

Item 1 – Cover Page

Helianth Investment Management, LLC
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12/15/2021

This Brochure provides information about the qualifications and business practices of Helianth Investment Management, LLC. If you have any questions about the contents of this Brochure, please contact us at (203) 302-3979. 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.

Helianth Investment Management, LLC 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 Helianth Investment Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Firm Brochure provides you with a summary of Helianth Investment Management, LLC advisory services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things. This Item is used to provide our clients with a summary of new and/or updated information; we will inform of the revision(s) based on the nature of the information as follows.

In the future, this Item of this Brochure will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of the Brochure. Since this is the Firm's initial Brochure and no prior version of the Brochure exists, there are no material changes to disclose as of the date hereof.

The Firm will provide you with a new updated Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure may be requested by contacting Robert Traenkle, Firm Managing Partner, at bob@helianthinvestment.com.

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Item 4 – Advisory Business

Helianth Investment Management, LLC (Helianth Investment or Firm) is a newly-formed firm based in Connecticut and provides wealth management and investment advisory services to clients for a fee. Helianth Investment is wholly-owned and controlled by its Managing Partner Robert Traenkle, who is an experienced investment professional and financial advisor over the last 30 years.

Based upon client objectives and the client's expressed financial position combined with the investment strategies and advisory services Helianth Investment employs, Helianth Investment will buy and sell securities in clients' accounts. In performing its services, the Firm is not required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains the client's responsibility to promptly notify the Firm if there is ever any change in the client's financial situation or investment objectives for the purpose of reviewing, evaluating, and/or revising the Firm's previous recommendations and/or services. Managing Partner Robert Traenkle, is available for consultations at (203) 302-3979 and to discuss any changes or updates to a client's financial situation.

Assets Under Management (AUM)

As a newly registered investment adviser, Helianth Investment does not currently have any discretionary or non-discretionary AUM that it manages for any investment advisory clients.

Item 5 – Fees and Compensation

The specific manner in which fees are charged by Helianth Investment is established in an advisory client's written agreement with the Firm. The Firm will generally bill its advisory fees on a quarterly basis, and such fees are generally based on a percentage of assets under management (AUM) that we advise or manage, as the case may be.

Fees are generally payable quarterly in arrears and are due upon receipt of invoice. Either party may terminate the advisory agreement at any point; fees will be refunded on a pro-rata basis where advisory services were terminated prior to quarter-end. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. In those instances where a part of the client's assets are invested in money market funds or mutual funds, the client will incur additional

costs for the management of those funds by the funds over and above the fees charged by Helianth Investment. Yields for money market funds are inclusive of these fund costs.

The fees charged by Helianth Investment for its investment advisory services is generally based on the total assets of the advisory client's account using Helianth Investment's services. Where based on a percentage of AUM, Helianth Investment generally charges a percentage of assets under management ranging between 5 to 100 bps (basis points) or 0.05%-1.50%. For other related advisory services, including but not limited to financial planning or financial/investment consulting, Helianth Investment will negotiate and charge hourly fees generally ranging from \$100 to \$800 per hour or annual fixed-fees generally ranging from approximately \$4,000 to \$500,000, depending upon the scope, extent and complexity of advisory services to be provided. Such advisory fees are generally negotiable within these ranges as set forth above. Negotiation of fees will generally be based on the range of investment advisory and management services to be provided by Helianth Investment to the advisory client or the level and scope of the service(s) required or requested.

Additional Information

All fees paid to Helianth Investment are separate and distinct from the fees and expenses charged by investment pools, including mutual funds, to their shareholders. These fees and expenses are described in each pool's or fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee.

Helianth Investment's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which are incurred by the client. Clients may also from time to time incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by 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 Helianth Investment's fee, and Helianth Investment generally does not receive any portion of these commissions, fees, and costs.

As indicated above, Helianth Investment may price its advisory services based upon various objective and subjective factors. As a result, Helianth Investment's clients could pay diverse fees based upon the market value of their assets, the complexity of the engagement, and the level and scope of the overall investment advisory and/or financial advisory or planning services to be rendered. As a result of these factors, the services to be provided by Helianth Investment to any particular client could be available from other advisers at lower

fees. Also, Helianth Investment, in its sole discretion, may reduce or waive any minimum asset requirement based upon certain criteria (e.g., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, and/or negotiations with client, etc.).

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

Helianth Investment does not currently charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Helianth Investment provides portfolio management services to individual investors, high-net-worth individuals, family offices, trusts, charitable organizations and foundations, and small business companies.

Item 8 – Methods of Analysis, Investment Strategies & Risk of Loss

Investment Strategies & Methods of Analysis

Helianth Investment's methods of analysis and investment strategies have their own inherent risks. To perform an accurate market analysis, Helianth Investment must have access to current/new market information. Helianth Investment has no control over the dissemination rate of market information; therefore, unbeknownst to Helianth Investment, certain analyses may be compiled with outdated market information, severely limiting the value of Helianth Investment's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Private Wealth Management

Helianth Investment may utilize the one or more of the following methods of security or investment analysis:

- a. Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)

- b. Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- c. Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

Helianth Investment may utilize the following investment strategies when implementing investment advice given to clients:

- d. Long Term Purchases (securities held at least a year)
- e. Short Term Purchases (securities sold within a year)
- f. Short Sales (contracted sale of borrowed securities with an obligation to make the lender whole)
- g. Margin Transactions (use of borrowed assets to purchase financial instruments)
- h. Options (contract for the purchase or sale of a security at a predetermined price during a specific period of time)

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 (mutual funds, exchange-traded funds (ETFs) and individual bonds), 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.

The mutual funds and ETFs recommended by Helianth Investment may include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate and government fixed income securities and commodity futures. Equity securities may include large capitalization, medium capitalization and small capitalization stocks. Mutual funds and ETF shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the riskiest mutual funds used in Helianth Investment's investment strategies funds are the U.S. and International small capitalization and small capitalization value funds, emerging markets funds, and commodity futures funds. Conservative fixed income securities have lower risk of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities, or TIPS) present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Certain investment funds or pools recommended by Helianth Investment may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in developing countries.

More information about the risks of any particular market sector can be reviewed in representative mutual fund prospectuses within each applicable sector.

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.

Asset Allocation Risk. A fund's selection and weighting of asset classes and/or underlying funds may cause it to underperform other funds with a similar investment objective.

Item 9 – Disciplinary Information

Helianth Investment has no disciplinary actions in its history and has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Not Applicable as none currently.

Item 11 – Code of Ethics

Helianth Investment has 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, and personal securities trading and reporting procedures, among other things. All supervised persons at Helianth Investment must acknowledge the terms of the Code of Ethics annually, and also follow the Firm's Code of Ethics.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Helianth Investment 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. Employee trading is monitored on a quarterly basis under the Code of Ethics to reasonably prevent conflicts of interest between Helianth Investment and its clients. To supervise compliance with its Code of Ethics, the Firm requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holding reports and quarterly transaction reports to the firm's Compliance department. The Firm also requires such access persons to receive approval from the Compliance department prior to investing in any initial public offerings or private placements. Helianth Investment's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Robert Traenkle, Managing Partner of the Firm, at bob@helianthinvestment.com.

It is Helianth Investment's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Helianth Investment 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. 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.

Item 12 – Brokerage/Trading Practices

Where the client grants discretion for or requests Helianth Investment to recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct Helianth Investment to use a specific broker-dealer/custodian), Helianth Investment generally recommends that investment management or advisory accounts be maintained at an independent and unaffiliated broker-dealer/custodian. Factors that Helianth Investment considers in recommending such broker-dealer/custodians include historical relationship with the Firm, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Helianth Investment's clients will comply with the firm's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Helianth Investment determines, in good faith, that the commission/transaction fee 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-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Helianth Investment will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated unaffiliated broker-dealer/custodian are exclusive of, and in addition to, Helianth Investment's investment management or advisory fees. Helianth Investment's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

Custodian & Broker(s) Usage

Helianth Investment does not maintain custody of client assets on which we advise and that we may manage from time to time. Your assets will be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We generally recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, as the qualified custodian, and we are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 as applicable (advisory client referrals and other compensation). You should consider these conflicts of interest when selecting your custodian. The Firm does not open the account for you, although we may assist you in doing so with Schwab. Even though your account is maintained at Schwab, and we anticipate that most trades will be executed through Schwab, we can still

use other brokers to execute trades for your account as described below (see “Brokerage and Custody Costs” and “Directed Brokerage”).

Selecting & Using Brokers/Custodians

We use Schwab, a custodian/broker, to hold your assets and execute transactions. When considering whether the terms that Schwab provides are, overall, most advantageous to you when compared with other available providers and their services, we take into account a range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services and price competitiveness of such services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate prices
- Reputation, financial strength, security and stability
- Prior and ongoing service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see “Products/Services Available from Schwab”).

Brokerage and Custody Costs

For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, mutual funds and ETFs) do not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the un-invested cash in your account in Schwab’s Cash Features Program. Schwab’s commission rates applicable to our clients’ accounts were negotiated based on the condition that our clients collectively maintain a certain total level of aggregate assets in accounts at Schwab. This commitment benefits clients because the overall commission rates paid are lower than they would be otherwise. In addition to commissions, Schwab charges you a flat dollar amount as a “prime-broker” or “trade-away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the separate executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We are not required to select the broker-dealer that charges the lowest transaction cost, even if that broker-dealer provides execution quality comparable to other broker-dealers. Although we are not required to execute all trades through Schwab, we have determined

that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means seeking the most favorable terms for a transaction or trade based on all relevant factors under the surrounding circumstances, including those listed above (see “Selecting & Using Brokers/Custodians”). By using another broker-dealer, you may pay lower transaction costs in certain instances.

Products/Services Available to the Firm from Schwab

Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers directly. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we do not have to request them) and at no charge to us.

➤ A more detailed description of Schwab’s support services follows.

Services that Generally Benefit Clients. Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

Services that Do Not Directly Benefit Clients. Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts and operating our firm. They include investment research, both Schwab’s own and that of third parties. We use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that: i) provide access to client account data (such as duplicate trade confirmations and account statements); ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; iii) provide pricing and other market data; iv) facilitate payment of our fees from our clients’ accounts; and v) assist with back-office functions, recordkeeping, and client reporting.

Services that Generally Benefit Only the Firm. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include: i) Educational conferences and events; ii) Consulting on technology and business needs; iii) Consulting on legal and compliance related needs; iv) Publications and conferences on practice management and business succession; v) Access to employee benefits providers,

human capital consultants, and insurance providers; and vi) Marketing consulting and support.

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. If you did not maintain your account with Schwab, we would be required to pay for those services from our own resources.

Our Interest in Schwab's Support Services

The availability of these support services from Schwab benefits us because we do not have to produce or purchase them and do not have to pay for Schwab's services. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the lowest price or cost in custody services and in the execution of your transactions. While this is a conflict of interest, we believe, however, that taken in the aggregate our selection of Schwab as custodian and broker is in the best interests of our clients and is consistent with seeking best execution under the circumstances. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "Selecting & Using Brokers/Custodians" above) and not Schwab's services that benefit only us.

Research/Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular independent broker-dealer/custodian, Helianth Investment from time to time receives from such broker-dealer/custodians without cost (and/or at a discount) support services and/or products, certain of which assist Helianth Investment to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by Helianth Investment may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by the Firm in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that may be received will assist Helianth Investment in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Helianth Investment to manage and further develop its business enterprise and operations. However, there is no corresponding commitment made by the Firm to such broker-dealer/custodians or any

other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above broker-dealer/custodians arrangements.

Directed Brokerage

Helianth Investment may accept directed brokerage arrangements where a client requires that account transactions be effected through a specific broker-dealer. In such client directed arrangements, the client will typically negotiate terms and arrangements for their account with that broker-dealer separate from Helianth Investment, and Helianth Investment will not seek better execution services or prices from other broker-dealers or be able to aggregate or batch the client's transactions for execution through other broker-dealers with orders for other accounts managed by Helianth Investment. As a result, in cases of a directed brokerage arrangement the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

Please Note: In the event that the client directs Helianth Investment to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative trade execution arrangements that may be available through Helianth Investment.

Batched-Bunched/Aggregated Trading

To the extent that Helianth Investment provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless Helianth Investment decides to purchase or sell the same securities for several clients at approximately the same time. Helianth Investment may (but is not obligated to) aggregate or "bunch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among Helianth Investment's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account in any given trade. Helianth Investment does not receive any additional compensation or remuneration as a result of such aggregation.

Also, client commission arrangements and related “soft-dollar” benefits used or received by the Firm are being used within the parameters of Section 28(e) and its related safe harbor. Please also note that such “soft-dollar” benefits are not limited to those clients who may have generated a particular benefit although certain soft dollar allocations may be connected to particular clients or groups of clients.

Item 13 – Review of Accounts

Client accounts will be reviewed periodically, including as often as daily depending upon market and economic conditions, but no less than monthly.

A. For those clients to whom Helianth Investment provides investment management supervisory services, account reviews are conducted on an ongoing basis by the Firm's Principals and/or representatives. All clients are reminded that it remains their responsibility to advise the Firm of any changes or updates regarding their investment objectives and/or financial situation. All clients are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with the Firm preferably quarterly, but on not less than an annual basis.

B. From time to time, the Firm will conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change or update in client investment objectives and/or financial situation, market corrections and client request.

C. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. The Firm may also provide a written periodic report summarizing account activity and performance by electronic delivery or mail, as the case may be.

Item 14 – Client Referrals and Other Compensation

As referenced above, Helianth Investment receives an indirect economic benefit from unaffiliated broker-dealer/custodians, without cost and/or at a discount, and may also receive support services and/or products from such broker-dealer/custodians. We receive an economic benefit from Schwab in the form of the support products and services it makes available to the Firm whose clients maintain their accounts at Schwab. You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the arrangement because the cost of these services would otherwise be borne

directly by the Firm. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage/Trading Practices).

Where a client is introduced to Helianth Investment by a third-party solicitor, Helianth Investment can pay such solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940. The Firm will only compensate such persons or entities for referrals of investment advisory clients, and all such referral or solicitor arrangements will be in accordance with SEC Rule 206(4)-3 (the Solicitor or Referral Fee Rule) which requires a written agreement and certain related written documentation.

The Firm does not currently act as a third-party solicitor for compensation where it refers investment advisor clients or other investors to other investment managers or advisors.

Item 15 – Custody

Helianth Investment does not take or hold actual or physical custody of any clients assets or investments. Helianth Investment clients' assets are generally held in custody by Schwab as an unaffiliated broker-dealer qualified custodian.

Clients will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. Clients should carefully review those periodic statements when you receive them. We also encourage clients to compare Schwab's account statements with the periodic account statements and/or portfolio reports clients may receive from the Firm.

To the extent another custodian is selected or used by the client, such clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. The Firm 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

Helianth Investment may receive 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 that particular client account. When selecting securities and determining amounts, Helianth Investment observes the investment policies, limitations and restrictions of the client for which it advises.

Investment guidelines and restrictions should be provided in writing to Helianth Investment by the client. The Firm has the authority to determine, without obtaining consent of the client before transactions are effected, both the securities which are to be bought or sold and the amount of such securities. Limitations or restrictions on this authority would result if the client specified that certain investments were to be precluded or prohibited such as "no tobacco stocks" or "no sin stocks" or the like.

Item 17 – Voting Client Securities

As a matter of firm policy, Helianth Investment generally does not accept the authority to and does not generally vote proxies, unless the Firm has agreed in writing to undertake and accept such proxy review and voting responsibility. As part of this policy and practice advisory clients generally retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. However, the Firm may from time to time upon request, provide advice to its advisory clients regarding their voting of their client proxies. Also, Clients will generally receive applicable proxies directly from the issuer of securities held in clients' investment portfolios, but to the extent the Firm may receive certain client proxies, the Firm will forward such proxies to the client for review and voting.

In those limited instances where Helianth Investment accepts proxy voting authority in writing, the Firm will have responsibility for voting proxies for portfolio securities consistent with the best economic or financial interests of such clients as a matter of policy and as a fiduciary to our advisory clients. Our Firm will maintain written policies covering the handling/review, voting and reporting of proxy voting and providing appropriate disclosures about our firm's proxy policies and practices, including disclosure of any potential conflicts of interest as well as making information available to clients about the proxies voted and related required records. Also, a copy of the Firm's proxy voting policies and how proxies have been voted in the prior year(s) on behalf of that client will be sent to such client upon request.

Class Actions/Legal Proceedings

Clients should note that Helianth Investment will neither advise nor act on behalf of the investment advisor clients in legal proceedings involving companies whose securities are held or previously were held in the investment advisor's clients' account(s), including, but

not limited to, the filing of “Proofs of Claim” in class action settlements. Unless directed otherwise in writing, Helianth Investment will transmit or forward copies of class action notices received to the client and/or a third party advisor or representative as designated by the client. Helianth Investment will also make commercially reasonable efforts to forward such notices in a timely manner.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about such advisory firm’s financial condition where such financial condition would likely impair the advisory firm’s ability to meet contractual and fiduciary commitments to its clients. Helianth Investment has no such financial commitment or condition that impairs its ability to meet contractual and fiduciary commitments to its clients, and it has also not been the subject of a bankruptcy proceeding.