

Cover Page and Introduction

This brochure provides information about the qualifications and business practices of Kurtin Financial Advisers, LLC (KFA). This brochure is required under federal securities laws, is provided to prospective clients before or at the time of entering any investment advisory agreement, and is delivered or offered to existing clients each year (unless that client is an SEC-registered investment company).

The language and information in this brochure address specific questions, which the U.S. Securities and Exchange Commission requires of investment advisory firms, but may not reflect all details, or information about the firm.

This form must be written in “plain English” and avoid unusual industry jargon or odd terms to the extent possible. Under federal and state law, we are a fiduciary and must make full disclosure to clients of all material facts relating to the advisory relationship; seek to avoid conflicts of interest with clients; and, make full disclosure of all material conflicts of interest between our firm and our clients that could affect the advisory relationship. This obligation requires us to provide the client with sufficiently specific facts so that the client is able to understand the conflicts of interest we may have and the business practices in which we engage, and can give informed consent to such conflicts or practices or reject them.

If you have any questions about the contents of this brochure, please contact us at 214.891.0399 and/or emailing us at KKS@KurtinFinancial.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. Additional information about Kurtin Financial Advisers, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov.

Kurtin Financial Advisers, LLC
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214.891.0399
www.KurtinFinancial.com

Material Changes

Our Brochure, or these paragraphs of material changes known to the SEC as “Item 2”, will be delivered or offered to existing clients within 120 days of our December fiscal year. The Brochure may also be requested at any time at 214.891.0399 or by email to KKS@KurtinFinancial.com. We must update this information in our Brochure at least annually. This section contains any material changes from our last annual update, identifies and discusses changes. This section is in regards to only material changes since the last annual update of our Brochure.

One item of note is that Kurtin Financial Advisers (KFA) has grown in its Assets Under Management (AUM) and is now required to elevate the firm’s registration with the Security and Exchange Commission (SEC). Approval is expected around mid-April 2022, at which time KFA will submit its withdrawal from the State of Texas current registration.

There are no other material changes to report at this time.

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Further supplemental information is also attached including:

Supplement A: Proxy Voting Policy
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Advisory Business

STRUCTURE AND MISSION

Kathy Kurtin Stewart is the sole owner of Kurtin Financial Advisers, LLC, a Texas limited liability company. Established in 2006, Kurtin Financial Advisers, LLC (KFA) provides independent financial advice and custom financial responsibilities for the private wealth of select families. Strictly committed to the families it serves, KFA provides independent strategic planning, implementation and ongoing management and oversight of assets and liabilities related to various types of family wealth structures.

PRESIDENT, CEO

Kathy Kurtin Stewart

Kathy has 35 years of wealth management experience including investment management, fiduciary and estate considerations, charitable strategies and multi-generational tax planning. Having started Scudder's southwestern mutual fund division then serving as the firm's key AARP Investor's Delegate, Kathy's investment career includes over three decades developing custom wealth platforms designed to serve the unique needs of her clients. As one of the nation's leading wealth strategists for Northern Trust Company for fourteen years, Kathy built a \$5 billion private client following. On behalf of KFA, Kathy has been providing independent and exclusive wealth advisory services for individuals, families and any related trusts, charitable foundations and family partnership structures since 2006.

From Houston, Texas, Kathy was born in into a large family in 1958. She graduated from Memorial High School in 1977, obtained her BBA from Texas A&M University in 1981, and later completed the three-year National Graduate Trust School program at Northwestern University. Kathy has held several investment licenses. As a Registered Investment Advisor, she currently holds the all-encompassing requisite Series 65 license.

Noted for her strong financial and people skills, Kathy and has served in the Dallas and Houston communities for many years on boards that include the arts, churches and hospitals. She in on the President's Advisory Board of UT Southwestern; has twice chaired the Investment Committee for the UT Southwestern / St Paul Medical Foundation; is on the Advisory Board of MD Anderson Living Legends Committee and is devoted to St. Jude Children's Research Hospital, Young Catholic Professionals, Legatus and her church.

Advisory Business (cont'd)

ADVISORY SERVICES

The majority of services provided by KFA are investment supervisory services for private clients who seek overall wealth advice based on their family and tax structures, nature and size of their wealth. KFA seeks to understand the client's needs, goals and level of education in order to provide ongoing advice that represents their best interest.

While clients may also provide or impose restrictions on investing in certain securities or types of securities, KFA advice may include public and private investments for taxable, tax-deferred and charitable entities. For maximum prudence KFA also works with clients' other advisers, as well as with seasoned professionals/subadvisors most knowledgeable in tangent areas such as capital markets, domestic and global economies, and tax law.

KFA may be asked to manage, or provide advice on, other assets of client on a non-discretionary basis especially where information about such asset might influence strategy and thinking about discretionary assets. Examples of non-discretionary assets may include illiquid assets such as real estate, private equity, insurance or longer-term assets.

The firm and its sub-advisor provide direct management of individual stock equities and fixed income notes or bonds with flexibility to employ multiple investment styles. Our work and conversations may also include research or advisory counsel on related investments in private equity, real property and business evaluations. Investment strategies are custom to each situation, as we do not use model portfolios. Portfolios often are heavily weighted towards the production of cash flow. Equity stock investment may be designed towards value, growth, or conservative income styles, and may be adjusted according to presumed market cycles or your specific requirements

The SEC defines "investment supervisory services" as continuous investment advice provided to clients based on their individual needs, whether in terms of having sole discretion to manage a portfolio or providing nondiscretionary advice. As of 01/31/2022, \$111,489,680 in assets receive continuous investment management and supervisory services.

TYPES OF INVESTMENTS

The firm may discuss and use all investment opportunities for a client. There are no model portfolios or pre-labeled strategies or packages of funds. Each portfolio is built to achieve the custom goals of, and reflect the circumstances and desires of, the owner or beneficiary or trustee and thus no single portfolio managed by the firm is the same as another.

Advisory Business (cont'd)

Investment returns can be severely reduced over time by the impact of fees or costs, taxes, inappropriate diversifications or concentrations, and inflation or the depreciation of currency. Poor results by any investor often stem from these factors. We have a natural preference to avoid packaged investments and funds, and to invest directly in securities and assets which address your needs. This also avoids layers of fee costs, avoids potential liquidity risks in funds, and addresses some regulatory concerns that the fund industry is prone to systemic stresses. As to the definitions of “types of investments” itemized by the SEC, we may offer advice on all such items including equity securities, warrants, options, realty and mineral interests, investment company securities, metals and commodity assets, corporate and sovereign debt securities, tax exempt securities, commercial paper, certificates of deposit and money market securities.

Despite this flexibility, many of our clients maintain moderate portfolios geared to achieving a balance of goals. Investments may reflect your own objectives, personal taxes, legal matters, a possible range of time horizons, the impact of your involvement in any business or industry cycles, your personal beliefs and interests, liabilities or risks outside the portfolios, the timing of business project funding or personal needs, importance of relative performance or absolute performance, life cycle factors, estate planning techniques and so on. We spend more time selecting an investment for you than some people spend making their most important decisions such as choosing a spouse. These factors should become obvious from our conversations...but it is important that we know you.

Serving as a fiduciary, the firm only acts for the sole benefit and interests of a client, with loyalty to those interests. This is the highest standard of care at either equity or law, requires complete avoidance of any conflict of interest, and the firm may not be paid, profit or be rewarded in any way from the relationship unless the principals consent by agreement.

Fees and Compensation

Annual fees are determined according to the fair market value of the portfolio(s) in the relationship as determined by the client's independent custodian.

Charges in our schedule below are intended to cover basic financial services of Kurtin Financial Advisers, LLC.

ANNUAL ADVISORY FEE:

Minimum Fee \$10,000

Fair Market Value	Stated as a Percentage
First \$5,000,000	1.00%
Next \$5,000,000	0.75%
Balance	0.50%

KFA may engage one or more unaffiliated sub-advisors possibly resulting in additional management fees. Fees relating to services often provided by attorneys, accountants, and other outside advisers, when incurred, are in addition to these fees. Other costs may include transaction or custodial charges of brokerage firms. When unusual duties are involved with discretionary or non-discretionary assets, there may be an additional charge depending on the services rendered.

Clients have the option of choosing their own brokers.

Kurtin Financial Advisers, LLC does not accept compensation for the sale of securities or other investment products.

KFA fees are charged in arrears and withdrawn directly from client accounts generally monthly. In some cases, clients may request to be billed for services and/or make payment quarterly. In the event of a termination, full fees for the final month would be charged for the month proportional to the amount of work and number of days of service provided. Clients may terminate a contract without penalty within five business days after entering into the contract, if this appropriate disclosure statement was not delivered to the client at least 48 hours prior to entering any advisory contract with the firm.

All fees are subject to negotiation.

Performance-Based Fees and Side-By-Side Management

Kurtin Financial Advisers, LLC does not accept performance-based fees (that is, fees based on a share of capital gains on or capital appreciation of the assets of a client) at this time.

Types of Clients

Kurtin Financial Advisers, LLC (KFA) serves individuals especially of high net worth, family trusts, estates, partnerships, corporations, and charitable entities.

Each client is hand selected by means of an important value proposition and suitability relayed between and agreed upon by a prospect and this firm. There is no stated minimum account size at this time.

Methods of Analysis, Investment Strategies, Risk of Loss

Kurtin Financial Advisers, LLC (KFA) may use various methods either of analysis including fundamental and technical analysis, internally or via sub-managers. Research includes, but is not limited to, reviewing balance sheets, annual reports, research by outside providers, financial news and white papers news releases, private placement memorandums, on-sight inspections and especially personal interviews.

KFA works closely with a sub-advisor that typically uses a long-term and short-term purchases approach. There is additional client discussion about tactical considerations with micro and macro themes and each strategy is unique to each portfolio and client psychology.

We/sub-advisors do not believe there is a known or knowable correct value for securities prices, such prices being the product of individual value judgments and group behavior. We do believe experienced investors are more likely able to judge relative value and group behavior than inexperienced investors. Dislocations between short-term influences and equilibrium judgments create opportunities that can sometimes be recognized in our view. Thus, our methods of security analysis include macroeconomics, microeconomics, liquidity issues, investigative accountings, evaluations of other experienced investors, technical price behaviors, cyclical studies, credit and duration analysis, and other methods. This may include methods of behavioral and social investment finance; such studies building on concepts of psychology to further explain and understand investor behavior, the assignment of valuation level, and events developing prospectively in the financial markets.

Methods of Analysis, Investment Strategies, Risk of Loss (cont'd)

Some of this analysis would be considered traditional and some would be judged, to our knowledge, unique. Sources of information may include corporate reports, prospectuses, regulatory filings, research materials prepared internally and by others, timing algorithms and rating services, press releases and media of all types, facility inspections, and any other proper public content. Strategies and tactics may result in holding periods which last many years or more rarely even as short as a few days, but strategies involving options or margin or short sales would be unlikely, and unique only to a particular situation endorsed by an individual client.

Clients bear a significant risk of loss in strategies involving equity securities and moderate risk of loss in strategies involving fixed income securities. Such significant risks stem from changes in interest rates, inflation, economic activity, currencies, credit quality, liquidity, specific security events, news media reportings, and corporate or government management. Performance evaluations are a critically important component of analysis. However, past performance is no guarantee of future success. Future returns are impacted by prospective changes in volatility, taxes, management, costs, economic conditions, and other factors.

Many of our clients maintain moderate portfolios geared to achieving a balance of goals. Investments may reflect one's own objectives, personal taxes, any legal matters, a possible range of time horizons, and the impact of one's involvement in any business or industry cycles, one's personal beliefs and interests, any liabilities or risks outside the portfolios, the timing of business project funding or personal needs, importance of relative performance or absolute performance, life cycle factors, estate planning techniques and so on.

Suitability is the key to ultimate construction of client portfolios.

Investment returns can be severely reduced over time by the impact of fees or costs, taxes, inappropriate diversifications or concentrations, and inflation or the depreciation of currency. Poor results by any investor often stem from these factors. Thus, KFA has a natural preference to avoid packaged investments and to invest directly in securities and assets that address both the client's needs and our efforts to both increase opportunities and reduce potential mistakes.

Additionally, while we have a great deal of ongoing conversation to determine and update a client's understanding of financial instruments, KFA discusses the knowledge that investing in securities involves risk of loss that they must be prepared to bear.

KFA may also implement client advice.

Most important to us is that we know our client.

Disciplinary Information

Kurtin Financial Advisers, LLC has never, nor has any individual personnel at the firm ever, been involved in any legal or unethical or disciplinary event in the investment industry. If any such material event were to occur, the firm would promptly update clients.

Other Financial Industry Activities and Affiliations

Kurtin Financial Advisers, LLC (KFA) is independent. KFA has no cross-ownership or conflicts of interest with any brokerage firm, bank, financial planning firm, accounting firm, law firm, insurance agency, real estate broker, mutual fund or financial institution. KFA is not actively engaged in any business, product or service other than providing investment advisory services. Further, KFA is not a general partner in any partnership in which clients are solicited to invest.

KFA is expected to be completely independent and unbiased.

KFA provides responsibilities for all oversight and supervising of investments for clients including the hiring and firing of all/any unaffiliated sub-advisers. Rahlfs Capital, LLC, has been engaged to provide all or part of the investment management as a sub-adviser with investment discretion.

KFA and Rahlfs Capital are mutually involved with KFA clients, using our complimentary skills and notable experience.

Rahlfs Capital provides direct management of individual stock equities and fixed income notes or bonds with flexibility to employ multiple investment styles. Their work and conversations may also include research or advisory counsel on related investments in private equity, certain commodity markets, foreign exchange, and business evaluations.

All investment strategies are custom to each situation. KFA does not use model portfolios.

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

All personnel involved with Kurtin Financial Advisers, LLC (KFA) adhere to high standards of professional conduct and a code of ethics that is the cornerstone of the trust that client families have in us.

This includes placing the integrity of the profession and the interests of the client first, acting with integrity, competence and respect both in one's personal and professional life, and improving and maintaining one's professional competence continually over time. The procedures of KFA emphasize our duties to act with loyalty and skill for all clients or stakeholders, and further include provisions prohibiting insider trading, unfair personal trading, or conflicts of interest.

KFA does not deal in its own account to acquire securities from, nor sell securities it owns to, any client. KFA does not receive compensation as a broker or agent for any securities transaction. KFA avoids media appearances or situations that might provide psychological compensation from an association with any client or might influence our independent and unbiased process of investment action and objective research.

KFA control person has and may recommend investments into securities that may also have been purchased for the portfolio of the control person. Conflicts of interests include trading in advance of client accounts. However, great care is taken to avoid any conflict of interest in the timing of such transactions, such as acquiring a security after the trades of a client are executed during that trading day or upon completion of a multi-day trading program. In the event a potential conflict of interest might arise from some coincidence or development, such conflict would be disclosed and mutually resolved. Adherence to the firm's code of ethics, and applicable rules and laws, is routinely confirmed. A detailed copy of these policies is available on request, and our Policy on Internal Trading is included as a supplement to this document. Last, but not least, most trades for clients and firm are handled at the discretion of sub-advisor.

Our Code of Ethics is provided upon request.

Brokerage Practices

Responsibilities and discretion are detailed in client's specific agreement with Kurtin Financial Advisers, LLC (KFA) for investment management, along with client's specific agreement with an independent custodian for proper safekeeping of their assets. KFA typically has discretionary authority to determine not only the securities being bought or sold, but is also authorized to determine advantageous brokerage firms and dealer trading desks (sub-services) to be used at the time of transactions as well as the commission rate to be paid. It is also possible that, in unique situations, a client or sub-advisor will direct trades to a specific broker for execution.

The selection of trading desks or brokerage firms may change from time to time, based on pricing and efficient execution, commission rate, financial stability, reputation or knowledge of a particular market, and other factors such as proper settlement procedures into client's independent custodian. Neither KFA, nor its sub-advisor, will embark to agree to higher commission rates in return for any product, service, or research information, and no transactions have been directed to a particular broker in return for any product or service.

In some cases, KFA (or a sub-advisor) must use a specific software trading system in order to place or clear trades through a particular brokerage or custodian, whether selected by us or by client, and that software is provided to us "free" by that firm and for that purpose. Also, in some cases, KFA (or a sub-advisor) may receive "free" research reports or information from a particular brokerage or custodian, and that material may be sent to us with or without our request.

As a result, the SEC considers the firm (or our sub-advisor) to receive a "soft-dollar" compensation benefit of brokerage research or required software. However, any such assistance is to benefit the clients of the firm. Moreover, the selection of brokerage firms or the independent custodian housing client's assets is unrelated to the availability of soft-dollar research, or software, required for trading or any other perceived benefit to the firm.

KFA does not receive any "actual dollar" benefits, and the selections of brokerages or custodian financial institutions are decisions made completely without bias. Such standards of ethical conduct with respect to soft dollar benefits are a part of our code of ethics.

Trade aggregation, or the bundling of trades to obtain lower trading costs, is permitted and the trade may then be allocated out across several client accounts. Proper and reasonable efforts are made to provide involved accounts with an equal access to such cost savings.

Review of Accounts

Reviews are twofold starting with the CEO who spearheads and reviews the overall financial needs and ongoing goals of the client. The firm meets with clients on a periodic basis, and promptly at request. Often quarterly, we meet to confirm any changes on the client's objectives including, risk tolerance and cash flow. Many topics are of interest to our clients and us such as economic, political, and tax issues to name a few. We are most interested in any changes within our clients' circumstances where we could be of professional service or courtesy. Clients may access KFA by many methods, as often as their needs arise, and are encouraged to take initiative especially when an event has occurred in their life, or in the world, that creates cause for discussion.

Internal reviews are performed on a continual basis, daily and weekly, with the degree and timing determined upon our discretion, client discussion, market action, news flow, and receipt of information from your third party independent custodian. All internal reviews and analysis involve Kathy Stewart, as President and COO, and often include the appropriate sub-advisor. The combined process includes ongoing market analysis of the fundamentals of each issue daily, monthly and quarterly.

KFA provides investment performance data as often as the client requests. Some of the independent custodians, especially trust companies and private banks, provide calculated data pursuant to their independent records and relationship with our mutual client. KFA and its sub-advisor also provide traditional benchmark comparisons and custom performance reports tailored with a format and to the preferences of each client.

Statements of balances, transactions, tax data, and other calculations are available from the third party financial services firms chosen by you for safekeeping and custody, such as trust companies or private banks, brokerage firms, other registered investment advisors, or financial institutions. Clients may receive such independent custodian reports monthly or quarterly as desired. We may then assist you in interpreting or compiling reports and statements, as well as prepare customized documents, earned rates of return, prospective risk analysis, brainstorming and graphics as part of the review process.

Client Referrals and Other Compensation

Kurtin Financial Advisers, LLC (KFA) does not have an existing arrangement under which it compensates a non-employee for referrals.

As most clients have been unsolicited, KFA has not created an active marketing strategy per se. Business to date has been the result of clients who believe their friends need to consider our independent, professional approach. Thus, KFA has grown from word-of-mouth and a mutual respect and interest in responding to our clients' referrals, some of whom have chosen to work with us.

Custody

Kurtin Financial Advisers, LLC (KFA) does not have direct custody of client funds or securities, and a qualified custodian provides statements directly to our clients typically monthly. Moreover, using technology, these independent custodians provide confidential client account access 24/7, which provides various other data such as intermittent transactions and daily valuations.

When a client directs asset transfers, at times they request we handle their standing instructions using a Standing Letter of Authorization form provided by the custodian. In these cases, and to comply with the Securities and Exchange Commission no-action letter regarding the conditions required for certain standing letters of instruction:

The client provides an instruction to custodian in writing that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.

Custodian performs appropriate verification such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.

The client has the ability to terminate or change the instruction to custodian.

The adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.

Custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice re-confirming the instruction.

Custody (cont'd.)

Our firm maintains records showing that third party recipients are not related to the firm.

KFA uses only independent and qualified custodians in order to add a most prudent asset safeguard for our clients. Low-cost custodial providers are key to the overall price consciousness we represent. Some independent custodians, such as Charles Schwab, have below average – or no - commissions with Investment Adviser (IA) friendly trading platforms along with transparency for clients. Additionally, independent custodians such as trust company banks are not typically broker/dealers yet require reliable transactions and communications in order to properly and efficiently settle transactions and provide accurate recordkeeping.

To use our services, a client must first establish an account with a qualified custodial bank or brokerage firm and will then receive statements and tax accounting directly from that custodian.

Investment Discretion

Comfortable with independent custodians used for proper safekeeping of client assets, Kurtin Financial Advisers, LLC (KFA) customarily has discretionary authority to determine not only the securities being bought or sold, but is also authorized to determine advantageous sub-advisors, brokerage firms and dealer trading desks to be used at the time of transactions as well as the commission rate to be paid. In unique situations, a client may direct trades to a specific broker for execution. The selection of any of these sub-services may change from time to time, based on pricing and efficient execution, commission rate, financial stability, reputation or knowledge of a particular market, and other factors such as proper settlement procedures into any client's independent custodian.

KFA describes investment discretion for investment management in our standard investment advisory agreement along with any specifically customized language a client might want to add in general or concerning specific holdings or instructions.

Voting Client Securities

Kurtin Financial Advisers, LLC (KFA) policies are designed to ensure that the firm votes proxies in the best interests of clients, and that proper records are maintained so that clients may obtain information on how the firm voted their proxies if desired and upon request. If the voting responsibility is ours, we do act to acquire knowledge of a vote and confirm that proxy votes are cast, unless the decision is to abstain or agree by default with management. We do act to acquire information necessary and beneficial to an informed vote.

Our Proxy Voting Policy is attached as a Supplement to this Brochure.

Financial Information

Because Kurtin Financial Advisers, LLC (KFA) does not solicit prepayment in fees, nor does Kurtin Financial Advisers, LLC have direct custody control of the assets of any client, and since Kurtin Financial Advisers, LLC is a single member LLC the SEC does not require us to produce a certificate of balance sheet.

Requirements for State-Registered Advisers

Detailed information describing the Principal executive officers and management personnel of Kurtin Financial Advisers, LLC is provided under the Advisory Business section on page 4 and referenced in the Table of Contents.

Detailed information describing all types of business in which Kurtin Financial Advisers, LLC is actively engaged is provided under the Advisory Business section on page 4 and referenced in the Table of Contents.

As stated above under Fees and Compensation on page 7 and referenced in the Table of Contents, Kurtin Financial Advisers, LLC does not accept performance-based fees.

Kurtin Financial Advisers, LLC has not been involved in any events, legal or otherwise, and has no history of any liability claims or awards from any civil, self-regulatory organization or administrative proceedings.

Attached supplements

We are pleased to provide required supplements including our procedures for voting your proxies, the education and business background of all personnel involved with your specific accounts, our privacy policy, our policy on internal trading, cyber-security and some detail on our business continuity procedures in the event of a natural disaster or other event.

PROXY VOTING POLICY

What you should know:

Our policies are designed to ensure that the firm votes proxies in the best interests of clients, and that proper records are maintained so that clients may obtain information on how the firm voted their proxies if desired and on request.

Recordkeeping and voting procedures:

Certain procedures for voting proxies, and recordkeeping maintained by the firm, are:

If the voting responsibility is ours, we do act to acquire information necessary and beneficial to an informed vote, and do further confirm that proxy votes are cast, unless the decision is to abstain. We work closely with Rahlfs Capital to assist our decisions when voting.

A file of recent proxy material is retained by us, unless otherwise available online, and of the recording of how any past proxy vote was cast.

Our firm votes all proxies to maximize long-term shareholder value. We generally hold securities enjoying talented and trusted management; hence, voting decisions tend to align with management recommendations...given no material conflict with shareholder value.

We decline voting responsibility if a custodian sends such material directly to client, and may uniformly abstain from voting if we conclude the effect on shareholder economic interests or on the value of the portfolio holding is indeterminable or insignificant. If voted, the firm uniformly votes all proxies to maximize long-term share value. We chiefly hold securities enjoying talented and trusted management; hence, votes align with management recommendations...given no material conflict with shareholder value. This policy is applied uniformly without nuance as to custodial platform, asset mix strategy, or other characteristics of an account or client. No perceived conflict of interest between clients from this uniform application of policy has ever been suggested and such might seemingly be ambiguous or inconsequential in the experiences of the firm.

Kurtin Financial Advisers does not engage in shareholder activism; however, if the firm believes it is in our clients' best interest, and typically in consultation with the client, we will only then initiate a dialogue with management and officers.

Individual agreements on voting:

Last, in certain cases and if described in our Portfolio Management Services Agreement, we will vote proxies as directed by the client.

INTERNAL TRADING POLICY

What you should know:

We act to ensure the trading of securities held in managed client portfolios is based solely on our perceived best interests of our client, per authority established by our individual contractual agreements with clients, and further consistent with the requirements of an SEC-regulated investment management firm. Our trading policy is further consistent with the standards, skills, diligence, and care that a prudent person acting in a like capacity and familiar with such matters might use in such circumstances then prevailing in pursuit of maximizing long-term investment value relative to pertinent risks and desired quality. Finally, the person responsible for matters related to trading policies is Kathy Kurtin Stewart, President, available at 214-891-0399.

Trading policies at the firm are reviewed from two perspectives... policies which address the trading of securities held in managed client portfolios, and policies that relate to the investment holdings of the firm itself or any employee, officer or principal of the firm. The following procedures and policies apply to most situations.

Records we keep:

The firm periodically reviews the process of selecting our approved brokers, the quality of service provided by our brokerage relationships, the avoidance of any material soft dollar benefits, and the overall pursuit of best execution relative to the constraints and objectives of client portfolios.

A permanent record of all trading activity is maintained to assist in the evaluation of trading desk functions over time, and to assure that all clients are treated fairly in the execution of orders and allocation of trades.

Priorities we maintain:

The firm gives priority to investments made on behalf of a client over those that benefit the interests of any other entity or individual, placing client interests above and before any other.

Personal investments benefiting any employee, officer, principal, or immediate family, are monitored and supervised. Such investments must be maintained in accounts complying with our approved lists of custody locations and investment types. The firm acts to ensure that trades for clients are executed prior to, or are unaffected by, any trades made by an employee, officer, principal, or immediate member of their family.

Above all, and in every case, we act independently and objectively, with competence and diligence, for the benefit of clients, in a professional and ethical manner at all times, whether a written policy exists or not.

POLICY FOR PROTECTING YOUR FINANCIAL PRIVACY

Page 1 of 2

What you should know:

This policy covers Customer Information, defined as personally identifiable information about a consumer or a consumer's current or former relationship with Kurtin Financial Advisers, LLC. This policy may be required by Federal Financial Privacy Laws. We recognize our obligation to keep your information secure and confidential. We do not sell or share Customer Information with marketers who may want to offer you products and services. We do carefully manage and protect all information related to you.

Making the security of information a priority:

Keeping financial information secure is one of our most important responsibilities. We value your trust, and we handle information about you with care. We limit access to Customer Information to only those associates who need to know that information to maintain or provide superior service to you. Any employee is bound by a code of ethics and a confidentiality agreement that requires confidential treatment of Customer Information. Your Customer Information may also be handled by service providers for Kurtin Financial such as your Custodian. We limit access to Customer Information to those service providers who need to know that information to provide or maintain service to you. We also maintain physical, electronic, cybersecurity, and procedural safeguards to protect your Customer Information. We will continually assess new technology and methods for protecting information and maintain proper upgrading of our systems as appropriate.

Collecting information:

We collect and use various types of information to service your accounts, to save you time and money, and to better understand your needs. We may collect the following Customer Information about you from the following sources:

1. Information you provide to us on applications, contracts, and through other means, such as name, address, a driver license or social security number, assets, income, and debt.
2. Information about your transactions and account experience with us, such as your account balance, investment history, and information about our communication with you such as account statements and correspondence.
3. Information from outside sources as may relate to your personal accounting, credit, place of employment, or legal representative.
4. Information of a general nature, such as demographic information, that is not assembled or used for the purpose of determining your eligibility for service.

We may also observe and note atypical behavior or incidences for aging or vulnerable client.

Managing information with companies that work for us:

We may share all types of Customer Information with service providers that work for us to provide you with products and superior services that you've requested or already have with us. We share only the information needed to provide those products and services and to provide a great client experience. These service providers may include financial service providers such as an account's administrator and custodian, and non-financial companies such as data processing companies. These service providers might assist us, for example, in fulfilling service requests, processing your transaction, maintaining company records, or helping mail account statements and tax information. In addition, we may share Customer Information with affiliated and nonaffiliated financial institutions that could work for us to provide various services. All of these companies act on our behalf, and are contractually obligated, to keep the information that we provide to them confidential, and use the information only to provide the services we've asked them to perform for you and us.

Disclosing information in other situations:

We may also disclose Customer Information to non-affiliated third parties when permitted or required by law. This may include a disclosure in connection with a subpoena or similar legal process, a fraud investigation, or an audit or examination. We may also share any of the types of Customer Information outside our family of service providers if we have your consent.

Making sure information is accurate:

Keeping the information about your account accurate and up-to-date is very important. We provide you with access to account information through various means such as account statements and online viewing. If you ever find your account information is incomplete, inaccurate, or not current, or if you have any other questions, please call or write us at the numbers listed below. We will try to update or correct any erroneous information or investigate your inquiry or complaint as quickly as possible.

Keeping up-to-date with our privacy policy:

We will provide notice of our privacy policy annually, as long as you maintain an ongoing relationship with us. This policy may change from time to time, but you can always contact us at 214.891.0399 for a copy. Our privacy policy applies only to individual investors and families who have a direct relationship with us. Last, we recommend the following website for information related to identity theft and the data breaches that seem increasingly commonplace in modern society:

http://www.sec.gov/oiea/investor-alerts-bulletins/ia_databreaches.html

BUSINESS CONTINUITY PROCEDURES

What you should know:

Disruptions to the normal flow of business activity can arise from a number of expected causes. We have good plans to recover from any disaster, pandemic or business disruption, and two separate firms maintain records of your accounts. The business continuity of the financial institution maintaining custody of your assets is a foremost concern of clients, and such firms have their own separate business continuity and disaster recovery plans. In the event of a natural disaster or similar disruption, the safety of the financial institution responsible for the safekeeping of your assets is of primary importance, and you may be provided emergency contact information from your independent custodian. For our part, as your investment advisor, we require access to account records, news flow, market data, and technical abilities to execute transactions. We accomplish this in part as noted below.

Our data records and ability to monitor accounts:

We have pre-arranged for mobile business function, in the event of physical disaster. We maintain private data backups, incorporating both optical and electronic data media, in fire-proof safes or encrypted media in three locations, two on-site and offsite, in the event of physical or electronic events. The company does not, however, maintain data on any third-party servers or internet “cloud” file storage arrangements due to our concerns about cybersecurity and data protection. In the event of incapacity or loss of a “key man” employee, multiple trusted individuals – including the pre-existing sub-advisors - have a contact list of business persons to contact at that time, along with private advice for each client.

We maintain redundant processing capacity at our principal office in event of technical malfunction, as well as access to pre-existing sub-advisors and business partners in the event a separate channel is required to execute transactions. At no time does this firm hold client assets or physical certificates.

Your protection and access to your assets:

Importantly, all client securities are held in safekeeping custody with separate financial institutions, with custodian banks and central depositories such as the Depositary Trust Co., or with a financial institution chosen by the client and their legal advisors. This structure provides families with security, liquidity, and third party independence. These firms also further maintain backup data records, and the administrative staffs of these financial institutions are available to clients in the event of any disruption.

CYBER SECURITY PROCEDURES

What you should know:

The investment industry and the U.S. Securities and Exchange Commission work together to protect investors from cybersecurity threats by minimizing the possibilities of unauthorized access to your information. We act to maintain cyber-security controls which are appropriate to the firm, reasonable in the expectations of our clients, and consistent with the periodic guidance we may receive from the SEC. We also act in concert with your custodian and consider their procedures and safeguards.

Potential threats are evaluated in terms of safeguarding data and communications.

Protection of networks and information is a priority. The firm reviews these processes to identify and assess any potential changes in security over time. We do not place data on any third-party servers or internet "cloud" file storage arrangements. We use a no-path isolation procedure so that our data storage has no electrical path to a network except when briefly needed. Storage devices are not mirrored, nor typically accessible or shared as in the case of a firm with larger staffing.

Clients are not provided access through any portal to information at the firm. Requests for funds transfers are handled via the custodial platform and pre-approved authority. It is very important that our clients avoid passing secure information to/through us via emails. Any unexpected event brought to our attention by the safekeeping custodian would be addressed immediately with the client.

We maintain up-to-date antivirus software including Norton Antivirus and Malwarebytes Premium and consistently scan all files. Generally, we avoid emailing or sharing private files outside of our firm's secure network. In those limited instances where it's necessary to share a file with a client or trusted party, we encrypt sensitive files before sending it. We transmit passwords or codes for encrypted files via a separate communication channel to avoid interception and having our firm's security compromised.

While these policies are directed towards cyber-security, the physical security of our workplace is also important and maintained.

To date, we have not experienced, nor been notified of, any cyber threats or intrusions. We have never experienced any loss or exposure of data, and have never detected unauthorized activity. Further, we are unaware of any client who has experienced identity theft or correlated any such issues back to our firm or their custodian institution. We recognize, too, that other electronic devices require similar care to avoid cyber security issues.