

**Item 1: Cover Sheet**



**INFORMATIONAL BROCHURE**

**ONEASCENT FINANCIAL SERVICES, LLC**

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**This brochure provides information about the qualifications and business practices of OneAscent Financial Services LLC. If you have any questions about the contents of this brochure, please contact TJ Claud at the number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. OneAscent Financial Services LLC is a registered investment adviser. Registration does not imply any certain level of skill or training.**

**Additional information about OneAscent Financial Services LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2:           Statement of Material Changes**

OneAscent Financial Services LLC is required to update its Form ADV in the event of a material change. There are currently no material changes to report.

**Item 3: Table of Contents**

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## INFORMATIONAL BROCHURE

### ONEASCENT FINANCIAL SERVICES LLC

#### **Item 4: Advisory Business**

The mission of OneAscent Financial Services LLC (“OneAscent”), founded in February 2017, is to provide investment advisory services to clients and their professional advisors through the offering of managed accounts, proprietary strategies and assistance to other investment advisors. OneAscent is owned by OneAscent Holdings LLC, which in turn is principally owned by Harry Pearson and Robert Grubb.

#### Asset Management

Asset management services may be provided on either a “discretionary” or “non-discretionary” basis. When a client engages the firm to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your investment objectives. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others, utilizing a separate account (third party) manager or keeping the proceeds in cash. We may also allocate some or all of your assets to a Unified Managed Account platform through our advisory affiliate OneAscent Investment Solutions LLC. You may at any time place reasonable restrictions on the types of investments we may use on your behalf, or on the allocations to each security type, though such restrictions may limit the potential performance of your portfolio. You will receive at your request written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive statements directly from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as a written agreement that outlines the responsibilities of both the client and the firm.

Asset management services may be provided to client accounts held at a custodian that is not directly accessible by the firm (“Held Away Accounts”). The firm may, but is not required to, manage these Held Away Accounts using the Pontera Order Management System that allows the Firm to view and manage these assets.

Asset management services may be provided to clients by utilizing fee-based annuity and insurance options via a third-party platform.

In certain limited circumstances, and in the discretion of the firm, a client may engage the firm to provide investment management services on a non-discretionary basis. This means the firm monitors the accounts in the same way as for discretionary services. The difference is that changes to your account will not be made until we have confirmed with you (either verbally or in writing) that our proposed change is acceptable to you.

#### Unified Managed Accounts and OneAscent Investment Solutions LLC

#### *Use of Overlay Manager*

As mentioned above, we may allocate some or all of your assets to our advisory affiliate, OneAscent Investment Solutions LLC (“OAIS”), an advisory affiliate of OneAscent. OAIS can create a Unified Managed Account or “UMA”, which is a single portfolio with a mix of asset classes and investment

positions through the use of model portfolios, which may consist of third party managers, and to a lesser extent, other investment options such as mutual funds and exchange traded funds. This is accomplished with the use of an Overlay Manager. The Overlay Managers that OneAscent has selected are Adhesion Wealth Advisors Solutions (“Adhesion”) and GeoWealth Management LLC (“GeoWealth”), who provide portfolio trading, re-balancing, reporting and other administrative services. Each UMA is designed meet a specific goal, while maintaining diversification for the purpose of mitigating short term risk, and at the same time positioned to appreciate and create income for the investor. UMAs are created by OAS and accessed by other advisors (including OneAscent’s advisory teams) for their clients.

OneAscent provides UMA services on a discretionary basis, meaning that you will grant OneAscent discretionary authority to manage your account through the selection of an Overlay Manager, third party managers, and other investment options. In addition, you will authorize your account custodian to follow our instructions as well as instructions given by Adhesion or GeoWealth to effect transactions, deliver securities, deduct fees and take other actions with respect to your account. We retain the right to replace any third party manager on discretionary basis. You will not have a direct contractual relationship with Adhesion or GeoWealth or any other third party manager.

When clients engage OneAscent to provide UMA services, the client and OneAscent will execute an Investment Management Agreement that describes the services to be provided, the fees for the service, other expenses related to the provision of the investment management services, and how to terminate the agreement. Depending on the service a client has selected, OneAscent will separately provide each client with the applicable disclosure documents for any third party manager or service providers utilized, which includes information about their services, model portfolios, investment strategies at or before execution of our Investment Management Agreement.

#### *UMA Services without use of Overlay Manager*

Representatives of OAFS will be responsible for the ultimate decisions as to the securities to be bought and sold in the accounts, as well as the timing of implementation of those decisions. In the event that the individual investment adviser representative servicing the account utilizes the services of OAS, that representative will receive trade “signals”, or trade suggestions, from OAS and will determine if and when to implement them. In the event that OAS sends a trade signal, and the investment adviser representative does not choose to implement it, or chooses to implement it after some delay, performance in the accounts will likely differ from performance of the model.

#### Other Unified Managed Accounts

We may utilize other Unified Managed Accounts or “UMAs”, unaffiliated with OneAscent Investment Solutions (“OAS”), consisting of separate account portfolios, in the form of recommendations for investment portfolio sleeves comprised of: (i) separate account strategies offered by various investment advisers, (ii) separate account strategies offered through the use of model portfolios, (iii) mutual funds, and (iv) exchange traded funds (“ETFs”). OneAscent has selected Natixis Advisors, LLC to provide investment portfolio advisory services to client portfolios. OneAscent has selected Callan, LLC as the Program Coordinator, to provide certain due diligence for sub-advisors providing investment strategies for the UMAs.

#### Tax Overlay Manager Services

For clients who elect, OneAscent offers tax overlay management services as an additional option for accounts utilizing the UMA Program through an Overlay Manager, Adhesion. Tax overlay management

services are an additional service, and will increase the management fee. Clients are not under no obligation to elect to receive tax overlay management services. Adhesion will develop a tax strategy for your account based on the information and instructions provided by us on your behalf. Tax overlay management services in an investment account offer benefits and limitations, as described below. The tax strategy developed for you by Adhesion is provided solely in connection with your account and the Overlay Manager does not provide general tax planning services. If you do elect the tax overlay management services option, please consider the following:

- The Tax Overlay Manager will implement tax overlay management services based on the information and instructions provided for your account(s).
- The Tax Overlay Manager does not provide general tax advice, tax return preparation or tax planning services.
- The Tax Overlay Manager will seek to reduce the overall tax burden of the account while seeking to maintain the risk and return characteristics of the model portfolios received from Strategists and/or Managers.
- When providing tax overlay management services to the account, short-term gains are avoided where possible, but long-term gains are not limited unless you have requested a mandate to limit realized long-term gains.

The Overlay Manager will provide tax overlay management services with the assumption that the Overlay Manager will continue to provide services to the account for an entire tax year. The termination or removal of the overlay management services before the completion of an entire tax year may result in adverse tax consequences, including without limitation realization of short-term capital gains. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

The Tax Overlay Management Services are offered at an additional cost to you.

#### Advisory Teams

OneAscent works directly with clients through individual investment adviser representatives, who may work with other representatives providing financial planning and asset management services.

Depending upon the individual professional working with the client, OneAscent may also provide assistance with debt management or other matters. We are a distinctly biblically based firm, and our goal is to help clients align their assets with their values.

We provide these advisory services through numerous investment teams. The investment teams that comprise OneAscent are listed below:

<u>Advisor Team Name</u>	<u>Team Leader</u>
Hampton Square Wealth Management	Scott MacKenzie
Sovereign Private Wealth	Mike Kuckel & Will Hines
Zahoranski Wealth Management	Stacey Zahoranski
JB Stark Financial	James Stark
Anthem Advisors	Cavett Cooper

Trina Hanner	Trina Hanner
Tevebaugh & Associates	Mark Tevebaugh
Adventure Financial	Suzuanne Foster
2:24 Wealth Group	John McDonald
Provident Oak Financial	Nelson Negron
Stonebridge Wealth Management	Mitch Martin
Navigator Financial	Cameron Collier
The Cornerstone Financial Group	Mark Morrison
Providence Financial Advisors	Brad Nelson
Wealth Stewards	Paul Tyers
Tate Financial Partners	John Tate
Strategence Capital	Tim Stoller
River Oak Financial	Ben Craft
Lone Oak Financial Services	Ben Wilhelm
Sovereign Family Office	Justin Cramer
Resolute Capital Group	David Anderson
Financial Strategies Group	Stephen Moore
Legatum Group	Josh Arrington
Pure Capital Advisors; Pure Capital Sports	Wesley Hodges
Enough Wealth	Joshua Mudse

### Financial Planning

In most cases, the client will supply an OneAscent representative with information including income, investments, savings, insurance, age, the values the client would like to see advanced as part of their planning process, and many other items that are helpful to the firm in assessing financial goals. The information is typically provided during personal interviews and supplemented with written information. Once the information is received, we will discuss your financial needs and goals with you and compare your current financial situation with the goals you state. Once these are compared, we will create a financial and/or investment plan to help you meet your goals, and work with you to educate you about household finances and investments.

The plan is intended to be a suggested way to achieve financial goals in keeping with the client's values. Not every plan will be the same for every client. Each one is specific to the client who requested it. Because the plan is based on information supplied by you, it is very important that you accurately and completely communicate to us the information we need. Also, your circumstances and needs may change as your engagement with us progresses. It is very important that you continually update us with any changes so that if the updates require changes to your plan, we can make those changes. Otherwise, your plan may no longer be accurate.

### Tax Preparation

For some clients, OneAscent can arrange for tax preparation services to be completed by a third party and reviewed by OneAscent. OneAscent's tax services are designed to make the tax filing process simple and stress free for each client, while also working to reduce a client's tax liability on current and future returns.

### Financial Consulting

OneAscent may provide financial consulting services (including investment and non-investment related matters, including estate planning, retirement planning, tax planning, etc.). Prior to engaging OneAscent to provide planning or consulting services, clients are generally required to enter into a written agreement with OneAscent setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to OneAscent commencing services.

OneAscent provides investment consulting services to certain broker/dealers' customers ("Brokerage Customers") who provide written consent requesting to receive OneAscent's consulting services. Brokerage Customers have entered into a written consulting agreement with OneAscent.

### Seminars and Educational Workshops

OneAscent also provides information and guidance on general finance, retirement, and charitable giving issues for our clients and the public. We do not charge for these seminars.

### Services to Employer Sponsored Retirement Plans

OneAscent provides investment advisory services to qualified plans. While linked to investments and investment advice, consulting to pension plans can involve a great deal more than selecting investments. OneAscent offers two approaches to its ERISA clients: investment option selection and full pension consulting.

### Back-Office Services

OneAscent provides back-office services to registered investment advisory firms and individual investment adviser representatives. Back-office services include, but are not limited to, account servicing, billing, trade execution, and reporting.

### Participant Directed Retirement Plan ERISA Investment Fiduciary Services

As a Plan Sponsor, you may want to appoint a qualified investment firm to serve as the named Investment Fiduciary for your Plan to minimize your fiduciary responsibility regarding the investments available to your plan participants. OAFS may serve as the named Investment Fiduciary to a qualified retirement plan which may include being an "investment manager" within the meaning of ERISA Section 3(38) and a "fiduciary" within the meaning of ERISA Section 3(21). OAFS will acknowledge our fiduciary status and duties in writing. The primary clients for these services will be pension, profit sharing, 403(b), and 401(k) plans that provide for participant directed investments. ERISA Investment Fiduciary Services are comprised of three distinct services. Clients may choose to use any or all of these services.

The Investment Fiduciary shall have the following discretionary authority and responsibility:



- To manage the investment of the Trust Fund using only the investment options available through the recordkeeper, products, and/or platforms chosen by Plan Sponsor;
- To appoint and remove one or more investment managers;
- To establish, revise from time to time, and communicate to the Trustee and/or Investment Manager(s), assist in building and investment policy for the Plan. We will meet with your and/or your plan committee (in person or over the telephone) to determine an appropriate investment strategy that reflects the Plan Sponsor's stated investment objectives for management of the overall plan. Our firm then prepares a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.

#### Schwab Performance Technologies Institutional Intelligent Portfolios

We offer an automated investment program (the "Program") through which clients are invested in a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange-traded funds and mutual funds ("Funds") and a cash allocation. The client may instruct us to exclude up to three Funds from their portfolio. The client's portfolio is held in a brokerage account opened by the client at Charles Schwab & Co., Inc. ("CS&Co"). We use the Institutional Intelligent Portfolios® platform ("Platform"), offered by Schwab Performance Technologies ("SPT"), a software provider to independent investment advisors and an affiliate of CS&Co., to operate the Program. We are independent of and not owned by, affiliated with, or sponsored or supervised by SPT, CS&Co., or their affiliates (together, "Schwab"). We, and not Schwab, are the client's investment adviser and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible, for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client's investment needs and goals, and managing that portfolio on an ongoing basis. We have contracted with SPT to provide us with the Platform, which consists of technology and related trading and account management services for the Program. The Platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the "System"). Based on the information the client provides to us, we will recommend a portfolio via the System. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision and select a portfolio based on all the information we have about the client. The System also includes an automated investment engine through which we manage the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects). We charge clients a fee for our services as described below under *Item 5 Fees and Compensation*. Our fees are not set or supervised by Schwab. Clients do not pay brokerage commissions or any other fees to CS&Co. as part of the Program. Schwab does receive other revenues, including (i) the profit earned by Charles Schwab Bank, SSB, a Schwab affiliate, on the allocation of the Schwab Intelligent Portfolios Sweep Program described in the Schwab Intelligent Portfolios Sweep Program Disclosure Statement; (ii) investment advisory and/or administrative service fees (or unitary fees) received by Charles Schwab Investment Management, Inc., a Schwab affiliate, from Schwab ETFs™, Schwab Funds®, and Laudus Funds® that we select to buy and hold in the client's brokerage account; (iii) fees received by Schwab from mutual funds in the Schwab Mutual Fund Marketplace® (including certain Schwab Funds and Laudus Funds) in the client's brokerage

account for services Schwab provides, and (iv) remuneration Schwab receives from the market centers where it routes ETF trade orders for execution.

#### Assets Under Management

As of December 31, 2023, OneAscent had \$1,788,648,397 in assets under management across 7,877 accounts. OneAscent also provides consulting services giving OneAscent \$181,560,307 in assets under advisement.

### **Item 5: Fees and Compensation**

#### **A. Fees Charged/ Fee Schedule:**

##### Unified Managed Accounts (Adhesion and GeoWealth)

Generally, fees may vary from 0.50% to 2.00% per annum of the market value of a client's assets in the UMA. The Overlay Managers (Adhesion and GeoWealth) and third party managers charge separate and additional fees with respect to client accounts for account models and administration. Portions of these fees are paid directly to OAS. In addition, the client will be billed by OneAscent for the advisory fee. Fees are negotiable, based on the nature of the account. Factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors.

##### Unified Managed Accounts (Natixis)

Generally, fees may vary from 0.50% to 2.00% per annum of the market value of a client's assets in the UMA. The Overlay Manager (Natixis) and third party managers charge separate and additional fees with respect to client accounts for account models and administration. In addition, the client will be billed by OneAscent for the advisory fee. Fees are negotiable, based on the nature of the account. Factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors.

##### Financial Planning

Financial planning fees can be hourly, fixed fee basis (which may be per project or per month), or included with asset management services. Our hourly charge is between \$125 and \$500 per hour, depending on the professional working on the project. Fixed fees will typically be between \$0 and \$15,000, and in special circumstances, can be greater than \$100,000. The fee range stated is a guide. Fees may be higher or lower than this range, based on the nature of the engagement. Fees are negotiable, and will depend on the anticipated complexity of your plan and the professional(s) working on the plan.

##### Asset Management for Non-UMA Clients

Generally, fees may vary from 0.50% to 2.00% per annum of the market value of a client's assets managed by OneAscent. In limited circumstances, asset management may also be done on a flat fee basis. Flat fees will be between \$1,000 and \$100,000 per annum. The fee ranges stated are a guide. Fees are

negotiable, and may be higher or lower than this range, based on the nature of the account. Factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors.

#### Asset Management for Held Away Accounts

Generally, fees may vary from 0.50% to 1.00% per annum of the market value of a client's assets managed by OneAscent. In limited circumstances, asset management for Held Away Accounts may also be done on a flat fee basis. Factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors. In addition to the Firm's advisory fee, Pontera charges a separate and additional fee with respect to client accounts, which is borne by the client's adviser.

#### Asset Management for Fee Based Annuities and Insurance

Generally, fees may vary from 0.50% to 2.00% per annum of the market value of a client's assets managed by OneAscent. In limited circumstances, asset management for fee based annuities and insurance may also be done on a flat fee basis. The fee ranges stated are a guide. Fees are negotiable, and may be higher or lower than this range, based on the nature of the account. Factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors. In addition to the Firm's advisory fee, the third-party platform charges a separate and additional fee with respect to client accounts.

#### Separate Managers

When an OneAscent advisor allocates client assets to a separate manager (which may be in some cases a private placement), including an affiliated manager including, but not limited to OAS, fees payable to such managers are separate from, and in addition to, fees payable to OneAscent. This means that the overall fees to OneAscent and these managers may be significantly higher than if OneAscent had managed the assets directly. OneAscent will consider these fees in its decision to recommend the use of any third-party manager, including OAS. OneAscent has a conflict of interest because OneAscent has the incentive to refer clients to OAS, because of common ownership, and therefore are likely to receive greater overall compensation if assets are allocated to their respective affiliated firms as opposed to a different third-party manager or in-house management. This conflict of interest is disclosed to clients verbally and in this brochure. OneAscent also attempts to mitigate the conflict of interest by requiring employees to acknowledge the firm's Code of Ethics, their individual fiduciary duty to the clients of OneAscent, which requires that employees put the interests of clients ahead of their own.

#### Financial Consulting

Financial consulting is done on a fixed fee basis (which may be per project or per month). Fixed fees will be between \$500 and \$4,000 per annum. The fee range stated is a guide. Fees may be higher or lower than this range, based on the nature of the engagement. Fees are negotiable and will depend on the anticipated complexity of your plan.

OneAscent receives a consulting fee on the assets under management from Brokerage Customers who have provided written consent to a broker/dealer to receive the investment consulting service from OneAscent and have entered into a written consulting agreement with OneAscent. The consulting fee is calculated as a percentage from the assets under management as of the end of a calendar quarter period. The initial fee is paid only after the completion of one full calendar quarter period following the date of the executed agreement with broker/dealers.

### Tax Preparation

Tax Preparation can be arranged on a fixed fee basis or included with asset management services. The fixed fee rates for stand-alone tax preparation will vary, but due to the extreme variations in client tax complexity (various states of residence, international issues, business ownership) there is no guideline for tax costs that can be determined in an abstract manner. Each fee must be determined on a case-by-case basis.

### Back-Office Services

Back-office services are negotiable and be arranged on a flat-fee or hourly basis.

### Trading Costs

OAFS utilizes various technology platforms for the purpose of providing clients with account reporting services, and provides additional services related to the processing of trades and non-investment transactions and other client needs. Costs related to account reporting services, processing trades, and other non-investment transactions may vary from 0.02% to 0.15%. The fee ranges stated are a guide. Fees are negotiable, and may be higher or lower than this range, based on the nature of the arrangement between OAFS and the IAR servicing the account.

### B. Fee Payment

#### Asset Management

Investment advisory fees will generally be debited directly from each client's account. The advisory fee is paid on a quarterly basis, in advance, with adjustments made for deposits and withdrawals greater than \$25,000 intra-quarter. Fees are calculated by multiplying the overall asset value, as of the last day of the prior quarter, of the account (or overall household, if applicable) by the annual fee rate, and then dividing the result by 4. Thereafter, adjustments are made to pro-rate fees for any deposits or withdrawals greater than \$25,000 made during the prior quarter. Once the calculation is made, we will instruct your account custodian to deduct the fee from your account and remit it to the firm.

For clients who elect to be billed on a flat fee basis, fees are payable on a quarterly basis, in advance, and no adjustments are made for deposits and withdrawals made intra-quarter. The annual flat fee will be renewed upon the anniversary of the execution of the contract each year, and fees for renewal services will be agreed upon by the parties at the time of renewal. Once the fee calculation is made each quarter, we will instruct your account custodian to deduct the fee from your account and remit it to the firm.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. The client will also receive a statement from their account custodian showing all transactions in their account, including the fee. It is the responsibility of the client to verify the accuracy of all fee calculations. The client may terminate the investment advisory contract by notifying OneAscent in writing at its principal place of business.

The advisory agreement may be modified as mutually agreed upon in writing. The agreement is terminable by you at any time. The agreement is not assignable by OneAscent Financial Services LLC without the advance written consent of the client.

Please note that clients invested in certain programs with smaller accounts (roughly under \$10k) are likely to pay fees on a percentage basis higher than that of clients with larger accounts due to the fact that some costs incurred are fixed in terms of dollar amount. Your advisor will consult with you about your anticipated fees and costs prior to opening your account.

#### Financial Planning

For financial planning clients, fees will generally be billed for fees incurred, but clients may request that planning fees be debited from an investment management account. The financial planning fee is billed in two payments, the first being approximately 50% of the estimated total bill, and is due upon the engagement. The second payment, which represents all outstanding amounts due, is billed upon completion.

#### Tax Preparation

Invoices for tax preparation services will be issued upon delivery of the prepared returns, and are payable upon receipt.

#### Back-Office Services

Invoices for back-office services will be issued by OneAscent to the individual registered investment adviser or individual investment adviser representative and payable upon receipt.

#### Trading Costs

Trading costs will generally be debited directly from each client's account. The trading fee is paid on a quarterly basis, in advance, with adjustments made for deposits and withdrawals greater than \$25,000 intra-quarter. Trading fees are calculated by multiplying the overall asset value, as of the last day of the prior quarter, of the account (or overall household, if applicable) by the annual fee rate, and then dividing the result by 4. Thereafter, adjustments are made to pro-rate trading fees for any deposits or withdrawals greater than \$25,000 made during the prior quarter. Once the calculation is made, we will instruct your account custodian to deduct the trading fee from your account and remit it to the firm. Please consider that the advisory fee and platform fee (trading cost) are combined when entered into our portfolio management and billing software, Black Diamond, because Black Diamond cannot accommodate separate fees. Thus, your agreement will state the advisory fee (i.e., 1%), but in Black Diamond the fee entered for billing purposes is higher than 1% (i.e., 1.05%, which represents the 1% advisory fee and the 0.05% for the platform fee). Also, the custodial statement will read 1.05% due to the combination. Please consult with your advisor, who will assist you in showing the fee breakdown in any billing period.

For clients who elect to be billed on a flat fee basis, trading fees are payable on a quarterly basis, in advance, and no adjustments are made for deposits and withdrawals made intra-quarter. The annual flat fee will be renewed upon the anniversary of the execution of the contract each year, and trading fees for renewal services will be agreed upon by the parties at the time of renewal. Once the fee calculation is made each quarter, we will instruct your account custodian to deduct the trading fee from your account and remit it to the firm.

Clients whose trading fees are directly debited will provide written authorization to debit fees from their accounts held by a qualified custodian chosen by the client. The client will also receive a statement from their account custodian showing all transactions in their account, including the fee. It is the responsibility

of the client to verify the accuracy of all fee calculations. The client may terminate the investment advisory contract by notifying OneAscent in writing at its principal place of business.

### C. Other Fees

#### *Mutual Funds*

All fees paid to OneAscent for investment advisory services are separate and distinct from the fees and expenses charged by underlying investments such as mutual funds. In the case of mutual funds, these fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. Expenses of a fund, including management fees payable to the mutual fund manager, will not appear as transaction fees on a client's statement, as they are deducted from the value of the shares by the mutual fund manager. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a fund directly, without the services of OneAscent. In that case, the client would not receive the services provided by OneAscent which are designed, among other things, to assist the client in determining which fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by OneAscent to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. OneAscent can provide or direct you to a copy of the prospectus for any fund that we recommend to you.

#### *Other Fees*

There are a number of other fees that can be associated with holding and investing in securities. You will be responsible for fees including transaction fees for the purchase or sale of other securities, including commissions for the purchase or sale of a stock or exchange traded fund. Other fees you will be responsible for may be associated with the custody of assets and platform fees.

When utilizing the services of a third party manager (as described more in Item 8), such managers will charge fees for their services. These fees are separate from, and in addition to, OneAscent's fees.

Please make sure to read Item 12 of this informational brochure, where we discuss broker-dealer and custodial issues.

#### *Schwab Performance Technologies Institutional Intelligent Portfolios*

As described in *Item 4 Advisory Business*, clients do not pay fees to SPT or brokerage commissions or other fees to CS&Co. as part of the Program. Schwab does receive other revenues, including (i) the profit earned by Charles Schwab Bank, SSB, a Schwab affiliate, on the allocation of the Schwab Intelligent Portfolios Sweep Program described in the Schwab Intelligent Portfolios Sweep Program Disclosure Statement; (ii) investment advisory and/or administrative service fees (or unitary fees) received by Charles Schwab Investment Management, Inc., a Schwab affiliate, from Schwab ETFs™, Schwab Funds®, and Laudus Funds® that we select to buy and hold in the client's brokerage account; (iii) fees received by Schwab from mutual funds in the Schwab Mutual Fund Marketplace® (including certain Schwab Funds and Laudus Funds) in the client's brokerage account for services Schwab provides; and (iv) remuneration Schwab receives from the market centers where it routes ETF orders for execution. Brokerage arrangements are further described below in *Item 12 Brokerage Practices*.



#### D. *Pro-rata Fees*

If you become a client during a billing period, you will pay a management fee for the number of days left in that billing period. If you terminate our relationship during a billing period, you will be entitled to a refund of any pre-paid and unearned management fees for the remainder of the billing period. Once your notice of termination is received, we will refund the unearned fees to you in whatever way you direct (check, wire back to your account). Further, as discussed above, any deposits or withdrawals greater than \$25,000 will result in an adjusted fee calculation with respect to the account related to the deposit or withdrawal. Deposits will incur a pro-rated fee for the remainder of the billing period. Withdrawals will result in a pro-rata refund of the unearned fee with regard to the withdrawn amount. OneAscent will cease to perform services, including processing trades and distributions upon termination. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be “de-linked”, meaning they will no longer be visible to OneAscent and will become a retail account with the custodian.

#### E. Compensation for the Sale of Securities

To permit OneAscent clients to have access to as many investment solutions as possible, certain professionals of OneAscent are registered representatives of Purshe Kaplan Sterling Investments, Inc. (“PKS”), a FINRA member broker-dealer. The relationship with PKS allows these professionals to provide additional products to clients’ portfolios that would not otherwise be available. Because PKS supervises the activities of these professionals as registered representatives of PKS, the relationship may be deemed material. However, PKS is not affiliated with OneAscent or considered a related party. PKS does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those he recommends to clients.

### **Item 6: Performance-Based Fees**

OneAscent will not charge performance based fees.

### **Item 7: Types of Clients**

OneAscent generally provides advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, broker/dealers, and other business entities.

OneAscent does not have a specified minimum account size. Some clients who wish to access multiple asset management styles, specifically third party managers, may be required to have an account minimum.

### **Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

#### ***Methods of Analysis and Investment Strategies***

Each client portfolio is separately managed, and invested according to that client’s investment objective. Once each account’s objectives are ascertained, OneAscent will develop a set of asset allocation guidelines. An asset allocation guideline is a percentage-based allocation among different types of assets like stocks, fixed income, or third party managers with specific expertise (asset classes), or specific types of securities (large cap, mid-cap). For example, a client may have an asset allocation strategy that calls

for 80% of the portfolio to be invested in equity securities and fixed income and the rest invested with third party managers. Within each main allocation may be sub-allocations. For example, a client with 80% in direct securities may have a mix of large cap, mid cap and small cap equities combined with mutual funds and fixed income, while another client's direct securities might be all in ETFs and mutual funds. Each client is managed individually.

The percentages in each asset type recommended by OneAscent are based on the typical behavior of that security type, individual securities we follow current market conditions, the client's current financial situation, financial goals, and the timeline to achieve those goals. Because OneAscent develops an investment strategy based on each client's personal situation and financial goals, each client's asset allocation guidelines may be similar to or different from another client's. It is important to remember that because market conditions can vary greatly, asset allocation guidelines are not necessarily strict rules. Rather, we review accounts individually, and may deviate from the guidelines as we believe necessary.

Assets may be managed through the use of a third party manager or directly managed by a OneAscent professional, depending on the professional advisor with whom the client works as well as client needs. When managing assets directly, the securities recommended may include stocks, index funds, exchange traded funds, mutual funds, options and bonds. Clients whose assets are managed through a UMA with OAIS will be given a separate disclosure statement for OAIS. Clients are encouraged to carefully review the disclosure information provided by OAIS.

Specific equity and fixed income securities are chosen based on a variety of factors including dividends, income, interest rates, company management, price to earnings ratios, and other factors. Specific mutual funds are chosen based on where its investment objective fits into the asset allocation recommended by OneAscent, its risk parameters, past performance, peer rankings, fees, expenses, and any other aspects of the fund OneAscent deems relevant to that particular fund. Specific third party managers are chosen based on their performance, investment style, investment consistency, experience, and expertise. OneAscent bases its conclusions on publicly-available research, such as regulatory filings, press releases, purchased research, and proprietary screens and analytics. We will also utilize technical analyses, which means that we will review the past behaviors of the security and the markets in which it trades for signals as to what might happen in the future.

#### Transitioning Accounts

Upon engagement, each client will complete an Investor Profile and Application, which may utilize client information to give OneAscent a clearer picture of each client's financial circumstances, and the results of these questionnaires may be the basis for determining the client's investment strategy. The firm will also review a client's portfolios, discuss the client's investment objectives and risk tolerance as well as any potential investment restrictions, and plan a transition for the client's assets from their current accounts to accounts managed by the firm. Transition plans will involve the placement of each client's assets in an asset allocation strategy deemed appropriate by OneAscent. In many instances, but not always, the assets will be placed in the OAIS UMA platform. These are described in the respective Form ADV of each manager, and clients whose assets are placed with OAIS should carefully review the Form ADV.

As assets are transitioned from a client's prior advisers to OneAscent, there may be securities and other investments that do not fit within the investment strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the investment strategy selected by OneAscent. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted



low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. In the event an investment in a client account is unable to be unwound for a period of time, OneAscent will monitor the investment as part of its services to the client. OneAscent may suggest that a given investment be moved to a separate account.

### ***Third Party Managers***

We recommend that for some clients, certain portions of their portfolio are most appropriately managed by a third-party (sometimes including a private placement), typically when those managers demonstrate knowledge and expertise in a particular investment strategy. We do not consider a mutual fund to be a separate account manager, as the mutual fund itself is a security.

We examine the experience, expertise, investment philosophies and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentration and leverage as part of our overall periodic assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks.

Based on a client's individual circumstances and needs, we will determine which selected money manager's portfolio management style is appropriate for that client. Factors considered in making this determination include account size, risk tolerance and the investment philosophy of the selected money manager. We encourage clients to review each third-party manager's disclosure document regarding the particular characteristics of any program and managers selected by us.

We will regularly and continuously monitor the performance of the selected money managers. If we determine that a particular selected money manager is not providing sufficient management services to the client or are not managing the client's portfolio in a manner consistent with the client's investment objectives, we will remove the client's assets from that selected money manager and place the client's assets with another money manager at our discretion and without prior consent from the client, unless the client non-discretionary. Permission for non-discretionary accounts will be obtained before placing the client's assets with another money manager.

OneAscent will obtain appropriate due diligence on all independent third-party managers, making reasonable inquiries into their performance calculations, policies and procedures, code of ethics policies and other operational and compliance matters to account for performance and risk management. We examine the experience, expertise, investment philosophies and past performance of third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks.

The use of a third party manager, including OAIS, SEI Investments Company, and Natixis does not change the relationship between the OneAscent professional and the client, in that such professional will still manage the overall client portfolio, adding, subtracting and modifying the allocations to different strategies and managers.

## ***Risk of Loss***

There are always risks to investing. *Clients should be aware that all investments carry various types of risk, including the potential loss of principal that clients should be prepared to bear.* It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason, and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Strategy Risk.** When investments are made through a strategy, rather than individualized investment considerations, there is always the possibility that individualized investment choices would have produced a more positive result for a client than an approach where investments are made for a group of individuals with common characteristics.
- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading:** Clients should note that OneAscent may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies. OneAscent endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk.** The amount of debt or leverage determines the financial risk of a company.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Information Risk:** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.
- **Short Sales.** "Short sales" are a way to implement a trade in a security OneAscent feels is overvalued. In a "long" trade, the investor is hoping the security increases in price. Thus in a long trade, the amount of the investor's loss (without margin) is the amount paid for the security. In a short sale, the investor is hoping the security decreases in price. However, unlike a long trade where the price of the security can

only go from the purchase price to zero, in a short sale, the price of the security can go infinitely upwards. Thus in a short sale, the potential for loss is unlimited and unknown, where the potential for loss in a long trade is limited and knowable. OneAscent utilizes short sales only when the client's risk tolerances permit.

- **Options.** The use of options transactions as an investment strategy involves a high level of inherent risk. Although the intent of many of the options-related transactions implemented by OneAscent is to hedge against principal risk, certain of the options-related strategies (i.e., straddles, short positions, etc.), may in and of themselves, produce principal volatility and/or risk. Thus, a client must be willing to accept these enhanced volatility and principal risks associated with such strategies. In light of these enhanced risks, client may direct OneAscent, in writing, not to employ any or all such strategies for his/her/their/its accounts. Clients participating in the Options Strategy should *carefully* consider all information regarding the strategy and its risks prior to participating.

- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.

- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up, or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company's future. For example, a company's management may lack experience, or the company's capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.

- **Concentration Risk.** While OneAscent selects individual equities and bonds for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.

- **Transition Risk.** As assets are transitioned from a client's prior advisers to OneAscent there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by OneAscent. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of OneAscent may adversely affect the client's account values, as OneAscent's recommendations may not be able to be fully implemented.

- **Restriction Risk.** Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.

- **Risks Related to Investment Term & Liquidity.** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure

of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.

- **Algorithms and Models.** When an investment manager develops a mathematical algorithm that identifies trigger points for the purpose of indicating a “buy” or “sell” signal, these trigger points are limited in that they are based on solely the data input into the algorithm. There is an unlimited amount of data that can be considered in making any given decision as to whether to buy or sell any given security. An algorithm, by design, ignores some data in favor of others. There is a risk that the data selected for the algorithm will not create a positive result, whereas other data, had it been considered, may do so.

- **REITs:** OneAscent may recommend that portions of client portfolios be allocated to real estate investment trusts, otherwise known as “REITs”. A REIT is an entity, typically a trust or corporation, that accepts investments from a number of investors, pools the money, and then uses that money to invest in real estate through either actual property purchases or mortgage loans. While there are some benefits to owning REITs, which include potential tax benefits, income and the relatively low barrier to invest in real estate as compared to directly investing in real estate, REITs also have some increased risks as compared to more traditional investments such as stocks, bonds, and mutual funds. First, real estate investing can be highly volatile. Second, the specific REIT chosen may have a focus such as commercial real estate or real estate in a given location. Such investment focus can be beneficial if the properties are successful, but lose significant principal if the properties are not successful. REITs may also employ significant leverage for the purpose of purchasing more investments with fewer investment dollars, which can enhance returns but also enhances the risk of loss. The success of a REIT is highly dependent upon the manager of the REIT. Clients should ensure they understand the role of the REIT in their portfolio.

- **MLPs:** OneAscent may recommend that portions of client portfolios be allocated to master limited partnerships, otherwise known as “MLPs”. An MLP is a publicly traded entity that is designed to provide tax benefits for the investor. In order to preserve these benefits, the MLP must derive most, if not all, of its income from real estate, natural resources and commodities. While MLPs may add diversification and tax favored treatment to a client’s portfolio, they also carry significant risks beyond more traditional investments such as stocks, bonds and mutual funds. One such risk is management risk-the success of the MLP is dependent upon the manager’s experience and judgment in selecting investments for the MLP. Another risk is the governance structure, which means the rules under which the entity is run. The investors are the limited partners of the MLP, with an affiliate of the manager typically the general partner. This means the manager has all of the control in running the entity, as opposed to an equity investment where shareholders vote on such matters as board composition. There is also a significant amount of risk with the underlying real estate, resources or commodities investments. Clients should ask OneAscent any questions regarding the role of MLPs in their portfolio.

- **Funds Available Risk:** Clients who have check-writing authority for their accounts are responsible for losses related to trades not occurring due to a lack of cash within their account.

- **Excess Cash Balance Risk:** Client accounts may have cash balances in excess of \$250,000, which is the insurance limit of the Federal Deposit Insurance Corporation. For cash balances in excess of that amount, there is an enhanced risk that operation related counterparty risk related to the account custodian could cause losses in the account. We mitigate this risk by carrying cash balances in amounts either subject to protection or as limited as you, the client, directs. You may elect to participate in a “cash sweep” program through your account custodian which automatically moves excess cash from your investment account into a cash account and then invests that cash into cash based investments, such as money market funds. We do not receive compensation of any kinds for facilitating your participation in such cash sweep accounts.

- **Risks specific to sub-advisors, other managers and private placements.** If we invest some of your assets with another advisor, including a private placement, there are additional risks. These include

risks that the other manager is not as qualified as we believe them to be, that the investments they use are not as liquid as we would normally use in your portfolio, or their risk management guidelines are more liberal than we would normally employ. The third-party manager who has been successful in the past may not be able to replicate that success in the future. Private funds are pooled investment vehicles, and each pooled investment vehicle is managed according to the stated investment program in the respective private fund's private placement memorandum. This means that individual investors in a fund will not receive individual asset management within the fund. In addition, as we do not control the underlying investments in a third-party manager's portfolio (even if the portfolio is managed by an affiliate), there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for a particular client. Moreover, when we do not control the manager's daily business and compliance operations, it is possible for us to miss the absence of internal controls necessary to prevent business, regulatory or reputational deficiencies. Accordingly, clients investing in private funds should carefully read that fund's private placement memorandum, and clients investing through a third party manager should carefully read that manager's Form ADV.

**Item 9:           Disciplinary Information**

We have not been the subject of any legal or disciplinary events that would be material to your evaluation of our business or the integrity of our management.

**Item 10:         Other Financial Industry Activities and Affiliations**

A. Broker-dealer

*Please see the response to Item 5E with regard to individuals registered in their individual capacities with broker-dealers.*

B. Futures Commission Merchant/Commodity Trading Advisor

Neither the principal of OneAscent, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

C. Relationship with Related Persons

*OneAscent Investment Solutions LLC*

Harry Pearson and Rob Grubb, owners of OneAscent, are also owners of OneAscent Investment Solutions LLC ("OAIS). When a OneAscent advisor allocates client assets to a separate manager, including an affiliated manager such as OAIS, fees payable to such managers are separate from, and in addition to, fees payable to OneAscent. This means that the overall fees to OneAscent and these managers may be significantly higher than if OneAscent had managed the assets directly. OneAscent will consider these fees in its decision to recommend the use of any third party manager, including OAIS. OneAscent has a conflict of interest because OneAscent has the incentive to refer clients to OAIS, because of common ownership, and therefore are likely to receive greater overall compensation if assets are allocated to their respective affiliated firms as opposed to a different third party manager or in-house management. Individual investment adviser representatives may also receive greater compensation for allocating assets to affiliated managers than to other non-affiliated managers. OneAscent also consults on the Collective



Investment Trusts that OAS manages. This may present a conflict of interest for OneAscent to recommend the Collective Investment Trusts if OAS is serving as the investment manager. These conflicts of interest are disclosed to clients verbally and in this brochure. OneAscent also attempts to mitigate the conflict of interest by requiring employees to acknowledge the firm's Code of Ethics, their individual fiduciary duty to the clients of OneAscent, which requires that employees put the interests of clients ahead of their own.

#### *OneAscent Wealth Management, LLC*

Harry Pearson and Robert Grubb, owners of OAFS, are also indirect owners of OneAscent Wealth Management, LLC ("OAWM"). OAWM is registered with the United States Securities and Exchange Commission. OAWM's purpose is to provide financial planning and wealth management services to clients. OAWM will recommend that all or a portion of client assets are invested through OAS. When a OAWM advisor allocates client assets to a separate manager, including an affiliated manager such as OAS, fees payable to such managers are separate from, and in addition to, fees payable to OAWM. This means that the overall fees to OAWM and these managers may be significantly higher than if OAWM had managed the assets directly. OAWM will consider these fees in its decision to recommend the use of any third party manager, including OAS. OAWM has a conflict of interest because OAWM has the incentive to refer clients to OAS, because the owners of those firms are also owners of OAWM, and therefore are likely to receive greater overall compensation if assets are allocated to their respective affiliated firms as opposed to a different third party manager or in-house management. Individual investment adviser representatives may also receive greater compensation for allocating assets to affiliated managers than to other non-affiliated managers. OAS is also the investment manager to Collective Investment Trusts. OAFS may be consulting the individual plans of the Collective Investment Trusts, and therefore it may be a conflict of interest for OAFS to recommend the Collective Investment Trusts if OAS is serving as the investment manager. This conflict of interest is disclosed to clients verbally and in this brochure. OAWM also attempts to mitigate the conflict of interest by requiring employees to acknowledge the firm's Code of Ethics, their individual fiduciary duty to the clients of OAWM, which requires that employees put the interests of clients ahead of their own. In addition to the conflict of interest in recommending our affiliate, OAS for the management of model strategies or investment in a registered investment company managed by OAS, OAFS has additional conflicts related to OAWM. One such conflict is that OAFS executes the billing processed for OAWM. OAWM has a conflict in arranging for the billing to be done in this manner by an affiliate as opposed to a third party because there is the potential for greater income to the indirect owners as described above. However, OAFS and OAWM believe this billing approach is more beneficial to clients because of streamlined services and potentially lower costs. In addition, OAFS may also provide certain administrative and consulting services to individual investment adviser representatives related to the sales or other transfers of their business. OAFS has a conflict of interest in recommending the sale of an investment adviser representative's business to another OneAscent investment adviser representative, because if the clients of one investment adviser representative stay with another OneAscent entity, the overall compensation to OneAscent will be higher than if those clients left as a result of a sale to an outside investment adviser representative or firm. Further, if OAFS receives a fee for providing consulting services to the investment adviser representative, there is a conflict of interest for OAFS with regard to that investment adviser representative. OAFS mitigates these conflicts of interest by disclosing them in this Part 2A and providing additional ethics training to our investment adviser representatives on an annual basis.

#### *Insurance*

Certain professionals of OneAscent are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for OneAscent clients, in their capacity

as licensed insurance agents, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as employees of OneAscent. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage OneAscent or utilize these professionals to implement any insurance recommendations. OneAscent attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with OneAscent, or to determine not to purchase the insurance product at all. OneAscent also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of OneAscent, which requires that employees put the interests of clients ahead of their own.

#### *Vendor Sponsorships*

In limited circumstances, certain vendors including investment managers, mutual fund managers, TAMP partners, and custodians to which we allocate (or may allocate) client assets will assist in payment of costs associated with travel to and from diligence site visits and advertising and conference costs associated with recruiting new advisors. This creates a conflict of interest because OneAscent could be incentivized to use these vendors because of the relationship and not because it is best for clients. OneAscent attempts to mitigate this conflict of interest by disclosing these relationships to clients and requiring all personnel to certify they will follow the firm's Code of Ethics.

#### *Accounting Services*

Certain OneAscent advisors may utilize certain individuals to provide accounting services to clients. Fees for accounting services will not be used to offset or as a credit against advisory fees. OneAscent may have an incentive to recommend accounting services based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for accounting services is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage OneAscent to implement any accounting recommendations. OneAscent attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to engage other companies that are not affiliated with OneAscent. OneAscent also attempts to mitigate the conflict of interest by requiring employees to acknowledge their individual fiduciary duty to the clients of OneAscent, found in the firm's Code of Ethics, which requires that employees put the interests of clients ahead of their own.

#### *Investment Advisor Representatives*

As discussed in Item 4 above, our firm offers services through our network of investment advisor representatives ("Advisor Representatives" or "IARs"). IARs may have their own legal business entities whose trade names and logos are used for marketing purposes and may appear on marketing materials or client statements. The client should understand that the businesses are legal entities of the IAR and not our firm, OneAscent. The IARs are under the supervision of our firm, OneAscent, and the advisory services of the IAR are provided through our firm, OneAscent. Please refer to the ADV Part 1 for more information regarding these advisors.

#### *OneAscent Capital*

OneAscent Holdings, LLC the owner of OneAscent Financial Services LLC, is also the owner of

OneAscent Capital, which is the manager of the OneAscent Capital Fund I, L.P. and OAC Pathway LLC (the “Funds”). OneAscent Capital Impact Fund I, LP is a Delaware limited partnership, and OAC Pathway LLC is a Delaware limited liability company the purpose of which is to facilitate investors’ ability to invest in private equity, both through private equity managers and direct investments. Investors in the Fund pay management fees and incentive fees (fees based upon a portion of the capital appreciation of the investor). These fees are separate from and in addition to the fees charged by OAFS. Assets invested in the Funds will be counted in assets under management for the purpose of calculating management fees due to OAFS. OAFS will continue to provide ongoing diligence on the Funds (as we would for any other third party manager or private placement) and will evaluate the holdings in the Funds for the purpose of incorporating them into the client’s overall asset allocation. OAFS will consider the additional fees to the Funds as part of its diligence and evaluation process in determining whether to recommend that a client invest in the Funds. Because an affiliate (in this case, OneAscent Holdings) will receive indirect compensation because of investments in the Funds, OAFS has a material conflict of interest when evaluating the Funds as potential investments for a client. We attempt to mitigate this conflict by disclosing it to our clients both in this Form ADV and in a separate written disclosure to all investors that are clients of OAFS. Further, all supervised persons of OAFS are required to read and follow the firm’s Code of Ethics, which reminds our advisors of their fiduciary duty to place client interests ahead of their own. In addition, OAFS is also expected to refer clients to OneAscent Capital for OneAscent Capital to act as a consultant for private and alternative investments.

#### D. Recommendations of Other Advisers

See Item 4 with regard to discussion of OneAscent Investment Solutions LLC.

Please see Item 8 regarding Third Party Managers in general.

OneAscent will also be set up as a Turnkey Asset Management Platform (TAMP) on Schwab’s platform. This TAMP will primarily service OneAscent Wealth Management, which therefore presents a conflict of interest due to both being under common control. OneAscent does not receive compensation from the third party managers on the platform. Rather, OneAscent debits client fees and remits the portion of the fees due to the third party manager to them. OneAscent attempts to mitigate this conflict by disclosing it to clients in this Form ADV and by requiring all representatives to follow the firm’s policies and procedures, which specifically note the fiduciary obligation to place client interests ahead of the individual representative’s or OneAscent’s. Fees for such programs may be higher or lower than if client directly obtained services of the third party manager or if client obtained advisory services separately. When selecting the third party managers, adequate due diligence will be performed. The due diligence proves will include a minimum of a completed due diligence assessment report, a review of assets under management, and expense ratios associated with the managers offerings. Additional due diligence factors may also be considered and requested. Please refer to the *OneAscent Wealth Management* section above for more information regarding this relationship.

#### E. Financial Institution Consulting Services

OneAscent has an agreement with a broker/dealer to provide investment consulting services to Brokerage Customers. Broker/dealers pay compensation to OneAscent for providing investment consulting services to Customers. This consulting arrangement does not include assuming discretionary authority over Brokerage Customers’ brokerage accounts or the monitoring of securities. These consulting services offered to Brokerage Customers may include a general review of Brokerage Customers’ investment holdings, which may or may not result in OneAscent’s investment adviser representative making specific securities recommendations or offering general investment advice. Brokerage Customers will execute a



written consulting agreement directly with OneAscent.

This relationship presents a conflict of interest. Potential conflicts are mitigated by Brokerage Customers consenting to receive investment consulting services from OneAscent; by OneAscent not accepting or billing for additional compensation on broker/dealers' assets under management beyond the consulting fees disclosed in Item 5 in connection with the investment consulting services; and by OneAscent not engaging as, or holding itself out to the public as, a securities broker/dealer. OneAscent is not affiliated with any broker/dealer.

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

A. A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.

B. On occasion, OneAscent may recommend to clients that they invest in any security in which OneAscent, or any principal thereof has any financial interest. Cole Pearson has an equity interest in Eventide Asset Management. Mr. Pearson does not have an active role with the company; however, he does receive profit sharing distributions based on his equity ownership giving him an incentive to recommend investment products based on the compensation received, rather than on the client's needs. In the case of discretionary accounts, it may not always be feasible for clients to direct OneAscent to invest in non-Eventide mutual funds unless clients provide specific investment restrictions in their investment policy statements. Finally, Clients are not always in a position to select non-Eventide mutual funds since they are relying on OneAscent for investment management unless OneAscent provides alternate mutual funds for clients to select. OneAscent attempts to mitigate this conflict of interest by disclosing the conflict to clients and allowing them to (a) decline the use of Eventide funds in their entirety or (b) allowing the use of Eventide funds so long as other options were considered and the Eventide fund is determined to be in the best interests of the client.

*Registered Funds Managed by OneAscent*

OneAscent Investment Solutions ("OAIS"), an affiliate of OneAscent Financial Services LLC is the manager to a number of funds registered under the Investment Company Act of 1940 (the "Registered Funds"). It is expected that OneAscent Financial Services LLC will recommend that clients whose investment objectives are appropriate for one or more Registered Funds to invest in such Registered Funds. This creates a conflict of interest, which may be material. Because OAIS receives a fee from the Registered Funds for managing each Registered Fund, and a fee from the clients whose assets are managed in the strategies that include each Registered Fund (or, as the case may be, the client's portfolio that contains the Registered Funds directly), OneAscent Financial Services LLC has an incentive to recommend one or more Registered Funds to clients because of the potential for an increased fee, as opposed to simply the client's objectives. OneAscent Financial Services LLC attempts to mitigate this conflict by disclosing the conflict to clients. Further, OneAscent Financial Services LLC includes in its Code of Ethics a requirement that each professional acknowledge their responsibility to place client interests ahead of their own.

C. On occasion, an employee of OneAscent may purchase for his or her own account securities which are also recommended for clients. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid

placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

D. On occasion, an employee of OneAscent may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade, so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

## **Item 12: Brokerage Practices**

### **A. Recommendation of Broker-Dealer**

OneAscent recommends that investment accounts be held in custody by Schwab Advisor Services ("Schwab"), SEI Investments Company (SEI), or National Financial Services ("Fidelity"). These custodians offer enhanced services to independent investment advisors. These services include custody of securities, trade execution platforms, and access to research not available to the general public. These custodians are wholly independent from OneAscent. It is expected that most, if not all, transactions in a given client account will be cleared through the custodian of that account in its capacity as a broker-dealer.

OneAscent has chosen to recommend Schwab, Fidelity, and SEI to its clients based on a variety of factors. These include, but are not limited to, commission costs. These custodians have what can be considered discounted commission rates. However, in choosing a broker-dealer or custodian to recommend, we are most concerned with the value the client receives for the cost paid, not just the cost. These custodians add value beyond commission cost. Other factors that may be considered in determining overall value include speed and accuracy of execution, financial strength, knowledge and experience of staff, research and service. They also have arrangements with many mutual funds that enable us to purchase these mutual funds for client accounts at reduced transaction charges (as opposed to other broker-dealers). Schwab and SEI have very high market shares of the investment adviser business which makes them the most experienced in matters likely to arise for our clients. OneAscent re-evaluates the use of these custodians at least annually to determine if they are still the best value for our clients.

We do not consider whether Schwab, Fidelity, or SEI, or any other broker-dealer/custodian, refers clients to OneAscent as part of our evaluation of these broker-dealers.

### Overlay Manager

OneAscent has entered into an agreement with Adhesion Wealth Advisor Solutions and GeoWealth to provide Overlay Portfolio Management services to Unified Managed Accounts managed by OneAscent or its Investment Advisor Representatives.

Adhesion and GeoWealth's overlay portfolio management services are only available to accounts held at Schwab Advisor Services ("Schwab"), or Pershing Advisor Solutions ("Pershing"), although they may in the future accept other custodian brokers. Adhesion and GeoWealth have arranged with these custodians

the capability to electronically place trades in your accounts on your behalf. This electronic trading capability is generally required for effective provision of our OPM services.

Typically, trading and transaction clearing services will be provided by the client's custodian, at fee rates previously agreed to by the custodian and OneAscent. Transactions for accounts at one Supported Custodian may be effected either before or after transactions effected by another Supported Custodian. Consequently, an account held at one Supported Custodian may experience performance results different from an account held at another Supported Custodian due to differing brokerage fees, commissions and trade executions.

#### **B. Aggregating Trades**

Commission costs per client may be lower on a particular trade if all clients in whose accounts the trade is to be made are executed at the same time. This is called aggregating trades. Instead of placing a number of trades for the same security for each account, we will, when appropriate, execute one trade for all accounts and then allocate the trades to each account after execution. If an aggregate trade is not fully executed, the securities will be allocated to client accounts on a *pro rata* basis, except where doing so would create an unintended adverse consequence (for example, if a *pro rata* division would result in a client receiving a fraction of a share, or a position in the account of less than 1%).

#### **Directed Brokerage**

OneAscent allows clients to direct brokerage. "Directing" brokerage means choosing to maintain all or some of their assets with a broker-dealer that is not recommended by OneAscent. OneAscent may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients' money because without the ability to direct brokerage OneAscent may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

### **Item 13: Review of Accounts**

All accounts will be reviewed by a senior professional on at least an annual basis. However, it is expected that market conditions, changes in a particular client's account, or changes to a client's circumstances will trigger a review of accounts.

The annual report in writing provided by OneAscent is intended to review asset allocation. All clients will receive statements and confirmations of trades directly from their account custodian. Please refer to Item 15 regarding Custody.

### **Item 14: Client Referrals and Other Compensation**

#### **A. Economic Benefit Provided by Third Parties for Advice Rendered to Client.**

*Please refer to Item 12, where we discuss recommendations of Broker-Dealers.*

OneAscent may receive economic benefits in the form of research and educational services and analytical software tools from Callan that it uses to manage its clients' accounts at reduced or wholly waived fees

based upon fees received by Callan that are attributable to OneAscent's clients' assets in the Callan UMA program.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us. You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the arrangements because the costs of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above under *Item 12 Brokerage Practices*. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

#### **B. Compensation to Non-Advisory Personnel for Client Referrals.**

Clients may be introduced to OneAscent via other third parties. In the event that OneAscent compensates any party for the referral of a client to OneAscent, any such compensation will be paid by OneAscent, and not the client. If the client is introduced to OneAscent by an unaffiliated third party, that third party will disclose to the client the referral arrangement with OneAscent, including the compensation for the referral, and provide the client a copy of OneAscent's ADV Part 2A and 2B. The referral source will also provide a written disclosure to the client regarding the relationship between OneAscent and the referral source, including the fact that referral fees will be paid.

Certain individuals who are salaried employees of the IARs of OneAscent may receive bonuses based on clients they bring to their respective IAR.

### **Item 15: Custody**

There are two avenues through which OneAscent has custody of client funds; by directly debiting its fees from client accounts pursuant to applicable agreements granting such right, and potentially by permitting clients to issue standing letters of authorization ("SLOAs"). SLOAs permit a client to issue one document that directs OneAscent to make distributions out of the client's account(s).

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. The client will also receive a statement from their account custodian showing all transactions in their account, including the fee.

We encourage clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on your quarterly report prepared by OneAscent against the information in the statements provided directly from their account custodian. Please alert us of any discrepancies.

In addition to the account custodian's custody procedures, clients issuing SLOAs will be requested to confirm, in writing, that the accounts to which funds are distributed are parties unrelated to OneAscent.

### **Item 16: Investment Discretion**

Asset management services are provided on a "discretionary" or "non-discretionary" basis. When OneAscent is engaged to provide asset management services on a discretionary basis, OneAscent will monitor the accounts to ensure that they are meeting the client's agreed upon guidelines. If any changes are needed, OneAscent will make the changes. These changes may involve selling a security or group of

investments and buying others or keeping the proceeds in cash. Clients may at any time place restrictions on the way their account is managed. For example, a client may restrict the types of investments OneAscent may use in the client's account, or the allocations to a security type. Clients engaging OneAscent on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and OneAscent.

In the event that you are invested in an account that utilizes an Overlay Manager, such as an UMA, you will grant the Overlay Manager complete and unlimited discretionary trading authority with respect to your account. The Overlay Manager will be solely responsible for the day-to-day investment management decisions for your account, and neither OneAscent nor any third party manager will be responsible for implementing the investment trading decisions.

**Item 17:        Voting Client Securities**

OneAscent will only vote proxies on Client's behalf to the extent that the account Custodian is able to be serviced through our proxy voting service, and such may change from time to time.

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. At our discretion, OneAscent will vote proxies on behalf of its clients.

Copies of our Proxy Voting Policies are available upon request.

**Item 18:        Financial Information**

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per account and more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.