

Item 1 – Cover Page

Form ADV Part 2A Brochure

Axiom

FINANCIAL STRATEGIES GROUP

Axiom Financial Strategies Group, LLC

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New Albany, IN 47150
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April 8, 2020

This Brochure provides information about the qualifications and business practices of Axiom Financial Strategies Group, LLC [“Axiom”]. If you have any questions about the contents of this Brochure, please contact us at clientservices@axiomfsg.com.

The information in this Brochure has not been approved or verified by the United States of America Securities and Exchange Commission (“SEC”) or by any state securities authority.

Axiom is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Axiom also is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Axiom is #306618.

Item 2 – Material Changes

This Item of the Brochure discusses only specific material changes that are made to the Brochure and provides clients with a summary of such changes. This is our 120-day registration filing and we have updated our regulatory assets under management. We have also included the following changes:

- Disclosure about of pension advisory services has been added.
- Addition of our affiliated insurance business.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure may be requested by contacting Michael Grau, Chief Compliance Officer at (812) 913-7701.

Additional information about Axiom is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Axiom who are registered as investment adviser representatives of Axiom.

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Item 4 – Advisory Business

Axiom is a registered investment adviser owned by limited liability corporations that Michael Grau and Vaughan Scott control and has been providing advisory services since 2019. This is the firm's 120-day registration filing. As of March 31, 2020, Axiom had \$210,313,798 in discretionary assets under management and \$64,919,585 in non-discretionary assets for a total of \$275,233,383 to report.

Axiom offers a variety of advisory services, which include investment and wealth management, financial planning, and consulting services. Prior to Axiom rendering any of the foregoing services, clients are required to enter into one or more written agreements with Axiom setting forth the relevant terms and conditions of the advisory relationship (the 'Advisory Agreement'). Axiom manages investment portfolios for individuals, high net worth individuals, trusts, foundations, businesses and corporations. Axiom will work with a client to determine the client's investment objectives and investor risk profile. These investment objectives may be set forth in a written Investment Policy Statement (IPS) that describes an asset allocation that conforms to a client's risk tolerance level and expected rate of return requirements. Investment and portfolio allocation software is used to evaluate alternative portfolio designs. Axiom evaluates clients' existing investments with respect to their IPS and works with new clients to develop a plan to transition from a client's existing portfolio to the portfolio recommended by Axiom. Axiom then continuously monitors clients' portfolio holdings and holds regular review meetings with clients regarding their accounts, as necessary.

Axiom will utilize the financial information provided by the client to analyze and develop strategies and solutions to assist the client in meeting their financial goals. Axiom will allocate a client's assets among various investments taking into consideration the client's unique ability, need, and willingness to take risk.

Investment and Wealth Management Services

Axiom manages portfolios on a discretionary and, in very limited circumstances, non-discretionary basis. Axiom may also provide its clients with a broad range of services, as described in more detail below. Axiom advises its clients by delivering tailored wealth management services and solutions. These services are based on a comprehensive understanding of each client's current situation, past experiences, and future goals. With this acquired knowledge Axiom will create, analyze, strategize, and implement goal-oriented investment solutions. These solutions become our client's investment policy. This policy and our matched strategies are designed to be risk appropriate, cost effective and tax efficient.

Axiom provides clients with wealth management services which generally include a broad range of comprehensive financial planning and consulting services, as well as discretionary and/or, in very limited circumstances, non-discretionary management of investment portfolios.

Axiom primarily allocates client assets among individual equity and debt securities, exchange-traded funds ("ETFs"), and institutional mutual funds in accordance with the client's stated investment objective and risk/volatility parameter. Axiom may also occasionally recommend clients allocate a certain portion of their assets to independent investment managers ("Independent Managers"). Where appropriate, Axiom

may also provide advice about many types of legacy positions or other investments held in client portfolios. Clients may engage Axiom to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts (to the extent permissible without an insurance license) and assets held in employer sponsored retirement plans and qualified tuition plans (e.g., 529 plans). In these situations, Axiom will direct or make recommendations on a non-discretionary basis for the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company or custodian for the plan trustee or administrator and clients retain responsibility for effecting trades in these accounts.

Axiom tailors its advisory services to meet the needs of its individual clients and seeks to manage client portfolios in a manner consistent with the client's investment objective and risk tolerance parameter. Axiom consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. Clients are advised to promptly notify Axiom if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if Axiom determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

To the extent a client decides to invest with an Independent Manager or in a particular fund, those managers and funds will have their own investment practices. Those investment practices are described in each managers' Form ADV or fund's prospectus, or in its offering or other disclosure documents. In addition, selected money managers or funds typically have discretion to determine the type and amount of securities to be purchased or sold for the client for that portion of the client's assets managed by the money manager or fund.

Independent Managers

As mentioned above, Axiom may select certain Independent Managers to actively manage a portion of its clients' assets. Pursuant to the terms of the investment advisory agreement, Axiom shall have the discretion to appoint and terminate these third-party advisers. The specific terms and conditions under which a client engages an Independent Manager may also be set forth in a separate written agreement with the designated Independent Manager. In addition to this brochure, clients may also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets. Axiom evaluates a variety of information about Independent Managers, which may include the Independent Managers' public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, Axiom seeks to assess the Independent Managers' investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposure. Axiom also takes into consideration each Independent Manager's management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

Axiom continues to provide services relative to the discretionary or non-discretionary selection of the Independent Managers. On an ongoing basis, Axiom monitors the performance of those accounts being

managed by Independent Managers. Axiom seeks to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

Separate Financial Planning, Business Strategy & Transition Planning, Family Strategy & Transition Planning and Consulting Fee

Axiom starts with an extensive review of a client's family situation which includes assets and liabilities as well as estate, tax, and insurance needs. The Firm then employs a risk tolerance and risk capacity-focused simulation to get a detailed cash flow analysis and proposed asset allocation. Together, this information is analyzed to develop a proposed financial plan, which is designed to be dynamic in nature, ever-evolving due to life changes resulting from changes in cash flow needs, risk tolerance, time horizon, or investment objectives.

Axiom's financial planning and consulting services may include any or all of the following functions:

Business Succession Planning	Liability Management
Cash Flow Forecasting	Risk Management
Trust and Estate Planning	Charitable Planning
Financial Planning	Distribution Planning
Investment Consulting	Tax Planning
Insurance Planning	Retirement Plan Consulting
Business Strategy & Transition Planning	Family Strategy & Transition Planning

While each of these services is available on a stand-alone basis, some of these services may be rendered in conjunction with investment portfolio management services, as part of a comprehensive wealth management engagement (described in more detail below). In performing these services, Axiom is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.), and is expressly authorized to rely on such information. Axiom may recommend clients engage the firm for additional related services, or we may recommend other professionals to implement recommendations made by Axiom. Such additional services by Axiom or another professional will be provided for additional compensation, commensurate with the nature, extent, complexity, and other characteristics of such services. Clients are advised that a conflict of interest, or the perception of one, may exist because the firm may have additional incentive to recommend such additional services based on the compensation to be received, rather than solely based on the client's needs, and in some cases, based on the prospect of cross-referrals of advisory clients from the other professional or his or her firm.

Axiom also provides advice in the form of financial consultations. This hourly service consists of consultations based on specific investment and financial concerns of the client. Consulting services may include, for example, assistance with establishing and implementing a retirement plan, preparation or review of an investment policy statement, the compilation of reports on various investment accounts, and

asset allocation recommendations. The scope and depth of the consultation varies depending on the client's particular circumstances and needs. Axiom provides financial planning and consulting services to non-advisory clients for a fixed fee or hourly fee.

Clients are under no obligation to act upon any recommendations made by Axiom under a financial planning or consulting engagement or to engage the services of a third-party professional. Clients retain the absolute right to decide whether or not to act on such recommendations, and if they choose to act on such recommendations, whether to engage the Firm or such professional for such services or to engage another investment adviser or professional of their choosing, which may charge less (or more) for such services. Should a client choose to implement the recommendations contained in the plan, Axiom suggests the client work closely with his/her attorney, accountant and/or insurance agent.

Implementation of financial plan recommendations is entirely at the client's discretion. Financial planning recommendations are of a generic nature and are not limited to any specific product or service offered by a broker dealer or insurance company.

Pension Consulting Services:

Clients may also retain Axiom to provide advisory services for their retirement plan account. When providing these services, the firm may act as an ERISA 3(21) fiduciary and is required to act under the standard of care in ERISA that is generally a higher standard than imposed on our firm under the Investment Advisers Act of 1940. Advisory services available to plan participants include:

- Non-discretionary investment advice
- Asset allocation models
- Strategic investment allocations
- Investment performance reporting

Axiom's Pension Consulting Services is comprised of two distinct components, which will typically be offered in conjunction with each other, but may be offered separately:

1. Portfolio Composition Consulting
2. Retirement Plan Consulting

While the primary clients for these services will be participant-directed pension, profit sharing and 401(k) plans, Axiom will also offer these services, where appropriate, to individuals and trusts, estates, charitable organizations or other types of retirement plans.

1. Portfolio Composition Consulting:

Within this component, Axiom will recommend investments and model portfolios to plan sponsors, who in turn will provide the recommendations to employees and participants. Axiom will review various investments, consisting of mutual funds (both index and managed), individual equities, and bonds determined appropriate. The number of investments to be recommended will be determined by the client, based on the plan's Investment Policy Statement.

2. Retirement Plan Consulting:

Axiom provides different advisory services (as detailed below) separately or in combination for Retirement Plan Consulting clients. Clients may choose to engage Axiom for any combination of the services below.

- a) *Investment Policy Statement ("IPS") Preparation:* Axiom will meet with the client (in person or over the telephone) to determine the client's investment needs and goals. Axiom will then prepare a written IPS stating those needs and goals and encompassing a policy under which these goals are to be achieved. The IPS will also list the criteria for selection of investment vehicles and the procedures and timing interval for monitoring of investment performance.
- b) *Investment Performance Monitoring:* Client investments will be monitored based on the procedures and timing intervals delineated in the Investment Policy Statement. For nondiscretionary clients, Axiom will supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate. For discretionary clients, Axiom may rebalance model portfolios or substitute investment options available to plan participants by directly instructing the administrator or custodian to effect such changes.
- c) *Employee Communications:* For pension, profit sharing and 401(k) plan clients wherein there are individual accounts with participants exercising control over assets in their own account ("self-directed plans"), Axiom also provides periodic educational support and investment workshops designed for the Plan participants. The nature of the topics to be covered will be determined by Axiom and the client. **No**

Legal, Accounting or Tax Advice. Axiom will act solely in its capacity as a registered investment advisor and does not provide any legal, accounting or tax advice. Client should seek the counsel of a qualified accountant and/or attorney when necessary. Axiom may assist clients with tax harvesting, and we will work with a client's tax specialist to answer any questions related to the client's portfolio account.

Item 5 – Fees and Compensation

Axiom offers investment and wealth management services for an annual fee based on the amount of the client's assets under the firm's management. The specific manner in which fees are charged by Axiom is established in a client's written investment advisory agreement. Axiom will generally bill its fees monthly in arrears based on the client's average daily balance. Clients may elect to be billed directly for fees or to authorize Axiom to directly debit fees from the client's portfolio accounts. Accounts initiated or terminated during a calendar month will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be immediately due and payable.

For investment and wealth management services Axiom provides with respect to certain client holdings (e.g., held-away assets, 529 plans, etc.), Axiom may negotiate a fee rate that differs from the range set forth below. Axiom, may, in its sole discretion, negotiate to charge a lesser fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention

and pro bono activities. Clients should note that similar advisory services may be available from other registered investment advisers for similar or lower fees.

Axiom's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third-party investments and other third parties such as fees charged by independent managers, custodial fees, 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. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Axiom's fee, and Axiom shall not receive any portion of these commissions, fees, and costs.

Axiom has contracted with Trade-PMR for services including trade processing, collection of management fees, record maintenance, report preparation, marketing assistance and research. Item 12 further describes the factors that Axiom considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

The following fee schedule is applicable as of this Brochure:

Fee Schedule:

Total Assets Under Management (By Family)	Fee
First \$1,000,000	Up to 1.50%
Greater than \$1,000,000 - Less than or equal to \$5,000,000	Up to 1.25%
Greater than \$5,000,000 - Less than or equal to \$10,000,000	Up to 1.00%
Greater than \$10,000,000	Up to 0.75%

This fee schedule is a flat fee based on cumulative household assets under management and therefore may vary each quarter based on the client's assets under management. However, certain ERISA rules prevent householding corporate plans with personal assets for fee reduction. Additionally, for some clients, Axiom may enter into a fixed-fee arrangement, which can range from \$25,000 - \$250,000.

Separate Financial Planning, Business Strategy & Transition Planning, Family Strategy & Transition Planning and Consulting Fee

Fees for financial planning, business or family strategy and transition planning, and/or consulting services can be billed on a project, fixed rate, or an hourly rate of \$100 - \$1000 per hour depending on the team member(s) involved. There is no minimum fee required for these services, however the total fee shall not exceed \$20,000 per day. Axiom requires a retainer for the services which is payable upon entering the agreement. The balance of the fee is due and payable upon receipt of the final consulting or planning services. Axiom may agree with clients to charge fixed fees for consulting. Based on the task(s) to be performed, Axiom and the client may agree on a fixed fee based on an estimate of the number of hours necessary for completion. Axiom may request a deposit to initiate consulting services. Axiom will not request the prepayment of fees more than \$1,200 more than six months in advance.

Pension Consulting Services

The following fee schedule is applicable for retirement and pension consulting services:

Total Assets Under Management	Fee
First \$1,000,000	Up to 1.00%
Greater than \$1,000,000 - Less than or equal to \$5,000,000	Up to 0.75%
Greater than \$5,000,000 - Less than or equal to \$10,000,000	Up to 0.50%
Greater than \$10,000,000	Up to 0.25%

Item 6 – Performance-Based Fees and Side-By-Side Management

Axiom does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). All fees are calculated as described above and are not charged on the basis of income or capital gains or capital appreciation of the funds or any portion of the funds of an advisory client.

Item 7 – Types of Clients

Axiom provides portfolio management services to individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, family entities, charitable institutions, foundations, corporations, and other business entities.

Axiom generally requires a minimum account of \$250,000.00 to open a portfolio. The firm, in its sole discretion, may accept client with smaller portfolios based upon each client's particular circumstances as it deems appropriate. Axiom may aggregate the portfolios of family/household members to meet the minimum portfolio size.

Additionally, certain Independent Managers may impose more restrictive account requirements and varying billing practices than Axiom. In such instances, Axiom may alter its corresponding account requirements and/or billing practices to accommodate those of the Independent Managers.

Item 8 – Methods of Analysis, Investment Strategies

Axiom will carefully construct a tax-efficient and cost-effective asset allocation strategy based on a client's unique cash flow needs, stated return and risk profile. Security selection is based on qualitative, quantitative, technical, and relative strength metrics. Portfolios holdings are constantly monitored and adjusted as market conditions and our clients' circumstances dictate. Clients may hold or retain other types of assets as well,

and Axiom may offer advice regarding those various assets as part of its services. Advice regarding such assets will generally not involve asset management services but may help to more generally assist the client.

Axiom predominantly allocates client assets to a combination of active and passive (tax-efficient and cost-effective) strategies, utilizing combinations of publicly traded securities such as stocks, bonds, ETFs, mutual funds, and/or separately managed portfolios. Nevertheless, individual client circumstances may dictate the use of other types of securities, actively managed portfolios, or alternative investments.

Risk of Loss

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

All investments present the risk of loss of principal – the risk that the value of securities (e.g., stocks, mutual funds, ETFs, bonds, etc.), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities when sold is greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

Axiom may recommend a variety of types of funds to our clients, including, but not limited to, U.S. or offshore unit investment trusts, open-end and closed-end mutual funds and hedge funds, private equity funds, venture capital funds, advisory accounts, real estate investment trusts, ETFs, or other private alternative or other investment funds. An investment in such other funds and managers may present risks peculiar to the particular investment vehicle, such as: long-term illiquidity, redemption notice periods or other restrictions on redemptions, capital calls, or periodic taxable income distribution.

Although all investments involve risk, Axiom's investment advice seeks to limit risk through diversification among asset classes and, as appropriate for particular clients, the investment directly in fixed income securities to represent the fixed income class.

Depending upon the client's financial needs, strategies implemented might include long term purchases (securities held at least a year), short term purchases (securities sold within a year), trading (securities sold within 30 days), short sales, margin transactions, option writing, including covered options, uncovered options or spreading strategies, structured products, and other securities or derivatives transactions.

Certain securities utilized by Axiom may contain international securities. Investing outside the United States of America involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in developing countries.

Equity Securities Risk: Equity securities (common, convertible preferred stocks and other securities whose values are tied to the price of stocks, such as rights, warrants and convertible debt securities) could decline in value if the issuer's financial condition declines or in response to overall market and economic conditions. A fund's principal market segment(s), such as large cap, mid-cap or small cap stocks, or growth or value stocks, may underperform other market segments or the equity markets as a whole. Investments in smaller companies and mid-size companies may involve greater risk and price volatility than investments in larger, more mature companies.

Fixed-Income Securities Risk: Fixed-income securities are subject to interest rate risk and credit quality risk. The market value of fixed-income securities generally declines when interest rates rise, and an issuer of fixed-income securities could default on its payment obligations.

Foreign Securities Risk: The risks of foreign securities include loss of value as a result of: political or economic instability; nationalization, expropriation or confiscatory taxation; changes in foreign exchange rates and foreign exchange restrictions; settlement delays; and limited government regulation (including less stringent reporting, accounting, and disclosure standards than are required of U.S. companies). Certain of these risks are greater for investments in emerging markets.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Axiom or the integrity of Axiom’s management. Axiom has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Axiom Insurance Solutions, LLC: Due to common control and ownership, Axiom is affiliated with Axiom Insurance Solutions, LLC. Certain members of Axiom are licensed insurance agents of Axiom Insurance Solutions LLC and may provide insurance services for compensation. Licensed insurance agents of Axiom Insurance Solutions, LLC may recommend and offer insurance coverage for clients desiring to implement their insurance needs through this entity. Clients are not under any obligation to engage Axiom Insurance Solutions when considering implementation of insurance recommendations. The implementation of any or all such recommendations is solely at the discretion of the client.

As a result of common control and ownership, Axiom is affiliated with Next Chapter IP, LLC. Next Chapter IP LLC is a business consulting firm for businesses, non-profit organizations, families, and family enterprises on the topics of leadership, succession, and transition planning and personnel development by providing advice and best practices on how they can leverage their time, talent, and treasure to evaluate, improve, and optimize their human, social, intellectual, and spiritual capital. Clients of Axiom may be referred to Next Chapter IP, LLC for business consulting services which would be deemed a conflict of interest due to the financial compensation received by Mr. Scott, owner.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Axiom strives to identify, eliminate and/or mitigate conflicts and potential conflicts of interest and has adopted policies, procedures and oversight mechanisms to address such conflicts and potential conflicts of interest. Axiom has specifically adopted a Code of Ethics in compliance with Rule 204A-1 under the

Investment Advisers Act of 1940. The Code of Ethics emphasizes Axiom's fiduciary obligation to put client interests first and is designed to ensure personal securities transactions, activities, and interests of employees will not interfere with the responsibilities to make decisions in the best interest of clients.

Axiom has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Axiom must acknowledge the terms of the Code of Ethics annually, or as amended.

Axiom's employees and persons associated with Axiom are required to follow Axiom's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Axiom may trade for their own accounts in securities which are recommended to and/or purchased for Axiom's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Axiom will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code of Ethics, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Axiom's clients. Nonetheless, because the Code of Ethics would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Axiom and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Axiom's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Axiom will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

Axiom's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting our Chief Compliance Officer.

It is Axiom's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Axiom will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another

person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Axiom has the discretionary authority to select brokers and to negotiate commissions on behalf of clients. Axiom will endeavor to select those brokers or dealers which will provide the best services at the lowest commission rates possible. The reasonableness of commissions is based on the broker's ability to provide professional services, competitive commission rates, research and other services which will help Axiom in providing investment management services to clients. Axiom may select a broker(s) who provides useful research and securities transaction services even though a lower commission may be charged by a broker who offers no research services and minimal securities transaction assistance.

Axiom utilizes Trade-PMR, Inc. (“Trade-PMR”) for brokerage and trade execution services. Trade-PMR clears trades and custodies assets with First Clearing, FINRA member broker-dealers. First Clearing is a trade name used by Wells Fargo Clearing Services, LLC., a non-bank affiliate of Wells Fargo & Company. Trade-PMR acts as an introducing broker dealer on a fully disclosed basis. Trade-PMR and First Clearing are members of SIPC and are unaffiliated registered broker dealers and FINRA members. The brokerage commissions and/or transaction fees charged by Trade-PMR or any other designated broker-dealer are exclusive of and in addition to Axiom’s fee. Axiom regularly reviews these programs to seek to ensure that its recommendation is consistent with its fiduciary duty. Factors which Axiom considers in recommending Trade-PMR and First Clearing or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research, and service. The commissions and/or transaction fees charged by these brokers may be higher or lower than those charged by other broker-dealers. Effective January 2020, TradePMR and First Clearing have eliminated transaction and custodian fees for accounts managed by Axiom.

In addition, Trade-PMR provides Axiom with access to its institutional trading and custody services, which are typically not available to retail investors. These brokerage services include the execution of securities transactions, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Additionally, Axiom may receive the following benefits from Trade-PMR: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its participants; access to block trading which provides the ability to aggregate securities transactions and then allocates the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

The commissions paid by Axiom’s clients are intended to be consistent with Axiom’s duty to obtain “best execution.” However, a client may pay a commission that is higher than what another qualified broker-dealer might charge to affect the same transaction when Axiom determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealers’

services, including among others, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while Axiom will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

Transactions for each client will generally be affected independently. For certain trades, Axiom will block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block. Block trading allows Axiom to execute equity or fixed income trades in a timely, equitable manner and to reduce overall commission charges to clients. Again, clients who do not provide Axiom with brokerage discretion will not participate in block trades, and their trades in similar securities will be placed with brokers after trades for discretionary accounts. Axiom does not participate in soft-dollar relationships.

Independent managers selected by clients to manage clients' assets will generally also request the discretion to select brokers and negotiate commissions on behalf of a client. Axiom will not have control over trading execution by such managers. Clients should review the Form ADV disclosure documents of such managers regarding their trading practices.

Item 13 – Review of Accounts

For those clients to whom Axiom provides investment management services, Axiom performs periodic account reviews. This informal review may include assessing client goals and objectives, monitoring the portfolios and addressing the need to rebalance. Individual securities held in client accounts will be periodically monitored by Axiom, while the firm will monitor any selected third-party managers on a quarterly basis. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, market conditions, or the political or economic environment.

Additional reviews that Axiom may periodically perform include tax-planning, cash-flow needs, as well as charitable giving, insurance, and estate planning. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with Axiom and to keep Axiom informed of any changes thereto. Axiom shall contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Reports

In addition to the account statements you receive from your account custodian at least quarterly, Axiom may also provide written reports that provide details on account holdings and performance. As a convenience to clients, in addition to reports on clients' financial assets, at a client's request Axiom may prepare a global consolidated report that also includes certain non-financial assets (e.g., real estate). In such instances, Axiom relies on the client to provide current and accurate price or other valuation information to be included in the client's consolidated report. In no instance are non-financial assets included in

performance reporting. Axiom does not independently verify, and expressly disclaims responsibility for, the accuracy of any non-financial asset values clients provide to us to include in their reporting.

Item 14 – Client Referrals and Other Compensation

Axiom compensates certain independent third-party solicitors (the “solicitors”) whereby a fee is paid quarterly based on a percentage of the investment advisory fee paid by clients introduced by the solicitors. Axiom is aware of the special considerations promulgated under Section 206(4)- 3 of the Investment Advisers Act of 1940 and similar state regulations. The solicitation fee is paid pursuant to a written agreement retained by both the investment adviser and the solicitors and required disclosures are provided to the introduced client prior to or at the time of entering into any advisory contract. The solicitors refer clients to Axiom to receive investment services and are compensated for such referrals.

As noted in Item 12, Axiom will receive additional benefits from Trade-PMR which includes electronic systems that assist in the management of Axiom client accounts, access to research, the ability to directly debit client fees, software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), pricing information and other market data, assist with back-office functions, recordkeeping and client reporting.

Item 15 – Custody

Axiom does not maintain physical possession of any client account assets. Clients assets must be held by a bank, broker dealer, mutual fund transfer agent or other such institution deemed a ‘qualified custodian’ by the SEC. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client’s investment assets. Axiom urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Axiom usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. Investment guidelines and restrictions must be provided to Axiom in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Axiom will have authority to and will vote proxies on behalf of advisory clients for positions in which Axiom has provided investment discretion. Axiom will not vote proxies for legacy positions that the client maintains in their portfolios. Axiom has adopted proxy voting policies and procedures designed to vote proxies efficiently and in the best interests of its clients. Axiom seeks to identify any material conflicts of interest and to ensure that any such conflicts do not interfere with voting in clients' best interests. Clients may obtain a copy of Axiom's complete voting policies and procedures and information about how registrant voted a client's proxies by contacting the Chief Compliance Officer.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Axiom's financial condition. Axiom has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.