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FORM ADV PART 2A Firm Brochure

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This brochure provides information about the qualifications and business practices of Hauser Retirement Solutions 2, LLC. If you have any questions about the contents of this brochure, please contact Hauser Retirement Solutions 2, LLC at 513-745-9200. 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. Please note that registration does not imply any certain level of skill or training.

Additional information about Hauser Retirement Solutions 2, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.



Item 2. MATERIAL CHANGES

On October 23, 2024, an amendment has been made to this ADV Part 2A Brochure as described in:
Item 14, Client Referrals and Other Compensation

We will provide you with a new Brochure as necessary based on material changes, at any time, without charge. Currently, the Brochure may be requested by contacting Andy Warning at 513-832-5463.

Additional information about Hauser Retirement Solutions 2, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with HRS.

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Item 4. ADVISORY BUSINESS

Hauser Retirement Solutions 2, LLC (“HRS,” “us” or “we”), established in July of 2018, is an investment advisor registered with the Securities and Exchange Commission (“SEC”) with its principal place of business in Cincinnati, OH. Hauser, Inc. owns 100% of HRS. Mark Hauser owns 60% of Hauser, Inc. The other 40% of Hauser, Inc. (“HIG”) is owned by the following four irrevocable trusts.

1. Mark Hauser, Trustee of the Melissa Jane Hauser Irrevocable Trust
2. Mark Hauser, Trustee of the Nicole Wells Hauser Irrevocable Trust
3. Mark Hauser, Trustee of the Kathryn Grace Hauser Irrevocable Trust
4. Mark Hauser, Trustee of the Arthur Eric Hauser Irrevocable Trust

HRS provides investment advisory and consulting services to retirement plans including 401(k) plans, 403(b) plans, 457 plans, profit sharing plans and other ERISA qualified plans (“clients,” “you” or “plan”). HRS currently offers its retirement plan investment advisory and consulting services to corporate clients, on their own behalf and on behalf of their plan and plan participants.

HRS provides its services to assist plan sponsors, plan trustees and investment committees to meet their fiduciary responsibilities under 404(c) of the Employee Retirement Income Security Act of 1974 (“ERISA”). These investment advisory and consulting services range from the development of Investment Policy Statements to the delivery of Participant Communication services.

Non-Fiduciary Services

In providing the below listed services to plans, HSA is acting in a non-fiduciary capacity.

Participant Communication – HRS may provide group meetings and individual participant meetings for the delivery of participant education communications and presentations. The schedule, timing and number of meetings shall be determined prior to contract acceptance. HRS may also assist with the development of participant education presentations and customized communications delivered through various formats other than individual and group meetings.

Fiduciary Education - HRS will provide fiduciary training as needed for our clients that provides education, documentation and plan metrics to assist in meeting fiduciary responsibilities and improve operational efficiency.

RFP/Benchmarking – HRS will provide benchmarking of retirement plan fees, services and investments. This process includes the gathering of plan demographics, the identification and selection of potential bidding providers based upon matching client goals and objectives, a detailed bidding analysis, finalist presentations and transitional assistance.

Fiduciary Investment Services

HRS may provide investment advisory services to assist plan sponsors, plan trustees and investment committees to meet their ERISA fiduciary responsibilities. HRS may provide these services under ERISA § 3(21) or ERISA § 3(38). Under these sections, clients can engage HRS to provide investment advisory services. By doing so, HRS shares fiduciary responsibility with plan trustees and investment committees as it relates to the assets HRS is under agreement to provide investment management or advisory services. As a part of a client’s fiduciary team, HRS provides the investment expertise to implement the plans investment policies and objectives.

Plan Investment Advisory Services

HRS acting as an advisor under ERISA § 3(21)

For the purposes of ERISA § 3(21), HRS does not exercise any discretionary authority or control respecting management of the plan or management or disposition of its assets or have any discretionary authority or discretionary responsibility in the administration of the plan. Therefore, HRS is not a “fiduciary” pursuant to ERISA except to the extent it renders “investment advice” to the plan within the meaning of section 3(21) of ERISA and Department of Labor regulations there under.

Under ERISA § 3(21), HRS acts as the advisor making investment recommendations, but it is ultimately up to the plan sponsor to decide whether and how to implement these recommendations.

Furthermore, under ERISA § 3(21), the participants are responsible for any individual investment selections made under the plan.

HRS acting as an investment manager under ERISA § 3(38)

For the purposes of ERISA § 3(38), HRS serves as the investment manager, who exercises discretionary authority with regard to the mutual funds and other investment vehicles that it selects for investment under the Plan. Therefore, HRS is not a “fiduciary” pursuant to ERISA except to the extent it renders “investment advice” to the plan within the meaning of section 3(38) of ERISA and Department of Labor regulations there under. Under ERISA § 3(38), HRS acts as the advisor with discretionary authority with regard to the investments managed for the plan, allowing the plan sponsor to transfer liability for selecting, monitoring, and replacing the investment options to HRS, the investment manager.

Furthermore, under ERISA § 3(38), the participants are responsible for any individual investment selections made under the plan.

Investment and Fiduciary Consulting Services

HRS may also provide the following investment and fiduciary consulting services to plans.

Investment Policy Statement – HRS will assist you in developing an Investment Policy Statement for your retirement plan that provides the guidelines for selecting and evaluating investments offered in your plan. HRS will work with plans to create an Investment Policy Statement consistent with ERISA. The Investment Policy Statement will document the plan’s objectives and set into writing the plan’s investment policies regarding investment selection, monitoring, benchmarking, and de-selection.

Manager Selection – HRS’s investment manager research and selection process is a fully integrated process designed to select asset managers for each asset class and style to be represented within the plan. Our quantitative screening ensures that each manager meets standards for style consistency, risk adjusted performance, consistency of performance and low expenses. Our experienced analysts further assess the philosophy behind the numbers, the process by which it is implemented and most importantly - the people who manage the portfolios.

Monitor & Measure – HRS will establish and manage a process to select, de-select, and monitor investments offered with retirement plans. HRS will evaluate the plan’s current offering by benchmarking the investment return, risk, and expenses to its peers and relative indices, by providing an assessment of asset class overlap or gaps, and by evaluating overall investment offering to the plan’s current Investment Policy Statement.

Trustee & Investment Committee Meetings – HRS meets regularly with the Plan Trustees & Investment Committees to document the performance of the plan’s investments and to make any recommendations that may be appropriate for changes. These meetings are documented and become part of the plans due diligence file.

The plan investment advisory and investment and fiduciary consulting services provided by HRS are tailored to the specific needs of the plan client. The investment advisory services are provided in accordance with the Investment Policy Statement, and if one does not exist such similar information or guidance as provided by plan sponsors, plan trustees and/or investment committees.

HRS does not participate in any wrap fee programs.

Assets Under Management

As of December 31, 2023, HRS managed \$965,737,685 in regulatory assets under management, all on a non-discretionary basis.

Item 5. FEES AND COMPENSATION

Investment management and advisory fees are HRS's sole compensation. We receive no fees or compensation in connection with the purchase or sale of securities for other investment products on behalf of our clients, including such things as brokerage commissions, asset-based sales charges, or service fees from the sale of mutual funds. Some mutual funds pay 12b-1 fees to third parties for distribution-related services and fees for administrative services. These 12b-1 and administrative fees are reflected in the net asset value of a mutual fund's shares. These types of fees are typically deducted directly from plan participants' investments, and the plan trustee(s) may determine to utilize these fees to compensate service providers to the plan. When providing discretionary advisory services, HRS utilizes no-load mutual funds and/or retirement plan class shares that do not carry any sales load, revenue share or 12b-1 fees, when available. When providing non-discretionary advisory services HRS provides to the plan trustee(s) recommended mutual funds to be utilized and the share class or classes available for those mutual funds. HRS's investment management and advisory fees are not dependent upon the share class of a mutual fund utilized by a plan client. However, plan trustee(s) will at times determine to utilize mutual fund share classes that pay a sales load, revenue share or 12b-1 fees, even in instances when other share classes are available. The plan trustee(s) will utilize these fees to pay HRS's investment management and advisory fees, as well as the fees charged by other services providers to a plan client. At no time does HRS receive any fees or payments that are greater than, or in addition to, the investment management and advisory fees set forth in each written engagement agreement with a plan client.

The specific manner in which we charge fees is established in the written engagement agreements that we enter into with our clients. All fees are subject to negotiation. Our fees are:

- Based on the market value of plan assets under management,
- calculated and paid on a monthly or quarterly basis, in arrears, as of the end of applicable period,
- pro-rated for any assets that we manage for less than a full calendar quarter, and
- vary by the level of service each client has chosen.

HRS does not deduct client fees. The plan administrator makes the fee calculation and sends HRS the fee. Thus, HRS does not have the ability to deduct fees. The methodology for fee deduction will be clearly outlined in the Client Engagement Agreement.

The advisory fees paid to HRS represent fees for management of your retirement plan and are separate from any other fees and expenses charged by other parties; therefore, the advisory fees shown in this Brochure represent only the fees paid to HRS and do not reflect operating expenses and other costs charged by the mutual funds, or other products a client may be invested in and these expenses and costs are ultimately borne by the client, as the shareholder. In addition, mutual funds may charge contingent deferred sales charges ("CDSC") on withdrawals. HRS is not responsible for any CDSC charges incurred through HRS's management of a client's portfolio or for any transaction costs incurred while managing a client's assets. A complete description of all fees and expenses of the securities in which a client is invested is contained in the relevant prospectuses. HRS also advises clients to carefully review their custody agreement with their custodian as there may be custodial fees and other service fees charged to such clients by such custodians. See Item 12 below entitled "Brokerage Practices."

The same or similar investment advisory services may be available from other investment advisors for a lower fee. The advisory fee may be more or less costly than paying for the services separately, depending upon the investment advisory fees charged, the level of brokerage and other fees that would be payable if the client obtained the services available under the program individually.

HRS's investment advisory services and associated fees are as follows:

A. Retirement Plan Investment Management Services

I. INVESTMENT AND FIDUCIARY CONSULTING SERVICES AND NON-FIDUCIARY SERVICES FEES*

The annual fee will be invoiced monthly or quarterly, in arrears, based on the market value of the funds under advisement on the last business day of the previous month or quarter and will range from 15 to 100 basis points based on the value of plan assets. The minimum annual fee is \$7,500.

II. RETIREMENT PLAN 3(21) INVESTMENT ADVISORY FEES*

The annual fee will be invoiced monthly or quarterly, in arrears, based on the market value of the funds under advisement on the last business day of the previous month or quarter. This fee is in addition to the Consulting Services Advisory Fees noted above, the fee for 3(21) services will not exceed 15 basis points.

III. RETIREMENT PLAN 3(38) INVESTMENT ADVISORY FEES*

The annual fee will be invoiced monthly or quarterly, in arrears, based on the market value of the funds under advisement on the last business day of the previous quarter. This fee is in addition to the Consulting Services Advisory Fees noted above, the fee for 3(38) services will not exceed 30 basis points.

*All fees may be negotiated based on the specific situation of the plan and the asset levels and expected growth in the assets. In some circumstances, when certain one-time projects or work exceeds the scope of fee related work, HRS and clients may negotiate a separate hourly or per project rate for certain plan related project work. Depending on the services requested and scope of the project, hourly rates can range between \$75.00 and \$100.00 per hour.

IV. OTHER FEE ARRANGEMENTS

Plan Design and Consulting Fee is \$1,250 annually to be paid via invoice by Plan Sponsor. Due Diligence Fee per transaction to be paid via invoice \$5,000 per transaction or \$3,500 per plan if multiple plans require diligence in a single transaction.

For corporate benefit plans, flat consulting fees will generally range from 15 to 100 basis points based on the value of plan assets. The plan will be valued quarterly.

HRS also may receive certain fees from its custodial platforms and other revenue sharing compensation from mutual fund providers for providing shareholder services and administrative services for mutual funds purchased under the Plan. Any and all compensation and other revenue sharing payments received by HRS from these custodial platforms and/or mutual funds are used to offset administrative services and recordkeeping fees billed by HRS to its clients (as well as to offset fees charged by the Plan custodian or other professional service providers). Quarterly invoices sent to HRS clients illustrate total fees payable to HRS less revenue sharing income. To the extent revenue sharing income exceeds the fee payable, HRS will at the Plan Sponsor's discretion, set up a revenue recapture account or place the income into the applicable client's Plan.

HRS investment adviser representatives only receive the compensation described in Items 5, 10 and 14, and otherwise permitted herein, for performing advisory services.

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

HRS does not charge performance-based fees or fees based on a share of capital gains on, or capital appreciation of, the assets of a client. In addition, HRS does not engage in side-by-side management.

Item 7. TYPES OF CLIENTS

HRS provides investment management services to retirement plans. There are currently no requirements for opening or maintaining account minimums. See Item 5 for additional annual fees associated with certain services.

Item 8. METHOD OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

HRS follows a disciplined research and evaluation process to determine appropriate investments for each client's investment line-up. HRS has the expertise and analytical tools to choose from thousands of funds and fund families with a wide range of investment managers. This provides HRS with the flexibility to analyze leading investments in each asset class and develop investment strategies for client plans.

Investing in securities involves risk of loss that clients should be prepared to bear.

HRS's investment research process seeks to identify investment managers that are more consistent long-term performers in their areas of expertise. Using both quantitative and qualitative analysis, HRS screens in seeking to identify money managers across a broad spectrum of asset classes. HRS's objective is to create a roster of investment managers to play specific roles in our clients' plan portfolios.

HRS's selection process employs a bottom up approach, concentrating first on each specific asset class and then on the many investment managers that specialize there. Through a series of evaluation steps, HRS narrows our selection to those investment managers that HRS believes may meet a client's Investment Policy Statement.

HRS's research team begins with a review of an investment manager's rate of return, relative risk measurements, and management expenses as compared to its peer group. HRS's focus is on investment managers that have demonstrated a consistent, long term track record. Going beyond the numbers, HRS's investment research team also considers a manager's reputation for ethical practices, style consistency, and administrative infrastructure.

Listed below are samples of criteria tracked in HRS's screening process.

Quantitative Factors:

1. Returns vs. peer funds: 1, 3, 5 & 10 year total returns
2. Consistency of returns
3. Volatility measures: Standard Deviation of return
4. Return to Risk measures: Sharpe Ratio
5. Expense ratio analysis
6. Portfolio turnover
7. Style consistency

Qualitative Factors:

1. Management tenure and personnel
2. Investment process / decision making procedures
3. Fiduciary matters
4. Information availability

The quantitative screening of each Morningstar fund category significantly reduces the number of potential investments. From there, the qualitative standards are applied to create a client's fund lineup as well as building a "bullpen" of secondary fund choices should the preferred funds close to new investors or fall in our ranking system for any reason. For important information pertaining to the risks associated with investing, please review the section titled "Risk Factors" at the end of this section.

Risk Factors

Client understands, acknowledges and agrees that no assurance has been or can be given to client that any client will achieve his or her investment objectives by accepting or implementing in whole or in part any investment strategy and/or allocation or any specific recommendation by HRS to purchase or sell any security or other investment.

Securities markets fluctuate substantially over time. All investments in securities include a risk of loss of money invested (principal) and any unrealized profits (i.e., profits in the account that have not been liquidated, sometimes called "paper profits"). In addition, performance of any investment is not guaranteed. HRS cannot guarantee any level of performance or that clients will not experience a loss of account assets.

HRS does not represent, warrant or imply that the services or methods of analysis used by HRS can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to major market corrections or crashes. No guarantees can be offered that clients' goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by HRS will provide a better return than other investment strategies.

The managers of the mutual funds, ETFs and collective investment trusts ("CITs") that HRS client's may utilize may employ the same or substantially similar investment strategies, and may hold similar portfolios of investments, in other investment

products or programs that they manage, such as managed account programs. Such other products or programs may be available through HRS or elsewhere. The costs and the services relating to the other products or programs in which these strategies are offered will differ.

There is no assurance that the no-load mutual funds, select load-waived mutual funds, ETFs and CITs will perform in any particular manner. Past performance of any mutual fund, ETF, CIT or asset class is no guarantee of future performance. Clients should carefully read the prospectus of each mutual fund and ETF before they invest.

Client has been informed, understands and acknowledges that unless stated otherwise in a supplemental disclosure document related to a specific investment or program, the investments in a client's program account are not insured by the Federal Deposit Insurance Corporation (FDIC), are not deposits with or the obligation of or guaranteed by HRS or the custodian or any of their affiliates, are subject to investment risk, including possible loss of principal invested, and that past performance is no guarantee of future results.

Risks associated with investing in mutual funds: Equity based mutual funds are subject to risks similar to those of stocks, including market risk, which is the risk that investment returns will fluctuate and are subject to market volatility, so that an investor's shares, when redeemed or sold, may be worth more or less than their original cost. International mutual funds are subject to fluctuations due to changes in a currency's exchange rate and political risk.

Fixed income mutual funds (bond funds) fluctuate with the bond market. Fixed income risks include:

- Credit risk: the risk that a company or bond issuer may fail to pay principal and interest payments in a timely manner;
- Interest rate risk: the risk that the Market value of the bonds will go down when interest rates go up; and
- Prepayment risk: the risk that a bond will be paid off early.

Risks associated with investing in ETFs and CITs: equity based ETFs and CITs are subject to risks similar to those of stocks, and fixed income based ETFs and CITs are subject to risks similar to those of bonds. Investment returns will fluctuate and are subject to market volatility, so that investor's shares, when redeemed or sold, may be worth more or less than their original cost. Foreign-based ETFs and CITs are subject to additional risks, such as the risk relating to fluctuations in a currency's exchange rate mentioned above. Please note that HRS personnel may buy or sell securities, specifically mutual funds and ETFs, which are also recommended to client.

Item 9. DISCIPLINARY INFORMATION

In August 2020, Mark Hauser, the Chairman and majority owner of the parent company of HRS, was personally charged with a single count of Conspiracy to Commit Mail Fraud and Honest Services Mail Fraud in connection to the College Admissions Scandal, and on September 21, 2020, Mark Hauser pled guilty to the aforementioned charge.

Item 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

The principal executive officers of HRS are also agents, and/or officers of HAUSER, Inc. ("Hauser"). These individuals may be independent agents for various insurance companies. Therefore, these individuals will be able to purchase insurance products for any client in need of such services. These individuals will be able to receive separate, yet typical compensation for the purchase of insurance products. HRS, its personnel and related persons have a conflict of interest to recommend clients purchase insurance products since commissions may be earned by HAUSER and licensed HRS personnel in addition to fees for advisory services. Clients are not obligated to purchase insurance products through HAUSER or its representatives. HRS, through its policies and procedures, addresses this apparent conflict of interest. HRS personnel may be sanctioned by HRS for taking advantage of a situation involving a conflict of interest and not acting within clients' best interests. Commissions may be higher or lower at HAUSER than at other insurance agencies. HRS personnel may have a conflict of interest in having clients purchase insurance related products through HAUSER, in that the higher their production with HAUSER the greater potential for obtaining a higher pay-out on commissions earned.

In connection with certain retirement plans, HRS may recommend that its clients consider using HAUSER or an HAUSER affiliate to provide insurance-related advice and services to such clients. HRS does not receive any direct compensation for such recommendations, but the relationship with HAUSER does raise a potential conflict of interest. HRS endeavors

to reduce the possibility of any conflict of interest in this situation by making such recommendation only if, in HRS' reasonable judgment, such a recommendation will not disadvantage its clients in any way, presenting information regarding potential alternative (i.e., non-HAUSER) providers to its clients, and requiring that the client make the ultimate decision in such circumstances.

The principal owner of HRS is also a 77% owner in HPE Capital Management II, LLC ("HPE"). HPE manages the following private funds: Hauser Capital Partners, LLC; Hauser Private Equity Core Fund II, LLC; and Hauser Private Equity Core Fund III, LLC. HPE is an insurance customer of HAUSER. No other business relationship exists or revenue sharing exists between the companies. HRS has reasonably disclosed all material conflicts of interest regarding HRS, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Neither HRS nor any of its personnel are registered, or have an application pending to register, as a broker/dealer, futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing persons.

Clients are advised that the investment recommendations, and advice offered by HRS, are not legal recommendations or advice, nor does it constitute accounting advice. Clients should coordinate and discuss the impact of financial advice with their attorney and/or accountant. Clients are advised that it is necessary to inform HRS promptly with respect to any changes in the client's financial situation and investment goals and objectives. Failure to notify HRS of any such changes could result in investment recommendations being made that are based upon inaccurate information, thus will not meet the needs of the client. Neither HRS nor any of its personnel recommend or select other investment advisers for clients and receive compensation directly or indirectly from those advisers that create a material conflict of interest, nor does either have other business relationships with those advisers that create a material conflict of interest.

Item 11. CODE OF ETHICS, PARTICIPATION or INTEREST IN CLIENT TRANSACTIONS, and PERSONAL TRADING

A. Code of Ethics

HRS has in place a Code of Ethics (the "Code") that provides for HRS and HRS's personnel to exercise its fiduciary duty to clients, to act in the best interest of clients, and always place clients' interests first and foremost. HRS takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as HRS's policies and procedures.

The Code establishes rules of conduct for all employees of HRS and is designed to, among other things; govern personal securities trading activities in the accounts of employees. The Code is based upon the principle that HRS and its employees owe a fiduciary duty to clients to conduct their affairs, including their retirement plan transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility. A material breach of the provisions of the Code by an employee may constitute grounds for disciplinary action, including termination of employment with HRS.

A copy of HRS's Code of Ethics is available to clients and potential clients upon request.

B. Participation or Interest in Client Transactions and Personal Trading

HRS personnel may buy or sell securities, specifically mutual funds and ETFs, which are also recommended to client. In light of the limited business activities of HRS, specifically the recommendation of mutual fund and ETF menus to plan clients, the opportunity for a conflict of interest between the interests of a plan client, any plan participants, HRS and personnel of HRS is remote. However, to ensure that even this remote chance of a conflict of interest is mitigated, HRS has implemented securities transaction reporting policies and procedures.

Specifically, the Code encompasses a personal securities transaction policy to monitor the personal securities transactions and securities holdings of each of HRS's "Access Persons." HRS's securities transaction policy requires that each Access Person must provide to the Chief Compliance Officer or his designee a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his designee with a written report of their current securities transactions during each calendar quarter and their

securities holdings on a yearly basis. Neither HRS nor any related person recommends to clients or buys or sells for clients' accounts investments in which the adviser or related persons has a material financial interest.

C. Privacy Policy

HRS recognizes and respects the privacy of each of its clients and their expectations for confidentiality. The protection of client information is of fundamental importance in our operation and HRS takes seriously its responsibility to protect nonpublic personal information. HRS collects, retains and uses information that assists HRS in providing services to clients. This information comes from the following sources:

- ▶ Account applications and other required forms
- ▶ Written, oral, electronic or telephonic communications and Account and transaction histories with us, our affiliates, or others

HRS does not disclose any nonpublic personal information about our client or former clients, except as permitted by law. HRS restricts access to nonpublic personal information about you to those employees, affiliates, and service providers who need to know that information to provide HRS products or services to you. HRS requires that these entities limit the use of the information provided to the purposes for which it was disclosed and as permitted by law.

D. Personal Trading

HRS follows the same policies as described in Item 11B in order to mitigate risks associated with recommending securities to clients, or buying or selling securities for client accounts, at or about the same time that HRS or a related person buys or sells the same securities for its own (or the related person's own) account.

Item 12. BROKERAGE PRACTICES

HRS does not select or recommend broker-dealers for client transactions.

Item 13. REVIEW OF ACCOUNTS

Plan client accounts are regularly monitored by the advisory personnel of HRS. Specifically, the funds/investments constituting the recommended investment options for any Plan are monitored on an ongoing basis utilizing the criteria described in Item 8. HRS provides a written report to plan clients on a quarterly basis. These written reports generally contain a summary of the performance of each of the funds/investments included as an investment option for the plan client and other statistical data and scoring regarding the performance of each of the funds/investments. The frequency of in-person meetings is determined with the plan client. HRS seeks to ensure that at least once each calendar year there is an in-person meeting with the plan client to review the performance of the plan investment options, as well as other statistical data and information relevant to the plan and the plan investment options.

In addition to these periodic reviews, there may be instances where HRS may send additional reports or otherwise request additional meetings with the plan client. Events that may trigger additional reporting or additional meetings are as follows: the performance of a fund/investment option; any material changes to a fund/investment option, such as a change in control or management personnel change, that necessitates removal and replacement; market events; or legal, regulatory or industry events materially affecting qualified retirement plans.

Item 14. CLIENT REFERRALS AND OTHER COMPENSATION

In determining a plan menu of investment options, or otherwise in providing nondiscretionary advice regarding plan investment options, HRS seeks to recommend the most efficient share class of mutual funds. In seeking to determine the most efficient mutual fund share class, HRS may select or recommend share classes that carry sales loads, revenue share or 12b-1 fees. However, in any instance where a fund may be included in a plan client that has any type of load, revenue share or 12b-1 fee, HRS does not accept any of these charges in payment of its fees. In any of these instances HRS seeks to have the plan administrator rebate any such load or fees to the plan participants that are holders of any such funds. In such instances, these types of share classes may be a more efficient option for a plan client. Ultimately, the method and ability

for rebate of these mutual fund fees is dependent upon the capabilities of the plan administrator and may be subject to the direction of the plan sponsor/trustees. Regardless, HRS does not accept any of these fund fees and, therefore, HRS is not presented with a conflict of interest in selecting or recommending a fund line-up for a Plan.

HRS has an agreement with a third party Investment Advisor to receive compensation for client referrals. Any referral made by HRS is under no obligation to become a client of the Investment Advisor. A referral will be provided with the necessary disclosures documents outlining this agreement and compensation.

Existing plan clients from time to time may acquire other businesses/companies. The acquired company's retirement plan can either be merged into the existing plan or it may be determined that the plan be terminated. In those instances where a plan is deemed to terminate or maintains terminated participant balances, HRS has an agreement to offer the terminating plan a referral to American Century for assistance. The terminating plan is under no obligation to utilize American Century. HRS will receive compensation from American Century for referrals provided in this situation.

In addition to salary, Martha Allman, Jessica Singer and Kate Tubesing may be eligible for a bonus determined by reference to the net revenue growth of HRS. Clients should be aware that the receipt of this additional compensation itself creates an inherent conflict of interest, and may affect the judgment of these individuals when making recommendations. As part of our fiduciary duty to clients, HRS and our representatives endeavor at all times to put the interests of the clients first, and recommendations will only be made to the extent that they are reasonably believed to be in the best interests of the client. Additionally, the conflicts presented by these practices are disclosed to clients through this Brochure.

Item 15. CUSTODY

For all accounts, HRS does not take custody of client accounts at any time. Client accounts are custodied at various firms that are referred to as "qualified custodians." The plan client contracts directly with the qualified custodian for the provision custody services. The plan is provided with regular written plan account statements directly from the qualified custodian and/or administrator. The plan sponsor/trustees should carefully review these statements.

HRS will provide periodic reports focused upon the performance of each of the fund/investment options in the plan to the plan sponsor/trustees. The plan sponsor/trustees are urged to compare any report provided by HRS to the statements and reports received from the qualified custodian and/or administrator.

Item 16. INVESTMENT DISCRETION

A. Discretionary Investment Authority

Plans may engage HRS as a discretionary investment adviser, i.e. a 3(38) fiduciary under ERISA. HRS assumes the fiduciary responsibility for the selection, monitoring and replacement of the investment options of the plan client. Prior to assuming this discretionary authority the plan client is required to execute an investment advisory agreement granting to HRS this discretionary authority. In addition, HRS and the plan sponsor/trustees will prepare an Investment Policy Statement that details the methodologies and criteria utilized to define the style universe of investment options, the specific investment options to be utilized and the ongoing criteria for monitoring and replacing investment options.

In its role as a 3(38) fiduciary, HRS is only responsible for those plan investments selected by HRS and HRS has no responsibility for any other plan investments maintained in the plan by direction of the plan sponsor/trustees or any other person or entity. As an example, employer securities and investments held in a directed brokerage account are not subject to any fiduciary responsibility or duty on the part of HRS. Furthermore, the plan sponsor/trustees should be aware that when HRS assumes the investment responsibilities by serving as a 3(38) fiduciary, the plan sponsor/trustees retain all of their fiduciary duties, obligations and responsibilities pursuant to applicable law.

B. Non-Discretionary Investment Authority

Plans may engage HRS as a non-discretionary investment adviser, i.e. a 3(21) fiduciary under ERISA. In this capacity, HRS assumes no fiduciary responsibility for the completion of an Investment Policy Statement or any aspect of the definition, selection, maintenance or replacement of any plan client investment options. In this non-discretionary role HRS provides the ongoing monitoring, recommendations and reporting described above in Item 13. However, in this capacity the plan

sponsor/trustees retain the full authority over the selection of plan investment options and may, or may not, utilize the recommendations provided by HRS.

Item 17. VOTING CLIENT SECURITIES

HRS shall not vote proxies on behalf of any client account. Presumably, all proxy solicitation materials will be forwarded to the client directly from the company or the proxy service provider to vote in accordance with current regulations.

Item 18. FINANCIAL INFORMATION

A. Balance Sheet

HRS does not require prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore does not need to include a balance sheet with this Brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither HRS nor its management has any financial conditions that are reasonably likely to impair its ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Years

HRS has not been the subject of a bankruptcy petition.

