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Item 1 Cover Page

- A. The name of our firm is Haven Wealth Group, LLC (HWG). It is located at 1111 North Loop West, Suite 1110, Houston, Texas 77008. The phone number for HWG is 713-980-8820. The fax number is 713-980-8053. The website for HWG is located at www.havenwg.com. The date of the writing of this brochure is February 26, 2021. Haven Wealth Group, LLC is a registered investment advisor.
- B. This brochure provides information about the qualifications and business practices of Haven Wealth Group, LLC. If you have any questions about the contents of this brochure, please contact us 713-980-8820 or email us at haven@havenwg.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.
- C. Haven Wealth Group, LLC is a registered investment advisor. Registration does not imply a certain level of skill or training.

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Item 2 Material Changes

The following items were materially changed.

None

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Item 4 Advisory Business

- A. Haven Wealth Group has been in business for 12 years. The principal owners of the firm are Richea Powell and Charles Calvin.
- B. Haven Wealth Group manages money for individuals, pensions, foundations and endowment funds on a fully discretionary basis. HWG primarily invests in particular stocks and bonds as opposed to selection of funds. ETF's may be used to fill gaps between investments in individual stocks and bonds.
- C. HWG tailors their advisory services to allow for variations in risk tolerances, cash flow needs and asset mix. Clients can impose restrictions on investments in certain securities or types of securities.
- D. HWG does not participate in wrap fee programs.
- E. All HWG clients are managed on a fully discretionary basis. As of December 31, 2020, HWG had \$ 215,160,111 in assets under management which are all managed on a fully discretionary basis.

Comprehensive Financial Planning

HWG also provides comprehensive financial planning for individuals to help manage long-term goals and/or plan for retirement. This type of planning is necessary for any age client. Planning will help individuals achieve targets for any future needs. HWG considers planning to be an integral part of customer service.

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Item 5 Fees and Compensation

- A. Haven Wealth Group charges a fee for the discretionary management of the client's accounts based on the total value of their assets under management. The following represents HWG fee schedule based on the value of assets under management at the end of each calendar month:

<u>Portfolio Balance</u>	<u>Annual Rate</u>
1. Relationships Under \$500,000	Fee
Investments up to \$499,999	2.00%
2. Relationships Between \$500,000 and \$999,999	Fee
Investments up to \$999,999	1.80%
3. Relationships Greater than \$1,000,000	Fee
Investments up to \$2,000,000	1.50%
The Next \$1,000,000	1.25%
The Next \$2,000,000	0.80%
Amounts exceeding \$5,000,000	0.50%

Fees may be negotiable for a good business reason.

- B. Haven Wealth Group will charge a fee to cover the cost of research and brokerage services that benefit all clients for accounts custodied at Schwab beginning in September 2020. The following represents this fee based on the value of assets under management at the end of each calendar month.

<u>Portfolio Balance</u>	<u>Annual Rate</u>
All balances	0.10%

This fee is not negotiable.

- C. Fees are deducted monthly and charged in arrears. Fees for a given month will be deducted during the first week of the following month. Example: Fees charged in February will be based on your account balance as of January 31st.
- D. HWG currently custodies assets at Charles Schwab and Company. Schwab does not charge you any transaction fees on equities.
- E. Clients are never billed or charged in advance.
- F. Neither HWG nor its supervised persons accept compensation for the sale of securities or other investment products, including asset-based products or service fees from the sale of mutual funds.

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

HWG does not charge any performance-based fees nor do any supervised persons at the company manage accounts that are charged performance based fees. HWG also does not participate in Side-by-Side Management.

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Item 7 Types of Clients

HWG manages investments for high net worth individuals, foundations, 401(k) plans, pensions, endowments, and some corporations. The minimum desired relationship size is \$1,000,000. However, the company will open accounts for individuals and entities with a lesser amount if there is a good prospect of obtaining additional funds in the near future. The relationship size is used by the company rather than account size, as many individual investors have investments split between taxable accounts and tax-deferred accounts of various sizes for different family members.

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Item 8 Methods of Analysis, Investment Strategies, and Risk of Loss

- A. Haven Wealth Group focuses on comprehensive financial planning and investment management. We use a values-based approach to craft investment plans with appropriate asset allocations tailored specifically to each client's individual financial needs and aspirations.

HWG utilizes an Absolute Return Investment Strategy. While all accounts are designed to meet individual cash flow needs and risk tolerances, we embrace the philosophy that portfolios should be designed to maximize returns during strong bull markets, while minimizing losses and protecting profits during bear markets. This does not mean that we can guarantee returns nor does it mean that we guarantee that a client avoids the risk of loss; it just implies that we evaluate each day's market conditions to determine how assets should be allocated between all asset classes given any market condition. By utilizing this strategy, the company can take prompt action to reallocate portfolios during periods of market weakness. All investments involve risk and therefore clients may incur losses.

- B. HWG considers each client's overall financial position, income requirements and return expectations when structuring portfolios. Fixed income and high dividend paying stocks are used to meet client cash flow requirements, while growth stocks are used to generate capital appreciation. Since growth stocks typically pay little to no dividends, the price volatility may be higher than income producing securities and may result in more volatility. If interest rates rise materially, fixed income securities may generate losses. Today interest rates remain exceptionally low by historical standards, creating challenges for conservative clients seeking an income producing portfolio. For these clients, HWG invests in fixed income securities, preferred stock, public real estate investment trusts, and other low volatility, income producing stocks such as utility and consumer staple stocks.
- C. Haven Wealth Group utilizes research from multiple sources to analyze risks, growth, and future expected returns of various investments. The company looks at both the fundamental and technical aspects of each investment and each industry in which they operate. Risks include, but are not limited to, general market risk, company specific risk, and, with respect to bonds, interest rate risk. There are far too many factors that are beyond the control of any investment advisor's decisions to eliminate risk. Therefore, all investors must understand that there is always a risk of loss.

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Item 9 Disciplinary Information

Neither HWG nor its supervised persons are connected with any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

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Item 10 Other Financial Industry Activities and Affiliations

- A. No member of HWG management is registered or has an application pending to register as a broker-dealer or as a representative of a broker-dealer.
- B. No member of HWG management is registered or has an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the forgoing entities.
- C. HWG management does not have any relationships with any outside businesses that result in any client conflict of interests.
- D. HWG does not recommend nor select any other investment advisors for its clients.

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Item 11 Code of Ethics, Participation or Interest in Client and Personal Trading

A. Haven Wealth Group Code of Ethics:

Haven Wealth Group, LLC maintains a policy of strict compliance with the highest standards of ethical business conduct and the provisions of applicable federal securities laws, including rules and regulations promulgated by the Securities and Exchange Commission (SEC). This Code of Business Conduct and Ethics applies to each employee of the Company, including management. It is designed to ensure compliance with all legal requirements and the keeping of the Company's strictest standards of business conduct.

HWG employees have the responsibility to place the interests of Clients first at all times and never take advantage of Client transactions. They should avoid any conflicts, or the appearance of conflicts, with the interest of Clients. The Haven Wealth Group Policy on Personal Securities Transactions provides rules concerning personal transactions in Securities that employees must follow in carrying out these responsibilities. Employees also have a responsibility to act ethically, legally, and in the best interests of Haven Wealth Group, LLC and our Clients at all times. The Code of Conduct sets forth rules regarding these obligations. HWG employees are expected, not only to follow the specific rules, but also the spirit of the Code of Ethics.

While this Code does not address every possible situation that may arise, every Employee is responsible for exercising good judgment, applying ethical principles, and bringing potential violations of the Policy to the attention of the Chief Compliance Officer, Rosalie Groendes, of Haven Wealth Group, LLC. To this end, Employees shall read and understand this Code and uphold the standards in the Code in their day-to-day activities at the Company.

For a full copy of the Code of Ethics for Haven Wealth Group, please call us at 713-980-8820 or email us at haven@havenwg.com.

B. Participation or Interest in Client Transactions:

Haven Wealth Group and all related persons do not, will not, and have not ever bought or sold any securities for client accounts in which they have any material interest. This type of transaction is strictly prohibited.

C. Personal Trading:

Haven Wealth Group manages portfolios for the benefit of Haven Wealth Group employees in addition to those of its clients. Therefore, Haven Wealth Group advisory personnel invest in the same securities that it recommends to clients.

Various regulations require all broker/dealers and investment advisers to establish, maintain and enforce written policies reasonably designed to prevent the misuse of inside information by the Company and its Employees, particularly with regard to personal trading activity. To comply with these regulations, the Company has adopted certain securities trading policies. Employees should read the securities trading policy

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closely prior to taking part in any personal securities trading activities. These policies adhere strictly to sound business principles, industry practices and the highest ethical standards. Our policies are intended to ensure full conformity with the laws, rules and regulations of the governmental bodies and self-regulatory organizations that monitor our business activities.

D. Employee Trades and Trade Review:

To avoid any conflicts of interest where employee portfolios could receive favorable treatment, the following procedures are followed: Trades for employee portfolios are made at the same time as trades for client portfolios. These trades are typically "blocked" together so that all portfolios receive the same buy or sales price. In the event individual trades are made on a date when there are no block trades, these trades must be pre-approved by either the compliance officer or one of the partners of the firm. HWG maintains an employee trade book where employee and employee related trades that are not part of a blocked order are kept in date order for easy access.

Daily, the CCO receives the HWG Trade Blotter in a format listing all Buys and Sells arranged by individual tickers or CUSIPs. Daily review enables the CCO to clearly see what trades were done in large blocks encompassing specific HWG investment groups versus more individual trades (i.e., client requests to sell, specific needs to raise cash in a particular account or investing new funds received from clients).

In this review, the CCO will question smaller unblocked trades to verify the reason for the trade and will also be able to further guard against any potential frontrunning by HWG traders. This compliance review will be noted and dated daily on the saved copy of the Daily Trade Blotter. The note will also show who performed the review on that date.

Monthly statements are also available and maintained for all employee portfolios. Employees with investment accounts outside of Haven Wealth Group's authority are required to provide copies of their investment statements monthly to the CCO for her review.

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Item 12 Brokerage Practices

A. The Custodians and Brokers we Use:

Haven Wealth Group does not maintain custody of your assets that we manage. Although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account.

Your assets must be maintained in an account at a “qualified custodian”, generally a broker-dealer or bank. From our firm’s inception in 2008 to August, 2020 we required that our clients use Fidelity Investments or Moody National Bank as their qualified custodian. From 2014 to 2016, we migrated client assets from Moody National Bank to Fidelity Investments. Beginning in August, 2020 we required that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian

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 require 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 (Client Referrals and Other Compensation). You should consider these conflicts of interest when selecting your custodian.

We do not open the account for you, although we assist you in doing so. If you do not wish to place your assets with Schwab, then we cannot manage your account. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. 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 accounts as described below (see “Your Brokerage and Custody Costs”).

B. How We Select Brokers/Custodians:

Haven Wealth Group selects Schwab, a custodian/broker, to hold all client assets and execute most 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 wide 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).
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, and exchange traded funds (ETFs), etc.
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security, and stability
- Prior service to us and our clients
- Services delivered or paid for by Schwab

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- Availability of other products and services that benefit us, as discussed below (see “Products and Services Available to us from Schwab”)

C. Your Brokerage and Custody Costs

1. Custody:

Our clients’ accounts will custody at Schwab. Schwab generally does not charge separately for custody services but is compensated by charging you commissions on bonds, options, and prime brokerage trades. Certain trades (for example, certain Mutual Funds, all ETF’s, and all Equities) do not incur commissions or transaction fees at Schwab. Schwab is also compensated by earning interest on the un-invested cash in your account in Schwab’s Cash Features Program. Schwab’s fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least \$170 million of their assets in accounts at Schwab. This commitment benefits you because the overall fees you pay 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 broker-dealer other than Schwab. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. In order to minimize your trading costs, we have Schwab execute most trades for your account.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or 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 the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How We Select Brokers/Custodians”). By using another broker or dealer you may pay lower transaction costs.

2. Brokerage:

Haven Wealth Group has completed extensive due diligence in determining the brokers it uses in trading securities (equities, bonds, preferred stocks, and options).

For equity trades, Haven Wealth Group uses the custodian of client assets as broker to trade equities. Historically, this broker has been Fidelity Investments. Moving forward, Schwab will act as the broker for equity trades. Factors considered in selecting a custodian/broker are detailed above (How We Select Brokers/Custodians).

When trading Bonds or Preferred Stocks, Haven Wealth Group maintains relationships with several bond Broker/Dealers to compare pricing when executing both buys and sells. Our policy is to request bids from at least two Broker/Dealers on Bond transactions. Accounts with total account balances under \$100,000 are treated as an exception to this policy, as they are required to trade through their custodian as broker pursuant to FINRA minimum equity requirements for Prime Brokerage trading.

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If any client is interested in a list of bond Broker/Dealers used by Haven Wealth Group, they may contact the office at 713-980-8820 or mail us at Haven Wealth Group, 1111 North Loop West, Suite 1110, Houston, Texas 77008.

Best execution requires innovative technology that ensures speed, reliability and accuracy in market transactions. Haven Wealth Group has made a considerable investment in the development of an equity order-management system designed to allow us to conduct business efficiently. This system has a direct interface with the Schwab trading desks. Our trading platform enables HWG to block trade accounts to ensure consistent execution prices across all managed accounts. All block trades are used to form average trade prices, ensuring that all clients receive the same execution pricing.

Best Execution not only means attaining the best price for a quoted bid or offer for an order, but it also means working a large order without moving the market in an adverse manner. Any thinly traded stocks are sold over time to avoid moving the market. Obtaining best execution for trades requires the best people. We understand the dynamics of both equity, bond, preferred stock, and options trading, and we understand virtually every aspect of what happens to an order once it enters the market. We rely on our team to make smart decisions. Together we bring the skill, talent, and ability necessary to interact with the markets effectively. HWG conducts quarterly Best Execution reviews the 1st Monday of each quarter. In these meetings, new ideas and a review of old ideas are discussed to ensure that Haven Wealth Group is adhering to the Best Execution possible.

a. Equities

Schwab: Client accounts custodied with Schwab will receive equity trades at \$0 commission rates. Haven Wealth Group does not receive a soft dollar benefit from trades executed with Schwab.

b. Bonds and Preferred Stocks

Buys

Haven Wealth Group (HWG) maintains relationships with several bond broker/dealers. To provide independent verification of Bond or Preferred Stock prices, we consider the following:

- Offerings from multiple dealers
- Offerings of similar bonds/stocks in terms of credit quality and maturity
- Spreads to the appropriate benchmark
- Prices available on Bloomberg
- Most transactions are sent through Schwab, DA Davidson Fixed Income Capital Markets, BB&T, Morgan Stanley, Fidelity Investments, Raymond James, RBC or Mid Atlantic Capital Corporation.

Sales

When selling a bond position, we typically place the bond out for bid with at least two broker/dealers. Normally, these dealers are either Schwab, DA Davidson Fixed Income Capital Markets, BB&T, Morgan Stanley, RBC, Raymond James, or Fidelity Investments. In 2011, HWG established a relationship with Institutional Trading Services (ITS) which enhanced its best

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execution capability. ITS, now part of Mid Atlantic Capital Corporation, is a fully electronic trading system that allows buyers and sellers to obtain bids and offers from many different buyers and/or sellers, usually within minutes.

Small custodial accounts are required to use their custodian's bond trading desk to buy and sell bond positions pursuant to FINRA minimum equity requirements for Prime Brokerage. FINRA defines small accounts as those accounts with balances under \$100,000. Although we are required to buy and sell bonds for these accounts with the custodian, we still make sure that the bids/offerings represent the best value for the client by reviewing bids from other sources.

D. Update to Prime Brokerage Fees

Schwab assesses a fee of \$25 per transaction for Prime Broker / Trade Away transactions.

E. Other considerations

1. HWG conducted extensive investigations in selecting the brokers currently used for trading equity and bond securities.
2. During 2018, Haven Wealth Group negotiated with Vendor William O'Neil for better pricing on research products. HWG management was able to lower their annual payments to this vendor from \$140,724 per year to \$100,000 per year. This is significant to HWG's Best Execution Plan and to this ADV section because less expenses paid for current research frees up additional soft dollars to be spent on other research to benefit all HWG clients.
3. Brokerage for Client Referrals: Neither the HWG firm nor any of their related persons receive referrals from a broker-dealer or third party when selecting broker-dealers.
4. Directed Brokerage:
 - a. HWG does not recommend, request, or require clients to direct us to execute transactions through a specified broker-dealer.
 - b. HWG does not have any clients that direct us to execute transactions through a specified broker-dealer.

F. Trade Aggregation

Aggregation of the purchase or sale of securities for various client accounts:

HWG advisory personnel do invest in the same securities recommended to its clients. As a result, it is the policy of the company to avoid conflicts of interest where employees could receive favorable treatment. To avoid such conflicts, HWG trades employee portfolios at the same time it trades client portfolios. By honoring this policy, HWG employees will receive the same stock purchase prices as their clients and avoid front-running.

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It is understandable that individual employees may need cash or have excess cash to be invested from time to time. If there is no client trade activity occurring on the same day, employee trades may be processed as individual orders after pre-approval has been obtained from an officer of the firm. No one will have the authority to approve their own trades. HWG maintains a book on all unblocked employee trades and trade dates.

The CCO reviews transaction activity reports generated by each custodian daily. During this review, all employee trade activity is analyzed to ensure that block trade and pre-approval procedures were followed. The HWG compliance officer or a firm principal reviews and approves a trade sheet for each unblocked trade and that transaction is entered into a log. The specific intent of this review process is to ensure that management was informed of all trade activity and to ensure that no front-running has occurred.

G. Products and Services Available to us from Schwab

Schwab Advisor Services TM is Schwab's business serving independent investment advisory firms like us. They provide our client 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. 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 don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services.

Services that Benefit You: 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 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 You: 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 client's accounts and operating our firm. They include investment research, both Schwab's own and that of third parties. We use the research to service all or a substantial number of our clients' accounts. In addition to investment research, Schwab also makes available software and other technology that:

- Provides access to client account data (such as duplicate trade confirmations and account statements).
- Facilitates trade execution and allocate aggregated trade orders for multiple client accounts
- Provides pricing and other market data
- Facilitates payment of our fees from our clients' accounts
- Assists with back-office functions, recordkeeping, and client reporting.

Services that Generally Benefit Only Us: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

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- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and compliance related needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- 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 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. Schwab also provides us with other benefits, such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services: The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services.

Schwab has also agreed to pay up to \$34,000 for certain technology, research, marketing, and compliance consulting products and services on our behalf over a period of 12 months contingent on our ability to have \$170 million in assets under management on Schwab's platform during such time. This is a onetime benefit which will not recur in the future.

These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to use Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. 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. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How We Select Brokers/Custodians") and not Schwab's services that benefit only us.

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Item 13 Review of Accounts

- A. Haven Wealth Group has an Investment Review Program in place that reaches out to all clients at least annually in an attempt to schedule a review. Every year, based on the client's anniversary date with the firm, notices are emailed to every client, delivery receipt required, if they have not had a review during the current year. Many clients respond to this mailing and schedule their annual review. Clients that do not respond will receive follow-up requests during the year by mail, email or phone call from our staff. An Excel spreadsheet is kept current to show the date of the last annual review for each client.

For many larger accounts, meetings are held more often: semi-annually or quarterly, depending on the client's needs and desires. These reviews are normally held by both partners of the firm. In the event one of the partners is not available, the other partner will conduct the review. Crissy Hebert conducts reviews on small portfolios and also presents individual planning results to clients of any size portfolios.

- B. In addition, client relationship meetings are held whenever a client requests a meeting or wants to discuss his or her portfolio.
- C. The content of Investment Reviews includes a summary of the portfolio's performance relative to the appropriate benchmark indices, performance attribution (i.e. sources of portfolio returns), economic and various other research reports that may be pertinent to the current investment climate and outlook. Our client reviews also contain a cash flow summary. Therefore, each investment review includes a summary of the client portfolio beginning balance, cash flow contributions and/or withdrawals, a portfolio appraisal and actual net of fee investment dollar return for each year.

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Item 14 Client Referrals and Other Compensation

- A. Haven Wealth Group does not receive any economic benefits from non-clients for providing investment advice.
- B. Haven Wealth Group entered a Solicitor Agreement with Richard Wiesner on October 7, 2013. The named solicitor and Haven Wealth Group signed and agreed to the following:
 - 1. The investment adviser and the solicitor are registered under the Investment Adviser's Act of 1940 (The Act).
 - a. The solicitor is not a person (A) subject to a Commission order issued under section 203(f) of the Act, or (B) convicted within the previous ten years of any felony or misdemeanor involving conduct described in section 203(e)(2)(A) through (D) of the Act, or (C) who has been found by the Commission to have engaged, or has been convicted of engaging, in any of the conduct specified in paragraphs (1), (5) or (6) of section 203(e) of the Act, or (D) is subject to an order, judgment or decree described in section 203(e)(4) of the Act.
 - b. An agreed fee will be paid pursuant to this written agreement to which the adviser and the solicitor are parties.
 - c. The solicitor, at the time of any solicitation activities for which compensation is paid or to be paid by the investment adviser will provide the client or prospect with a current copy of the investment adviser's Written Disclosure Statement required by Rule 204-3 ("brochure rule") and a separate written disclosure document.
 - 2. Such cash fee will be paid to the solicitor with respect to solicitation activities for the provision of impersonal advisory services only.
 - a. Haven Wealth Group agrees to compensate the solicitor for any prospect or existing client solicitations that produce new investment opportunities resulting in new account balances or an increase in existing portfolio balances. Solicitor agrees to perform his duties under the agreement in a manner consistent with the instructions of the investment adviser and the provisions of the Act and the rules there under.
 - b. The investment adviser must receive from the client or prospect, prior to, or at the time of, entering into any written or oral investment advisory contract with such client, a signed and dated acknowledgment of receipt of the investment adviser's written disclosure statement (ADV Part II, sections A and B) and the solicitor's written disclosure document.
 - c. The investment adviser will make a bona fide effort to ascertain whether the solicitor has complied with this agreement, and has a reasonable basis for believing that the solicitor has so complied.
 - 3. The solicitor shall be compensated as agreed and as stated within his Solicitor's Agreement.
 - 4. The solicitor has been provided with copies of his or her own Solicitor Disclosure Form. A solicitor is required to give a copy of this Disclosure to all prospects that they solicit for Haven Wealth Group.
 - 5. When prospects execute documents to become clients of HWG, they will be asked to sign a document stating that they have been given a copy of the aforementioned Solicitor Disclosure Form.

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- C. We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. In addition, Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our client's assets in accounts at Schwab reaches a certain size. 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 us. 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 Practices).

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Item 15 Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct the custodian to deduct our advisory fees directly from your account or if you grant us authority to move money to another person's account.

Haven Wealth Group has a qualified, third-party custody relationship with Charles Schwab. Schwab maintains actual custody of your assets. As of October 26th, 2020, Haven Wealth Group transitioned client assets from Fidelity Investments to Schwab and will maintain one custodian (Schwab) following the completion of this transition.

This relationship allows for qualified, third party custody of client's assets, as well as reporting of asset valuation. Custodians generate monthly statements reporting all transactions, fees, and balances. All clients should carefully review the account statements they receive from the independent custodian. In addition, the custodian enables the client to monitor their investments daily by utilizing the custody agent's on-line systems. The custody relationship removes direct access to client's money from the investment advisor. The independent third party custodial relationship is a positive for the clients and offers no conflict of interest.

You will receive account statements directly from Schwab at least quarterly. Statements will be sent to the e-mail or postal mailing address you provided. You should carefully review those statements promptly when you receive them.

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Item 16 Investment Discretion

HWG provides investment management on a fully discretionary basis. If the client has any limitations that they wish to impose on HWG, they note those in the Investment Policy Statement that they sign when they open their relationship. These notes are placed either in the Restriction Section or the Special Circumstances Section depending on the limitation. If any existing client wishes to add any limitations on HWG after opening an account, they may do so by calling the firm at 713-980-8820 or sending this in the form of a written request by mail or email to the firm address in Item I.

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Item 17 Voting Client Securities

A. It is the policy of Haven Wealth Group (HWG) to give the client's their option of voting their own proxies for their investment accounts or offering to vote their proxies for them. HWG has no preference as there is no benefit to our firm. If the clients choose for our firm to vote their proxies for them, HWG will make every effort to determine which way to vote considering the best interests of the client. HWG will consider each company's management recommendation, but will vote for or against those recommendations pending their opinion of which way offers the best value to the client's holdings.

B. The following procedures will be used for Proxy Voting:

When HWG receives and votes on proxies for the clients, the voting will be approved by one of the HWG partners (Richea Powell or Charlie Calvin) to ensure that the best decisions are made for the clients. A proxy form may be found on the HWG server. This form will be filled out by one of the partners and initialed, then given to the CCO to enter the votes.

The CCO will vote the shares as directed at: <https://central.proxyvote.com/pv/web.do>

After voting the shares, the Proxy Form should be scanned and filed electronically.

If requested, a copy of the proxy voting may be printed out to be picked up or mailed to the client. Clients requesting a copy of the voting can call Haven Wealth Group at 713-980-8820 or mail in a request at 1111 North Loop West, Suite 1110, Houston, Texas 77008.

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Item 18 Financial Information

- A. HWG does not require any prepayment of their fees on their services. All investment management fees are paid monthly in arrears. No financial information is given to clients.
- B. Although HWG has discretionary authority of client portfolios, the firm does not require any clients to pay any fees in advance of services rendered.
- C. HWG has not been subject to a bankruptcy petition at any time since inception of the firm in 2008.

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Item 19 Requirements for State Registered Advisers

Haven Wealth Group is registered with the Securities and Exchange Commission and notice files with the States of Texas and Georgia.

Haven Wealth Group Personal Information Policy

Facts	What does Haven Wealth Group do with your Personal Information?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: - Social Security number and income - Account balances and transaction history
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Haven Wealth Group chooses to share; and whether you can limit this sharing.

Reasons why Haven Wealth Group can share your personal information	Does Haven Wealth Group Share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transaction, maintain your account (s), respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
For our marketing purposes - to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't Share
For our affiliates' everyday business purposes - information about transactions and experiences	No	We don't Share
For our affiliates to market to you	No	We don't Share
For our non-affiliates to market to you	No	We don't Share

To limit sharing	<p>Call 713-980-8820 - our menu will prompt you to one of our staff Visit us online: www.havenwg.com</p> <p>Please note: If you are a new customer, we can begin sharing your information from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to discuss our sharing.</p>
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Questions:	713-980-8820
What we do	
How does Haven Wealth Group protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We authorize our employees to get your information only when they need it to do their work, and we require companies that work for us to protect your information.
How does Haven Wealth Group collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> -open an account or make deposits or withdrawals from your account -pay bills <p>We also collect your personal information from others such as custodians, affiliates or other companies</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> -sharing for affiliates everyday business purposes -affiliates from using your information to market to you -sharing for non-affiliates to market to you <p>State law and individual companies may give you additional rights to limit sharing See below for more information</p>
What happens when I limit sharing for an account I hold Jointly with someone else?	Your choices will apply to everyone on the account

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. HWG has no affiliates.
Non-Affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

