covers all directors, officers, partners, employees, and any other persons who are under RWA's supervision and control.
- Fiduciary Duties – The Code is based on the principle that RWA and its employees owe a fiduciary duty to RWA clients. Accordingly, RWA and its employees must avoid activities, interests and relationships that might interfere or appear to interfere with making decisions in the best interests of RWA's clients.
- Personal Securities Trading – All employees are subject to certain trading restrictions. In addition, all employees must report their personal securities transactions quarterly and personal securities holdings annually.

- Code of Conduct – The Code contains specific topics designed to reflect RWA’s commitment to ethical conduct. These topics include compliance with legal and regulatory requirements, gifts, outside activities, entertainment, and board directorships. We also maintain separate Insider Trading Policies and Procedures.
- Code Violations – The Code provides for appropriate sanctions for violations.

You can obtain a copy of RWA’s Code by contacting compliancegroup@rwawealth.com.

Recommending Securities in Which We Hold a Financial Interest

RWA does not recommend or buy or sell securities in which RWA or a related party holds a material financial interest.

Employees Investing in the Same Securities as Clients

The Firm permits employees to invest in the same securities as those held by clients. Potential conflicts can arise when employees invest in the same securities that the Firm recommends to clients. For instance, if a security is not widely available and employees invest in a limited security offering that is also recommended for clients, clients may not be able to invest in the security.

To mitigate potential conflicts of interest arising from employees investing in the same securities as clients, the Firm requires all employees to preclear transactions for all limited or private offerings and initial public offerings and preclear all reportable securities transactions with a market value over \$20,000. Furthermore, with the exception of certain securities (e.g., open-end mutual funds), the Firm’s policy requires that the Compliance Department review employee personal trading to ensure that such employees do not profit at the expense of clients.

Employees Trading in the Same Securities as Clients at the Same Time

Employees are permitted to buy or sell securities at or around the same time as when those securities are recommended to clients. This practice creates a situation where employees are in a position to potentially benefit in a material manner from the sale or purchase of those securities. For instance, if employees have knowledge of pending client trades that could impact the market price of a security, they could time their transactions with the intention of receiving a better price than that of the clients.

To mitigate this potential conflict of interest, the Firm has a policy requiring employees to preclear reportable security transactions with a market value over \$20,000 to prevent employees receiving a material benefit or profit at the expense of a client. Furthermore, the Firm conducts additional training with investment professionals.

As noted in Item 5 above, RWA provides investment management services to the accounts of Affiliated Persons. Affiliated Persons are required to have fully discretionary accounts, which are treated similarly to and traded alongside client accounts. Refer to item 12 for additional information on RWA’s trade aggregation practices.

ITEM 12. BROKERAGE PRACTICES

CUSTODIAL/BROKERAGE RECOMMENDATIONS

Neither RWA nor the Firm are broker-dealers or custodians, and neither is affiliated with any broker-dealers or custodians

Clients must maintain their assets in an account at a “qualified custodian,” generally a broker-dealer or bank. Clients can choose the qualified custodian where their assets are held; however, RWA typically recommends Fidelity Institutional, or Schwab as the qualified custodian for client accounts (“Recommended Custodians”) and facilitates the arrangement for the safekeeping of client assets with these custodians.

The choice of qualified custodian can also determine the brokerage services available to the client and the cost of such services, as discussed below. Brokerage fees typically vary depending on the qualified custodian where the client account is custodied. Certain qualified custodians have specific terms, fees or commission schedules associated with trading with the qualified custodian's affiliated broker-dealer.

These terms, fees or commissions applicable to client accounts are typically based on the scope and nature of the business that RWA transacts with the qualified custodian. Qualified custodians may also charge clients a fee in addition to commissions paid to the executing broker ("Prime Broker Fee), if RWA uses a broker-dealer other than the qualified custodian's affiliated broker-dealer. As a result, the price at which trades are executed will likely vary by qualified custodian.

When qualified custodians impose Prime Brokerage Fees for equity transactions it is usually more cost effective for RWA to trade equities with the qualified custodian's affiliated broker-dealer; however, RWA takes into account a variety of factors including, but not limited to, the ability of the equity broker-dealer to execute difficult trades (e.g. possible market impact, size of the order, market liquidity), commitment of capital, speed of execution, clearance and settlement efficiency, financial stability and responsibility, reputation, access to markets, confidentiality, ability to provide cost transaction analysis, and responsiveness to RWA, without sacrificing quality of execution.

Fixed Income Transactions

Fixed income securities (i.e., bonds) are generally traded in an over-the-counter ("OTC") market between broker-dealers without a central exchange. In this market, bond dealers place bids and make offers to buy and sell bonds on a net basis with no stated commission plus accrued interest. Any commission or net mark-up is implied by the difference or "spread" between the price the dealer purchases the bond for and the price the dealer sells the bond at. A new issue bond is sold to purchasers at a net price with a fixed sales credit paid to the underwriter by the issuers of the bond.

The Firm has a large network of fixed income broker-dealers in this OTC market providing timely access to municipal and corporate bonds at market price. When qualified custodians impose Prime Brokerage Fees it is usually more cost effective for RWA to execute bond transactions through its extensive fixed income dealer network.

Recommended Custodians

As noted in item 4, RWA generally recommends Fidelity and Schwab to act as the qualified custodian for client accounts. RWA's Recommended Custodians provide a comprehensive custody platform, a broad range of investment options, including investment products not available to retail clients, and trading capabilities through affiliated broker-dealers.

RWA seeks to negotiate competitive terms, fees and applicable commissions charged by the Recommended Custodians to clients; however, the fees and commissions charged by RWA's Recommended Custodians could be higher or lower than those charged by other custodians and broker-dealers for the same services.

Potential Conflicts of Interest with RWA's Recommended Custodians

RWA's Recommended Custodians provide RWA's clients with services and benefits that are generally not available to retail customers. Some of these services help RWA manage or administer client accounts, while others help RWA manage and grow its business. These support services are generally, but not always, available to RWA whether we request them or not. These services include: (i) consulting on technology, compliance, legal and business needs; (ii) educational conferences; and publications and conferences on practice management. Other benefits, such as business entertainment, are provided to RWA personnel from time to time.

RWA's Recommended Custodians have a minimum dollar amount of assets required in order for RWA to receive some or all of the services they offer. This provides an incentive for RWA to continue to use or expand its use of RWA's Recommended Custodians.

Despite these potential conflicts, RWA believes that the Recommended Custodians provide RWA clients with quality services considering the associated costs to the client and RWA.

SOFT DOLLARS

The term “soft dollars” generally refers to arrangements whereby a discretionary investment adviser is allowed to pay for and receive research, research-related or execution services from a broker-dealer or third-party provider, in addition to the execution of transactions, in exchange for the brokerage commissions from transactions for client accounts. Use of client commissions to pay for research and brokerage services presents investment advisers with significant conflicts of interest and gives incentives for investment advisers to disregard their best execution obligations when directing orders in order to obtain client commission services as well as to trade client securities inappropriately in order to earn credits for client commission services.

RWA does not receive so-called “soft dollar” services from broker-dealers; however, broker-dealers utilized by RWA provide research reports to RWA that assist in the portfolio management process.

DIRECTED BROKERAGE

RWA does not have any directed brokerage arrangements and does not encourage such arrangements. However, should a client direct RWA to use a particular broker to execute such client’s transactions (“directed brokerage”), it is important for the client to understand the following limitations of such arrangement:

- RWA will not have the ability to negotiate best price and best execution for that client’s trades; therefore, directed brokerage could cost clients more money. Directed brokerage clients could pay higher commission rates than those paid by other clients, could receive less favorable trade executions and may not obtain best execution on their transactions.
- Directed brokerage accounts will not be able to participate in aggregated or block transactions with other clients. This will preclude directed brokerage accounts from obtaining the volume discounts or more favorable terms that might be available from aggregated transactions.
- If RWA is placing orders in the same security for both directed brokerage clients and clients that use the broker approved by RWA, RWA will usually place orders for directed brokerage clients after it has placed orders for other clients.

BROKERAGE FOR CLIENT REFERRALS

RWA does not select or recommend brokers-dealers or direct client transactions to brokers based upon whether RWA receives client referrals from such brokers. The Firm participates in two referral programs. One is with an affiliate of Fidelity—Fidelity Personal and Workplace Advisors, LLC. Under this referral program, Fidelity Personal and Workplace Advisors, LLC serves as a solicitor for the Firm. The other referral program is through Schwab Advisory Network. Under this program, Schwab Advisory Network also serves as a solicitor for the Firm. For more information regarding these solicitor arrangements, please see Item 14 of this Brochure.

TRADE AGGREGATION

The aggregation or blocking of client transactions allows RWA to execute transactions in a more timely, equitable, and efficient manner and seeks to reduce overall commission charges to clients. It is RWA’s policy to aggregate client transactions where possible and when advantageous to clients. Typically, tactical investment decisions are implemented immediately for all discretionary accounts, with the exception of individual account constraints or tax considerations. If the decision involves a mutual fund, all discretionary accounts holding that mutual fund are typically traded on the same day. If the decision involves an individual equity security or ETF, to the extent possible, the order will be aggregated for all client accounts and executed at the same time. Client orders partially filled will, as a general matter, be

allocated pro rata in proportion to each client's original order. Tactical investment decisions for non-discretionary accounts are implemented as soon as practically possible, after RWA receives confirmation from the client.

For trading purposes, the accounts of Affiliated Persons are not treated more favorably than any other account managed by RWA. To the extent that accounts of Affiliated Persons are included with other accounts in aggregated orders, allocations of those orders will occur as described above.

ITEM 13. REVIEW OF ACCOUNTS

PERIODIC REVIEW OF CLIENT ACCOUNTS

RWA monitors client accounts on an ongoing basis for allocation drift based on market conditions, cash flows and specific fund/manager issues. Generally, each client's wealth advisor and service team conduct at least an annual account review. Annual account reviews consider factors such as changes in client goals and financial circumstances, performance of managed accounts, financial planning, and restrictions on accounts.

REVIEW OF CLIENT ACCOUNTS ON OTHER-THAN-PERIODIC BASIS

Any changes in the financial or other circumstances of a client would also necessitate a review of the portfolio to confirm that the allocation remains appropriate and to determine any recommended changes. RWA relies on each client to promptly notify their client team of any material changes to the client's financial condition including, but not limited to, investment objective, risk tolerance, net worth, annual income, and investment time horizon.

CONTENT AND FREQUENCY OF CLIENT REPORTS

Clients receive, at a minimum, quarterly account statements in writing from their qualified custodian which, depending on the arrangements made between the clients and the qualified custodians of their respective accounts, include capital valuations and other information as required by applicable laws or as provided for informational purposes. In addition, RWA typically provides clients with a quarterly report of their accounts, including performance of the assets held in client accounts.

ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION

COMPENSATION TO THIRD PARTIES FOR REFERRALS

Many wealth advisors and certain other employees are compensated by RWA based on a percentage of the net fee collected from the client. This arrangement incentivizes these employees to increase assets under management. Because fees for fixed income management are less than the standard investment management fees, these employees also have a personal interest in recommending the more expensive portfolio management services.

RWA has promoter arrangements with unaffiliated third parties ("Promoters") that allow the Promoters to receive a cash referral fee for referring clients to RWA. The Promoters are paid a cash referral fee based upon a percentage of the advisory fees actually received from any client introduced by the Promoters to RWA. RWA's payment of fees to Promoters for client referrals do not result in any increase in the advisory fee paid by any client. The Firm is required to provide any prospective client introduced by Promoters to the Firm with written documentation outlining the compensation arrangement between the Promoters and the Firm. The Promoters are also required to meet certain requirements under the Investment Advisers Act of 1940.

The Firm participates in the Fidelity Wealth Advisor Solutions® Program (the “WAS Program”), through which the Firm receives referrals from Fidelity Personal and Workplace Advisors, LLC (“FPWA”), a registered investment advisor and Fidelity Investments company. The Firm is independent of and not affiliated with FPWA or any Fidelity Investments company. FPWA does not supervise or control the Firm, and FPWA has no responsibility for or oversight of the Firm’s provision of investment management or advisory services.

Under the WAS Program, FPWA acts as a solicitor for the Firm, and the Firm pays referral fees to FPWA for each referral received based on the Firm assets under management attributable to each client referred by FPWA or members of each referred client’s household.

To receive referrals from the WAS Program, the Firm must meet certain minimum participation criteria, but the Firm could have been selected for participation in the WAS Program as a result of its other business relationships with FPWA and its affiliates, including Fidelity Brokerage Services, LLC (“FBS”). As a result of its participation in the WAS Program, the Firm has a potential conflict of interest with respect to its decision to use certain affiliates of FPWA, including FBS, for execution, custody and clearing for certain client accounts, and the Firm has a potential incentive to suggest the use of FBS and its affiliates to its advisory clients, whether or not those clients were referred to the Firm as part of the WAS Program. Under an agreement with FPWA, the Firm has agreed that it will not charge clients more than the standard range of advisory fees disclosed in Item 5, above, to cover solicitation fees paid to FPWA as part of the WAS Program. Pursuant to these arrangements, the Firm has agreed not to solicit clients to transfer their brokerage accounts from affiliates of FPWA or establish brokerage accounts at other custodians for referred clients other than when the Firm’s fiduciary duties would so require, and the Firm has agreed to pay FPWA a one-time fee equal to 0.75% of the assets in a client account that is transferred from FPWA’s affiliates to another custodian; therefore, the Firm has an incentive to suggest that referred clients and their household members maintain custody of their accounts with affiliates of FPWA. However, participation in the WAS Program does not limit the Firm’s duty to select brokers on the basis of best execution.

The Firm participates in the Schwab Advisor Network® (the “SAN Program”). The SAN Program is designed to help investors find an independent investment advisor. Schwab is a broker- dealer independent of and unaffiliated with the Firm. Schwab does not supervise the Firm and has no responsibility for the Firm’s management of clients’ portfolios or the Firm’s other advice or services. The Firm pays Schwab fees for clients that were referred through the SAN Program. The Firm’s participation in the SAN Program may raise potential conflicts of interest described below. The Firm pays Schwab a Participation Fee on all referred clients’ accounts that are maintained in custody at Schwab and a Non-Schwab Custody Fee on all referred clients’ accounts that are maintained at, or transferred to, another custodian. The Participation Fee paid by the Firm is a percentage of the fees the client owes to the Firm or a percentage of the value of the assets in the client’s account, subject to a minimum Participation Fee. The Firm pays Schwab the Participation Fee for so long as the referred client’s account remains in custody at Schwab. The Participation Fee is billed to the Firm quarterly and may be increased, decreased, or waived by Schwab from time to time. The Participation Fee is paid by the Firm and not by the client. The Firm has agreed not to charge clients referred through the SAN Program fees or costs greater than the fees or costs the Firm charges clients with similar portfolios who were not referred through the SAN Program. The Firm generally pays Schwab a Non-Schwab Custody Fee if custody of a referred client’s account is not maintained by, or assets in the account are transferred from, Schwab. This Non-Schwab Custody Fee does not apply if the client was solely responsible for the decision not to maintain custody at Schwab. The Non-Schwab Custody Fee is a one-time payment equal to a percentage of the assets placed with a custodian other than Schwab. The Non-Schwab Custody Fee is higher than the Participation Fees the Firm generally would pay in a single year. Thus, the Firm will have an incentive to recommend that client accounts be held in custody at Schwab. The Participation and Non-Schwab Custody Fees will be based on assets in accounts of the Firm’s clients who were referred by Schwab and those referred clients’ family members living in the same household.

Thus, the Firm will have incentives to encourage household members of clients referred through the SAN Program to maintain custody of their accounts and execute transactions at Schwab and to instruct Schwab to debit the Firm's fees directly from the accounts. For accounts of the Firm's clients maintained in custody at Schwab, Schwab will not charge the client separately for custody but will receive compensation from the Firm's clients in the form of commissions or other transaction-related compensation on securities trades executed through Schwab. Schwab will also receive a fee (generally lower than the applicable commission on trades it executes) for clearance and settlement of trades executed through broker-dealers other than Schwab. Schwab's fees for trades executed at other broker-dealers are in addition to the other broker-dealer's fees. Thus, the Firm has an incentive to cause trades to be executed through Schwab rather than another broker-dealer. The Firm nevertheless acknowledges its duty to seek best execution of trades for client accounts. Trades for client accounts held in custody at Schwab may be executed through a different broker-dealer than trades for the Firm's other clients. Thus, trades for accounts custodied at Schwab may be executed at different times and different prices than trades for other accounts that are executed at other broker-dealers.

ITEM 15. CUSTODY

RWA does not hold client assets but is deemed to have custody of certain client assets under arrangements authorizing RWA to withdraw assets of a client maintained with the client's qualified custodian upon RWA's instructions and when RWA acts in any legal capacity affording it or its supervised persons with ownership of or access to client assets (e.g., trustee, power of attorney). Advisers with custody must comply with certain requirements under the Advisers Act.

Funds and securities for all clients must be held by qualified custodians and clients must receive at least quarterly accounts statement directly from the qualified custodian. In addition, RWA typically provides clients with a quarterly report of their accounts, including performance of the assets held in client accounts. To the extent that any reports provided by RWA contain information comparable to that contained in the qualified custodian's quarterly account statement, If clients have any questions about their custodian's account statement or if they do not receive an account statement from their custodian, they should contact compliancegroup@rwawealth.com. RWA encourages clients to raise any questions with us about the custody, safety, or security of their assets.

ITEM 16. INVESTMENT DISCRETION

RWA provides continuous and regular investment advisory services to both discretionary and non-discretionary accounts. The extent to which RWA exercises discretion over the investment selection in a client account, as well as any limitations on RWA's discretionary authority is as agreed with each client and/or as stated in each client's investment management agreement. An investment management agreement is executed at the commencement of each account opening, prior to RWA's assumption of discretionary (or non-discretionary) authority. RWA's authority can be limited by client-imposed investment objectives and strategies. Additionally, managers of Investment Funds and other separate accounts generally hold discretionary authority over these Investment Funds and separate accounts.

RWA's investment management agreement contains a provision limiting the extent to which RWA may be liable for conduct arising out of the management of the client's account. Such provision, however, does not relieve RWA from liability for conduct as to which a client has a non-waivable cause of action against RWA under state or federal law. As such, any client who is considering bringing a claim against RWA for conduct arising out of the management of the client's account is strongly urged to consult with its own counsel regarding its rights under federal and state law, notwithstanding the inclusion of a contractual limitation of liability in the client's investment management agreement.

Legal Proceedings

RWA is not obligated to advise or act on behalf of its clients for any legal proceedings relating to bankruptcies or shareholder class action litigations involving securities held or previously held in client accounts. Accordingly, RWA will not be responsible for responding to or forwarding class action settlement offers relating to securities currently or previously held in client accounts to clients, except as noted below.

In 2025, RWA began offering class action litigation monitoring, claim filing, and claim payment distribution services for the securities maintained in client accounts (“Class Action Services”) through Broadridge Financial Solutions, Inc. (“Broadridge”). Clients opening new accounts at Fidelity and Schwab can elect in their investment management agreement whether or not to authorize RWA to include their account in Class Action Services. For those clients who elect to participate in Class Action Services, RWA provides Broadridge with account trading history information in connection with Class Action Services, but does not conduct research, provide additional supporting documentation, or bill clients for Broadridge’s service fee. It is important to note that for claims where Broadridge cannot independently and completely conduct the research, filing and claim payment distribution process, claims will not be submitted on behalf of clients. Broadridge deducts a 20% service fee from the proceeds of any recovered funds for Class Action Services provided.

ITEM 17. VOTING CLIENT SECURITIES

In 2025, RWA began offering Proxy Voting services to new clients utilizing RWA’s Recommended Custodians. For clients who have directed RWA to exercise voting proxy voting authority, RWA uses a third-party proxy voting service to vote client proxies in accordance with predetermined instructions. Clients cannot direct their votes for particular solicitations. Conflicts can arise when RWA, its affiliates, or any of its employees has any financial, business or personal relationship with the issuer of a proxy proposal for a security held in a client’s account. RWA’s current predetermined instructions are to vote proxies for client securities with management unless a material conflict is identified. If a material conflict arises, RWA will determine whether voting with management is in the best interest of the client.

RWA typically, although not required, authorizes external separate account managers to vote any proxies relating to the sub-advised securities in accordance with the external separate account manager’s proxy voting policy.

A client can obtain additional information regarding how the client’s proxies were voted or request a copy of RWA’s proxy voting policies and procedures by contacting compliancegroup@rwawealth.com.

Clients can choose to retain the right to vote proxies for investments held in their accounts. If a client has retained the right to vote proxies for investments held in their account, they should receive their proxies from the qualified custodians that maintains their account. These clients should contact their qualified custodian with any questions about a particular proxy or action.

Current clients whose assets are custodied at Fidelity and Schwab can direct RWA to exercise proxy voting authority by completing required paperwork with the qualified custodian. Please reach out to your wealth advisor or contact compliancegroup@rwawealth.com for additional details.

ITEM 18. FINANCIAL INFORMATION

RWA does not require nor solicit the prepayment of more than \$1,200.00 in fees per client six months or more in advance. Therefore, RWA is not required to include a balance sheet for the Firm’s most recent fiscal year.

The Firm has never been the subject of a bankruptcy petition or proceeding and is not subject to any financial condition that would impair its ability to fulfill its contractual commitments to its clients.