

Windward Wealth Strategies, Inc.

Part 2A of Form ADV Brochure

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windwardwealthstrategies.com

February 22, 2023

This Brochure provides information about the qualifications and business practices of Windward Wealth Strategies, Inc. (the “Adviser”). If you have any questions about the contents of this Brochure, please contact us at 920-230-2215 or by email at info@windwardwealthstrategies.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.

The Adviser is a registered investment adviser. The registration of an investment adviser does not imply any level of skill or training.

Additional information about the Adviser also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 — Material Changes

The material changes in this brochure from the last annual updating amendment of Windward Wealth Strategies, Inc. on 03/10/2022, are described below. Material changes relate to Windward Wealth Strategies, Inc. 's policies, practices or conflicts of interests only.

- Walter Koskinen retired from Windward Wealth Strategies, Inc. in June 2021.

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Item 4 — Advisory Business

Firm Description

The Adviser provides professional investment management to a broad range of investors. All services are provided on a supervisory basis. The Adviser provides continuous investment advice and management based upon the individual needs and objectives of each client. The Adviser was founded in February 2015 and commenced operations in April 2015.

Principal Owner

The Adviser is privately held, and its employees own all the outstanding stock of the firm. The principal owner of the Adviser is Gregory B. Pierce.

Types of Advisory Services

The Adviser offers discretionary investment management services on a range of investments, including domestic and foreign equity securities, alternative investments (including private placements for qualified clients), and taxable and tax-exempt fixed income securities. The Adviser may also offer advice on investments in mutual funds or other investments as part of an asset allocation mix. For clients who grant the Adviser complete discretionary authority, the Adviser determines which securities are to be bought or sold and, in these determinations, it is guided by the general guidelines which are set up at the inception of the Adviser-client relationship in cooperation with the client. These general guidelines cover such things as the relative proportion of debt securities and equity securities, the degree of risk which the client wishes to assume and the types and amounts of securities to constitute the portfolio, including any restrictions imposed by the client. The Adviser endeavors to manage the portfolio in accordance with these guidelines.

In addition to discretionary investment management services, the Adviser also provides financial planning services to clients, as described herein.

Client Reporting on Alternative Investments

On client reports, the Adviser may show alternative investments held or controlled by a client or by a third party on behalf of the client. These assets are reported for client recordkeeping purposes only. The Adviser does not have actual custody or control of these assets. With the exception of most marketable securities, the description of the asset and its price (or value) may have been provided to the Adviser by the client and should not be relied upon for any purpose by a third party.

Client Assets

As of December 2022, total assets under management were approximately \$ 166,454,757.00. All client assets are managed on a discretionary basis.

Item 5 — Fees and Compensation

Discretionary Investment Management

Fees for discretionary investment management services are based on a percentage of assets under management and are payable monthly in advance, in some cases quarterly in advance, unless otherwise stipulated in writing. The annual rates provided below are applied to the market value of investment capital including cash or its equivalent held for investment, as appraised by the Adviser. Where client assets are invested in mutual funds, exchange traded funds, or other third-party investment vehicles, the client may incur both a direct management fee payable to the Adviser and an indirect management fee through the third-party investment. Where the Adviser provides before fee and after fee performance, before fee performance includes all fees (i.e., trading, custodian, advisory fees, etc.) incurred by the client other than the Adviser's fee. No fee increase will take effect without at least thirty days' advance written notice to clients.

Unless the Adviser has permission from the client to debit automatically the client's custodial, banking or brokerage account(s), as the case may be, the Adviser will invoice each client for services rendered.

The contractual relationship between the Adviser and its clients shall remain in force until canceled by either party upon 30-days' prior written notice. Unless a client specifically instructs the Adviser to liquidate the client's assets, the Adviser will not liquidate assets when notice of termination is received from a client. In the event of termination by either party, any unearned fees will be prorated back to the client.

FEE SCHEDULE

\$2 Million or less	1.00%
Over \$2 Million to \$10 Million	0.75%
Over \$10 Million	0.60%

*All portfolio fees are subject to negotiation depending upon total value of assets managed, asset type, and servicing requirements.

Financial Planning

Fees for financial planning services are charged in one of two ways:

- As a fixed fee, typically ranging from \$500-\$2,500, depending on the specific service requested, the nature and complexity of the client's circumstances, and the qualifications, training and experience of the individuals performing the service. Up to 100% of this fee may be due upon signing the client agreement, with the balance due upon completion of services.
- On an hourly basis, ranging from \$100-\$500 per hour, depending on the nature and complexity of the client's circumstances, as well as the qualifications, training and experience of the individual performing the work. An estimate for total hours will be provided at the start of the client relationship. Up to 100% of the estimated fee may be due upon signing the client agreement, with the balance (based on actual hours) due upon completion of services.

In both cases, Financial Planning services will be delivered within 6 months of signing the client agreement and acceptance of the prepaid fee.

The contractual relationship between the Adviser and its clients shall remain in force until canceled by either party upon 30-days' prior written notice. Any collected but unearned fees for these services will be promptly refunded to the client upon termination of the client agreement, and any earned but unpaid fees will be due and payable.

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

The Adviser does not intend to enter into performance fee arrangements with clients; therefore, the Adviser does not expect to expose its clients to the potential conflicts of interests associated with side-by-side management.

Item 7 — Types of Clients

Description

The Adviser provides investment advisory services to corporations, pension and profit-sharing plans, municipalities and other public institutions, foundations, trusts, pooled investment vehicles, individuals and other separate accounts.

Account Minimums

The Adviser has a standard minimum account size of \$250,000 for all accounts. Smaller accounts may be accepted based upon a number of factors, including geographic considerations, related account relationships, the number of clients with individual firms and support services provided by other firms.

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

Discretionary and Non-Discretionary Investment Management

Investment Strategies and Methods of Analysis. The Adviser offers discretionary advice on a range of investment styles including domestic large-cap, mid-cap and small-cap equity securities, foreign equity securities and alternative investments (including private placements for qualified clients), as well as a range of taxable and tax-exempt fixed income products. The Adviser may also offer investment advice on mutual funds or other investments as part of an asset allocation strategy. These investments are selected based upon an evaluation of a company's performance history, management, total assets, expense ratio, turnover ratio and dividend yield.

The Adviser's security analysis methods include, but are not limited to, fundamental analysis (evaluating securities based upon their historical and projected financial performance); technical analysis (examining technical moves in the price of a security based upon peer securities of comparisons to an investment sector or index); and cyclical analysis (determining the desirability of a security based upon the status of the security within the price cycle the security or similar securities have followed historically).

The Adviser's main sources of information include, but are not limited to, financial newspapers and magazines; inspections of corporate activities; research materials prepared by other investment firms; corporate rating services; timing services; annual reports; prospectuses; public filings; and company press releases.

Principal Risk Factors. Investing in securities involves risk of loss that clients should be prepared to bear. The Adviser does not offer any products or services that guarantee rates of return on investments for any time period to any client. All clients assume the risk that investment returns may be negative or below the rates of return of other investment advisers, market indices or investment products. Investments are subject to market risk, which may cause the value of the client's account to be worth more or less than the client's initial investment. The market value of a client's account is expected to fluctuate. Further, the securities selected may decline in value or not increase in value when the market in general is rising.

Private Equity Funds: In addition to the risks associated with hedge funds, there are risks specifically associated with investing in private equity. Capital calls can be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

Financial Planning

The Adviser also offers advice in the form of a financial plan. Clients choosing this service will receive a detailed, written financial plan designed to help the client pursue their stated financial goals and objectives.

In designing a financial plan for clients, the Adviser generally gathers information from the client through personal interviews. Information gathered includes a client's current financial status, future goals and attitudes toward risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared.

The Adviser's financial plans may address any (or all) of the following areas:

- Basic financial check-up, including a review and analysis of: goals and priorities; net worth including debt and cash management, cash flow or budgeting; basic insurance needs and appropriate coverage levels and holdings for emergency funds; and utilization of employee benefits funds, if available.
- Development of an investment policy statement ("IPS") for the client, including an assessment of investment volatility tolerance, liquidity needs and time horizons for goals and objectives; an analysis of existing investment portfolios; and completion of necessary paperwork for opening accounts and transferring existing holdings.
- Capital needs analysis and projections for retirement or other financial independence situations.
- Review of employer-sponsored retirement plan to include an evaluation of investment choices, allocation recommendations in consideration of the client's IPS and other assets managed by the Adviser.

The final written plan will include action items relating to a variety of topics, including, but not limited to, the following:

- Stock Option Analysis
- Charitable Gifting
- Retirement Planning
- Insurance Analysis

- Special Funding (education, future purchases, etc.)
- Estate Planning Coordination

Additionally, the Adviser provides advice on non-securities matters in connection with the rendering of estate planning, fixed insurance, and/or fixed annuity advice.

Should a client choose to implement the recommendations contained within a financial plan, the Adviser suggests the client work closely with their attorney, accountant, insurance agent and/or stockbroker. Implementation of the recommendations contained in a financial plan is entirely at the client's discretion.

Item 9 — Disciplinary Information

The Adviser and its employees have not been involved in any legal or disciplinary events that would be material to a client's evaluation of the firm or its personnel.

Item 10 — Other Financial Industry Activities and Affiliations

Neither the Adviser nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

Neither the Adviser nor its representatives are registered as or have pending applications to become either a Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

Gregory Pierce is the President and Director of Fox Valley Pro Basketball, Inc. and Kim Molitor is the Director of Fox Valley Pro Basketball, Inc. Fox Valley Pro Basketball, Inc. is a Regulation D, private offering formed to build an arena in Oshkosh, Wisconsin.

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

The Adviser has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the

reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons of the Adviser must acknowledge the terms of the Code of Ethics annually, or as amended.

Gregory Pierce is the President and Director of Fox Valley Pro Basketball, Inc. and Kim Molitor is the Director of Fox Valley Pro Basketball, Inc.

The Adviser anticipates that, in appropriate circumstances and consistent with clients' investment objectives, it will recommend to investment advisory clients the purchase or sale of securities in which the Adviser, its affiliates and/or clients, directly or indirectly, have a position of interest. The Adviser's employees are required to follow the Adviser's Code of Ethics. Subject to satisfying this policy and applicable laws, employees of the Adviser may trade for their own accounts in securities which are recommended to and/or purchased for the Adviser's clients. The Code of Ethics is designed to ensure that the personal securities transactions, activities and interests of the employees of the Adviser will not interfere with (i) making decisions in the best interest of advisory clients, and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code of Ethics, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of the Adviser's clients. In addition, the Code of Ethics requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored by the firm's compliance personnel to ensure compliance with the Code of Ethics, and to reasonably prevent conflicts of interest between the Adviser and its clients.

The Adviser and its associated persons may have material financial interest in issuers of securities that the Adviser may offer for purchase or sale by clients. For example, interest in a real estate development company. This presents a conflict of interest in that the Advisor or its related persons may receive more compensation from investment in a security in which the Advisor or a related person has a material financial interest than from other investments. Client approval will be sought for client investment in such recommendations and, if granted, such approval will be binding. The Advisor always acts in the best interest of the client consistent with its fiduciary duties and clients are not required to invest in such investments if they do not wish to do so.

The Adviser's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting the firm's Chief Compliance Officer at 920-230-2215.

Item 12 — Brokerage Practices

For clients who grant the Adviser complete discretionary authority, the Adviser determines the broker or dealer through which the securities are to be bought or sold and the commission rates at which transactions are affected. In making these decisions, the Adviser considers a variety of factors, including best price and execution and the quality of the brokerage and research services provided by the broker. Research services received from brokers and dealers are supplemental to the Adviser's own research effort and, when utilized, are subject to internal analysis before being incorporated by the Adviser into its investment process. The Adviser pays cash for all research services received from external sources. Accordingly, the Adviser does not pay for research with brokerage (i.e., the Adviser does not make use of so-called "soft dollars").

When a client desires that a particular broker is to be used, the client is required to specifically direct the Adviser in writing, typically in the form of an investment advisory agreement signed by the client, to do so. Where the client directs the Adviser to use a specified broker, the client should understand that (i) the Adviser will not negotiate commissions on the client's behalf and that, as a result, the client may pay materially different commissions than paid by other clients of the Adviser depending on the client's commission arrangement with such broker and upon other factors, such as the number of shares, round and odd lots, and the market for security purchased or sold; (ii) the client's securities trades will not be included in the Adviser's "batched" orders (i.e., orders for the purchase or sale of the same security for more than one account of The Adviser) executed through such broker and, therefore, the client may pay a different brokerage commission than other clients of the Adviser participating in such "batched" orders; (iii) if the Adviser was not directed to use such broker, the client may pay less in commissions; (iv) the Adviser has a potential conflict between client's interest in obtaining best execution and the Adviser's interest in receiving future referrals from such broker/dealer and; (v) for the foregoing reasons, the Adviser may not obtain best execution in certain transactions in the client's account.

From time to time it may be desirable to acquire or dispose of the same securities for more than one client at the same time. In this circumstance, it may not be possible to acquire or dispose a sufficiently larger portion of the security, or the client may have to accept a less favorable price. The Adviser's trade allocation/aggregation procedures have been designed to ensure that all clients are treated fairly and equitably with no particular group or client(s) being favored or disfavored over any other clients, but also to allow for flexible use of appropriate allocation methodologies. In circumstances where combined orders can be affected, orders for the same security executed on the same day for more than one client are treated as a combined order and the price averaged for participating clients and transaction costs are shared equally and on a pro rata basis.

Trades will not be combined where a client has directed transactions to a particular broker- dealer or when the Adviser determines combined orders would not be efficient or practical. Where a client pays a per-trade, rather than a per-share brokerage commission, clients may experience relatively high brokerage costs per equity share when the Adviser executes small share trading lots on the client's behalf. No personal security transactions for the Adviser employees will be included in any client-blocked trades.

With respect to limited-supply investment opportunities, the Adviser allocates investment opportunities among clients on an objective basis. The Adviser generally allocates investment opportunities among client accounts pro rata based on the initial quantity demanded for each account. The factors considered in allocating investment opportunities, including opportunities of limited supply, generally include the following:

- investment objectives,
- investment strategies,
- investment parameters and restrictions,
- tax considerations,
- liquidity considerations,
- hedging considerations,
- legal and/or regulatory considerations,
- asset levels,
- timing and size of investor capital contributions and redemptions,
- cash flow considerations,
- market conditions,
- existing exposures to an investee company or security, and
- other criteria deemed relevant by the Adviser (the nature and extent of the differences will vary from client to client).

Based on such factors and the fact that different portfolio management personnel may manage the Adviser's various client accounts, there are, or are expected to be, differences between and among the clients with respect to portfolio holdings and the timing of transactions. As such, the Adviser may not always allocate investment opportunities on a pro rata basis. There will be circumstances where:

- only some of clients participate in investment transactions (e.g., to avoid odd lot positions or de minimis positions),
- the level of participation between and among clients in investment transactions is not on a pro rata basis, and
- investment transactions among clients vary in other respects.

Such non-pro rata investment transactions among clients will be made in the discretion of the Adviser when deemed:

- appropriate given the differences between the clients involved,
- appropriate because the target holdings of the particular investment that the Adviser

- has established with respect to the clients involved differ from client to client, and/or
- otherwise to be in the best interests of the clients involved.

It is the Adviser's general policy that no client will receive inappropriate preferential treatment or otherwise be treated unfairly, and the Adviser will seek to uphold this policy when making decisions regarding investment allocations.

It is the Adviser's policy for clients to be made whole following a trade error provided it is consistent with the custodian's trade error policy, when trade error accounts are used to rectify trade errors. In such instances, the custodian's policy dictates the use of any gains that accrue due to trade errors (e.g., donated to charity, used to offset losses, etc.). An error detected before the settlement date of the trade (the "Settlement Date") generally will be run through a proprietary error or other account or otherwise corrected in another manner; generally, this means that the security position will be sold or covered in the market. An error detected and corrected before the Settlement Date that was run through the proprietary error account will be handled as follows: (i) any gain accrues to the benefit of the Adviser; and (ii) any loss will be to the detriment of the Adviser, including any commission expenses. An error detected and corrected after the Settlement Date will be handled as follows: (i) any gain after correction accrues to the benefit of the client account; and (ii) any loss after correction will be reimbursed to the client's account by the Adviser, including any commission expenses.

Item 13 — Review of Accounts

Periodic Reviews

Each account will be reviewed at least monthly by a portfolio manager. The Adviser has two portfolio managers who conduct portfolio reviews. They continuously evaluate the impact of the changing economic and market conditions on the securities in and investment objectives of each portfolio. Major factors considered in all reviews include the market activity of individual securities and industries, the asset allocation mix within the portfolio and the investment strategy in terms of the income, risk and growth objectives of the client.

Reports

Clients receive periodic letters and commentaries discussing the Adviser's outlook for the markets and clients' portfolios. Clients may also receive other periodic newsletters, telephone calls and personal consultations. Portfolio summaries, portfolio appraisals, purchase and sale reports, reports detailing realized gains and losses, and income and expenses will be provided upon request. Customized reports are also available upon request.

Item 14 — Client Referrals and Other Compensation

The Adviser does not intend to enter into referral fee arrangements.

Item 15 — Custody

Account Statements

All clients' accounts are held in custody by unaffiliated broker/dealers or banks, but the Adviser can access many client funds through its ability to debit advisory fees. For this reason, the Adviser is considered to have "custody" of client assets. Clients receive statements from their respective custodians on at least a quarterly basis. To the extent the Adviser sends you account statements, you are encouraged to compare the information included within the account statements to the information reflected in the statements you receive directly from your custodian. The Adviser's statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

The Adviser may also be deemed to have custody over the funds and securities invested in pooled investment vehicles it that the Adviser manages.

Item 16 — Investment Discretion

Generally, the Adviser exercises investment discretion over client accounts. As such, the Adviser will normally have the authority to supervise and direct the investments of and for the client's account without prior consultation with the client. When selecting securities and determining amounts, the Adviser observes the investment policies, limitations and restrictions of the clients for which it advises.

Certain clients impose investment restrictions and limit the Adviser's authority to trade or select brokers. These restrictions and limitations must be set forth in the client's respective agreement with the Adviser.

Item 17 — Voting Client Services

The Adviser has adopted policies and procedures to ensure that it votes client proxies in the best interest of those clients who have delegated their proxy voting responsibility to the Adviser. The Adviser bases final voting decisions on a pre-established set of policy guidelines. Decisions are based on independent, objective analysis of economic interests of shareholders. When a material conflict of interest may affect the Adviser's ability to vote proxies in clients' best interest, the Adviser will disclose such conflict of interest to affected clients and obtain written consent before voting. The Adviser will not be responsible for or take any action or render any advice with respect to, voting of securities in accounts managed by a third party adviser.

Generally, the Adviser votes proxies for all accounts at the same broker/custodian on an

aggregated basis. However, if a client notifies the Adviser in advance, the Adviser will vote that account on a non-aggregated basis. In order to obtain a report showing how proxies were voted or to obtain a copy of the Adviser's Proxy Voting Policies and Procedures, please contact:

Attention: Chief Compliance Officer
Windward Wealth Strategies, Inc.
2370 State Road 44, Suite A
Oshkosh, WI 54904
920-230-2215

Class Action Lawsuits

The Adviser generally does not elect to participate in legal actions such as class action lawsuits on behalf of its clients. Rather, such decisions remain with the client or an entity designated by the client. At the client's request, the Adviser may assist the client in reaching this decision by forwarding claims to the client or by providing supporting documentation and information. However, the final determination as to whether to participate, and the completion and tracking of any such related documentation, rests with the client. The Adviser does not make claims on behalf of its clients.

Item 18 — Financial Information

The Adviser has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Windward Wealth Strategies, Inc.

Part 2B of Form ADV

Brochure Supplement

Gregory B. Pierce

2370 State Road 44
Oshkosh, WI 54904
(920) 230-2215

windwardwealthstrategies.com

This Brochure Supplement provides information about Gregory B. Pierce that supplements the Windward Wealth Strategies, Inc. Brochure. You should have received a copy of that Brochure. Please contact Cassandra A. Knight, Chief Compliance Officer, if you did not receive the Brochure or if you have any questions about the contents of this Brochure Supplement.

Gregory B. Pierce's Biographical Information

Birthdate: 03/15/1967

Educational Background and Business Experience

Education:

University of Wisconsin – Eau Claire, Eau Claire, WI
Hamline University School of Law, St. Paul, MN

B.A. – History & Political Science
J.D.

Business Background (last five years):

<u>Name & Address of Firm</u>	<u>Kind of Business</u>	<u>Position</u>	<u>Dates</u>
Windward Wealth Strategies, Inc. Oshkosh, WI	Investment Adviser	President, Chief Investment Officer	April 2015 to Present
Reinhart Partners, Inc. Mequon, WI	Investment Adviser	Portfolio Manager	2007 to March 2015

Disciplinary Information

Gregory B. Pierce has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Gregory B. Pierce or Windward Wealth Strategies, Inc.

Other Business Activities

Gregory B. Pierce is the President of Fox Valley Pro Basketball, Inc.

Additional Compensation

Gregory B. Pierce does not receive economic benefits from any person or entity other than Windward Wealth Strategies, Inc. in connection with the provision of investment advice to Windward Wealth Strategies, Inc.'s clients.

Supervision

As President and Chief Investment Officer of Windward Wealth Strategies, Inc., Gregory B. Pierce also maintains responsibility for the firm's operations. His activities are overseen by Cassandra A. Knight, Chief Compliance Officer. Both can be reached directly by calling the telephone number on the cover of this Brochure Supplement.

Windward Wealth Strategies, Inc.

Part 2B of Form ADV

Brochure Supplement

Kim Molitor

2370 State Road 44
Oshkosh, WI 54904
(920) 230-2215

windwardwealthstrategies.com

This Brochure Supplement provides information about Kim Molitor that supplements the Windward Wealth Strategies, Inc. Brochure. You should have received a copy of that Brochure. Please contact Cassandra A. Knight, Chief Compliance Officer, if you did not receive the Brochure or if you have any questions about the contents of this Brochure Supplement.

Kim Molitor's Biographical Information

Birthdate: 08/06/1968

Educational Background and Business Experience

Education:

University of Wisconsin – Oshkosh, Oshkosh, WI B.S. – Journalism

Business Background (last five years):

<u>Name & Address of Firm</u>	<u>Kind of Business</u>	<u>Position</u>	<u>Dates</u>
Windward Wealth Strategies, Inc. Oshkosh, WI	Investment Adviser	Relationship Manager, Secretary	April 2015 to Present
Reinhart Partners, Inc. Mequon, WI	Investment Adviser	Relationship Manager	2009 to March 2015
Associated Wealth Management Neenah, WI	Trust	Trust Officer	2004-2009

Disciplinary Information

Kim Molitor has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Kim Molitor or Windward Wealth Strategies, Inc.

Other Business Activities

Kim Molitor is the vice president of Fox Valley Pro Basketball, Inc.

Additional Compensation

Kim Molitor does not receive economic benefits from any person or entity other than Windward Wealth Strategies, Inc. in connection with the provision of investment advice to Windward Wealth Strategies, Inc.'s clients.

Supervision

Kim Molitor's activities are overseen by Gregory B. Pierce, President and Chief Investment Officer, who maintains responsibility for the firm's operations. Ms. Molitor's compliance activities are overseen by Cassandra A. Knight, Chief Compliance Officer. Both can be reached directly by calling the telephone number on the cover of this Brochure Supplement.