

**Part 2A Appendix 1 of Form ADV: Wrap Fee Program Brochure**

Form ADV, Part 2A, Item 1

***Cover Page***

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March 12, 2024

**FORM ADV PART 2A APPENDIX 1  
WRAP FEE PROGRAM BROCHURE**

**This brochure provides information about the qualifications and business practices of Objectivity Squared Wealth Management. If you have any questions about the contents of this brochure, please contact us at (843) 212-2805. 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 Objectivity Squared Wealth Management is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Objectivity Squared Wealth Management is 311052.**

**Objectivity Squared Wealth Management is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

## ***Material Changes***

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. Each year, we will ensure that you receive a summary of any material changes to this and subsequent brochures by April 30th. We will further provide you with our most recent brochure at any time at your request, without charge. You may request a brochure by contacting us at (843) 212-2805.

### **Material Changes since the Last Update**

Objectivity Squared Wealth Management was established as a new Registered Investment Advisor in October 2020 with the Securities and Exchange Commission ("SEC"), under the rules and regulations of the US Investment Advisers Act of 1940, as amended (the "Advisers Act").

There have been no material changes to this brochure since the last filing and distribution to Clients.

***Table of Contents***

<b><i>Services, Fees and Compensation</i></b>	<b><i>4</i></b>
<b><i>Fees and Compensation</i></b>	<b><i>5</i></b>
<b><i>Account Requirements and Types of Clients</i></b>	<b><i>8</i></b>
<b><i>Portfolio Manager Selection and Evaluation</i></b>	<b><i>8</i></b>
<b><i>Client Information Provided to Portfolio Managers</i></b>	<b><i>13</i></b>
<b><i>Client Contact With Portfolio Managers</i></b>	<b><i>13</i></b>

### ***Services, Fees and Compensation***

Objectivity Squared Wealth Management ("OSWM" or the "Advisor") is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The Advisor is organized as a Limited Liability Company ("LLC") under the laws of the State of South Carolina. OSWM was founded in October 2020, and is owned and operated by Nicholas C. Holmes (Managing Member / CCO) and Alexander Opoulos (Managing Member).

OSWM provides investment advisory services, which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, and/or preparing written investment strategies. Our investment advice is tailored to meet our clients' needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification. OSWM also provides financial planning consulting as part of investment management services, including, but not limited to, risk assessment/management, investment planning, estate planning, financial organization, or financial decision making/negotiation and retirement planning.

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. OSWM's fiduciary commitment is further described in the Advisor Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 of the Disclosure Brochure.

A "wrap fee program" for purposes of the SEC is a program under which investment advisory and brokerage execution services are provided for a single "wrapped" fee that is not based on the transactions in a client account. OSWM provides discretionary and non-discretionary investment advisory services to some of its clients through a managed account program ("the Wrap Fee Program"). OSWM will assist clients in determining the suitability of the Wrap Fee Program for the client.

In order for OSWM to provide asset management services, we request you utilize the brokerage and custodial services of Raymond James Financial, Inc. ("Raymond James"), for which we have an existing relationship. Raymond James and Objectivity Squared Wealth Management are separate and unaffiliated.

#### ***WRAP FEE PROGRAM***

OSWM's Wrap Fee Program is offered as a part of the Asset Management Services described above. OSWM provides portfolio management services for this program based on the Client's investment goals and objectives. Managed Accounts are available to primarily high net worth individuals.

To ensure clients are not charged fees on their wrap accounts that should not be their responsibility, each account is hard coded to ensure the following fees are absorbed by OSWM:

- Annual Fees
  - Taxable Account Maintenance
  - Capital Access (checking account feature)
  - Retirement Account Fee
- Service Fees
  - Wire Fees
  - Non-Sufficient Funds Charges
  - Overnight Mail
  - Transfer Fees
- Handling Fees
  - Mutual Funds
  - All Other Securities

To further ensure all accounts are properly hard coded, as noted above, OSWM has memorialized this process internally to require this be done.

### ***Fees and Compensation***

The following types of fees will be assessed:

**Asset Management** – Fees are charged quarterly in advance and are based primarily on asset size and the level of complexity of the services provided. In individual cases, OSWM has the sole discretion to negotiate fees that are lower than the standard fee shown or to waive fees. Fees are not based on the share of capital gains or capital appreciation of the funds or any portion of the funds. The fee calculation does not include non-billed accounts or cash alternative accounts. Comparable services for lower fees may be available from other sources. Fees for the initial quarter will be prorated based upon the number of calendar days in the calendar quarter that the advisory agreement is in effect. Fees are based on the market value of the assets on the last business day of the previous quarter. Annual fees range from .70% - 1.00% depending on the amount of assets under management (“AUM”) – See chart below. Consulting services are included in these fees for asset management.

Certain clients may be involved in a private equity option. Private equity fees are based on either the committed capital or a quarterly asset value provided by the funds’ custodian, as indicated in the Investment Advisory Agreement. Fees on the committed capital and quarterly asset values will also follow the chart below.

#### Fee Schedule for Asset Management:

Total Household Value	Maximum Annual Advisory Fee
Less than \$10,000,000	1.00%
\$10,000,000 - \$15,000,000	0.90%
\$15,000,001 - \$20,000,000	0.80%
Over \$20,000,000	0.70%

As authorized in the client agreement, the account custodian withdraws OSWM's advisory fees directly from the clients' accounts according to the custodian's policies, practices, and procedures. The custodian in turn remits these fees to OSWM. The custodial statement includes the amount of any fees paid directly to OSWM to manage the account. You should compare the statement we send to your custodian/broker-dealer's statement and verify the calculation of fees. Your custodian/broker-dealer does not verify the accuracy of fees calculations. If the account does not contain sufficient funds to pay advisory fees, OSWM has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. With the exception of IRA accounts, clients may reimburse the account for advisory fees paid to OSWM.

Fees are charged in advance on a quarterly basis, meaning that advisory fees for a quarter are charged on the first day of the quarter. Clients may terminate investment advisory services obtained from OSWM, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with OSWM. The client is responsible for any fees and charges incurred by the client from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, the client may terminate advisory services upon written notice delivered to and received by OSWM. Clients who terminate investment advisory services during a quarter are charged a prorated advisory fee based on the date of OSWM's receipt of client's written notice to terminate. Any earned but unpaid fees are immediately due and payable, and any prepaid and unearned fees will be immediately refunded.

#### Private Equity

Certain clients may be involved with a third-party private equity vehicle, such as Live Oak Capital or other similar investments. OSWM will apply standard suitability practices for eligibility requirements.

Clients may be invoiced monthly for all time spent by OSWM as agreed upon by client or upon completion of the services if less than a month. Clients who wish to terminate the planning process prior to completion may do so with written notice. Upon receipt of written notification, any earned fee will immediately become due and payable, and any prepaid and unearned fees will be immediately refunded. A client may terminate an advisory agreement without being assessed any fees or expenses within five (5) days of its signing.

### Additional Fees and Expenses

In addition to advisory fees paid to OSWM as explained above, clients are charged custodial service, account maintenance, transaction, and other fees associated with maintaining the account, however OSWM pays some or all of these fees for designated Wrap Accounts. Therefore, these fees are included in the fee stated above. These fees vary by broker dealer and/or custodian. Additionally, for any mutual funds purchased, the client may pay their proportionate share of the funds' distribution, internal management, investment advisory and administrative fees. Such fees are not shared with OSWM and are compensation to the fund manager. Clients are urged to read the mutual fund prospectus prior to investing.

Mutual fund companies impose internal fees and expenses on clients. These fees are in addition to the costs associated with the investment advisory services as described above. Complete details of such internal expenses are specified and disclosed in each mutual fund company's prospectus. Clients are strongly advised to review the prospectus(es) prior to investing in such securities.

Mutual funds purchased or sold in broker-dealer accounts may generate transaction fees that would not exist if the purchase or sale were made directly with the mutual fund company. Mutual funds held in broker-dealer accounts also charge management fees. These mutual fund management fees may be more or less than the mutual fund management fees charged if the client held the mutual fund directly with the mutual fund company.

Clients may purchase shares of mutual funds directly from the mutual fund issuer, its principal underwriter, or a distributor without purchasing the services of OSWM or paying the advisory fee on such shares (but subject to any applicable sales charges). Certain mutual funds are offered to the public without a sales charge. In the case of mutual funds offered with a sales charge, the prevailing sales charge (as described in the mutual fund prospectus) may be more or less than the applicable advisory fee. However, clients would not receive OSWM's assistance in developing an investment strategy, selecting securities, monitoring performance of the account, and making changes as necessary.

Nicholas Holmes and Alexander Opoulos ("Advisory Persons") are also licensed insurance professionals conducting business under Objectivity Squared Insurance Solutions, LLC ("OSIS"), a licensed insurance agency under common control with the Advisor. Implementations of insurance recommendations are separate and apart from Advisory Person's role with OSWM. OSIS and Advisory Persons will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor. Please see Item 5 and Item 10 of the Disclosure Brochure.

### ***Account Requirements and Types of Clients***

OSWM offers investment advisory services to individuals, high net worth individuals, charitable organizations, corporations, and certain retirement accounts. There is no minimum account size required to open and maintain an advisory account.

### ***Portfolio Manager Selection and Evaluation***

OSWM acts as the portfolio manager for its Wrap Fee Program accounts. There is no conflict of interest with the arrangement.

#### *Advisory Business*

Objectivity Squared Wealth Management is a Registered Investment Adviser based in Charleston, South Carolina, and incorporated under the laws of the State of South Carolina. OSWM is owned by Alex Opoulos and Nick Holmes. OSWM is registered with the SEC and subject to the rules and regulations of the US Advisers Act. In October 2020, Objectivity Squared Wealth Management became an independently registered investment advisor, and provides investment advisory services, which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, and/or preparing written investment strategies. Our investment advice is tailored to meet our clients' needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification. OSWM also provides financial planning consulting services including, but not limited to, risk assessment/management, investment planning, estate planning, financial organization, or financial decision making/negotiation and retirement planning.

Objectivity Squared Wealth Management provides investment advisory and other financial services through its Investment Advisory Representatives ("IAR") to accounts opened with Objectivity Squared Wealth Management. Managed Accounts are available to high net worth individuals.

#### *Asset Management*

Objectivity Squared Wealth Management provides discretionary and non-discretionary investment advisory services to some of its clients through various managed account programs. Objectivity Squared Wealth Management will assist clients in determining the suitability of the Managed Account Programs for the client. The IAR is compensated through a comprehensive single fee and the account may be assessed other charges associated with conducting a brokerage business. The firm and its IAR, as appropriate, will be responsible for the following:



- Performing due diligence
- Recommending strategic asset and style allocations
- Providing research on investment product options, as needed
- Providing client risk profile questionnaire
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information for each new account
- Performing client suitability check on account documentation, reviewing the investment objectives and evaluating the investment vehicle selections
- Providing Firm Brochure (this document)

OSWM may recommend a Wrap Fee Program for the client's account(s). A "Wrap Fee Program" for purposes of the SEC is a program under which investment advisory and brokerage execution services are provided for a single "wrapped" fee that is not based on the transactions in a client account. OSWM provides discretionary investment advisory services to some of its clients through a Wrap Fee Program. OSWM will assist clients in determining the suitability of the Wrap Fee Program for the client. Wrap Fee Program accounts recommended by OSWM are not managed differently from non-Wrap Fee Program accounts. Because brokerage execution costs are included in the client's overall advisory fee, the client's fee may be greater than those that have accounts in non-Wrap Fee Program accounts, however fees will not exceed the fee schedule stated in this Wrap Fee Brochure. All clients with Wrap Fee Program accounts will be provided with this Wrap Fee Brochure. This Brochure is focused on Wrap Fee Program accounts.

As of December 31, 2022, the firm had the following Assets Under Management:

Discretionary Assets Under Management: \$330,300,000

Non-Discretionary Assets Under Management: \$6,500,000

Total Assets Under Management: \$336,800,000

### *Performance-Based Fees and Side By Side Management*

OSWM does not charge performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or appreciation of the assets of a client. Our fees are calculated as described in Fees and Compensation section above, and are not charged on the basis of performance of your advisory account.

## *Methods of Analysis, Investment Strategies, and Risk of Loss*

OSWM's methods of analysis and investment strategies incorporate the client's needs and investment objectives, time horizon, and risk tolerance. OSWM is not bound to a specific investment strategy for the management of investment portfolios, but rather consider the risk tolerance range of each portfolio and the risk level of each level when the account is opened. Examples of methodologies that our investment strategies may incorporate include:

**Asset Allocation** – Asset Allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk. Asset Allocation has the potential of all the risks listed below.

**Dollar-Cost Averaging** – Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging lessens the risk of investing a large amount in a single investment at the wrong time. Dollar-Cost Averaging has the potential of all the risks listed below.

**Technical Analysis** – involves studying past price charts, patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks. Technical Analysis has the potential of all the risks listed below.

**Long-Term Purchases** – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Long-Term Purchases have the potential of all the risks listed below.

**Short-Term Purchases** – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations. Short-term Purchases primarily have the potential of Market Risk, Business Risk, and Liquidity Risk as listed below.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Investing in securities involves risk of loss that clients should be prepared to bear. Although we manage your portfolio with strategies and in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

OSWM's primary goal for investing is to help the client maintain purchasing power over the long term. This may result in short term variability and loss of principal. Time horizon and risk tolerance are key determinates of the proper asset allocation. OSWM's approach focuses on taking appropriate risks for which clients are compensated (i.e. market risk) and seeking to limit or eliminate risks that do not provide compensation over the long term (i.e. individual stock risk or lack of portfolio risk).

Below are some more specific risks of investing:

**Market Risk.** The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by the client or an underlying fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

**Management Risk.** OSWM's investment approach may fail to produce the intended results. If our perception of the performance of a specific asset class or underlying fund is not realized in the expected time frame, the overall performance of client's portfolio may suffer.

**Equity Risk.** Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

**Fixed Income Risk.** The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

**Municipal Securities Risk.** The value of municipal obligations can fluctuate over time, and may be affected by adverse political, legislative and tax changes, as well as by financial developments that affect the municipal issuers. Because many municipal obligations are issued to finance similar projects by municipalities (e.g., housing, healthcare, water and sewer projects, etc.), conditions in the sector related to the project can affect the overall municipal market. Payment of municipal obligations may depend on an issuer's general unrestricted revenues, revenue generated by a specific project, the operator of the project, or government appropriation or aid. There is a greater risk if investors can look only to the revenue generated by the project. In addition, municipal bonds generally are traded in the "over-the-counter" market among dealers and other large institutional investors. From time to time, liquidity in the municipal bond market

(the ability to buy and sell bonds readily) may be reduced in response to overall economic conditions and credit tightening.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. OSWM has no control over the risks taken by the underlying funds.

**Alternative Investments (Limited Partnerships).** The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

**Structured Product Risks.** Structured notes are not bank deposits and are not insured by the Federal Deposit Insurance Corporation or any other governmental agency. The terms and risks of each structured note vary materially depending on the nature and volatility of the referenced asset, the credit-worthiness of the issuer, and the maturity of the instrument, among other factors. The general risks associated with this type of investment include, but are not limited to, non-payment risk (payment of interest and return of principal may be reduced, in whole or in part, due to underperformance of the referenced asset); counter-party risk (for reasons such as bankruptcy, the issuer of the structured note may fail to pay all or a portion of the principal and interest due on the structured note); underperformance risk (depending on market conditions, the structured note may underperform alternative allocations to traditional bonds, the referenced asset, or a combination of such investments). Structured notes are significantly riskier than conventional debt instruments. There is a risk of loss of some or all of the principal at maturity.

**Leveraged ETF Risks.** Leveraged ETFs seek to deliver multiples of the performance of the index or benchmark they track. These ETFs attempt to deliver some multiple of an index's daily returns (positive or negative). Please consider the implications to both the upside and the downside of multipliers. While it may seem that a 2x multiplier is a benefit in an up-market cycle' it is important to remember that the same multiplier applies when the ETF moves against the market. This could potentially result in significant losses, and highlights the additional risk associated with Leveraged ETFs.

#### *Voting Client Securities*

OSWM does not vote proxies on behalf of Client advisory accounts. At the Client's request, OSWM may offer the Client advice regarding corporate actions and the exercise of proxy voting

rights. If the Client owns shares of common stock or mutual funds, the Client is responsible for exercising the right to vote as a shareholder.

In most cases, the Client will receive proxy materials directly from the account custodian. However, in the event OSWM receives any written or electronic proxy materials, we would forward them directly to the Client by mail, unless the Client has authorized our firm to contact you by electronic mail, in which case, OSWM would forward any electronic solicitation to vote proxies.

Form ADV, Part 2A Appendix 1, Item 7

#### ***Client Information Provided to Portfolio Managers***

OSWM may directly provide the portfolio management services for the Wrap Fee Program accounts. As such, OSWM receives all information provided by the Client through a formal Needs Analysis and consultation with the Client. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Form ADV, Part 2A Appendix 1, Item 8

#### ***Client Contact With Portfolio Managers***

There are no restrictions placed on OSWM's clients' ability to contact and consult with their portfolio manager(s).

Form ADV, Part 2A Appendix 1, Item 9

#### ***Additional Information***

##### ***Disciplinary Information***

OSWM or its Principal Executive Officers have not had any reportable disclosable events in the past ten years.

##### ***Other Financial Industry Activities and Affiliations***

Alex Opoulos and Nick Holmes, owners of OSWM, are not currently registered with any broker dealer.

Neither OSWM nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

### Insurance Agency Affiliations

As noted in Item 5 and Item 10 of the Disclosure Brochure, Alex Opoulos and Nick Holmes (“Advisory Persons”) are also licensed insurance professionals conducting business under Objectivity Squared Insurance Solutions, LLC (“OSIS”), a licensed insurance agency under common control with the Advisor. Implementations of insurance recommendations are separate and apart from Advisory Persons’ role with OSWM. OSIS and Advisory Persons will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Adviser.

One of OSWM’s owners has a familial tie to a firm through which OSWM may purchase mutual funds. Clients should be aware that the purchase of these mutual funds could cause a conflict of interest. OSWM always acts in the best interest of the client; including the selection and purchase of mutual funds for advisory clients. Clients are in no way required to hold these specific mutual funds. OSWM may offer an alternative product.

### *Code of Ethics, Participation or Interest in Client Transactions and Personal Trading*

OSWM’s Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect client interests at all times and to demonstrate our commitment to fiduciary duties of honesty, good faith, and fair dealing. All of OSWM’s Associated Persons are expected to strictly adhere to these guidelines. Persons associated with OSWM are also required to report any violations to the Code of Ethics. Additionally, the firm maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about our clients or client accounts by persons associated with our firm.

OSWM may buy or sell securities for itself that we also recommend to clients. In addition, the individual IARs may buy or sell the same securities for their personal and family accounts that are bought and sold for your account(s).

OSWM does not have, nor plans to have, an interest or position in a security which is then also recommended to the client. As these situations may present a conflict of interest, the advisor has established the following restrictions in order to ensure its fiduciary responsibilities should this issue ever arise:

1. A director, officer or employee of the advisor shall not buy or sell a security for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of his or her employment, unless the information is also available to the investing public. No owner/employee of OSWM shall prefer their own interest to that of the client.
2. The advisor maintains a list of all securities held by the company and all directors, officers, and employees. These holdings are reviewed on a quarterly basis by the principal of the firm.

3. The advisor requires that all employees must act in accordance with all applicable Federal and State regulations governing registered investment advisors.
4. The advisor will monitor any blocking of personal trades with those of clients to ensure that clients are not at a disadvantage.

OSWM's Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Nick Holmes at (843) 212-2629.

OSWM does not recommend or select other investment advisors to our clients for which we receive compensation, directly or indirectly, from those advisors, nor do we have business relationships with any other investment advisors.

#### *Review of Accounts*

Client accounts are reviewed at least quarterly by Nick Holmes, the Principal Executive Officer of the firm. Client accounts are reviewed with regard to their investment policies and risk tolerance levels. All accounts at OSWM are reviewed by this reviewer.

Reviews may also 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).

Each client will receive at least quarterly a written report that details the clients' account which may come from the custodian.

#### *Client Referrals and Other Compensation*

OSWM does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals. In addition, OSWM does not receive compensation for referrals made to other professional service providers.

#### *Financial Information*

OSWM is not required to provide financial information to our clients because we do not require or solicit the prepayment of more than \$1,200 six or more months in advance.