

**FOSTER GROUP**

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This brochure provides information about the qualifications and business practices of Foster Group, Inc. If you have any questions about the contents of this brochure, please contact us at (515) 226-9000 and [Bucko@fostergrp.com](mailto:Bucko@fostergrp.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Additional information about Foster Group, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## ITEM 2. MATERIAL CHANGES SUMMARY

This brochure provides prospective clients with information about Foster Group, Inc. that should be considered before or at the time of obtaining our advisory services.

This brochure is required to be updated at least annually or sooner when material changes to our business take place. There have been no material changes since the last annual amendment dated March 31, 2017.

While not deemed a material change for reporting purposes, Foster Group has had a change in its leadership. Starting on January 1<sup>st</sup>, 2017, Gregory “Buck” Olsen has been selected as the new Chief Executive Officer and Chief Compliance Officer of Foster Group. He replaces Mark Stadtlander, who will remain with the firm as the Lead Advisor Manager. At this same time Foster Group’s former Chief Operating Officer, Travis Rychnovsky will assume the new role of Chief Marketing officer.

Each year we will deliver to you, by no later than April 30<sup>th</sup>, a free updated brochure that includes or is accompanied by a summary of material changes; or a summary of material changes and an offer to provide a copy of the updated brochure and how to obtain it.

### ITEM 3 TABLE OF CONTENTS

Item 4. Advisory Business	4
Item 5. Fees and Compensation	9
Item 6. Performance Based Fees and Side by Side Management	12
Item 7. Types of Clients and Minimum Requirements	12
Item 8. Method of Analysis, Investment Strategies and Risk of Loss	13
Item 9. Disciplinary Information	16
Item 10. Other Financial Industry Activities and Affiliations	17
Item 11. Code of Ethics, Interest in Client Transactions and Personal Trading	18
Item 12. Brokerage Practices	19
Item 13. Review of accounts	22
Item 14. Client Referrals and Other Compensation	23
Item 15. Custody	27
Item 16. Investment Discretion	28
Item 17. Voting Client Securities	28
Item 18. Financial Information	28
Item 19. Requirements for State Registered Advisers	28
Miscellaneous	28
Business Continuity Plan	28
Privacy Policy	29

## ITEM 4. ADVISORY BUSINESS

### Firm Description

Foster Group, Inc. ("Adviser") is an investment adviser registered with the Securities and Exchange Commission under the Investment Advisers Act of 1940. Adviser has been operating as an investment advisory firm since 1991.

### Principal Owners

Adviser's principal owners are Gerald Ray Foster, Mark Alan Stadtlander, Philip Matthew Kruzan, Reed Roger Rinderknecht, Edward William Green, Kent Allen Kramer, Gregory John Olsen, Travis James Rychnovsky, Joseph Clarence Bantz, Bradley Dean Rempe, Ross Benjamin Polking, Jonathan Michael Evans, Bartholomew Allen Banwart, Brenton Lowell Carlson, Scott James Snyder, Marcus Lee Iwig, Kate Patricia Juelfs.

### Types of Advisory Services

The Adviser provides continuous investment supervisory services, furnishes investment advice through consultations, and furnishes advice to clients on matters not involving securities. We provide investment management services to individuals and institutional clients, as well as qualified plan consulting services. Our services may also include financial planning.

Adviser primarily offers advice on the following types of investments: mutual funds, exchange-traded funds ("ETFs") and investment company securities such as variable annuities.

All clients and entities seeking to begin a financial planning and investment management relationship with the Adviser are required to sign an Advisory Agreement. The Advisory Agreement establishes the advisory relationship between the Adviser and the client.

More specific information regarding our services is as follows:

## INVESTMENT MANAGEMENT

Our advisors meet with each individual or organization to establish the client's short-term and long-range investment goals and objectives. Various model portfolios are discussed, including the risk involved and potential return associated with each. Based on these discussions, a strategy is formulated to accomplish the client's objectives.

Our investment philosophy is based on a long-term perspective, taking into consideration asset allocation and diversification among several asset classes. For investment management clients, the Adviser assists the client in implementing an investment strategy, monitors results, and reports to the client on a regular basis. Client assets are held in a custodial account by an independent custodian and broker-dealer.

## INDIVIDUAL SERVICES

The Adviser may provide investment management services to its individual clients whose annual fees are in excess of \$3,000. If requested to do so by the client, we shall analyze a client's financial condition based on information provided by the client and personal consultations with the client utilizing an advanced financial planning approach, focusing initially on several key areas which, depending upon the client's situation and request, may include:

- Creation of personal financial statements
- Review of life, disability and long-term care insurance
- Retirement analysis
- Review of estate planning documents
- Investment portfolio analysis
- Charitable gift planning
- Education analysis
- Cash flows analysis

Adviser may, in its discretion, provide these services for annual fees less than \$3,000.

## INSTITUTIONAL SERVICES

The Adviser also provides investment management services to its institutional clients. The Adviser's primary role with such clients is to assist in determining a suitable allocation for the client's invested portfolio. Foster Group will focus initially on several key areas which, depending upon the client's situation and request, may include:

- Identification of the organization's goals and objectives
- Analysis of the organization's return needs
- Analysis of the organization's anticipated distribution requirements
- Selection of appropriate model portfolio allocation and portfolio construction methodology
- Implement and monitor portfolio
- Review and communicate results with client boards, committees and/or executives

## QUALIFIED PLAN CONSULTING SERVICES

Foster Group serves as a "fiduciary" as defined in §3(21) of ERISA and will provide investment advice or recommendations as to the management of the assets held in the Client's plan, to plan fiduciaries, or a plan participant or beneficiary, monitor the investment options for the investment of a plan's assets, and provide non-discretionary advice regarding the plan's investment options. These services may also include:

- Conducting due-diligence review meetings with Clients on an annual basis.
- Periodic meetings with the Client to review analysis of investments.
- Conducting enrollment, education and periodic plan review meetings with participants as scheduled or requested.
- Assisting Clients in obtaining general information about their account including specific questions such as the status of plan.

Foster Group provides these Qualified Plan Consulting Services as part of an investment sub-advisory agreement with Savant Capital Management.

## OTHER CONSULTING SERVICES

Upon request, Adviser may provide investment advice and/or financial planning services on a project or one-time basis.

## MISCELLANEOUS

### **Limitation of Financial Planning and Non-Investment Consulting/Implementation Services.**

As discussed above, to the extent requested by the client, Adviser may provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Neither Adviser, nor any of its representatives, serves as an attorney, accountant (except for two CPA employees-see Item 10 below), or insurance agent for any of Adviser's clients, and no portion of Adviser's services should be construed as same. To the extent requested by a client, Adviser may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Adviser. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Please Also Note:** It remains the client's responsibility to promptly notify Adviser if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Adviser's previous recommendations and/or services.

**Client Obligations.** In performing its services, Adviser shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify Adviser if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Adviser's previous recommendations and/or services.

**Please Note: Investment Risk.** Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Adviser) will be profitable or equal any specific performance level(s).

**Regarding Fees/Minimums.**

Adviser, in its sole discretion, may charge individual investment management clients a lesser fee and/or reduce or waive its aggregate account minimum based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

**Please Note:** If an individual maintains less than \$300,000 of assets under Adviser's management, and are subject to the \$750 quarterly minimum fee, they will pay a higher percentage Annual Fee than the 1.0% referenced in the fee schedule below.

**Please Note-Use of Mutual Funds:** Most mutual funds are available directly to the public. Thus, a prospective client can obtain many of the mutual funds that may be recommended and/or utilized by Adviser independent of engaging Adviser as an investment advisor. However, if a prospective client determines to do so, he/she will not receive Adviser' initial and ongoing investment advisory services.

**Please Note: Retirement Rollovers-No Obligation/Potential Conflict of Interest:** A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): i) leave the money in his/her former employer's plan, if permitted, ii) roll over the assets to his/her new employer's plan, if one is available and rollovers are permitted, iii) rollover to an Individual Retirement Account ("IRA"), or iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). Foster Group may recommend an investor roll over plan assets to an Individual Retirement Account (IRA) managed by Foster Group. As a result, Foster Group and its representatives may earn an asset-based fee (*see Please Note* below). In contrast, a recommendation that a client or prospective client leave his/her plan assets with his/her old employer or roll the assets to a plan sponsored by a new employer will generally result in no compensation to Foster Group (unless you engage Foster Group to monitor and/or manage the account while maintained at your employer). Foster Group has an economic incentive to encourage an investor to roll plan assets into an IRA that Foster Group will manage or to engage Foster Group to monitor and/or manage the account while maintained at your employer. If Foster Group recommends that a client roll over their

retirement plan assets into an account to be managed by Foster Group, such a recommendation creates a conflict of interest if Foster Group will earn an advisory fee on the rolled over assets. There are various factors that Foster Group may consider before recommending a rollover, including but not limited to: i) the investment options available in the plan versus the investment options available in an IRA, ii) fees and expenses in the plan versus the fees and expenses in an IRA, iii) the services and responsiveness of the plan's investment professionals versus Foster Group's, iv) protection of assets from creditors and legal judgments, v) required minimum distributions and age considerations, and vi) employer stock tax consequences, if any. No client is under any obligation to rollover plan assets to an IRA managed by Foster Group or to engage Foster Group to monitor and/or manage the account while maintained at your employer. **Please Note:** If Foster Group's engagement will include the management of the client's retirement account per the same fee schedule set forth in Item 5 below, regardless of custodian or the client's decision to process a rollover, the above economic incentive to recommend a rollover is moot. **Foster Group's Chief Compliance Officer, Gregory Olsen, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.**

**Please Note: Asset Based Pricing Limitations:** When we believe beneficial to the client, we may recommend that a client enter into an asset based pricing agreement with the account custodian. Under an asset based pricing arrangement, the amount that you will pay the custodian for account commissions/transaction fees is based upon a percentage (%) of the market value of your account (generally, the greater the market value, the lower the %). This differs from transaction-based pricing, which assesses a separate commission/transaction fee against your account for each account transaction. Account investment decisions are driven by Investment Policy Statement guidelines and asset class weightings, and not the amount of transaction fees payable by you to the account custodian. We do not receive any portion of the asset based transaction fees payable by you to the account custodian. **ANY QUESTIONS:** Our Chief Compliance Officer, **Gregory Olsen**, remains available to address them.

**Use of DFA Mutual Funds:** Many mutual funds are available directly to the public, without need to engage an investment professional. Other mutual funds, such as those issued by Dimensional Fund Advisors ("DFA"), are generally only available through registered investment advisers. Foster Group utilizes DFA mutual funds. Thus, if the client was to terminate Foster Group's services, restrictions regarding transferability and/or additional purchases of, or reallocation among, DFA funds will apply. **Foster Group's Chief Compliance Officer, Gregory Olsen, remains available to address any questions that a client or prospective client may have regarding the above.**



### Assets Under Management

The Adviser provides investment advice to clients on a discretionary basis. As of December 31, 2016, the Adviser's total assets under management are as follows:

Discretionary Clients	\$ 1,752,212,728
Non-Discretionary Clients	\$ 35,490,241
<b>Total</b>	<b>\$ 1,787,702,969</b>

## ITEM 5. FEES AND COMPENSATION

### Description

Adviser is a **fee-only** investment management firm, charging fees based exclusively on client assets under management, not determining fees by investment performance or gains. Annual fees can be hourly, fixed and/or a percentage of assets under management. Adviser does not receive any fees that are commission-based (such as sales charges, brokerage commissions or 12b-1 fees from mutual funds) or performance-based. The Adviser's standard fee schedule for investment management services are as follows:

### INDIVIDUAL INVESTMENT MANAGEMENT SERVICES

Assets Under Management Maximum Annual Fee	
\$0 up to \$1 million	1.00%
\$1 million up to \$2 million	0.75%
\$2 million up to \$3 million	0.60%
\$3 million up to \$5 million	0.50%
\$5 million up to \$25 million	0.40%
In excess of \$25 million	0.30%
*Subject to a minimum annual fee of \$3000	
Fees may be negotiated in certain circumstances	

Adviser has established a minimum quarterly fee of \$750 per client. As such, Adviser's services are designed for the investor with a minimum of \$300,000 of liquid assets.

Adviser's individual investment advisory fee covers all advisory services for a period of 12 months. Fees are billed quarterly, in advance. The adviser may in its discretion, provide these services for annual fees less than \$3,000. **See** disclosure regarding **Limitations** at Item 4 above.

## INSTITUTIONAL INVESTMENT MANAGEMENT SERVICES

### Assets Under Management Maximum Annual Fee

\$0 up to \$1 million	0.75%
\$1 million up to \$2 million	0.75%
\$2 million up to \$3 million	0.60%
\$3 million up to \$5 million	0.50%
\$5 million up to \$10 million	0.40%
In excess of \$10 million	Negotiable

Adviser's institutional investment advisory fee covers all advisory services for a period of 12 months. Fees are billed quarterly, in advance, and may be negotiable in certain circumstances. *See* disclosure regarding Limitations at Item 4 above.

## QUALIFIED PLAN CONSULTING SERVICES

Compensation for Qualified Plan Consulting Services are governed by an investment sub-advisory agreement with Savant Capital Management. Savant Capital Management will bill the Plan directly for the fees due. Fees are payable quarterly, in advance, and are calculated as a percentage of the ending asset value from the previous quarter. This fee compensates Foster Group and Savant as a sub-advisor, for all consulting, investment advisory, fiduciary, and participant education services. Foster Group's fee is included in the fee charged by Savant Capital Management under the investment sub-advisory agreement. The following is the standard fee schedule charged by Savant Capital Management per the Qualified Plan Investment sub-Advisory agreement:

## OTHER CONSULTING SERVICES

### Qualified Plan Assets Under Management Standard Annual Fee

From \$0 to \$1 million in plan assets *	1.00%
Next \$2 million	0.80%
Next \$7 million	0.60%
In excess of \$10 million	0.50%

\*Subject to a minimum annual fee of \$2500

Fees may be negotiated in certain circumstances

Upon request, Adviser may provide investment advice and/or financial planning services on a project or one-time basis. Fees for this type of service are charged on an hourly basis, typically at an hourly rate of up to \$250. Fees are payable upon the completion of the consulting project. **See** disclosure regarding **Limitations** at Item 4 above.

## FEE BILLING

### Investment Management

Our standard form of Client Agreement authorizes us to automatically deduct advisory fees directly from a client's account on a quarterly basis. The Adviser will send the client's custodian a quarterly statement reflecting the fees billed and the custodian will send the client a statement at least quarterly reflecting all fees deducted from the account. Clients are responsible for verifying the accuracy of the fee calculation, as client's custodian will not determine whether the fee was properly calculated. Clients will receive monthly reports from their custodian and/or broker/dealer that include confirmation of all securities transactions in their account during that month. Clients should promptly notify Adviser if they fail to receive a statement from their custodian at least quarterly.

### Qualified Plan Consulting Services

Savant Capital Management, as the sub-Advisor, is authorized to automatically deduct advisory fees directly from a client's account on a quarterly basis. The sub-Advisor will send the client's custodian a quarterly statement reflecting the fees billed and the custodian will send the client a statement at least quarterly reflecting all fees deducted from the account. Client is responsible for verifying the accuracy of the fee calculation, as client's custodian will not determine whether the fee was properly calculated. Clients will receive monthly reports from their custodian and/or broker/dealer that include confirmation of all securities transactions in their account during that month. Clients should promptly notify Adviser if they fail to receive a statement from their custodian at least quarterly.

Clients will receive monthly reports from their custodian and/or broker/dealer that include confirmation of all securities transactions in their account during that month.

## OTHER FEES AND EXPENSES.

### Investment Management and Qualified Plan Consulting Services Fees

Foster Group's fee does not include custodial fees, transaction costs or other expenses charged by the client's custodian or broker. Each mutual fund in which the client's assets may be invested charges its own advisory fee and other fees and expenses, which are set forth in the fund's prospectus.

## TERMINATION OF ADVISORY AGREEMENT

### Investment Management

Either the client or Adviser may terminate the Investment Advisory Agreement under the following circumstances: 1) by a mutual agreement of both the client and Adviser 2) by either party giving verbal or written notice to the other party specifying the date of termination, with verbal notice being confirmed by written notice within 14 days. Clients who terminate their Agreement will receive a refund of the portion of any fee paid but not yet earned as of the date such notice is received or such later date as may be designated by the client, based on the following formula:

$$\frac{(\text{Days remaining in quarter after termination}) \times (\text{fees paid for the quarter})}{(\text{Total number of days in the quarter})}$$

Less (Any expenses incurred by Adviser, up to and including that date.)

### Qualified Plan Consulting Services

Client may terminate the Investment Advisory Agreement for Qualified Plan Services without penalty, within 90 days after signing the Agreement. Any Advisers' Fees paid by Client will be refunded in full. This Agreement also may be terminated by either Client or the Advisers upon 30 days prior written notice, and Client will receive a refund within 60 days of the pro-rated portion of any Advisers' Fee paid but not yet earned as of the date such notice is received, less any expenses incurred by the Advisers up to and including such date.

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

Adviser does not charge any performance based fees.

## ITEM 7. TYPES OF CLIENTS AND MINIMUM REQUIREMENTS

The Adviser generally provides services which may include investment management and financial planning to individuals, high-net-worth individuals, trusts, estates, corporations and/or business entities. The Adviser also provides investment consulting services to pension and profit-sharing plans.

The Adviser has certain minimum thresholds that have been established to allow the Adviser to provide the high level of personal services and attention which we believe our clients deserve.

### Investment Management

Adviser typically requires Individual Investment Management clients to place \$300,000 or more under its management. Adviser may, in its discretion, make exceptions to this requirement. If an exception is made, Individual Investment Management clients with assets

under management by Adviser of \$300,000 or less may be required to pay a minimum quarterly fee of \$750. This fee includes the cost of all client meetings, account establishment, transfer initiation and other items. Foster group may, in its discretion, reduce or waive this minimum fee requirement.

Adviser typically requires Institutional Investment Management clients to place \$500,000 or more under its management. Adviser may, in its discretion, make exceptions to this requirement. This fee includes the cost of all client meetings, account establishment, transfer initiation and other items.

#### Qualified Plan Consulting Services

The Investment sub-Advisory Agreement between Foster Group, Savant Capital Management and the Client, imposes a minimum investment management fee of \$2,500 annually. If applicable, this minimum fee is to be collected on a quarterly basis. The Advisers in their discretion may reduce or waive this minimum fee requirement.

## ITEM 8. METHOD OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

#### Methods of Analysis

The Adviser's method of security analysis is primarily fundamental, although Adviser may employ a wide range of methods to manage portfolios and evaluate investments. Adviser's analysis is based on sources of information from academic research materials, corporate rating services, financial publications, annual reports, prospectuses, and filings with the SEC.

Our investment philosophy is grounded in Modern Portfolio Theory, which refers to the process of reducing risk in a portfolio through systematic diversification across and within asset classes. Adviser typically adheres to the passive style of investing and, thus, recommends passive, asset-class mutual funds and exchange-traded funds. Adviser typically does not recommend individual stocks, bonds or actively managed mutual funds in its asset allocation strategies and portfolio recommendations to clients.

Adviser analyzes mutual funds recommended to clients based on the fund's total operating expenses, portfolio turnover, investment objective and investment restrictions and limitations. Adviser typically recommends that clients invest in no-load institutional mutual funds advised by Dimensional Fund Advisors (DFA), Vanguard and Schwab that have low operating expenses, low portfolio turnover, below-average capital gains distributions and a fundamental investment objective of investing in a particular asset class. DFA funds generally are available for investment only by clients of registered investment advisors, and all investments are subject to approval of the advisor. This means that you may not be able to make additional investments in DFA funds if you terminate your agreement with Adviser, except through another adviser authorized by DFA.

We believe in diversified asset-class exposure obtained primarily through a diversified mix of low cost mutual funds that represent desired asset classes. Mutual funds and exchange-

traded funds recommended by Adviser typically invest in some or all of the following types of securities:

- U.S. Stocks of any market capitalization
- Foreign Stocks, including Emerging Markets
- Investment Grade Fixed Income Securities
- U.S. Government and Government Agency Securities
- Real Estate Investment Trusts (Domestic and Foreign)
- Money market funds

### Principal Investment Strategies

Asset allocation models and specific funds recommended to clients typically are set forth in the client Investment Policy Statement. Adviser primarily recommends low cost mutual funds for the reason that mutual funds can provide a diversified portfolio that is designed to, and may limit the impact of large fluctuations in values of individual stocks and bonds. Mutual funds do not offer protection from market volatility. At times, different funds may be recommended to improve client portfolios. Upon the request of a client, Adviser may provide a limited review of client assets for which we do not have discretionary authority in the context of the overall plan. Adviser invests for the long-term and does not engage in market timing.

Adviser generally does not recommend individual stocks or bonds, but certain exceptions may be made in cases where the stocks were obtained before becoming a client or are requested by the client. We monitor individual stock exposure in the overall portfolio. We may give advice and take action with respect to other clients that is different from the advice, timing, and nature of action taken with respect to your account. Timing, allocation, and types of investments are determined as part of each client's overall financial plan.

The Adviser typically uses long-term investment strategies to implement investment advice given to clients. A long-term purchase strategy generally assumes the financial markets will go up in the long-term, which may not be the case. There is also the risk that certain segments of the market that you are invested in will go down over time even if the overall financial markets advance. Purchasing investments long-term may involve an opportunity cost – that of “locking-up” assets that may be better utilized in the short-term for other investments.

There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

### Principal Investment Risks

***Investing in securities involves risk of loss that clients should be prepared to bear.*** Risk refers to the possibility that you will lose money (both principal and any earnings) or fail to

Timing, allocation, and types of investments are determined as part of each client's overall financial plan.

make money on an investment. The Adviser cannot guarantee that it will achieve a client's investment objective. Below are some of the more specific risks of investments which the Adviser may recommend to clients:

### **1. Market Risk.**

The prices of securities held by mutual funds in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

### **2. Management Risk.**

The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.

### **3. Equity Risk.**

Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

### **4. Fixed Income Risk.**

The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

### **5. Investment Companies Risk.**

When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or

below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.

#### **6. REIT Risk.**

To the extent that a client invests in REITs, it is subject to risks generally associated with investing in real estate, such as (i) possible declines in the value of real estate, (ii) adverse general and local economic conditions, (iii) possible lack of availability of mortgage funds, (iv) changes in interest rates, and (v) environmental problems. In addition, REITs are subject to certain other risks related specifically to their structure and focus such as: dependency upon management skills; limited diversification; the risks of locating and managing financing for projects; heavy cash flow dependency; possible default by borrowers; the costs and potential losses of self-liquidation of one or more holdings; the possibility of failing to maintain exemptions from securities registration; and, in many cases, relatively small market capitalization, which may result in less market liquidity and greater price volatility.

#### **7. Derivatives Risk.**

Funds in a client's portfolio may use derivative instruments. The value of these derivative instruments derives from the value of an underlying asset, currency or index. Investments by a fund in such underlying funds may involve the risk that the value of the underlying fund's derivatives may rise or fall more rapidly than other investments, and the risk that an underlying fund may lose more than the amount that it invested in the derivative instrument in the first place. Derivative instruments also involve the risk that other parties to the derivative contract may fail to meet their obligations, which could cause losses.

#### **8. Foreign Securities Risk.**

Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

### **ITEM 9. DISCIPLINARY INFORMATION**

The Adviser has no material legal or disciplinary events to report.



## ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Adviser's sole business and source of income is providing investment management, financial planning and qualified plan consulting services. Adviser does not take part in any other type of business.

Adviser is not owned or controlled by, or under common control with, any other company. We have no obligation to use a particular broker/dealer, vendor, or investment product.

Adviser is a member of Zero Alpha Group, LLC, a consortium of registered investment advisers across the U.S. who advocate the Modern Portfolio Theory of investment management. Zero Alpha Group members are geographically diverse, meeting at least biannually to share investment information, strategic and marketing plans and research related to Modern Portfolio Theory and passive investment management techniques. Zero Alpha Group also may negotiate with mutual fund companies and broker-dealers to obtain lower cost investment services on behalf of the members' respective clients.

Foster Group has contracted with Savant Capital, LLC dba Savant Capital Management, a Delaware Corporation and a Registered Investment Advisor, to provide Qualified Plan Investment Advisory Services to Foster's Qualified Plan Consulting Services clients. Savant Capital Management will be retained by the client as a 3(38) Fiduciary (a discretionary advisor under ERISA Section 3(38)) with full authority over investment decisions within the plan including the selection, monitoring, and replacement of investment options. Foster Group will be retained as a Limited Scope 3(21) Fiduciary to the client, recommending the investment advisor, serving in a co-fiduciary capacity, sharing non-discretionary authority over the investment decisions; assisting with the monitoring and maintenance of the investment menu, as well as the education efforts of the Participants, within the scope of ERISA Section 3(21). Fees for this arrangement are governed by the sub-advisory agreement between Foster Group and Savant Capital Management.

Foster Group representative, Bartholomew A. Banwart, CPA, also provides tax and accounting services in his separate individual capacity as a CPA, independent of Foster Group. His tax and accounting services are primarily provided to individuals, some of whom may also be Foster Group clients. The tax and accounting services provided by Mr. Banwart are separate and distinct from Foster Group's advisory services. Foster Group does not receive any compensation from Mr. Banwart relative to his tax and accounting services. No Foster Group client is obligated to use or engage Mr. Banwart for tax or accounting services. His services do not include the authority to sign checks or otherwise disburse funds on any Foster Group advisory client's behalf.

Foster Group representative, Shea A. Mears, CPA, also provides tax and accounting services in his separate individual capacity as a CPA, independent of Foster Group. His tax and accounting services are primarily provided to individuals, some of whom may also be Foster

Group clients. The tax and accounting services provided by Mr. Mears are separate and distinct from Foster Group's advisory services. Foster Group does not receive any compensation from Mr. Mears relative to his tax and accounting services. No Foster Group client is obligated to use or engage Mr. Mears for tax or accounting services. His services do not include the authority to sign checks or otherwise disburse funds on any Foster Group advisory client's behalf.

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

### Code of Ethics

Adviser has adopted a Code of Ethics pursuant to Rule 204A-1 under the Investment Advisers Act of 1940. The Code of Ethics is based on the principle that our employees owe a fiduciary duty to clients. In complying with this duty, advisory personnel must avoid activities or interests that might interfere with making decisions in the best interests of clients. Under the Code of Ethics, advisory personnel are required to submit quarterly reports of their personal securities transactions to Adviser's Chief Compliance Officer for review. Employees are prohibited from investing in initial public offerings and private placements without prior consent of the Chief Compliance Officer. In addition, each person subject to the Code of Ethics is required to report to the Chief Compliance Officer all violations of the Code of which such person becomes aware. Adviser will provide a copy of its Code of Ethics, free of charge, upon the request of any client.

Employees of Adviser who have obtained the Certified Financial Planner (CFP®) designation are bound by the CFP Board's *Standards of Professional conduct*, which outline ethical and practice standards for CFP professionals. On behalf of Adviser, only our employees with a CFP designation or bachelor's degree are authorized to give advice to clients.

### Participation or Interest in Client Transactions

Adviser generally does not recommend investments to clients in which Adviser or any of its principals has a financial interest. If any such investment were proposed, the principal would be required to disclose any participation or interest in the transaction to the client and to obtain the approval of Adviser's Chief Compliance Officer Gregory Olsen in advance.

### Personal Trading

Adviser employees are subject to the firm's Code of Ethics and must report their personal securities transactions to our Chief Compliance Officer for review on a regular basis to the extent required under the Investment Advisers Act of 1940. From time to time, Adviser employees may purchase mutual funds and other securities for their personal accounts, which are recommended to clients. In such cases, employees will not effect transactions for their personal accounts which will be contrary to recommendations being made to clients, nor will they compete with clients in connection with such transactions. Adviser has adopted an

Adviser generally does not recommend investments to clients in which Adviser or any of its principals has a financial interest.

Insider Trading Policy that prohibits its employees from trading on material, non-public information.

## ITEM 12. BROKERAGE PRACTICES

### Recommending Brokerage Firms

Adviser typically recommends that clients establish an account with Charles Schwab & Co. Inc., or TD Ameritrade. Charles Schwab & Co. Inc is an independent FINRA-registered broker-dealer, member SPIC. Foster Group participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade, Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. Foster Group is separate and unaffiliated with Schwab and TD Ameritrade. Adviser does not have discretion to select brokers without the client's consent and approval. Schwab and TD Ameritrade offer to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions, and may charge fees and/or commissions for such brokerage services. Adviser currently recommends Schwab and TD Ameritrade based on its determination that they provide low transaction fees, good execution capabilities, financial stability, access to institutional mutual funds, web trading platform and their ability to provide clients' account information in an electronic format acceptable to Adviser. While as a fiduciary, Adviser endeavors to act in the best interest of the client, its recommendation that a client maintain an account at a particular broker dealer may be based, in part, on other benefits that Adviser receives from such broker, in the form of related services, and not solely on the nature, cost or quality of brokerage services, which may create a potential conflict of interest.

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Adviser may receive from Schwab, and /or TD Ameritrade Institutional program (or another broker-dealer/custodian or provider) without cost (and/or at a discount) support services and/or products, certain of which assist the Adviser to better monitor and service client accounts maintained at such institutions. Advisor receives some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure under Item 14 below.) Included within the support services that may be obtained by the Adviser may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products provided by third party vendors used by Adviser in furtherance of its investment advisory business operations. There is no direct link between Advisor's participation in TD Ameritrade's Institutional

program and/or Schwab Institutional, and the investment advice it gives to its clients., although Advisor receives economic benefits through working with both. These benefits received by Foster Group, or its associated persons, do not depend on the amount of brokerage transactions directed to Schwab and/or TD Ameritrade.

Foster Group, Inc. (“Advisor”) considers a number of factors in selecting brokers and custodians at which to locate (or recommend location of) its client accounts, including, but not limited to, execution capability, experience and financial stability, reputation, and the quality of services provided. In selecting TD Ameritrade Institutional (“TD Ameritrade”) as the broker and custodian for certain of its current and future client accounts, Advisor takes into consideration its arrangement with TD Ameritrade as to obtaining price discounts for TD Ameritrade’s automatic portfolio rebalancing service for advisors known as “iRebal.” The Adviser continues to use this software on an ongoing basis for the benefit of all of its client accounts.

The standard iRebal annual license fee applicable to Advisor is \$48,750.00. That fee is subject to specified reductions (and even complete waiver) if specific amounts of client taxable assets are either already on the TD Ameritrade Institutional platform or are committed to be placed on it. Specified taxable client assets either maintained on or committed to the TD Ameritrade Institutional platform will bring fee reductions of up to \$48,750.00 per year for each of as many as three years or more.

The non-taxable assets excluded from the maintenance and commitment levels described above are those that constitute “plan assets” of plans subject to Title 1 of the Employee Retirement Income Security Act of 1974, amended, or of plans as defined in Section 4975 of the Internal Revenue Code (which include IRAs).

If Advisor does not maintain the relevant level of taxable assets on the TD Ameritrade Institutional platform, Advisor may be required to make a penalty fee payment to TD Ameritrade calculated on the basis of the shortfall.

Although Advisor believes that the products and services offered by TD Ameritrade are competitive in the marketplace for similar services offered by other broker-dealers or custodians, the arrangement with TD Ameritrade as to the iRebal service may affect Advisor’s independent judgment in selecting or maintaining TD Ameritrade as the broker or custodian for client accounts.

As indicated above, certain support services and/or products that *may* be received, may assist the Adviser in managing and administering client accounts. Others do not directly provide such assistance, but rather assist the Adviser to manage and further develop its business enterprise.

Adviser's clients do not pay more for investment transactions effected and/or assets maintained at *TD Ameritrade, and/or Schwab* as a result of this arrangement. There is no corresponding commitment made by the Adviser to *TD Ameritrade, and/or Schwab* or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

**The Adviser's Chief Compliance Officer, Gregory Olsen, remains available to address any questions that a client or prospective client may have regarding the above arrangements, and the conflict any such arrangement may create.**

Client's independent broker-dealer will charge each client a commission or fee to execute transactions in the customer's account. The broker-dealer, not Adviser, determines the commission rate and fees charged to clients. While Adviser believes the commissions and fees charged by the broker-dealers that it recommends are competitive, transactions may not always be executed at the lowest available commission rate. Although Adviser routinely requests that clients direct Adviser to execute all transactions through Schwab or TD Ameritrade, clients may direct the use of another qualified custodian and broker-dealer. Brokers selected at the discretion of the client may limit Adviser's ability to obtain the best price and execution and the client will incur trade away fees when trades are placed away from client's custodian.

### **Best Execution**

As a fiduciary, Adviser has an obligation to obtain best execution of advisory clients' transactions under the circumstances of the particular transaction. Adviser seeks to execute client transactions in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances. Adviser has evaluated the full range of brokerage services offered by Schwab and TD Ameritrade and considers them to have reliable execution capabilities, compared to other comparable brokers. Based on these factors, Adviser believes that Schwab and TD Ameritrade provide competitive price and execution to its clients compared to other broker-dealers that offer institutional advisory platforms. If client establishes a brokerage/custodial account with Schwab or TD Ameritrade, then Adviser will place all orders pursuant to its investment determinations on behalf of client's portfolio through either custodian, even though client potentially could obtain a more favorable net price and execution from another broker-dealer in particular transactions or from a discount broker in general. While we believe Schwab and TD Ameritrade's transaction rates to be competitive, transactions may not always be executed at

the lowest available commission rate.

### Soft Dollars

Adviser does not enter into so-called “soft dollar arrangements,” where an adviser directs client commissions to a broker-dealer that provides research and brokerage services to the adviser.

Schwab and TD Ameritrade offer institutional trading platforms to advisers. As an adviser, Adviser receives certain benefits from Schwab and TD Ameritrade, including electronic receipt of duplicate client confirmations and statements; ability to have investment advisory fees deducted directly from client accounts; access to an electronic communication network for client order entry and account information; and discounts on services offered by the broker-dealer and its affiliates

### Order Aggregation

Adviser does not execute aggregate or block trades on behalf of its clients.

## ITEM 13. REVIEW OF ACCOUNTS

If Adviser prepares a written financial plan for a client, the plan is reviewed periodically as agreed upon with the client. Typically, financial plans are reviewed at least annually.

Reviews may be conducted by any of the following individuals at the Adviser: Gregory Olsen, CFP®, CEO; Mark Stadtlander, CFP®, Lead Advisor Manager; Phil Kruzan, CFP®, Lead Advisor; Reed Rinderknecht, CFP®, Lead Advisor ; Kent Kramer, CFP®, Lead Advisor; Martha Gribble, Lead Advisor; Joseph Bantz, CFP®, Lead Advisor; Ross Polking, CFP®, Lead Advisor; Brad Rempe, CFP®, Lead Advisor; Scott Snyder, CFP®, Lead Advisor; Jon Evans, CFP®, Lead Advisor; Matt Abels, CFP®, Director of Wealth Management; Marcus Iwig, CFP®, Lead Advisor; Andrew Farmer CFP®, Lead Advisor; Shea Mears, CFP®, Lead Advisor; Kate Juelfs, Director of Service; Brittany Heard, CFP®, Associate Advisor; Caleb Brown, CFP®, Associate Advisor; Kyra Stadtlander, Associate Advisor; and Laura Giles, Associate Advisor.

Adviser reviews investment management accounts at least quarterly. More frequent reviews may be provided upon request by a client or in the event of unusual market activity.

Reviews of Adviser's approximately 1103 client investment management relationships may be conducted by one or more of the following individuals: Gregory Olsen, CFP®, CEO; Mark Stadtlander, CFP®, Lead Advisor Manager; Ed Green, CFP®, Lead Advisor; Phil Kruzan, CFP®, Lead Advisor; Reed Rinderknecht, CFP®, Lead Advisor; Kent Kramer, CFP®, Lead Advisor; Martha Gribble, Lead Advisor; Joseph Bantz, CFP®, Lead Advisor; Ross Polking, CFP®, Lead Advisor; Brad Rempe, CFP®, Lead Advisor; Scott Snyder, CFP®, Lead Advisor; Jon Evans, CFP®, Lead Advisor; Matt Abels, CFP®, Director of Wealth Management; Marcus Iwig, CFP®, Lead Advisor; Andrew Farmer CFP®, Lead Advisor; Shea Mears, CFP®, Lead Advisor; Kate Juelfs, Director of Service; Brittany Heard,

CFP®, Associate Advisor; Caleb Brown, CFP®, Associate Advisor; Kyra Stadtlander, Associate Advisor; Laura Giles, Associate Advisor; Bart Banwart, CFP®, Service Manager; or Seth Comfort, Portfolio Analyst. All trades placed in client accounts are reviewed by at least two of the above stated individuals.

Adviser will attempt to contact each client at least annually to determine whether there have been any changes in the client's financial situation or investment objectives, or whether the client wishes to impose reasonable restrictions on the management of the account or modify an existing restriction. Clients will be notified quarterly in writing that Adviser should be contacted if there have been any changes in the client's financial situation or the way in which the client's portfolio is managed. Adviser advisory representatives, who are knowledgeable about its management style, are available at Adviser's office or by telephone on a reasonable basis to meet with the client at the client's request.

Adviser typically provides individual clients with a written financial plan that may include, among other items, asset allocation recommendations, net worth statement, charitable giving strategies, estate planning information, or information regarding cash flow management, current market values, rates of return and portfolio allocation.

Adviser typically provides investment management clients with quarterly reports that may include, among other items, portfolio holdings and their current market values, rates of return, and portfolio allocation. Foster Group remains available to meet at least annually with Qualified Plan Consulting Service clients to review an analysis of investments, as well as conduct due-diligence meetings. Foster Group, may also conduct periodic education and plan review meetings with plan participants as scheduled or requested.

Adviser occasionally provides clients with newsletters and commentary containing general discussions of current market conditions or educational interviews.

## ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION

### Incoming Referrals

Schwab Advisor Network®: Foster Group receives client referrals from Charles Schwab & Co., Inc. ("Schwab") through Foster Group's participation in Schwab Advisor Network® ("the Service"). The Service is designed to help investors find an independent investment advisor. Schwab is a broker-dealer independent of and unaffiliated with Foster Group. Schwab does not supervise Advisor and has no responsibility for Foster Group's management of clients' portfolios or Advisor's other advice or services. Foster Group pays Schwab fees to receive client referrals through the Service. Foster Group's participation in the Service may raise potential conflicts of interest described below.

Foster Group 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 accounts that are maintained at, or transferred to, another custodian. The Participation Fee paid by Foster Group is a percentage of the fees the client owes to Foster Group or a percentage of the value of the assets in the client's account, subject to a minimum Participation Fee. Foster Group 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 Foster Group quarterly and may be increased, decreased or waived by Schwab from time to time. The Participation Fee is paid by Foster Group and not by the client. Foster Group has agreed not to charge clients referred through the Service fees or costs greater than the fees or costs Foster Group charges clients with similar portfolios who were not referred through the Service.

Foster Group 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 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 Advisor generally would pay in a single year. Thus, Foster Group 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 Foster Group's clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, Foster Group will have incentives to encourage household members of clients referred through the Service to maintain custody of their accounts and execute transactions at Schwab and to instruct Schwab to debit Foster Group's fees directly from the accounts.

For accounts of Foster Group's clients maintained in custody at Schwab, Schwab will not charge the client separately for custody but will receive compensation from Foster Group's clients in the form of commissions or other transaction-related compensation on securities trades executed through Schwab. Schwab also will 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, Foster Group may have an incentive to cause trades to be executed through Schwab rather than another broker-dealer. Foster Group 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 Foster Group'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.



Advisor may receive client referrals from TD Ameritrade through its participation in TD Ameritrade AdvisorDirect. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, Advisor may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with Advisor and there is no employee or agency relationship between them. TD Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise Advisor and has no responsibility for Advisor's management of client portfolios or Advisor's other advice or services. Advisor pays TD Ameritrade an on-going fee for each successful client referral. This fee is usually a percentage (not to exceed 25%) of the advisory fee that the client pays to Advisor ("Solicitation Fee"). Advisor will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by Advisor from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired Advisor on the recommendation of such referred client. Advisor will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to its clients or otherwise pass Solicitation Fees paid to TD Ameritrade to its clients. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.

Advisor's participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, Advisor may have an incentive to recommend to clients that the assets under management by Advisor be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, Advisor has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. Advisor's participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client accounts.

**The Adviser's Chief Compliance Officer, Gregory Olsen, remains available to address any questions that a client or prospective client may have regarding the Service and any corresponding perceived conflict of interest such arrangement may create.**

Adviser has entered into sponsorship arrangements with several medical associations and/or organizations (the “Association”). In return for the payment of an annual sponsorship fee to the Association, the Adviser receives access to the physician members of the Association, including the ability to present educational programs and/or seminars to Association members, place advertisements in the Association journal and/or membership directory, write articles for the Association newsletter, and distribute promotional materials and/or mailings to Association members. No Association member is obligated to engage the Adviser to provide advisory services. In the event that a member does engage the Adviser, the terms and conditions of the engagement shall be set forth in a written agreement between the Adviser and the physician. In the event that a member does engage the Adviser, the Adviser will not remit any portion of the fees received from the member engagement to the Association. The only remuneration to the Association is the annual sponsorship fee. The payment of the sponsorship fee is not contingent upon the Adviser’s success in obtaining member engagements. Nevertheless, as result of the payment of the annual sponsorship fee to the Association, the potential for a conflict of interest arises since the prospective engagement of the Adviser by Association members could encourage the Adviser to make future and/or renewal annual sponsorship payments to the Association.

**The Adviser’s Chief Compliance Officer, Gregory Olsen, remains available to address any questions that an Association member may have regarding the sponsorship arrangement.**

As disclosed under Item 12. above, Advisor participates in TD Ameritrade’s institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor’s participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor’s related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client

accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

#### Referrals of Other Professionals

Advisor emphasizes a "team approach" when providing investment advisory services to its clients. If requested by a client, or if Advisor believes legal or accounting services are required and in the best interests of a client's financial plan, Advisor will recommend an independent attorney or accountant. Advisor does not pay for client referrals or enter into arrangements with other professionals for client referrals. However, Advisor may have a conflict of interest in making these recommendations because it may receive referrals from professionals that it has recommended to clients. Advisor will refer other professionals to its clients only when the services provided by the professional best suit the client's needs.

#### Other Compensation

Advisor does not receive sales charges, commissions, service fees, 12b-1 fees or other compensation from a non-client in connection with providing investment advice to a client.

### ITEM 15.CUSTODY

The Adviser shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. The Adviser may also provide a written periodic report summarizing account activity and performance.

**Please Note:** To the extent that the Adviser provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by the Adviser with the account statements received from the account custodian. **Please Also Note:** The account custodian does not verify the accuracy of the Adviser's advisory fee calculation.

The Adviser does not accept custody of client funds. Clients will retain ownership of all funds and securities in their accounts.

## ITEM 16. INVESTMENT DISCRETION

### Discretionary Trading Authority

Clients typically grant Adviser discretionary authority over the client's account to determine the securities to be bought and sold, to place trades, to negotiate transactions costs on their behalf, where possible, and periodically to rebalance the client's account back to the recommended allocation. Adviser has no obligation to supervise or direct investments held in client accounts that were not recommended, or that are not subject to review, by Adviser for a fee.

### Limited Power of Attorney

Clients who have granted discretionary trading authority to the Adviser are required to grant a "limited power of attorney" to Adviser over client's custodial account for purposes of trading and fee deduction. The client grants this authority in the brokerage account application.

## ITEM 17. VOTING CLIENT SECURITIES

Adviser does not exercise proxy voting authority over securities held in clients' accounts. Each client retains proxy voting authority over the securities that are held in the client's account. Adviser will promptly forward to the client all proxy solicitation notices it receives that relate to securities held in the client's account. Client may thereafter, in the client's sole discretion and at the client's sole expense, decide how to vote such proxies. Copies of our proxy voting policy are available, free of charge, upon the client's written request to Adviser. Clients may contact Adviser with any questions about a mutual fund proxy solicitation at the address on the cover page.

## ITEM 18. FINANCIAL INFORMATION

We are not aware of any financial conditions that are reasonably likely to impair the fulfillment of our contractual commitments to our clients.

## ITEM 19. REQUIREMENTS FOR STATE REGISTERED ADVISERS

Because Adviser is a federally registered investment adviser, this Item is not applicable.

## MISCELLANEOUS

### Business Continuity Plan

Adviser has adopted a disaster recovery plan that governs how its operations will be conducted in the case of a significant business disruption. In the case of a significant business disruption that affects communication with or to Adviser's main offices, clients may continue to call the firm at 800-798-1012, or 515-226-9000 with any questions they may have. A message will also be posted on the firm's website at [www.fostergrp.com](http://www.fostergrp.com). A copy of the Adviser's disaster recovery plan will be made available to any client upon written request.

### Privacy Notice

The Securities and Exchange Commission (SEC) was required by the Gramm-Leach-Bliley Act to establish standards to safeguard client information and records. As a result, the SEC adopted Regulation S-P, which among other things, requires investment advisors registered with the SEC to adopt appropriate policies and procedures that address safeguards to protect this information and to disclose its privacy policies to clients.

Foster Group, Inc. ("Foster Group") has always taken great measures to protect and safeguard information we gather on our clients. As a financial company, we can choose if or how we share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

### Types of Information Collected

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms, such as your name, address, phone number, Social Security Number, date of birth, account numbers, tax documents, income, employment and residential information, cash balances, security balances, other investments, investment objectives, goals, and risk tolerance, net worth; and
- Information about your transactions with us or with your custodian(s), such as buys, sells, gains, losses, fees, and/or holdings. Such information may be obtained from paper statements or via electronic download directly from your custodian.

Foster Group's web servers collect domain names and/or IP addresses of users to measure what pages and features are accessed by our visitors. This information helps us administer the site, improve content and gather broad demographic information for aggregate use.

Foster Group may use “cookies” or similar files or scripts throughout its website to enhance your convenience in using our websites, to improve search functionality or to hold information that you would otherwise need to re-key. “Cookies” are text files collected by a user's web browser. If you do not wish to accept “cookies” from our website, you may configure your web browser so that it does not accept “cookies”; however, you may lose certain functions available on our website.

In order to understand how advertising performs, we may collect certain information on our Site and other sites and mobile apps through our advertising service providers using cookies, IP addresses, and other technologies. The collected information may include the number of page visits, pages viewed on our Site, search engine referrals, browsing activities over time and across other sites following your visit to our Site, and responses to advertisements and promotions on the Site and on sites and apps where we advertise.

Foster Group uses information described in this Notice to help advertise our products and services, analyze the effectiveness of the advertising, and determine additional need for marketing.

If you prefer we not use information based on online Site behavior, you may opt out of online behavioral advertising by going to <https://tools.google.com/dlpage/gaoptout>.

### **Use of Personal Information**

We do not sell your personal information to anyone. We do not share your information for joint marketing with other financial companies or share information about your transactions and experiences or information about your creditworthiness for our affiliates' everyday business purposes. We do not share your information so our affiliates or non-affiliates can market to you.

We do not disclose or share nonpublic personal information about you to third parties, unless one of the following limited exceptions applies or you have specifically asked us to do so:

- We disclose personal information to companies that help us process or service your transactions or account(s) which include custodians or other vendors.
- We may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example, to cooperate with regulators or law enforcement authorities.

Foster Group restricts access to your personal and account information to those employees who need to know that information in order to provide services to you. We maintain physical, electronic, and procedural safeguards to guard your nonpublic personal information.

Additionally, whenever Foster Group hires other organizations to provide services to Foster Group's clients, Foster Group will require them to sign confidentiality agreements and/or the Privacy Policy.

From time to time it may be useful or convenient for Adviser to discuss client's financial information with other professionals engaged by the client, such as their attorney, CPA, or insurance agent. Adviser will secure written authorization from client prior to the sharing of any information and may also request written authorization to receive information from these other professional advisors in serving the client.

### **Emergency Contact**

From time to time due to unforeseen circumstances relating to the physical or mental health of a client, the best financial interests of the client may be served if Foster Group is able to communicate regarding the client with another individual. If the client has provided Foster Group with a properly executed copy of the client's power of attorney, Foster Group may contact the client's attorney-in-fact, if Foster Group reasonably believes doing so is in the best interest of the client. If the client has provided Foster Group with a properly executed copy of a Client Advocate Designation, Foster Group may communicate with the Client Advocate. If the client's attorney-in-fact or Client Advocate is unavailable, Foster Group may communicate with a responsible family member Foster Group reasonably believes is an appropriate person with whom to communicate under the circumstances.

### **Sharing Practices Notification**

We must provide you with a copy of this statement which details our sharing practices when you initially open an account and each year while you are a customer.

### **Changes to Privacy Policy**

In the future, Foster Group may offer new and different programs that necessitate a change in this Policy. Foster Group reserves the right to change its privacy policy at any time without prior notice. Any changes to the privacy policy will be posted on our website at [www.fostergroup.com](http://www.fostergroup.com) under the Privacy section and will be effective immediately upon posting.

### **Governing Law and Jurisdiction**

Any disputes arising out of this Policy, and Foster Group's collection and use of customer information, shall be governed and interpreted in accordance with the laws of the United States and the State of Iowa.

### **Phishing Scams**

Foster Group does not send emails to customers requesting billing, login or password

information. If you receive an email purporting to be from Foster Group that asks you to provide personal or account information, or login and passwords, do not provide such information unless you have first verified that the website or email is from Foster Group. Such emails may be fraudulent and used in connection with scams known as phishing. Foster Group asks that you report any suspicious emails or websites to Foster Group.

### **Disposal of Information**

Foster Group has taken steps to reasonably ensure that the privacy of your nonpublic personal information is maintained at all times, including in connection with the disposal of information that is no longer required to be maintained. Such steps shall include whenever possible, shredding paper documents and records prior to disposal, requiring off-site storage vendors to shred documents maintained in such locations prior to disposal, and erasing and/or obliterating any data contained on electronic media in such a manner that the information can no longer be read or reconstructed.

### **Right to Limit Sharing**

Federal law gives you the right to limit sharing only for:

- affiliates' everyday business purposes—information about your creditworthiness (we do not share)
- affiliates to market to you (we do not share)
- non-affiliates to market to you (we do not share)

State laws and individual companies may give you additional rights to limit sharing.

### **Contact and Modifying Personal Information**

If you should ever decide to close your account(s) or become an inactive client, we will continue to adhere to the privacy policies and practices as described in this notice.

Should you have any questions about the privacy and protection of your records, please contact us and we will be happy to discuss this matter with you.

- Send a request by mail to: **Foster Group, 6601 Westown Parkway, Suite 100, West Des Moines, IA 50266.**
- Call: 1.800.798.1012

**Please note that you cannot opt out of receiving any notifications or disclosures that we are required by Federal or State law to provide to you.**



Definitions	
Everyday Business Purposes	The actions necessary by financial companies to run their business and manage customer accounts, such as providing investment advisory and financial planning advice, processing securities transactions, and otherwise providing financial services to you.
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
Non-Affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

**ANY QUESTIONS:** The Adviser's Chief Compliance Officer, Gregory Olsen, remains available to address any questions that any client or prospective client may have regarding any portion of the above Part 2A disclosure.