



Item 1 Cover Page



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Form ADV Part 2A Appendix 1 – “Wrap Fee Program Brochure”

Dated: 1/8/2024

This Form ADV2A – Appendix 1 (“Wrap Fee Brochure”) provides information about the qualifications and business practices of Richmond Investment Services, LLC when offering services pursuant to a wrap program. If you have any questions about the contents of this brochure, please contact us at (262) 242-4200. 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 (e.g. “registered investment advisor”) does not imply a certain level of skill or training.

Additional information about Richmond Investment Services, LLC is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Material Changes

Pursuant to SEC rules, Richmond Investment Services, LLC (“Firm,” “RIS,” “Adviser,”) will ensure that clients receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the Firm’s fiscal year end, December 31. This means that if there were any material changes over the past year, clients will receive a summary of those changes no later than April 30. At that time, Richmond Investment Services, LLC will also offer a copy of its most current disclosure brochure and may also provide other ongoing disclosure information about material changes as necessary. If there are no material changes over the past year, no notices will be sent.

Clients and prospective clients can always receive the most current disclosure brochure for Richmond Investment Services, LLC at any time by contacting their investment advisor representative.

This is a new brochure as of 1/8/2024.

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Item 4: Services, Fees & Compensation

The Adviser generally provides advisory services through programs sponsored by LPL Financial, LLC (“LPL”), a registered investment adviser and broker-dealer. LPL is independently owned and operated. LPL offers wrap-fee programs and non-wrap fee programs to clients.

The Firm sponsors a wrap fee program, which allows clients to pay a single fee for investment advisory services and associated custodial transaction costs. Transaction fees will be paid by the Firm via individual transaction charges. Because the Firm absorbs client transaction fees, an incentive exists to limit trading activities in client accounts. Custodial transaction costs, however, are not included in the advisory fee charged by the Firm for non-wrap services, and are to be paid by the Client to LPL. Depending on the Client’s account or portfolio trading activity, Clients may pay more for using the Firm’s wrap fee services than they would for using the Firm’s non-wrap fee services.

The Firm does not charge Clients higher advisory fees based on their trading activity, but you should be aware that the Firm may have an incentive to limit the Firm’s trading activities in your account because the Firm is charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by LPL.

LPL’s Financial Strategic Wealth Management Program II offers Clients an asset management account that is directly managed by the Firm’s investment advisor representatives. Clients participating in SWM II accounts pay a single wrap fee for advisory services and associated custodial transaction costs. Clients participating in LPL’s Strategic Wealth Management Program (“SWM”) pay an asset-based management fee and separate transaction costs. Please see the Firm’s Brochure (ADV 2A) for more information regarding SWM

Wrap Advisory Services

Strategic Wealth Management Program II (“SWM II”)

As part of the Firm’s SWM II service, a portfolio is created, consisting of individual stocks, bonds, exchange traded funds (“ETFs”), options, mutual funds and/or other investments. The Client’s individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Portfolios will be designed to meet a particular investment goal, determined to be suitable to the Client’s circumstances. Once the appropriate portfolio has been determined, portfolios are continuously and regularly monitored, and if necessary, rebalanced based upon the client’s individual needs, stated goals, and objectives.

Fees

The maximum annual fee to be charged to the Client’s account will not exceed 1.5%. The fee to be assessed to each account will be detailed in the Client’s signed advisory agreement or LPL account application. Fees are billed on a pro-rata basis quarterly in advance based on the value of

the account on the last day of the previous quarter. Fees are negotiable and will be deducted from the account. Please note that fees will be adjusted for deposits and withdrawals made during the quarter. If accounts are opened during the quarter, the pro-rata advisory fees will be deducted during the next regularly scheduled billing cycle. As part of this process, Clients understand the following:

- 1) LPL as the Client's custodian sends statements at least quarterly, showing all disbursements for each account, including the amount of the advisory fees paid to the Firm;
- 2) Clients provide authorization permitting LPL to deduct these fees; and
- 3) LPL calculates the advisory fees for all fee schedules and deducts them from the Client's account.

Other Types of Fees & Expenses

In many instances, LPL makes available mutual funds in a SWM II account that offer various classes of shares, including shares designated as Class A Shares and shares designed for advisory programs, which can be titled, for example, as "Class I," "institutional," "investor," "retail," "service," "administrative," or "platform" share classes ("Platform Shares"). The Platform Share class offered for a particular mutual fund in SWM II in many cases will not be the least expense share class that the mutual fund makes available and was selected by LPL in certain cases because the share class pays LPL compensation for the administrative and recordkeeping services LPL provides to the mutual fund. Client should understand that another financial services firm may offer the same mutual fund at a lower overall cost to the investor that is available through SWM II. In other instances, a mutual fund may offer only Class A Shares, but another similar mutual fund may be available that offers Platform Shares. Class A Shares typically pay LPL a 12b-1 fee for providing shareholder services, distribution, and marketing expenses ("brokerage-related services") to the mutual funds. Platform Shares generally are not subject to 12b-1 fees. As a result of the different expenses of the mutual fund share classes, it is generally more expensive for a Client to own Class A Shares than Platform Shares. An investor in Platform Shares will pay lower fees over time and keep more of his or her investment returns than an investor who holds Class A Shares of the same fund.

Advisor has a financial incentive to recommend Class A Shares in cases where both Class A and Platform Shares are available. This is a conflict of interest which might incline Advisor, consciously or unconsciously, to render advice that is not disinterested. Although the Client will not be charged a transaction charge for transactions, Advisor pays LPL a per transaction charge for mutual fund purchases and sales in the account. Advisor generally does not pay transaction charges for Class A Share mutual fund transactions. The cost to Advisor of transaction charges generally may be a factor Advisor considers when deciding which securities to select and whether or not to place transaction in the account.

The lack of transaction charges to Advisor for Class A Share purchases and sales, together with the fact that Platform Shares generally are less expensive for a Client to own, presents a significant conflict of interest between Advisor and the Client. In short, it costs Advisor less to recommend and select Class A share mutual funds than Platform Shares, but Platform Shares

will generally outperform Class A mutual fund shares on the basis of internal cost structure alone. Clients should understand this conflict and consider the additional indirect expenses borne as a result of the mutual fund fees when negotiating and discussing with your Advisor the advisory fee for management of an account.

Termination and Refunds

Either party may terminate the signed advisory agreement at any time. Upon receipt of you notice of termination, LPL will process a pro-rated refund of the unearned portion of the advisory fees charged in advance at the beginning of the quarter.

Retirement Rollovers

There is a conflict of interest for individuals that currently invest in an employer-sponsored retirement plan or individual retirement account that are considering a roll out of assets from the retirement plan or account. A conflict of interest exists because the Firm will be compensated only if the individual rolls over the proceeds into an IRA that the Firm manages. As a result, it can be construed that the Firm has a financial incentive to recommend one option over another. Therefore, the Client should include in his/her decision making process, a thorough review of all options available; for example (1) remain invested in the current retirement plan or account, (2) transfer assets to a new employer-sponsored retirement plan, (3) transfer to an IRA with a financial institution, or (4) withdraw assets directly, which would be subject to federal and applicable state and local taxes and possibly subject to the IRS penalty of 10% depending upon the age of the individual

Item 5: Account Requirement & Types of Clients

The Firm does not impose a minimum account size to become an advisory Client; however, certain programs offered by LPL and other broker-dealers may require a minimum amount of investable assets to open and maintain an account. A minimum initial account value of \$25,000 is suggested for the SWM II service.

The Firm's Clients generally include the following:

- Individuals
- Profit sharing plans and other qualified plans
- Trusts, estates, or charitable organizations
- Corporations and other business entities

Item 6: Portfolio Manager Selection & Evaluation

The Firm's investment adviser representatives ("IAR") act as portfolio managers for this wrap fee program. A conflict arises in that other investment advisory firms may charge the same or lower fees than the Firm for similar services. The Firm's IARs are subject to individual licensing requirements as imposed by state securities boards. The Firm is required to confirm or update

each IARs Form U4 on an annual basis. IAR supervision is conducted by the Firm's Chief Compliance Officer or other management personnel.

The Firm's IARs will regularly review the Account and implement changes that the IAR deems appropriate. An official Account review will be conducted and documented at least annually. The nature of these reviews is to learn whether Client Accounts are in line with their investment objectives and appropriately positioned.

Advisory Business

Information about the Firm's wrap fee services can be found in Item 4 of this brochure.

Each SWM II Client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the Account.

Performance-Based Fees & Side-by-Side Management:

The Firm does not charge performance-based fees.

Methods of Analysis, Investment Strategies & Risk of Loss

RIS uses a variety of methods of analysis, such as:

- Economic analysis. Economic analysis generally involves studying various factors in an economy, including macro-economic factors (such as interest rates, inflation, and growth) and micro-economic factors (such as market share, supply, and consumer demands) specific to a particular industry, sector, or company.
- Fundamental analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the security.
- Technical market analysis and technical trend following. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors to discern patterns. Technical analysis does not consider the underlying financial condition of an issuer. This presents the risk that a poorly managed or financially unsound issuer underperforms regardless of market conditions.

The financial professionals' investment strategies are based on the client's specific situation, including designated investment objectives and risk tolerances.

Investment activities involve a significant degree of risk. The performance of any investment is subject to numerous factors that are not within the control of RIS. Many of these factors include a wide range of economic, political, technological, and other conditions (including acts of terrorism and war or regional/global pandemic) that affect investments in general or in specific industries or companies. The investment decisions made, and the actions taken in managing client assets will be subject to various market, liquidity, currency, economic, political, and other risks. Investing in securities involves a risk of loss that clients should be prepared to bear. The investment performance and the success of any investment strategy can never be predicted or guaranteed, and the value of a client's investments will fluctuate due to market conditions. Investments may lose value and past performance is never a guarantee of future results. The information contained in this Brochure cannot disclose every potential risk associated with an investment strategy, nor all the risks applicable to a particular manager, security, or investment. Risks vary by client according to their investment objectives, guidelines, liquidity needs and not every strategy or portfolio will be exposed to each of the risks described. This list is not intended to be exhaustive of all the risks associated with investing in strategies or securities that are utilized or recommended by RIS.

Risks of Investing in Securities: Securities markets are volatile and investing in securities involves the risk of loss that clients should be prepared to bear. RIS cannot guarantee that the strategies offered will be able to achieve a particular level of return or maintain a particular risk profile.

Market Risk: The direction of the capital markets is difficult to predict and are dependent upon changes in several factors, including, but not limited to, interest rates, inflation, and a host of additional economic and political factors. There is always a risk that the capital markets will decline, bringing down the value of individual securities regardless of their fundamental characteristics. Market risk is also known as systematic risk or undiversifiable risk. This risk is both unpredictable and impossible to eliminate.

Investment Advisor Selection Risk: The investment performance of a client's investment program will vary with the success or failure of the investment advisor that RIS or a client selects to manage their assets. An investment advisor's past performance is never indicative of future results. Clients should not assume that the future performance of any specific investment advisor, investment strategy, recommendation or investment will be profitable.

Asset Allocation Risk: A portfolio that holds large cash positions may deviate from the stated benchmark and could underperform as a result. Differences in the security holdings and weights of a portfolio versus the strategy benchmark will result in disparities between a portfolio's performance relative to its benchmark. A portfolio may perform better or worse than a similarly managed account for various reasons including, but not limited to, the frequency and timing of rebalancing and trading each portfolio and the size and number of positions in each portfolio.

Portfolio Concentration Risk: Strategies that are concentrated in only a few securities, sectors or industries, regions or countries or asset classes could expose a portfolio to greater risk and may cause the portfolio value to fluctuate more widely than a portfolio that is diversified.

Overexposure to certain sectors or asset classes (e.g., MLPs, REITs, etc.) may prove to be detrimental to an investor if there is a negative sector move.

Company Specific Risk: The risk related to a firm's business plans, stock valuation, profitability, accounting practices, growth strategy, and other factors particular to a company rather than to the overall market. Some of these risks cannot be predicted, such as the retirement or death of a senior executive, which may lead to negative performance in the future.

Stock, Security, ETF or Fund Selection Risk: The risk that RIS or a client chooses a security that underperforms the market for unanticipated reasons. There can be no assurance that clients will ever come to realize the value of some of these investments, and that the investment will ever increase in value. During this time, the client may have funds locked up in an underperforming investment, which presents an opportunity cost for other investments.

Timing Risk: The risk that an investment performs poorly after its purchase or better after its sale. Moreover, if a redemption is required by the client, the client may face a loss due to poor overall market performance or security performance at that time.

Data Risk: RIS's securities analysis relies on data that is provided by third-party vendors and publicly available sources of information. Information that is incomplete, inaccurate or outdated would affect the efficacy of that analysis.

Counterparty Risk: A portfolio is subject to risk with respect to the counterparties. Risks affecting counterparties such as brokers, custodians, clearing banks or agents, escrow agents or issuers, foreign exchanges or securities lending programs could result in failure by the counterparty to honor its obligations. A portfolio may experience significant delays in obtaining any recovery (including recovery of posted collateral) during insolvency, bankruptcy or other reorganization proceedings and might realize only a limited recovery or no recovery at all. If the credit rating of a counterparty is lowered, a portfolio would be exposed to any increased credit risk associated with that counterparty.

Credit Risk: The credit rating of an issuer of a security is based on, among other things, the issuer's historical financial condition and the rating agencies' investment analyses at the time of rating. An actual or perceived deterioration of the ability of an issuer to meet its obligations would have an adverse effect on the value of the issuer's securities.

Liquidity Risk: Low trading volume, large positions or legal restrictions are some conditions which could limit or prevent a portfolio manager from selling securities or closing positions at desirable prices. Securities that are relatively liquid when acquired could become illiquid over time. The sale of any such illiquid investment might be possible only at substantial discounts or might not be possible at all. Further, such investments may be difficult to value.

Global and National Crisis Risk: Ongoing or future global or national crises including, but not limited to, pandemic, cyberattack, sabotage, terrorism, and acts of war could result in disruptions to the economies of many nations, individual companies, and can negatively impact global markets in an unforeseeable manner. Such disruptions include, but are not limited to, travel

restrictions; quarantines; supply chain disruptions; and workforce inefficiencies, absenteeism, distraction, or general anxiety. Such unpredictable, but no longer unprecedented, crises may exacerbate other pre-existing political, social, and economic risks in certain countries. The impact of such crises may be quick, severe and of unknowable duration. Ongoing or future crises could result in the temporary or permanent disruption of RIS's ability to provide investment advice and volatility in the financial markets and could have a negative impact on investment performance.

Investment Risks

Equity Securities: Equity securities are subject to market risk, which is the risk that common stock prices will fluctuate over short or even extended periods. Equity securities generally have greater price volatility than fixed income securities. The market price of equity securities may increase or decrease, sometimes rapidly and/or unpredictably. Equity securities may decline in value due to factors affecting markets in general, whether that be in a particular industry, sector or geographic region represented in those markets, or individual security concerns.

Debt or Fixed Income Securities: Debt securities are affected by changes in interest rates. When interest rates rise, the value of debt securities are likely to decrease. Conversely, when interest rates fall, the values of debt securities are likely to increase. The values of debt securities may also be affected by changes in the credit rating or financial condition of the issuing entities.

Master Limited Partnerships ("MLPs"): MLPs are limited partnerships that trade on securities exchanges like stocks. Issuers of MLPs are not subject to income tax, and shareholders in MLPs are actually "limited partners" in that company. The issuers' special tax designation allows MLPs to pass the tax burden on to their shareholders which will result in higher tax obligations for taxable clients.

Mutual Funds Risk: The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers, and the fund straying from its objective (i.e., style drift). Mutual funds have certain costs associated with underlying transactions, as well as operating costs such as marketing and distribution expenses and underlying advisory fees. Mutual fund costs and expense vary from fund to fund and will impact a mutual fund's performance. Additionally, mutual funds typically have different share classes, as further discussed below, that trade at different Net Asset Value ("NAV") as determined at the daily market close and have different fees and expenses.

Mutual Fund Share Classes: Mutual funds that offer different share classes are priced differently and have varying levels of internal costs. For example, institutional share classes often have higher trading costs; however, the internal costs of the fund are lower. Over a period, certain share classes will become more expensive if held in an account for a long period of time. Additionally, even though multiple share classes may be available, a custodian may only make available a limited number of share classes, or a custodian may not choose to offer the least expensive share class that is available. Other custodians and investment advisors may offer the same mutual fund or a different mutual fund share class at a lower overall cost to the investor.

If a client is invested through a LPL Strategic Wealth Management (SWM) or SWM II account, LPL makes available mutual funds that offer various classes of shares, including shares designated as Class A Shares and shares designed for advisory programs, which can be titled, for example, as “Class I,” “institutional,” “investor,” “retail,” “service,” “administrative” or “platform” share classes (“Platform Shares”). The Platform Share class offered for a particular mutual fund in SWM II in many cases will not be the least expensive share class that the mutual fund makes available and was selected by LPL in certain cases because the share class pays LPL compensation for the administrative and recordkeeping services LPL provides to the mutual fund. Clients should understand that another financial services firm may offer the same mutual fund at a lower overall cost to the investor than is available through SWM II. In other instances, a mutual fund may offer only Class A Shares, but another similar mutual fund may be available that offers Platform Shares. Class A Shares typically pay LPL a 12b-1 fee for providing shareholder services, distribution, and marketing expenses (“brokerage-related services”) to the mutual funds. Platform Shares generally are not subject to 12b-1 fees. As a result of the different expenses of the mutual fund share classes, it is generally more expensive for a client to own Class A Shares than Platform Shares. An investor in Platform Shares will pay lower fees over time and keep more of his or her investment returns than an investor who holds Class A Shares of the same fund.

Borrowing and Leverage Risk: If permitted by a client’s investment guidelines and by mutual agreement with the client, a portfolio may include the purchase of securities on margin, engage in short sales, borrow money or use derivatives, each of which will cause the portfolio to be leveraged. Leverage exaggerates the effect on a portfolio’s value for any increase or decrease in the market value of the portfolio’s investment value. Leveraging will also create interest expenses for a portfolio which can exceed the investment return from the borrowed funds.

Short Sales: A client portfolio strategy may include short selling. RIS makes no assurance that a strategy utilizing short sales will be profitable. A short sale is affected by selling a security which the seller does not own or selling a security which the seller owns but which it does not deliver upon consummation of the sale. To make delivery to the buyer of a security sold short, the prime broker or custodian on behalf of the seller must borrow the security. In so doing, it incurs the obligation to replace that security, whatever its price may be, at the time it is required to deliver it to the lender. The seller must also pay to the lender of the security any dividends or interest payable on the security during the borrowing period and may have to pay a premium to borrow the security. This obligation must, unless the seller then owns or has the right to obtain, without payment, securities identical to those sold short, be collateralized by a deposit of cash and/or marketable securities with the lender. Short selling is subject to theoretically unlimited risk of loss because there is no limit on how much the price of a security may appreciate before the “short” position is closed out. Further, short sales of securities involve a form of investment leverage, and the amount of the portfolio’s potential loss is theoretically unlimited.

Options Trading: Certain RIS advised portfolio strategies may include options trading. The taker (the buyer) of an option pays a premium which entitles the taker to purchase (in the case of a call) or sell (in the case of a put), from or to the grantor (the seller), a specified number of securities at a specified price, during the specified period. Options are speculative in that the whole cost of a purchased option is lost unless the price of the underlying security has moved in

the anticipated direction and the option is exercised or closed (but not allowed to expire); however, liability is limited to the premium paid for the option. An option writer (or seller) becomes obligated to purchase or sell the options contract or the underlying securities at a specified price during a specified period. In exchange for the premium received upon writing an option, the Client bears the risk of loss from adverse price movements in the underlying contracts or the underlying security so long as the position remains open. In the case of a sold option, the seller could have unlimited risk exposure or the potential for a significant loss. Options are complicated and risky investments and require an evaluation of whether the price of a security is going up or down and a prediction as to the amount and timing of that movement. This requires a sophisticated understanding of the underlying security, as well as the options strategy being used to speculate or hedge a security. Before engaging in options trading, a client must acknowledge that the client has carefully read and understand the custodian's agreement and the booklet entitled "Characteristics and Risks of Standardized Options" (<https://www.theocc.com>), and has consulted with their applicable legal, tax and financial advisors.

Preferred Equity: Holders of preferred equity are positioned between the bondholders and common stockholders within the liquidation of the capital structure. Preferred equity is subordinate to various other levels of debt, so if a company declares bankruptcy, the holders of preferred equity will not receive payment until all the company's secured creditors and bondholders have received payment. Also, like debt securities, the values of preferred equities are closely tied to interest rates. Typically, the longer the maturity, the more the preferred equity is affected by changes in interest rates.

Foreign Markets: Investments in foreign companies and overseas markets may involve unique risks, including, but not limited to, risks relating to changes in currency exchange rates, political, economic, and social events, different market operations and less information. Additional information about the risks related to investing in foreign, emerging and frontier markets is available upon request.

Alternative Investments: Alternative investments include other additional risks. Lock-up periods and other terms obligate clients to commit their capital investment for a minimum period of time, typically no less than one or two years and sometimes up to 10 or more years. Illiquidity is a substantial risk and will restrict the ability of a client to liquidate an investment early regardless of the success of the investment. Alternative investments are difficult to value within a client's total portfolio. There may be limited availability of suitable benchmarks for comparison of performance; historical performance data may also be limited. In some cases, there may be a lack of transparency and regulation providing an additional layer of risk. Some alternative investments may involve the use of leverage and other speculative techniques. As a result, some alternative investments may carry substantial additional risks, which may result in the loss of some or all of the investment. For tax-exempt investors, the use of leverage and certain other strategies will result in adverse tax consequences, such as the possibility of unrelated business taxable income, as defined under the U.S. Internal Revenue Code.

Procedural and Operational Risks

Operational Risk: Portfolios are exposed to operational risk introduced through human intervention or the failure of automated processes. Operational risks include, but are not limited to, reconciliation errors, trading the wrong security, trading a security for an unintended portfolio, or purchasing a security that a portfolio was intended to sell, or vice versa.

System Failures and Reliance on Technology Risks: RIS relies on technology, including hardware, software, telecommunications, internet-based platforms, and other electronic systems. Some technology that RIS uses is provided by third-party service providers and is beyond RIS's direct control. RIS seeks to ensure adequate backups of hardware, software, telecommunications, internet-based platforms, and other electronic systems, through its vendor due diligence procedures, but there is no guarantee that any or all third-party service provider risks will be mitigated. Furthermore, natural disasters, power interruptions and other events may cause system failures. Backup systems may not operate as well as the primary systems and may fail to properly operate. To reduce the impact a system failure may have, RIS continually evaluates its backup and disaster recovery systems and performs periodic testing of said systems. Despite RIS's efforts there may be times when other electronic systems malfunctions may be unavoidable and result in consequences such as the inability to execute client transactions or monitor client accounts.

Cybersecurity Risk: A portfolio is susceptible to operational and informational security risks due to the increased use of the internet. Cyber incidents can result from deliberate attacks or unintentional events. Cyberattacks include, but are not limited to, infection by computer viruses or other malicious software code, gaining unauthorized access to systems, networks, or devices through "hacking" or other means for the purpose of misappropriating assets or sensitive information, corrupting data, or causing operational disruption. Cybersecurity failures or breaches of third-party service providers may cause disruptions at third-party service providers and impact RIS's business operations, potentially resulting in financial losses; the inability to transact business; violations of applicable privacy and other laws, regulatory fines, or penalties; reputational damage; unanticipated expenses or other compensation costs; and/or additional compliance costs. RIS has an established business continuity and disaster recovery plan and related cybersecurity procedures designed to prevent or reduce the impact of such risks; there are inherent limitations in such plans and systems due in part to the evolving nature of technology and cyberattack tactics.

RIS does not primarily recommend a particular type of security.

Item 7: Client Information Provided to Portfolio Managers

All SWM II accounts are managed by an in-house licensed IAR. The IAR selected to manage the Client's Account will be privy to the Client's investment goals and objectives, risk tolerance, restrictions placed on the management of the Account, and relevant Client notes taken by the Firm. Please see the Firm's Privacy Policy for more information on how the Firm utilizes Client information.

Item 8: Client Contact with Portfolio Manager

Clients are always free to directly contact their IAR or Portfolio Manager with any questions or concerns about their portfolio or other matters.

Item 9: Additional Information

Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of the Firm's advisory business or the integrity of the Firm's management.

Financial Industry Activities & Affiliations

Clients should review their financial professional's Form ADV Part 2B Brochure Supplement to determine whether they are engaged in any of the activities described below that may create a conflict of interest. If the client did not receive Form ADV Part 2B Brochure Supplement, the client may contact RIS's Chief Compliance Officer using the information on the cover page of this Brochure.

Dually Registered Persons. Some of RIS's financial professionals are also registered with LPL as broker-dealer registered representatives ("dually registered persons"). LPL is independently owned and operated and is not affiliated with RIS. Clients may choose to engage their RIS financial professional in their individual capacities as registered representatives of LPL and to implement investment recommendations on a commission basis.

Licensed Insurance Agents. Some of RIS's financial professionals are licensed insurance agents and recommend the purchase of certain insurance-related products on a commission basis. The recommendation by a RIS's financial professional that a Client purchase or sell a security and/or insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular Client's need. Clients are not under any obligation to purchase or sell any commission products from RIS financial professionals.

Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

The Firm is an investment advisor registered with the Securities and Exchange Commission and is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its Clients. The Firm and its representatives have a fiduciary duty to all Clients. RIS and its representatives' fiduciary duty to Clients is considered the core underlying principle for the Firm's Code of Ethics and represents the expected basis for all representatives' dealings with Clients. RIS's Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees. In addition, the Code of Ethics governs personal trading by each employee of RIS

deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of RIS are conducted in a manner that avoids any conflict of interest between such persons and Clients of RIS or its affiliates. RIS collects and maintains records of securities holdings and securities transactions affected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. RIS maintains a code of ethics and they will provide a copy to any Client upon request.

The Firm and its financial professionals may purchase or sell securities that are also recommended to Clients. This practice may create a situation where RIS and their financial professionals are able to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as “scalping” (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if RIS did not have adequate policies in place to detect such activities. In addition, these procedures are designed to help detect insider trading, “front-running” (i.e., personal trades executed prior to those of RIS’s Clients) and other potentially abusive practices.

RIS has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of RIS’s “Access Persons;” that is persons who have access to the firm’s nonpublic information. This policy requires that Access Persons provide the Chief Compliance Officer with a written report of their current securities holdings as part of the process of becoming an Access Person. Additionally, each Access Person provides the Chief Compliance Officer with a written or electronic report of the Access Person’s current securities holdings at least once each twelve (12) month period thereafter on a date RIS selects.

RIS and its financial professionals may purchase or sell securities, at or around the same time as those securities are recommended to Clients. This practice creates a situation where the Firm is able to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. RIS has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each RIS Access Person.

Review of Accounts

RIS financial professionals review Client accounts on an ongoing basis; however, there is no ongoing review for limited scope engagements, such as creating a financial plan or consulting services.

RIS and/or the financial professional conducts account reviews on an other-than-periodic basis upon the occurrence of a triggering event, such as a change in Client investment objectives and/or financial situation, a market correction or material market event or otherwise by Client request. All Clients are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with the Advisor on at least an annual basis. These annual or other-than-periodic reviews are conducted in person, by phone, or via video conference (e.g., via Zoom).

Clients are provided written transaction confirmations and account statements directly from the custodian. Clients are urged to compare any report provided by RIS with the confirmations and statements received from the custodian.

Please Note: Each Client is responsible for promptly notifying RIS of any change in financial situation or investment objectives.

Other Compensation

If a Client is introduced to RIS by a promoter, RIS may pay that promoter a referral fee in accordance with the Advisers Act, and any corresponding state securities law requirements. Any such referral fee will be paid solely from RIS's investment advisory fee and will not result in any additional charge to the Client. If the Client is introduced to RIS by an unaffiliated promoter, the promoter, at the time of the promotion, will disclose the nature of the promoter relationship, and will provide Client with a copy of RIS's written disclosure document and with a copy of the written disclosure statement disclosing the terms of the promoter arrangement between RIS and the promoter, including the compensation to be received by the promoter from RIS.

RIS and their financial professionals may receive direct and indirect economic or other benefits from the custodians, including research, other benefits, and transition assistance and product sponsors (e.g., insurance companies, mutual fund companies, sub-advisors, TAMPs or other vendors), as further described below. Some of RIS's financial professionals are also associated with LPL as broker dealer registered representatives ("dually registered persons"). In their individual capacity as registered representatives of LPL, dually registered persons earn commissions for the sale of securities or investment products that the dually registered person recommends to Clients. LPL also provides other compensation to RIS and its dually registered persons, including, but not limited to, bonus payments, forgivable and non-forgivable loans, and other benefits. This compensation is based, in part, on participation in advisory programs sponsored by LPL and derived from advisory fees paid to LPL. The receipt of any such compensation creates a financial incentive for a RIS financial professionals to recommend LPL as custodian for the assets in a Client's advisory account and as advisory program sponsor. RIS encourages Clients to discuss any such conflicts of interest with their financial professional before deciding to custody its assets at LPL and utilize an LPL advisory program.

From time to time, product sponsors pay for Client luncheons, educational meetings, customer appreciation events, marketing events or advertising initiatives, including services for identifying Clients. These arrangements may give rise to conflicts of interest, or perceived conflicts of interest in that RIS and its financial professionals have an incentive to invest Client assets in investment products or services managed, sold, or offered by such product sponsors that provide these benefits to RIS and/or its financial professionals. RIS's commitment to its Clients and the policies and procedures it has adopted that require the review of such arrangements are designed to limit any interference with RIS and its financial professionals' independent decision making when choosing investment products and/or services for Clients.

Financial Information

The Firm is not required to provide financial information in this Brochure because of the following:

- The Firm does not require the prepayment of more than \$1,200 in fees when services cannot be rendered within 6 months.
- The Firm does not have a financial condition or commitment that impairs the Firm's ability to meet contractual and fiduciary obligations to Clients.

The Firm has never been the subject of a bankruptcy proceeding.