



## Summary of Material Changes to the ADV Disclosure Brochure

*Consistent with SEC rules, annual updates that are material in nature are required to be provided to all clients of First Affirmative Financial Network, LLC (First Affirmative) through a "Material Changes" document within 120 days of the close of the firm's fiscal year, which is the calendar year. Throughout the year, all clients will be provided with additional information about material changes, as necessary.*

This summary of the material changes to the Disclosure Brochure (Summary of Material Changes) is intended to provide you with sufficient information to determine whether you would like to review the Disclosure Brochure in its entirety.

You can obtain an electronic copy of the current Disclosure Brochure and this Summary of Material Changes in a publicly accessible area on the First Affirmative website at [www.firstaffirmative.com](http://www.firstaffirmative.com) or by contacting First Affirmative's Chief Compliance Officer, Kathy Lewis, at 719.478.7054 or [kathy@firstaffirmative.com](mailto:kathy@firstaffirmative.com).

Additional information about First Affirmative also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search the SEC's website for information about a registered investment advisor (RIA) by using the RIA's unique identifying number known as a "CRD number." First Affirmative's CRD number is 109036.

### Item 4: Advisory Business

In addition to acting as a fiduciary for you and your accounts under the Investment Advisers Act of 1940, when we provide investment advice to you regarding your retirement account or individual retirement account, we are fiduciaries within the meaning of Title I of Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate within the Prohibited Transaction Exemption (PTE-2020-02) that requires us to act in your best interest and not put our interest ahead of yours.

### Item 5: Fees and Compensation

A conflict of interest may arise when client Values-Aligned Direct Index Solutions (VADIS) portfolios are created using the Astro application on the Orion Advisor Technology (OAT) platform and accounts are opened at Apex Clearing (Apex). First Affirmative receives an indirect monetary benefit because Apex pays OAT a fee for accounts opened on their custodial platform. To mitigate this conflict First Affirmative provides disclosure of this conflict so that clients have this information to include in their decision-making process.

### Item 12: Brokerage Practices

The payment made to OAT by Apex, though indirect, creates a soft dollar benefit when VADIS accounts are opened on the Apex platform. Soft dollars are defined as

arrangements wherein a broker-dealer or registered investment advisory firm receives products or services for directing client accounts to a specific custodian. The First Affirmative's fees for investment advisory services, and the YourStake fees for Impact Preferences required for VADIS accounts, are the same regardless of the custodian. Clients are encouraged to review the options and conflicts with their Network Advisors so they can make an informed decision.