



Icon Financial Services LLC

Wrap Fee Program Brochure

This wrap fee brochure provides information about the qualifications and business practices of Icon Financial Services LLC. If you have any questions about the contents of this brochure, please contact us at 1 (503) 917-0590 or by email at: contact@iconsavingsplan.com. 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.

Additional information about Icon Financial Services LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Icon Financial Services LLC's CRD number is: 306816.

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Material Changes

The material changes in this brochure from the last annual updating amendment to this Wrap Fee Program Brochure on 03/14/2023 are described below. Material changes relate to Icon Financial Services LLC's policies, practices or conflicts of interests only.

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Services, Fees, and Compensation

Introduction

Investment Advisory Services are offered through Icon Financial Services LLC ("Icon Financial"), which is an SEC-registered investment advisor and wholly-owned subsidiary of The Icon Savings Corporation ("Icon"). Apex Clearing Corporation ("Apex"), a third-party SEC registered broker-dealer and member FINRA/SIPC, provides custody and clearing services for Icon Financial. This brochure describes the wrap fee program that Icon Financial offers to all of its discretionary investment advisory clients.

As used in this brochure, the words "we," "our," and "us" refer to Icon Financial and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

Program Description

Icon Financial provides discretionary portfolio management and financial education to clients under a wrap fee program (the "Program") as the sponsor and portfolio manager. Icon Financial provides algorithm-based portfolio management advice rather than in-person investment advice. Icon conducts all of its advisory services and education exclusively over the Internet via an online interface and technology platform developed and maintained by Icon. The platform represents an innovative new approach to retirement savings that allows clients to make contributions into their Individual Retirement Accounts ("IRA") directly from their employer. Icon has implemented innovative new systems that enable Icon Financial to offer advisory services at a low cost (compared to traditional investment advisor relationships) with a client-centric experience.

This Program bundles or "wraps" together the costs associated with investment advisory services such as custody, trading, clearance, and other administrative services, and charges a single wrapped fee, which is inclusive of costs associated with these different services. You are not charged separate fees for each of the underlying services associated with your account. We receive a portion of the wrap fee for our management services. The overall cost you will incur if

you participate in this Program may be higher or lower than you might incur by separately purchasing the underlying services or securities.

The client is required to enter into an advisory agreement with Icon Financial (the "Agreement") and to agree to the terms and conditions, which details the services provided to the client, the fees charged to the client, the conditions of the relationship with Icon Financial, and the use of the platform. As part of this Agreement, Icon Financial will request discretionary authority from clients in order to select securities and execute transactions, determine investment strategy, and select the broker or dealer to be used for transactions in the account. Discretionary authority is typically granted within the investment advisory agreement that you are required to sign prior to becoming a client.

By entering into the advisory Agreement, the client gives Icon Financial authorization to deduct the program fee directly from the client account through the qualified custodian holding the account. Icon Financial will provide access to an electronic statement that will detail the fees paid on the account. Portfolio management fees are withdrawn directly from the client account with the client's written authorization on a monthly basis. Program fees are paid in arrears. The Icon Financial Program fee is a flat monthly fee of \$4, regardless of the total account value. Client accounts that have not made an initial deposit or moved funds to/from the account will not be assessed the program fee. The billing date of a client account is established on the day the client makes the first deposit. As of October 12th, 2020, the program fee will only be charged if the client account is older than 90 days, or the account value is greater than \$500, whichever occurs first. Icon Financial reserves the right, in its sole discretion, to negotiate, reduce, or waive the advisory fee for certain clients for any period of time without notice, or fee adjustment for other clients. If the client enters into an agreement with Icon Financial at any time during the month other than the first calendar day and the account is deemed to be active, the program fee will be applied on a pro-rata basis. This means the program fee is payable in proportion to the number of days in the month of which you are a client.

Clients may terminate the Agreement without penalty, for a full refund of Icon Financial fees, within five business days of signing the Investment Advisory Contract. Thereafter, clients may

terminate the Investment Advisory Contract immediately upon written notice. The client will incur a pro-rata charge for the services rendered prior to termination. Icon Financial reserves the right, in its sole discretion, to negotiate, reduce, or waive the fee associated with terminating the Agreement.

Brokerage Practices

By entering into the advisory Agreement, the client agrees to establish an account with Apex Clearing Corporation, a third-party SEC registered broker-dealer and member FINRA/SIPC.

We believe that Apex provides high-quality execution services, exceptional client service, and financial stability. If you do not direct Icon Financial to execute transactions through Apex, we reserve the right not to accept your account. Since you are required to use Apex, we may be unable to achieve the favorable execution of your transactions.

We do not receive any soft dollar benefits from our Agreement with Apex nor do we have any soft dollar arrangements.

Suitability, Risk Scoring, and Recommendations

Icon Financial provides discretionary investment advisory services based on Modern Portfolio Theory ("MPT"). Clients are recommended a portfolio that we believe is appropriate based on their investment objectives and risk tolerances. Icon Financial generates these recommendations by reviewing the client's financial situation during the initial registration (and annually) through the use of suitability questions. These questions require the client to input various personal information such as age, financial situation, risk tolerance, and investment time horizon. Icon Financial uses an internal process to analyze the information and provide a risk score. This risk score is built using client answers regarding risk tolerance, investment time horizon, investment experience, and liquidity requirements. These risk scores are what Icon Financial uses to assign an appropriate portfolio recommendation. More conservative risk scores are typically associated with portfolios that favor a greater percentage of assets allocated to fixed-income and cash asset classes, rather than equities or other "risky" asset classes.

However, more aggressive risk scores are typically associated with recommendations that favor a greater percentage of assets allocated to equity asset classes. The client should carefully consider the recommendations before accepting. Additionally, when clients update their personal information, Icon Financial may recommend a change to their asset allocation and account holdings and ask clients to reconfirm their recommended portfolio choice.

The client may choose to ignore the Icon Financial recommended portfolio and choose to independently select another portfolio on the Program (the “Client Elected Portfolio”) that is different from that selected by Icon Financial. The client must understand and acknowledge that under a Client Elected Portfolio, they are directing that the account be managed according to such asset allocation and investment methodology as determined by Icon Financial and that the performance of the account may not be suitable or appropriate for the client. The client will be required to separately acknowledge the selection of the Client Elected Portfolio, and that Icon Financial will continue to manage the account with the Client Elected Portfolio.

The client further understands and acknowledges that Icon Financial may decide to terminate this Agreement and the client relationship, if Icon Financial, in its sole discretion, determines that the Client Elected Portfolio jeopardizes Icon Financial’s fiduciary duty to manage the account.

The provided recommendation consists of a model portfolio containing a mix of securities selected by Icon Financial. These portfolios are designed to match the risk profile and investment objectives of the client and are allocated to provide the appropriate amount of risk for their individual situation. The recommendations made by Icon Financial are limited in scope to the information that clients provide. Any recommendations made by Icon Financial are not intended to comprise any client’s complete investment situation because Icon Financial is not necessarily aware of the client’s total personal and financial situation.

Clients should also recognize that this method of analysis and risk scoring is reliant on the answers provided to Icon Financial and therefore, are able to be changed by the client on the platform at any time. Icon Financial may not use the entirety of information the clients provide when generating a risk score and subsequent recommendation.

Icon does not provide overall financial or tax planning. Icon Financial generally limits its investment advice to ETFs. Icon Financial may use other securities to help diversify a portfolio when applicable as well.

On an annual basis, Icon Financial will ask the client to confirm their suitability information to ensure accuracy. It is the client's responsibility to ensure that the information provided is accurate, as Icon Financial is not required to verify any of the information beyond the client's attestation that it is correct.

Icon Financial may adjust its recommendations from time to time in response to, or in anticipation of, changing market conditions and other factors.

Icon Financial will rebalance client accounts from time to time in accordance with internal policy. We aim to keep the overall risk profile of the portfolio in line with our expectations and your risk tolerance level, while not compromising the effects of long-term growth and compounding interest.

Because Icon Financial only allows clients to open Individual Retirement Accounts, tax efficiency is not a primary consideration when managing client assets.

Additional Program Disclosures and Fees

The Program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the Program, including the trading activity in the client's account, the advisor's ability to aggregate trades, and the cost of the services if provided separately (which, in turn, depends on the prices and specific services offered by different providers). Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but clients should be aware that Icon Financial has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs. To address this conflict, Icon Financial will always act in the best interest of its clients, consistent with its fiduciary duty as an investment advisor.

Certain other fees may not be included in the wrap fee and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange-traded fund, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Please refer to the Advisory Agreement and Miscellaneous Fees and Expenses Not Covered by Program Fee section for a detailed list of additional fees.

The wrap program fees you pay do not include any fees and expenses charged by exchange-traded funds. These fees are disclosed on each fund's prospectus, which is made available to you on the platform. Icon Financial does not charge these fees and does not benefit directly or indirectly from any of these fees.

Icon Financial will automatically reinvest dividends from investments. There is no opt-out for such reinvestment.

Assets Under Management

Icon Financial has \$3,790,809.00 in discretionary assets under management as of December 2023.

Account Requirements and Types of Clients

Icon Financial offers investment advisory services to all individuals. We do maintain a minimum initial contribution requirement of \$25, but do not require clients to maintain a minimum balance. We do retain the right to terminate your account if it falls below a minimum balance that, in our sole opinion, is too small to manage effectively.

Icon Financial differs from traditional financial advisors as we provide our services entirely through our digital platform. Clients should understand the differences before deciding to engage Icon Financial for advisory services. These differences include:

1. Clients must be willing to conduct all communication and engagement with Icon Financial via the digital platform.
2. Icon Financial uses a risk scoring algorithm in its creation of a recommendation that relies on the personal information submitted by the client. Icon does not verify these answers, so if the underlying information given to Icon Financial is incorrect, the resulting recommendation may not be appropriate. It is the client's responsibility to notify us promptly if there is a change in your digital profile and to keep your information as up to date as possible.
3. Clients may not adjust or set a restriction on the specific holdings or overall allocation of the model in which they are invested.

Portfolio Manager Selection and Evaluation

Icon Financial is the Program sponsor and portfolio manager. We strive to provide clients with a simple experience that helps them understand their savings journey. By demystifying financial services and empowering clients with confidence in their ability to save, we are creating an environment for them to succeed in their investment goals and objectives.

Methods of Analysis, Investment Strategies, and Risk of Loss

Icon Financial utilizes Modern Portfolio Theory ("MPT") in its management of the available portfolios to create a risk-appropriate blend of investments that match the risk tolerance of each investor. MPT is an investment theory that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets.

We focus our investment advice around a few key investment principles. Primarily, we believe that equities as an asset class generally outperforms other asset classes over moderate to long investment time horizons, and that fixed-income assets help protect portfolios from the volatility associated with equities. Additionally, we believe that investing in low-cost index-based ETFs (Exchange Traded Funds) can provide broad diversification while reducing the volatility of investment performance and generally outperforming high-cost actively managed funds. Utilizing these broad principals in conjugation with MPT, we identify a target asset allocation of equity asset classes and fixed income asset classes in each portfolio. Once we have identified

the proportion that maximizes return or equivalently minimizes risk for the expected return, we select the appropriate investment to represent that particular asset class. Icon Financial then creates and maintains the portfolios by adjusting the target asset allocation of the underlying securities from time to time. The investments used in the portfolios allow the client to diversify and gain exposure to a broad range of companies, industries, sectors, and regions while limiting the overall number of investments.

Icon Financial uses a variety of qualitative and quantitative factors when evaluating ETFs and potential investments such as, but not limited to:

Low Cost: We look for ETFs with low expense ratios and fund fees. Fees in retirement accounts can have a significant impact on long term gains and can negatively affect retirement savings outcomes. It is not the sole determining factor in deciding whether a security should be selected for a portfolio, but it is a significant factor.

Liquidity: This refers to whether or not a security is sufficiently liquid and will allow us to quickly buy or sell at need. If a security has low volume or does not have an active market, it may not be appropriate for us to include in the portfolio as we may not be able to sell or buy at will and may pose a long-term risk for our clients.

Tracking Error: ETFs generally have a variable degree of variance from the performance of the underlying index they may be tracking. The difference between the returns of the underlying index and the ETF is known as tracking error. We look for ETFs that maintain historically low tracking errors to ensure that the security will behave in a manner we expect from our portfolio modeling and MPT analysis.

Sufficiently Diversified: We ensure the ETF represents a sufficiently diversified underlying index that aligns with our MPT analysis for that particular asset class. For example, an ETF representing only small-cap companies would be an inappropriate selection for a portfolio in need of a security representing the total stock market.

ETF Provider Risk: Selecting ETFs from just one asset manager, or from an asset manager that is too small, may pose some long-term risk to our clients. Examining the provider of the ETF for financial stability is one of the factors considered when selecting securities. Additionally, we want our portfolios to have securities from different providers to reduce the risk associated with selecting investments from a single provider.

When constructing the portfolios, the ETFs selected are generally meant to replicate an asset class or index that aligns with the overall risk strategy (conservative, moderately conservative, moderate, moderately aggressive, and aggressive). These portfolios are built and constructed with the expectation for long-term growth, generally over a period of time longer than one year.

As part of investment management, Icon Financial may adjust or change investments within the available portfolios. Icon Financial may, at its sole discretion, liquidate client positions and reinvest the proceeds in the replacement investment.

Icon reserves the right to change, in its sole discretion from time to time and without prior notice to clients, the investments that comprise each portfolio and the relative allocation of investments within each portfolio.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Material Risks Involved

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Long-Term Trading and Investment is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include, but are not limited to, inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Digital Platform: Icon Financial uses technology to offer investment advice, provide recommendations, manage accounts, and generally operate. This technology may be proprietary in nature and may experience an unforeseeable software or hardware malfunction from time to time.

Modern Portfolio Theory (MPT): MPT assumes that investors are risk-averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Exchange-Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest, and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio, thus counteracting the low fees that is one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based

on their underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed-income investments (as applicable). In particular, foreign securities are subject to interest rate, currency exchange rate, and economic and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another, and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, that offers circular or similar material which should be carefully considered when making investment decisions.

Liquidity Risk: The risk of being unable to sell the investments in your portfolio at a fair market price due to high volatility or the lack of an active market. You may receive a lower price or you may be unable to sell the investment.

Credit Risk: This type of risk generally applies to debt investments, such as corporate bonds. A credit event at the issuer of the bond could cause the value of the issuer's security (the bond) to radically change in value.

Proxy Voting: Icon Financial will not ask for, nor accept, voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Client Information Provided to Portfolio Managers

Icon Financial manages all of the client portfolios directly on the platform. Client information is collected and shared with various internal parties who assist in reviewing and administering the Program. There are no conflicts of interest.

We share your private information with our custodian, Apex Clearing Corporation, and with our 3rd party money custody partner, Sila, in order to create and verify your account with us. We will only share the information necessary to carry out our contractual obligations to you in the servicing of the account. For additional information regarding your data and our privacy policy, please refer to our official privacy policy at www.iconsavingsplan.com/privacy.

Client Contact with Portfolio Managers

Clients may contact Icon Financial via the website or by phone on our support telephone line during business hours and by email at all times. Clients can typically expect a response within 1-3 business days. Phone communication will be limited to administrative questions, as we cannot provide investment advice or information regarding your portfolio over the telephone.

Additional Information

Disciplinary Information

Registered investment advisors are required to disclose any legal or disciplinary events that could materially impact a client's evaluation of our advisory business or the integrity of the company. We do not have any required disclosures.

Other Financial Industry Activities

The firm and its advisors do not have any other financial industry activities and affiliations.

Custody

Icon Financial takes custody when the funds are being moved via the payroll system (ACH) through a BSA "Sila". Icon Financial then has custody at Apex Clearing (Our BD and Custodian) where the IRAs are held as we can access and move the money freely. Both SILA and APEX

provide quarterly statements to the best of our knowledge. The assets at SILA are held in an "FBO Icon Clients". Because of this, Icon Financial will, from time to time, be deemed to have custody over client assets. These assets will always be held by a qualified custodian and will never be held solely by Icon Financial. These qualified custodians will provide account statements at least quarterly to the client regarding the assets held in the account. Clients will also receive account statements from Icon Financial and we urge clients to carefully compare and review both sets of statements to ensure accuracy and timely delivery. Please contact us immediately if you notice a discrepancy between your account and the statements provided.

Financial Information: Discretionary Authority and Custody

Icon Financial has no financial condition that we believe will impair our ability to meet our contractual commitments to clients.

Code of Ethics

Icon Financial has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions.

Recommendations Involving Material Financial Interests

Icon Financial does not recommend that clients buy or sell any security in which Icon Financial or a related person has a material financial interest.

Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Icon Financial may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Icon Financial to buy or sell the same securities before or after recommending the same securities to

clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Icon Financial will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Icon Financial may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Icon Financial to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Icon Financial will never engage in trading that operates to the client's disadvantage if representatives of Icon Financial buy or sell securities at or around the same time as clients.

Review of Accounts

Icon Financial advisory accounts do not undergo non-periodic review by Icon Financial; allocations will change in accordance with the portfolio management software utilized by Icon Financial and changes to the client's profile. Clients are encouraged to update Icon Financial of any change in their objectives, risk tolerance, or other pertinent information.

Content and Frequency of Regular Reports Provided to Clients

Icon Financial advisory clients will receive a periodic written report that details the client's account, including assets held and asset value, which report will come from the custodian.

Miscellaneous Fees and Expenses Not Covered by Program Fee

Below is a list of ancillary fees and expenses that clients may incur that are not included in the Icon Financial advisory Program fee. These fees are generally incurred based on a client request, which is beyond our control. Should the client incur any of these fees, the client will be responsible for payment in accordance with the account agreement and terms and conditions.

We reserve the right to change these fees in the future. Icon Financial Services may share a portion of the fees listed below with Apex. This may create a conflict of interest for Icon Financial advisory in performing its duties and services pursuant to the advisory Agreement.

Bank Transfers and Money Movement

Outgoing Wire Transfers (Domestic Bank) - \$25 per wire
Outgoing Wire Transfers (Foreign Bank) - \$45 per wire
Incoming Wire Transfers (Domestic Bank) - \$8 per wire
Incoming Wire Transfers (International Bank) - \$14 per wire
Paper Check Draft (Domestic) - \$5 per check
Paper Check Draft (International) - \$10 per check
Returned Checks, ACH, Wires, and Recalls - \$30 per item
ACH Notice of Correction - \$5 per notice
Stop payments on Apex Issued Checks - \$30 each
Outgoing ACAT Transfers - \$75
Incoming ACAT Transfers - \$0

Account Based

Overnight Mail Domestic - \$50
Overnight mail international Canada - \$100
Postage and Handling Confirms - \$2
Postage and Handling Statements - \$5
Paper Prospectus Domestic - \$2.50
Paper Prospectus International - \$8.50
Account Closure - \$30