

Klaas Financial Asset Advisors, LLC

4707 Perry Ridge Lane

Loves Park, IL 61111

Firm CRD No. 121399

March 4, 2024

Item 1. Cover Page

This wrap fee program brochure provides information about the qualifications and business practices of Klaas Financial Asset Advisors, LLC (**Klaas**). If you have any questions about the contents of this brochure, please contact us at (877) 495-5227 or by email at info@klaasfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (**SEC**) or by any state securities authority.

Klaas is a registered investment adviser registered with the SEC. Registration as an investment adviser does not imply any level of skill or training.

Additional information about Klaas is also available on the SEC's website at www.adviserinfo.sec.gov by conducting a Firm search using our Firm CRD No. 121399.

Klaas Investment Portfolios (KIP) is the brand name under which Klaas Financial Asset Advisors, LLC, provides investment management or investment supervision services to its clients.

Item 2. Material Changes

We deliver our Wrap Fee Program Brochure initially when we enter into an advisory agreement with you. The Wrap Fee Program Brochure will be updated no less than annually within 90 days of our December 31 fiscal year end. Within 120 days of our fiscal year end, we will deliver to you a summary of material changes which have been made to our Wrap Fee Program Brochure since its last annual update. This summary will include information about how you may obtain a complete copy of our updated Wrap Fee Program Brochure at no charge, and it will include the date of the last annual update.

We will provide updated disclosure information about material changes more frequently as needed.

Since the last annual update to our Wrap Fee Program Brochure dated March 31, 2023, we made the following material changes:

- As of February 2024, Eric J. Schwartz and Joshua E. Stirling are shareholders in the firm, as reflected in **Item 4**.
- When appropriate based on a client's financial circumstances, Clients may participate in the KIP Managed Charitable Program (**MCP**) to establish charitable accounts through a third-party charitable program. See *Discretionary Portfolio Management Services* in **Item 4** for further details.

We have made additional edits as necessary to correct typographical or grammatical errors, or to provide clarification where necessary. We do not consider these changes to be material.

As of December 31, 2023, we provided investment advisory services on approximately \$682 million in client assets for more than 1,000 client households. This total represents approximately \$569 million in client assets under management through our discretionary asset management wrap fee program (Klaas Investment Portfolios – KIP), approximately \$80 million in assets under advisement through our

non-discretionary retirement plan consulting services (**Klaas 401K**) for 21 retirement plans, and approximately \$33 million in assets under advisement through our non-discretionary Klaas Investment Consulting Services for brokerage customers. Furthermore, we provided financial planning and consulting services (**Klaas 360**) to approximately 24 client households.

Currently, our brochure may be requested by contacting us at (877) 495-5227 or info@klaasfinancial.com, or by visiting our website at www.klaasfinancial.com. The current brochure may be found under Downloads on the Resources tab. We will provide you with a copy of our current brochure at any time without charge.

Information about each of our Investment Adviser Representatives may be found in their respective Form ADV Part 2B Brochure Supplement, which can also be found by visiting the Downloads page on the Resources tab of our website at www.klaasfinancial.com.

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Item 4. Services, Fees and Compensation

Klaas Financial Asset Advisors, LLC (**Klaas**) is the sponsor of the Klaas Investment Portfolios (**KIP**) Wrap Fee Program (**Program**). Klaas is located in Loves Park, Illinois and Fitchburg, Wisconsin. The firm's shareholders are Craig J. Klaas, Maleeah L. Wernsing-Cuevas, Kyle A. Kite, Eric J. Schwartz, and Joshua E. Stirling.

Klaas is registered as an investment adviser with the U.S. Securities and Exchange Commission (SEC).

This Wrap Fee Program Brochure describes the services offered under the Program. In addition to the services outlined here, we also provide non-discretionary financial planning and consulting services, and retirement plan consulting. Further information regarding these



services can be found in our Disclosure Brochure, which is available upon request, or which can be found by visiting our website at www.klaasfinancial.com. The current brochure may be found under Downloads on the Resources tab.

The Program includes Financial Planning Services and Discretionary Portfolio Management Services, as described below. Clients who wish to participate in the Program will enter into an agreement with Klaas (**KIP Client Agreement**).

Financial Planning Services

As part of the Program, we provide financial planning services. Through discussions, interviews, and questionnaires, we will gather sufficient information to develop a financial plan and investment recommendations. The items covered in your financial plan are based on your financial circumstances and needs. The financial plan may consider such items as the following:

- Your personal financial circumstances, such as assets and liabilities, net worth, cash flow, spending analysis, budgeting, family situations, and personal obligations.
- Payment of past, present, and future debts, such as loans, education expenses, health expenses.
- Your current and future tax liabilities, and an analysis of how to mitigate tax liabilities with your investments.
- Your attitudes towards investments, including your risk tolerance, financial goals, and investment objectives.
- Your cash needs in the event of your disability, incapacity, or death, including the income needs of your dependents, and estate planning.
- Your current retirement assets, potential future savings, planned retirement age, income needs and spending in retirement.
- Other specific financial concerns you may have.

We base our investment recommendations on the information that you provide to us. Inaccurate or incomplete information may result in an inaccurate or incomplete investment recommendations. We must make certain assumptions with respect to interest and inflation rates, past trends, and future projections of the performance of the market and economy. Changes to your personal financial circumstances, goals, or objectives may cause our investment recommendations to change. We recommend you notify us promptly of any changes so that your strategy can be updated if necessary.

Although the financial plan may consider your tax situation or estate plan, we do not provide tax or legal advice. We recommend you work closely with your attorney, accountant, or other investment professionals in implementing your plan. We are happy to work with your professionals to coordinate your financial plan with your estate planning and tax planning.

In some cases, your financial plan may recommend an insurance product. Some of our Investment Adviser Representatives are also licensed insurance agents. If you choose to purchase a recommended insurance product through your Investment Adviser Representative, he or she will earn a commission. You may choose to purchase any insurance products through any licensed agent.

Discretionary Portfolio Management Services

In addition, we provide discretionary portfolio management services. Based on the information gathered in the financial planning process, we assist you in selecting one or more of the investment strategies available through the Program (**Program Strategies**). Other relevant information that may be considered may include (but is not limited to)

your preference for certain types of investments, the amount of your assets, the projected risk and return of your portfolio, and the management fees charged.

We may use one or more Program Strategies and allocate assets into, between, or among the Program Strategies. Klaas has established a Portfolio Management Group (**Klaas PMG**) consisting of qualified investment professionals dedicated to portfolio management, research, and trade administration functions. The Program Strategies may be developed by and managed by the Klaas PMG, or by third-party asset managers or separate account managers (**Asset Managers**) selected by Klaas PMG.

Klaas has the discretion to determine which Program Strategies are available in the Program. Klaas has the discretion to change the Program Strategies available through the Program, to change the selection of any Program Strategy, to add one or more additional Program Strategies to those previously selected, and to reallocate assets among Program Strategies at any time. Klaas also has the discretion to hire, replace, or terminate Asset Managers as it deems necessary at any time.

A variety of investment products and vehicles may be used, including, but not limited to, exchange-traded funds (ETFs), mutual funds, equity and fixed-income instruments. When appropriate based on a client's financial circumstances, Klaas may recommend a Program Strategy that includes an investment-only Managed Variable Annuity (**MVA**). The MVA is an insurance product offered by a licensed insurance carrier that includes an investment component. In addition, when appropriate based on a client's financial circumstances, Klaas may offer a Managed Outside Account (**MOA**). The MOA is an account held by a custodian with which Klaas does not have a direct relationship, such as an employer-sponsored qualified retirement plan account (e.g., 401(k), 403(b), or 457(b) account). Klaas uses an order management system to implement asset allocation or rebalancing transactions on behalf of Client in the MOA. Klaas regularly reviews the current holdings and investment options available in the MOA, and monitors, rebalances and implements transactions that Klaas deems appropriate based on Client's investment objectives. To do so, it is necessary for Client to grant access to the MOA through the third-party order management system, and authorize Klaas to connect with, view, and manage the MOA. Client agrees to take steps as necessary to initiate and maintain connection with the order management system, such as updating login credentials. Investment options available in MOAs may be limited by the custodian, or in the case of employer-sponsored qualified retirement plans, by the plan sponsor.

For our Clients who wish to make charitable contributions, we offer a Managed Charitable Program (**MCP**). Through MCP, clients may participate in a third-party charitable program which offers charitable accounts such as donor advised funds, endowments, and foundations. These third-party charitable programs are charitable trusts as described in Section 501(c)(3) and Section 509(a)(1) of the Internal Revenue Code. Clients may make irrevocable charitable contributions of assets to the charitable program. We help to facilitate the transfer of Client's funds. The Client may receive an income tax benefit for the tax year in which the contribution is made. Clients may appoint us to manage the funds in their charitable program on a discretionary basis, consistent with the specific investment policies and guidelines of the third-party charitable program. Once the contribution is made to the charitable program, the Client no longer has ownership of the funds. Contributions are irrevocable and non-refundable. The Client may



make recommendations to the sponsor of the charitable program on qualified charitable organizations to receive funds, and the amount of funds to be distributed. Clients may also authorize us to communicate these recommendations to the charitable program sponsor on Client's behalf. However, the sponsor reviews each recommendation and has the discretion to approve or reject any grant. Grants may only be given to charitable organizations organized under Section 501(c)(3) of the Internal Revenue Code.

Please note that client assets are primarily managed by Klaas PMG. Asset Managers, MVAs, MOAs, and accounts within the MCP are only used in limited circumstances and only where appropriate based on the unique financial circumstances of each client.

We rely upon you to notify us of any changes in your objectives, goals and risk tolerances, as well as any other material changes in your personal circumstances (such as your employment, marital status, financial condition, etc.). In addition, notify us if you wish to impose any reasonable restrictions on the management of your account. Please notify us promptly of any changes, as these changes may require changes in the Program Strategies employed.

Brokerage Practices

Program assets are maintained with a qualified custodian. We do not have physical custody of your assets, but we are deemed to have custody when you authorize us to deduct advisory fees directly from your account. You will receive account statements from the custodian on at least a quarterly basis. We recommend you carefully review those statements to verify the transactions are consistent with your investment goals and objectives.

We do not have the discretion to select the broker-dealer or custodian used for your accounts, although we may suggest broker-dealers and custodians and assist with new account paperwork. Because of our established relationship, we will generally recommend Fidelity Institutional Wealth Services (**Fidelity**) to you for custody and brokerage services. Fidelity, a member FINRA/SIPC, is an unaffiliated SEC-registered broker-dealer. Fidelity provides brokerage and custody through its affiliates, National Financial Services, LLC, or Fidelity Brokerage Services, LLC, which are also SEC-registered broker-dealers and members FINRA/SIPC. You may direct us in writing to use a particular custodian to execute some or all of the transactions for your account. If you do so, you may be responsible for negotiating the terms and arrangements for the account with that custodian. We may not be able to negotiate commissions, obtain volume discounts, or best execution with custodians with which we do not have an existing relationship. A difference in transaction fees and expenses may also exist between those charged to clients who direct us to use a particular custodian and other clients who do not. In addition, some Asset Managers may require the use of certain custodians. Please refer to the Brokerage Practices sections of their respective disclosure brochures for more information. Because our compensation in connection with the Program may vary depending on the broker-dealer or custodian selected, we may have a conflict of interest in recommending Fidelity.

In addition to brokerage and custody services, Fidelity provides access to investments generally available to institutional investors; research; software; and, educational opportunities. Fidelity also makes available or arranges for discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. Thus, we receive economic

benefits as a result of our relationship with Fidelity, because we do not have to produce or purchase the products and services listed above.

These services are not contingent upon us committing any specific amount of business to the custodians in trading commissions. Klaas does not enter into any soft dollar arrangements with custodians and broker-dealers through which we receive research or other services based on commissions generated in your account or the number transactions effected in your account.

Our recommendation of specific custodians may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. This creates a conflict of interest for us. We nonetheless strive to act in your best interests at all times.

Custodians may not charge separately for holding our client accounts, but may be compensated by you through other transaction-related fees with the securities transactions they execute for your account.

Commissions and other fees for transactions executed through the custodians we recommend may be higher than commissions and other fees available if you use another custodian firm to execute transactions and maintain custody of your account. We believe, however, that the overall level of services and support provided to our clients by our recommended custodians outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements.

Many of the services described above may be used to benefit all or a substantial number of our accounts, including accounts not maintained through our recommended custodians. We do not attempt to allocate these benefits to specific clients.

Aggregation of Client Trades

Klaas PMG may aggregate trades in a single order (a block trade). Aggregated trading allows for the purchase or sale of a security for the accounts of multiple clients in a single transaction.

Block orders are generally completed or filled on the same day the trade is placed. If a block order is filled (full or partial fill) at several prices through multiple trades, an average price will be calculated for all trades executed, and all participants in the block trade will receive the average price. The objective of the aggregated orders will be to allocate the executions in a manner deemed equitable to the accounts involved. While the occurrence of partial fills (i.e., a block order which is not fully executed within the same day) is rare, all partial fills shall be allocated to client accounts on a pro rata basis.

We may aggregate trades when operationally efficient, or when we reasonably believe the combination of the transactions provides better prices for clients than had individual transactions been placed for clients. We are not obligated to include all or any client transaction in an aggregated block trade. Trading practices, including trade aggregation practices, of Asset Managers (if applicable) are disclosed in their respective disclosure brochures.

Klaas PMG has established procedures to reasonably ensure trade execution will not favor or discriminate against any client or group of clients, and trades executed for the accounts of our Investment Adviser Representatives or employees will not be favored over transactions for client accounts.

Fees and Compensation

The fee for the program (**Program Fee**) is a percentage of assets under management in the Program (including cash and cash



equivalents, and MVAs, MOAs, and accounts within the MCP, if applicable), charged on a quarterly basis, in arrears, subject to a minimum fee of \$1,500 annually. Our standard fee schedule is as set forth in the table below.

Assets Under Management	Annual Fee
\$0 up to \$250,000	1.25%
Over \$250,000 up to \$500,000	1.15%
Over \$500,000 up to \$1,000,000	1.00%
Over \$1,000,000 up to \$2,000,000	0.90%
Over \$2,000,000 up to \$3,000,000	0.80%
Over \$3,000,000 up to \$5,000,000	0.75%
Over \$5,000,000 up to \$7,500,000	0.70%
Over \$7,500,000 up to \$10,000,000	0.65%
Over \$10,000,000	0.60%

Our standard fee schedule may change over time, and some clients are subject to legacy fee schedules which may be higher or lower than our current fee schedule. In addition, we reserve the right to reduce or waive fees under certain circumstances at our discretion.

Your Program Fee may vary depending on several factors, such as the Program Strategies used, the size of your accounts, and the overall complexity of your financial situation. All fees are discussed with you at the time of the engagement, and are described in the KIP Client Agreement and Terms and Conditions, as amended from time to time.

New accounts in the Program are charged a prorated fee for the first quarter which is based on the number of days in the quarter from the date the account is funded to the end of the quarter.

Any party at any time upon written notice may terminate the KIP Client Agreement. Program Fee payments will be assessed and due upon notification of the account termination or closure date. Program Fees will be calculated based on the account valuation provided by the custodian of the assets managed. Fees will be prorated based on the number of calendar days in the quarter prior to account termination and/or closure.

The Program Fee is a single wrap fee, and covers the financial planning and consulting services provided by Klaas, the portfolio management services provided by Klaas PMG (or Asset Manager, if applicable), and brokerage and custodial fees. Klaas will generally pay the broker-dealer a transaction charge for each trade in the account. Thus, Klaas will earn more compensation if fewer transactions are executed for the accounts. Broker-dealers may waive transaction fees for some types of investments or based on other circumstances (for example, if you enroll in electronic statements for your account). Some investment options (such as mutual funds, ETFs, or investments in MVA subaccounts) may be available with no transaction fees. We potentially have an incentive to choose investments with lower or no transaction fees. However, as a fiduciary, we are required to act in your best interest and have an obligation to manage your portfolio in a prudent matter, regardless of the transaction charges assessed in your account.

The Program Strategies make significant use of ETFs to gain exposure to various asset classes while attempting to minimize costs. Over 2,000 ETF products are available with differing methods and characteristics, including passive, hybrid, and actively managed ETFs. When evaluating ETFs for use in the Program Strategies, selection criteria include characteristics such as assets under management, ETF liquidity, how closely the ETF tracks its underlying index, and other criteria depending on the specific asset class and implementation approach of the ETF. The selection criteria help pare down the large

universe when selecting ETFs for use in the Program Strategies. Fidelity has made available a subset of more than 500 ETFs for purchase commission-free. Because we bear the transaction costs in the Program, we have an incentive to select ETFs with no transaction fee, which is a potential conflict of interest. However, we seek to mitigate this conflict of interest by applying selection criteria other than transaction costs to filter the ETF universe. We use both transaction fee and commission-free ETFs in the Program Strategies.

The Program Fee does not cover:

- Fees associated with MVAs, MOAs and accounts within the MCP, such as Brokerage commissions or other charges resulting from transactions not effected through the broker-dealer named in your KIP Client Agreement.
- Administrative fees charged by the third-party charitable program sponsor for accounts within MCP, which is based on the percentage of assets under management, as outlined in the agreement between you and the sponsor of the third-party charitable program.
- Any internal management operating fees or expenses imposed or incurred by a mutual fund or other pooled investment vehicle.
- Any additional custodial services contracted for directly by the client with the custodian.
- Mark-ups and mark-downs or dealer spreads broker-dealers may receive when acting as principal in certain transactions.
- Variable annuity account fees imposed by insurance carriers.
- Certain costs or charges that may be imported by the broker-dealer or custodian named in your KIP Client Agreement or third parties, including costs associated with exchanging foreign currencies, odd-lot differentials, IRA fees, transfer taxes, exchange fees, wire transfer fees, postage fees, and other fees or taxes required by law.

Further, to the extent that cash used for investment through Program comes from redemptions of the client's mutual fund or other investments outside of Program, there may be tax consequences or additional cost from sales charges previously paid and redemption fees incurred. Such redemption fees would be in addition to the Program Fee on those assets.

In most cases, multiple share classes of the same mutual fund are available for purchase. Some share classes of a fund charge higher internal expenses, whereas other share classes of a fund charge lower internal expenses. Institutional and advisory share classes typically have lower expense ratios and are less costly for a client to hold than Class A shares and other share classes that may be eligible for purchase in an advisory account. Mutual funds that offer institutional share classes, advisory share classes, and other share classes with lower expense ratios are available to investors who meet specific eligibility requirements that are described in the mutual fund's prospectus or its statement of additional information. These eligibility requirements include, but may not be limited to, investments meeting certain minimum dollar amounts and accounts the fund considers qualified fee-based programs. It is also possible the lowest cost mutual fund share class for a particular fund may not be offered through the Program or available for purchase within specific types of accounts. Clients should not assume they will be invested in the share class with the lowest possible expense ratio or cost. The share class available for client accounts may be restricted at the custodian or within an account program.

The custodian will receive payments from certain mutual funds (including money market funds) pursuant to a Rule 12(b)-1 distribution



plan or other such plan as compensation for distribution or administrative services and are distributed from the fund's total assets. These fee arrangements will be disclosed upon request of a client and are available in the applicable fund's prospectus. The fees received by the custodian create a conflict of interest. In addition, the custodian receives compensation in connection with cash held in the account.

The Program may cost a client more or less than purchasing such services separately depending on the frequency of trading in the Program accounts, commissions charged at other broker-dealers for similar products, fees charged for like services by other advisers and broker-dealers, the fee structure of the account and other factors.

As of December 31, 2023, within the KIP Wrap Fee Program, we provided discretionary asset management on approximately \$569 million in client assets for more than 900 client households. Discretionary asset management means we have the authorization to make investment decisions on behalf of our clients.

Item 5. Account Requirements and Types of Clients

We typically do not require a minimum amount of assets to open an account in the Program; however, we generally require clients to have a household investment balance of \$100,000. This minimum balance requirement may be waived, or may vary depending on the Program Strategy selected. Some Asset Managers (if applicable) may impose minimum account balances. If so, those restrictions are disclosed in their respective disclosure brochures. These minimums may be waived under certain circumstances. If the market value of the assets in a Program Strategy falls below the stated minimum, you may be required to deposit additional funds to meet the required account minimum, or close the Program Strategy account.

The Program is available to individuals, including high net worth individuals, business entities, trusts, and non-profit and charitable organizations.

Item 6. Portfolio Manager Selection and Evaluation

Klaas PMG conducts due diligence and selects the Program Strategies available in the Program. This due diligence and selection process is an ongoing process of broad discovery, and may entail an assessment of investment organizations, people, professional culture, operational processes, key vendors, size of asset base and client types (e.g., institutional, retail, distribution channels used), as well as management and ownership structure. When conducting due diligence and investment selection, thoughtful and thorough qualitative evaluation are the most critical decision inputs, not past performance. We may also rely on due diligence information provided by portfolio managers, as well as information available from other sources, such as disclosure brochures and independent databases. Among the types of information analyzed are historical performance, investment philosophy, investment style, historical volatility and correlation across asset classes.

Klaas PMG monitors the performance of Program Strategies on an ongoing basis. Program Strategies that underperform relative to the applicable asset class and or style for an extended period of time will likely be modified or removed from the Program. Klaas practices careful judgment and discretion when determining whether to include each Program Strategy in the Program. Factors that would cause us to replace a Program Strategy may include, but are not limited to, underperformance, a change in management personnel or a change in their strategy or discipline that is deemed no longer beneficial to the client, the determination of significant risk or impairment as

discovered through due diligence, or a significant regulatory deficiency.

When appropriate based on a client's financial circumstances, Klaas may recommend a Program Strategy that includes an investment-only managed variable annuity (**MVA**). The MVA is an insurance product offered by a licensed insurance carrier that includes an investment component. In this case, the client grants Klaas the discretion to manage the subaccount investments within the MVA according to the client's investment objectives. In offering an MVA, we seek out reputable insurance carriers that offer competitively-priced solutions. Investment options available in the subaccount are limited by the insurance carrier.

In addition, when appropriate based on a client's financial circumstances, Klaas may offer a Managed Outside Account (**MOA**). The MOA is an account held by a custodian with which Klaas does not have a direct relationship, such as an employer-sponsored qualified retirement plan account (e.g., 401(k), 403(b), or 457(b) account). Investment options available in MOAs may be limited by the custodian, or in the case of employer-sponsored qualified retirement plans, by the plan sponsor.

Finally, when appropriate based on a Client's financial circumstances and at the Client's request, Klaas may assist the Client in establishing a charitable account with a third-party charitable program through a Managed Charitable Program (**MCP**). Clients may appoint us to manage the funds in their MCP account on a discretionary basis, consistent with the specific investment policies and guidelines of the third-party charitable program. In this case, we receive an investment management fee for assets in the MCP account paid by the sponsor of the third-party charitable program. This management fee creates a conflict of interest, as we have an economic interest to advise Clients to contribute assets to and keep funds in the MCP account. However, we support the charitable intentions of our Clients, and will honor any grant recommendations made by the Client and approved by the third-party charitable program sponsor.

Individual Needs of Clients and Restrictions

As described in **Services, Fees and Compensation** above, through discussions, interviews, and questionnaires, we will assist you in determining your investment objectives, risk tolerance, and investment time horizon, and any applicable investment policies, guidelines, or reasonable restrictions. Based on this information, we select Program Strategies for the client.

You may place reasonable restrictions on your portfolio prohibiting particular investments or types of investments from being held portfolio. We will make a reasonable attempt to honor any reasonable restrictions you wish to impose, but in the case of pooled investment vehicles such as mutual funds or ETFs where underlying holdings change frequently, we cannot guarantee restrictions will always be enforced. In addition, please note that imposing such restrictions may cause Klaas PMG to deviate from the investment decisions it would otherwise make in managing your account. In some cases, we may not be able to accommodate restrictions if they do not allow us to manage your portfolio in a prudent manner.

Other Services

In addition to the KIP Wrap Fee Program, Klaas provides non-discretionary financial planning and consulting through its Klaas 360 service, non-discretionary investment consulting to brokerage customers, and also investment consulting and education services to plan sponsors and participants of qualified retirement plans through



its Klaas 401K service. Information on these additional services is provided in our Form ADV Part 2A Disclosure Brochure, which is available upon request.

Performance-Based Fees

We do not charge performance-based fees for the Program. Performance-based fees are generally based on a percentage of the capital gains and/or appreciation of the client account assets.

Methods of Analysis

As part of our discretionary portfolio management services, Klaas PMG designs, supervises, and manages individual investment accounts. In general, Program Strategies employ a structured and disciplined approach to investing. Our methodology is anchored in the academically rigorous investment principles of Modern Portfolio Theory and Asset Allocation as the key determinant of portfolio returns. Foundational to this philosophy is:

- Recognition of an integral relationship between risk and return;
- Diversification across asset classes and portfolio risk sources; and
- Time-tested effectiveness of a long-term investment strategy.

Asset allocation is the strategic combination of asset classes, such as stocks and bonds, to seek the highest long-term returns given an investor's acceptable level of risk. The methodology applied to the Program Strategies is based upon the belief that it is generally not in the investor's best interest to attempt to determine investment security purchase or sale points based on short-term economic information, market timing, forecasts, and prediction models.

Both quantitative and qualitative inputs are used to assess, design, and monitor investment portfolios and holdings. Evaluation parameters vary depending upon the asset, investment type or vehicle. Assessment and analysis include, but are not limited to:

- The impact of fees and expenses;
- Taxes and turnover;
- Liquidity and frictional costs for the asset or security type; and
- Potential to capture incremental return in a transparent and repeatable manner.

Klaas PMG uses outside vendors and/or third-party software, and research as needed, to assist in formulating investment recommendations. Vendor services used include: market analysis and manager research subscription datasets, public databases, software and tools related to asset allocation and portfolio optimization, as well as portfolio reconciliation, reporting, and rebalancing tools.

In addition to quantitative evaluation, qualitative analysis and due diligence can encompass many sources of assessment, data, and analysis, such as: conference calls, academic journals, economic and market research materials prepared by others, annual reports, prospectuses, ADV filings, company press releases, financial publications, as well as discussion and interaction with other investment professionals.

Investment Strategies

Our Program Strategies seek to efficiently and effectively capture targeted risk and return characteristics of your investment objective using broad asset allocation exposures, incorporating diversification across sources of risk and return, asset classes, countries, and sectors. Although Program Strategies generally deploy similar approaches for asset allocation, the number and mix of ETFs, mutual funds, and other security types used in accounts, individual client portfolios will vary depending on account size and other practical limitations to

implement cost-effective and efficient discretionary portfolio management services in accounts. Asset allocation and diversification are strategies designed to reduce risk, but they do not protect against losses.

Risks

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear. Investing carries the risk of loss of principal. Investments in securities are not guaranteed or insured by the FDIC or any other government agency.

Past performance is no indication of future performance, and we cannot offer any guarantees or promises that your goals and objectives will be met.

Although our Program Strategies seek to limit risk through broad diversification among asset classes, all investments involve risk. Asset allocation and diversification are investment strategies used to manage risk, but they do not guarantee a profit nor protect against a loss. Losses can occur by investing in any security, asset class, or investment strategy, including conservative Program Strategies. Even for longer investment time horizons, there is no assurance your investment objectives can be achieved, positive returns cannot be guaranteed as investing in securities necessarily involves a risk of loss.

In addition to general market risks, investment strategies may be subject to the risk of loss arising from direct or indirect exposure to catastrophic or geopolitical events, such as global pandemics, natural disasters, acts of terrorism, war, sanctions, cyber-attacks, or network outages. The extent and impact of any such event on investment strategies will depend on many factors, including the duration and scope of the event, the extent of any governmental restrictions, the effect on the supply chain, overall consumer confidence, and the extent of the disruption to global and domestic markets.

Risks of Specific Securities

Our Program Strategies typically invest in ETFs and mutual funds. However, we may use a variety of security types:

Equity Securities - Investing in individual stock positions involves inherent risk, including the potential for greater concentration risk related to a single company or business enterprise. Significant risks relate to the company's capitalization, quality of the company's management, quality and cost of the company's services, the company's ability to manage costs, management of litigation risk, and the company's ability to create shareholder value (i.e., increase the value of the company's stock price). Foreign securities, in addition to the general risks of equity securities, have geopolitical risk, financial transparency risk, currency risk, regulatory risk, and liquidity risk. Equity securities are not guaranteed or insured by the FDIC or any other government agency.

Mutual Fund Securities - Investing in mutual funds carries inherent risk. The major risks of investing in a mutual fund include the quality and experience of the portfolio management team and its ability to create fund value by investing in securities that have positive growth, the amount of individual company diversification, the type and amount of industry diversification, and the type and amount of sector diversification within specific industries. In addition, mutual funds tend to be tax inefficient and therefore investors may pay capital gains taxes on fund investments while not having yet sold the fund. Active mutual funds have higher fees and costs that can result in lower investment returns. Mutual funds are not guaranteed or insured by the FDIC or any other government agency.



Exchange Traded Fund (ETF) Securities – Exchange-traded funds are investment companies with shares that are bought and sold on a securities exchange. Generally, an ETF holds a portfolio of securities designed to track a particular market segment or index. Some examples of ETFs are SPDRs®, Powershares® and iShares®. Investing in ETFs involves risk. Specifically, ETFs, depending on the underlying portfolio and its size, can have wide price (bid and ask) spreads, thus diluting or negating any upward price movement of the ETF or enhancing any downward price movement. Certain ETFs or ETNs employ leverage, which creates additional volatility and price risk. ETFs are not guaranteed or insured by the FDIC or any other government agency.

Corporate Debt Securities, Commercial Paper, and Certificates of Deposit – Fixed income securities carry different risks than those of equity securities described above. These risks include the company's or the government's ability to retire its debt at maturity, the current interest rate environment, the coupon interest rate promised to bondholders, legal constraints, jurisdictional risk (U.S or foreign), and currency risk. If bonds have maturities of 10 years or greater, they will likely have greater price swings when interest rates move up or down. The shorter the maturity the less volatile the price swings. Foreign bonds have liquidity and currency risk. Corporate Debt securities are not guaranteed or insured by the FDIC or any other government agency.

Commercial paper and certificates of deposit are generally considered safe instruments, although they are subject to the level of general interest rates, the credit quality of the issuing bank, and the length of maturity. With respect to certificates of deposit, depending on the length of maturity there can be prepayment penalties if the client needs to convert the certificate of deposit to cash prior to maturity.

Municipal Securities – Municipal securities carry different risks than those of corporate government and bank-sponsored debt securities described above. These risks include the municipality's ability to raise additional tax revenue or other revenue (in the event the bonds are revenue bonds) to pay interest on its debt and to retire its debt at maturity. Municipal bonds are generally tax-free at the federal level, but can be taxable in individual states other than the state in which both the investor and municipal issuer are domiciled. Municipal securities are not guaranteed or insured by the FDIC or any other government agency.

U.S. Government Securities – U.S. government securities include securities issued by the U.S. Treasury and by U.S. government agencies and instrumentalities. U.S. government securities may be supported by the full faith and credit of the United States.

Voting Client Securities

Klaas does not accept voting authority for client proxies, and does not provide advice to clients on how to vote proxies. In addition, we do not take any action on behalf of clients or provide advice to clients with regard to any class action lawsuit or bankruptcy related to securities held in client accounts. In instances where an Asset Manager is used, proxy voting policies will be set forth in its respective disclosure brochure.

Item 7. Client Information Provided to Portfolio Managers

As described in **Services, Fees and Compensation** above, through discussions, interviews, and questionnaires, we will assist you in

determining your investment objectives, risk tolerance, and investment time horizon, and any applicable investment policies, guidelines, or reasonable restrictions. Your investment portfolio is generally managed internally by Klaas PMG. In rare instances, if we select an Asset Manager to manage all or a portion of your investment portfolio, we will provide the Asset Manager with basic information about you, including any reasonable restrictions you impose on your investment portfolio.

Item 8. Client Contact with Portfolio Managers

Clients are encouraged to contact us to discuss any questions you have regarding your investment portfolio. If an Asset Manager is used, you may contact us to arrange for a consultation with the Asset Manager, or you may contact the Asset Manager directly.

Item 9. Additional Information

Disciplinary Information

There are no legal or disciplinary events that are material to an evaluation of Klaas's advisory business.

Other Financial Industry Activities and Affiliations

Investment Adviser Representatives with Klaas are insurance licensed to offer fixed insurance products through various insurance companies. Clients are not obligated to execute insurance purchases through these individuals. However, should clients choose to execute securities transactions through these individuals, then clients are advised they will pay a commission to them and a conflict of interest exists.

Code of Ethics and Personal Trading

We have adopted a Code of Ethics (**Code**) to address the standards of business conduct required of our Investment Adviser Representatives and employees. The Code includes policies and procedures designed to protect your interests. The Code includes, but is not limited to, the following provisions:

- To uphold our fiduciary duty to put your interest ahead of ours at all times.
- To comply with all applicable laws and to maintain a standard of conduct.
- To avoid actual or potential conflicts of interest where possible, and to fully disclose any actual or potential conflicts that may exist.
- To conduct all personal securities transactions of our Investment Adviser Representatives and employees in a manner consistent with the Code.
- To avoid giving or receiving gifts that may influence decisions.
- To prevent any abuse of our position of trust and responsibility, including the use of inside information we may obtain.

You may obtain a complete copy of our Code upon request.

Review of Accounts

Klaas PMG conducts regular and ongoing monitoring, review, and due diligence of client accounts, Program Strategies, underlying investment products, and Asset Managers.

We will periodically rebalance the discretionary investment management account holdings within your account. The primary goal is to ensure the market value of the investments in asset class and allocation parameters remain aligned with the percentage of the total market value of the entire client account, within a reasonable



tolerance level. Rebalancing may generate a taxable transaction for you.

We will periodically review each client's financial plan, goals, and constraints to determine if risk/return and/ or investment portfolio allocation need revision as a result of changes in the client's financial circumstances. If changes are necessary, we will update investment policy guidelines and implement the Program Strategies as deemed appropriate.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Klaas provides clients with reviews of Program accounts on at least an annual basis. Klaas will not provide tax advice, and nothing in the account review should be construed as advice concerning any tax matter. Account reviews are not a substitute for periodic account statements received from the custodian or Form 1099. Account reviews should not be used to calculate fees or to complete income tax returns.

Client Referrals and Other Compensation

We do not currently compensate any unaffiliated persons or entities for referring clients to us. In the event we enter into such an agreement

for receiving client referrals, we will update this item as necessary. Any referral arrangements we may enter into will comply with applicable rules governing the nature of the referral arrangement, the fees to be paid, and the disclosure of the arrangement to clients.

Clients occasionally seek recommendations for third-party service providers such as insurance agents, estate planning attorneys, or accountants (**Service Providers**), for assistance with carrying out our financial planning recommendations. We have developed the Klaas Professional Network (**KPN**), which is a list of Service Providers with whom Klaas has worked in the past and who we believe provide quality services to their clients. KPN is provided as a convenience to clients only, and clients are encouraged to perform their own due diligence on qualified professionals before engaging their services. Klaas and Service Providers agree to share information with each other, as authorized by the client, as necessary to provide coordinated services to clients. No monetary compensation is provided by either Klaas or Service Providers to participate in KPN.

Financial Information

Because we do not require prepayment of advisory fees six months or more in advance, we are not required to provide a balance sheet.

We have not been the subject of any bankruptcy proceedings.