

Item 1 - Cover Page



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Form ADV Part 2A
Firm Brochure
March 27, 2024

This brochure provides information about the qualifications and business practices of Redeem Wealth Management. Please contact Jeremy Sharp at (480) 680-7975 if you have any questions about the content of this brochure.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information about Redeem Wealth Management is available on the SEC's website at www.adviserinfo.sec.gov. Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD ("CRD") number, which is 313761.

While the firm and its associates may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

Item 2 - Material Changes

The following material changes have been made to this document since our last annual updating amendment of the Form ADV Part 2A for Redeem Wealth Management on January 2023:

Item 4

- FeeX is now Pontera.

- Item 5

- Added fixed fee schedule for portfolio management services.

- Updated minimum fee for engagement to \$2,400.

- Updated portfolio management fee schedule.

Item 12

- Added an additional custodian, Altruist Financial LLC.

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Important Information

Throughout this document Redeem Wealth Management may also be referred to as “the firm,” “firm,” “our,” “we” or “us.” The client or prospective client may be also referred to as “you,” “your,” etc., and refers to a client engagement involving a single *person* as well as two or more *persons*, and may refer to natural persons and legal entities. In addition, the term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., internet address, etc.).

Our firm maintains a business continuity and succession plan that is integrated within the organization to ensure it appropriately responds to events that pose a significant disruption to its operations. A statement concerning the current plan is available under separate cover.

Item 4 - Advisory Business

Description of the Firm

Redeem Wealth Management is an Arizona domiciled limited liability company formed in February of 2021. We may operate under the trade name Redeem Wealth Management. Our firm is not a subsidiary of nor does it control another financial services industry entity. In addition to our 2021 registration as an investment advisor in Arizona, our firm and its associates may register, become licensed or meet certain exemptions to registration and/or licensing in other jurisdictions in which investment advisory business is conducted.

Jeremy E. Sharp is our firm's Managing Partner and Managing Member and maintains the only interest in the firm. Mr. Sharp also serves as Chief Compliance Officer (supervisor). Additional information about Jeremy Sharp, and his background may be found toward the end of this brochure.

Description of Advisory Services Offered

The firm's financial planning services provide clients with advice on key topics such as cash flow and budgeting, funding a college education, retirement planning, and risk management, estate or tax planning, among others. Ongoing and continuous supervision of clients' portfolios are provided through our portfolio management services offering as well as engaging the services of institutional investment managers. We provide periodic educational workshops involving a broad range of financial planning and investing topics. We are also available to assist retirement plan sponsors and plan participants.

An initial interview is conducted by a representative of our firm to discuss your current situation, goals and the scope of services that may be provided to you. During or prior to this meeting you will be provided with our Form ADV Part 2 firm brochure that includes a statement involving our privacy policy, as well as a brochure supplement about the representative who will be assisting you. We will also ensure that any material conflicts of interest have been disclosed to you that could be reasonably expected to impair the rendering of unbiased and objective advice.

If you wish to engage Redeem Wealth Management for its services, you must first execute our client engagement agreement. Thereafter discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, you may be asked to provide copies of the following documents early in the process:

- Wills, codicils and trusts
- Insurance policies
- Mortgage information
- Student loans
- Tax returns
- Divorce decree or separation agreement
- Current financial specifics including W-2s or 1099s
- Information on current retirement plans and benefits provided by your employer ●
- Statements reflecting current investments in retirement and non-retirement accounts ●
- Employment or other business agreements you may have in place
- Completed risk profile questionnaires or other forms provided by our firm

It is important that we are provided with an adequate level of information and supporting documentation throughout the term of the engagement including but not limited to: source of funds, income levels, and an account holder or attorney-in-fact's authority to act on behalf of the account, among other information that may be necessary for our services. The information and/or financial statements provided to us need to be accurate. Our firm may, but is not obligated to, verify the information that you have provided to us which will then be used in the advisory process.

It is essential that you inform our firm of significant issues that may call for an update to their plan. Events such as changes in employment or marital status, an unplanned windfall, etc., can have an impact on your circumstances and plans. Our firm needs to be aware of such events so that adjustments may be made as

necessary.

Financial Planning Services

Financial planning services may be as broad-based or narrowly focused as you desire. The incorporation of most or all of the listed components allows not only a thorough analysis but also a refined focus of your plans so that the firm is able to assist you in reaching your goals and objectives.

Cash Flow Analysis and Debt Management

A review of your income and expenses will be conducted to determine your current surplus or deficit. Based upon the results, we will provide advice on prioritizing how any surplus should be used, or how to reduce expenses if they exceed your income. In addition, advice on the prioritization of which debts to repay may be provided, based upon such factors as the debt's interest rate and any income tax ramifications. Recommendations may also be made regarding the appropriate level of cash reserves for emergencies and other financial goals. These recommendations are based upon a review of cash accounts (such as money market funds) for such reserves and may include strategies to save desired reserve amounts.

Risk Management

A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

Employee Benefits

A review is conducted, and analysis is made as to whether you, as an employee, are taking maximum advantage of your employee benefits. We will also offer advice on your employer-sponsored retirement plan and/or stock options, along with other benefits that may be available to you.

Personal Retirement

Retirement planning services typically include projections of your likelihood of achieving your financial goals, with financial independence usually the primary objective. For situations where projections show less than the desired results, a recommendation may include showing you the impact on those projections by making changes in certain variables (i.e., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

College Funding

Advice involving college funding may include projecting the amount that will be needed to achieve post secondary education funding goals, along with savings strategies and the "pros-and-cons" of various college savings vehicles that are available. We are also available to review your financial picture as it relates to eligibility for financial aid or the best way to contribute to family members, such as grandchildren, if appropriate.

Tax Strategies

Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, recommendations may be offered as to which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

Estate Planning

Our review typically includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. We may assess ways to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your prior approval.

Divorce Planning

Separation or divorce can have a major impact on your goals and plans. We will work with you to help you gain an understanding of your unique situation and provide you with a realistic financial picture so that you are in a better situation to communicate with legal counsel, a mediator or soon to be ex-spouse. We can assist in the completion of cash flow and net worth projections, budgetary analysis, as well as help you to understand the financial consequences and/or benefits involving a settlement.

Investment Consultation

Investment consultation services often involve providing information on the types of investment vehicles available, employee retirement plans and/or stock options, investment analysis and strategies, asset selection and portfolio design, as well as limited assistance if your investment account is maintained at another broker/dealer or custodian. The strategies and types of investments that may be recommended are further discussed in Item 8 of this brochure.

Business Consultation

We are available to assist small businesses in a variety of ways to include business strategy, practice management, general financial advice, debt management, as well as assisting you with matters involving coordination with your financial institution, attorney or accounting firm.

Broad-Based v. Modular Financial Planning

A broad-based plan is an endeavor that requires detail. Certain variables can affect the cost involved in the development of the plan, such as the quality of your own records, complexity and number of current investments, diversity of insurance products and employee benefits you currently hold, size of the potential

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estate, and special needs of the client or their dependents, among others. While certain broad-based plans may require 10 or more hours to complete, complex plans may require more than 20 hours. At your request we may concentrate on reviewing only a specific area (modular planning), such as an employer retirement plan allocation, funding an education or estate planning issues, or evaluating the sufficiency of your current retirement plan. Note that when these services focus only on certain areas of your interest or need, your overall situation or needs may not be fully addressed due to limitations you may have established.

Whether we have created a broad-based or modular plan, we will present you with a summary of our recommendations, guide you in the implementation of some or all of them per your decision, as well as offer you periodic reviews thereafter. In all instances involving our financial planning engagements, our clients retain full discretion over all implementation decisions and are free to accept or reject any recommendation we make.

Educational Workshops

Redeem Wealth Management provides periodic educational seminar sessions for those desiring information on personal finance and investing. Topics may include issues related to general financial planning, educational

funding, estate planning, retirement strategies, implications involving changes in marital status, and various other current economic or investment topics. Our workshops are educational in nature and do not involve the sale of insurance or investment products.

Estate Planning

We offer Estate Planning services for our clients to assist with general information as it applies to reviews of existing plans, gathering information needed to provide outside firms in the creation of documents, and updating existing plans for clients. Depending on the client needs and desires for estate planning document review, preparation, or updates we will engage with third-party scrivener service or estate planning attorneys.

Portfolio Management Services

You may engage our firm to implement investment strategies that we have recommended to you. Depending on your risk profile, goals and needs, among other considerations, your portfolio will involve the employment of one of our investment strategies as well as either a broad range or more narrowly focused choice of investment vehicles which are further discussed in Item 8 of this brochure.

Where appropriate, we will prepare written investment guidelines reflecting your objectives, time horizon, tolerance for risk, as well as any reasonable account constraints you may have for the portfolio. These guidelines will be designed to be specific enough to provide future guidance while allowing flexibility to work with changing market conditions. Since this effort is the product of information and data you have provided, you may be asked to review it and provide your final approval. We will then develop a customized portfolio for you based on your unique situation, investment goals and tolerance for risk. We serve as your portfolio manager on a discretionary or nondiscretionary basis (defined in Item 16), and the engagement typically includes:

- Determination of risk tolerance
- Investment strategy
- Investment guideline development
- Asset allocation

- Asset selection
- Regular monitoring
- Periodic rebalancing

Alternatively, following our review and/or plan development, we may recommend the portfolio management services offered through Betterment's institutional sub-advisory platform. Under this type of engagement, we will gather input from you about your financial situation, investment objectives, and any reasonable restrictions you may want to impose on the management of the account. Based on this information, we will assist you in selecting your investments based on your risk profile after which Betterment will manage your portfolio on a discretionary basis. We are available to answer any ongoing questions regarding the program and the client's portfolio. Clients may be required to maintain a minimum account size to be eligible for this service. We will inform you in advance of any minimum investment criteria.

At least annually thereafter a review will be performed from both a compliance and performance perspective to determine whether the selected investment manager remains an appropriate fit for your portfolio.

In cases where the client chooses to have Redeem Wealth Management advise on assets that are not held at a qualified custodian in which Redeem Wealth Management has an advisory relationship (See Item 12 of this Part 2A), Redeem Wealth Management is able to provide investment management services of those held away

accounts through a third-party portfolio management provider, Pontera. Such accounts will be studied, analyzed, asset-allocated, monitored, managed, tactically adjusted and rebalanced when necessary and periodically reviewed by the Firm in detail on behalf of the Client, taking into account the Client's evolving individual circumstances, goals and objectives.

Access to held-away accounts is achieved by the Client giving permission via a provided link through Pontera for the Firm to make asset allocation changes via the Client's online login credentials. These online credentials are never made available to, held or stored by Redeem Wealth Management. Access is restricted and the Firm will only have permissions to make changes to the allocation of funds or other securities in the account and will not at any time be able to adjust, add to or subtract from investment options, or any other plan policies or fees assessed by the plan or the fund providers, access the financial assets in the account, make deposits, withdrawals or distributions. These assets will be monitored using third party account aggregation software where the account values and holdings are transmitted and viewed from the account aggregation software. These assets are included in calculating the total assets under management when assessing the annual advisory fee.

Pontera

We provide an additional service for accounts not directly held in our custody, but where we do have discretion, and may leverage an Order Management System (Pontera) to implement asset allocation and opportunistic rebalancing strategies on behalf of the client. These are primarily 401(k) accounts, HSA's, and other assets we do not custody. We regularly review the available investment options in these accounts, monitor them, and rebalance and implement our strategies using different tools as necessary. If you elect to participate in this program, you will be notified via email when the Firm places trades through Pontera implementing any and all changes to your account. The fees charged in these situations are the same as described in the table below under "Fees and Compensation." Fees are paid separately on the management of these "held away" assets and clients may be provided an invoice describing the fees. Suitability documentation will be held with the Plan Custodian and cannot be changed by the Firm.

A. Responsibilities of Redeem Wealth Management. It is the responsibility of the Firm to establish and maintain strategic direction of investment management and investment policy statement and to provide oversight for the Sub-Advisors.

B. Responsibilities of Sub-advisors (Pontera). It is the responsibility of the subadvisor to implement the investment models appropriate for the investment policy statement. Sub-advisors are responsible for the day-to-day trading activity in the accounts as well as monitoring the portfolios alignment to the investment policy statement. Sub-advisors may also facilitate billing of investment accounts for investment advisory fees. Sub-advisors will typically have clerical responsibility for account billing and will therefore have the Client accounts charged the corresponding fees. Subadvisors then, retain the sub-advisor fee and distribute the Redeem Wealth Management Advisory fee to the firm.

a. Pontera – A clerical service that facilitates communications of orders from the Firm to held away accounts i.e., employer sponsored retirement plans like 401(k)'s. Pontera enables Redeem Wealth Management to make strategic and tactical changes in investment accounts not held on the TD Ameritrade custodial platform. Pontera does not handle billing of accounts and fees must be paid through separate billing process.

Wrap Fee Programs

Our firm does not sponsor or serve as a portfolio manager in an investment program involving wrapped (bundled) fees.

Client Assets Under Management

As of December 31, 2023, our firm had \$52,000,000 of reportable client assets under our management¹ through discretionary engagements.

General Information

Redeem Wealth Management does not provide legal related services. With your consent, we may work with other professional advisors, such as your estate planning attorney, to assist with the coordination and implementation of accepted strategies. You should be aware that these other professionals will charge you separately for their services and these fees will be in addition to our own advisory fees.

Our firm will use its best judgment and good faith effort in rendering its services. We cannot warrant or guarantee the achievement of a planning goal or any particular level of account performance or that your account will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; any act or failure to act by a service provider maintaining an account. Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document or our client engagement agreement shall constitute a waiver of any rights that a client may have under federal and state securities laws.

¹The term "assets under management" and rounding per the SEC's *General Instructions for Part 2 of Form ADV*.

Personal Tax Return Preparation

We provide tax preparation services for our clients to assist with the filing of federal and state tax returns for individuals and businesses. We will utilize the services of a third-party accounting, bookkeeping, and tax preparation firm to facilitate the preparation and filing of your tax return and we will work with you and the third party in order to gather the necessary information as part of this service. We may ask for an explanation or clarification of some items, but we will not audit or otherwise verify client data. The client is responsible for the completeness and accuracy of information used to prepare the returns.

We may observe the opportunities for tax savings that require planning or changes in the way the client handles some transactions. While an engagement for tax return preparation does not include significant tax planning services, we will share any ideas we have with you and discuss terms for any additional work that may be required to implement those ideas.

Item 5 - Fees and Compensation

Forms of payment are based on the types of services being provided, term of service, etc., and will be stated in your engagement agreement with our firm. Fees are to be paid by check or draft from US-based financial institutions. With your prior authorization payment may also be made through a qualified, unaffiliated PCI compliant third-party processor, or withdrawal from your investment account held at your custodian of record. Payment requests for our advisory fees will be preceded by our invoice, and fees paid to our firm will be noted in your account statement you will receive from your custodian. Our firm does not accept cash, money orders or similar forms of payment for its engagements. Lower fees for comparable services may be available from other sources.

Types of Fees and Payment Schedule

Financial Planning Services

We offer a project-based engagement via a fixed fee that ranges from \$500 to \$10,000. Our fee will take into consideration factors such as the complexity of your financial profile, the depth of services to be provided through the engagement, assets that comprise your overall portfolio, number of accounts comprising the portfolio, time involved in the engagement, among others. We require a deposit of one-half of the quoted fee to initiate the engagement which will be due upon execution of the agreement, and the remaining fee will be due upon delivery of your plan.

If you prefer to retain our services on a monthly basis, we begin by taking the steps necessary to establish your financial foundation. This includes preliminary meetings, review of financial documents (tax returns, bank or brokerage statements, etc.), and then the development of your financial plan. Our retainer service includes delivery of the plan and assistance in its execution to ensure you remain on track. We do not assess an initial project fee; instead we charge a monthly fee that ranges from \$50 to \$500 which is determined by the complexity of the engagement. The fee is due within the first 10 calendar days of each month, and the first month's fee is due upon executing our engagement agreement which we will prorate based on the number of days remaining in the month.

Estate Planning:

The fees for estate planning will be determined based on the complexity of the planning services needed. The fees may be negotiable in certain cases, will be agreed to at the start of the engagement, and are due at the end of the engagement. Clients are not required to utilize any third-party products or services that we may recommend, and they can receive similar services from other professionals at a similar or lower cost.

Educational Workshops Fees

Our workshops are complimentary; no fee is assessed.

Financial planning, Tax Preparation, and Portfolio Management Fees

Fixed Fee Option

We offer a fixed fee option for a combined service offering for financial planning, tax preparation, and portfolio management. Under this arrangement, we will charge a fixed annual rate ranging from \$2,400-\$36,000. This is a complexity-based fee starting at \$2,400 to \$6,000 per year with an additional \$2400 charged on every \$1,000,000 of net worth over \$1,000,000 (rounding down). This fee will be payable in equal monthly installments in advance, but never more than six months in advance. The exact fee will be memorialized in the client's contract. Fees are either withdrawn directly from client accounts with client written authorization or invoiced and payable via cash, check, or wire.

Portfolio Management Services Fees - Internal Portfolio Management

Our portfolio management service clients are assessed via an annualized asset-based fee that is based on either the average daily balance or the last market day for the previous calendar month, depending on the custodian of record selected for the client's account. As of 09/2022, this fee schedule is available to legacy clients who would like to remain on this fee schedule or adapt to the new fixed fee schedule. Legacy clients can stay on the existing fee schedule indefinitely.

Our fee is based on a straight tier with a minimum fee of \$2,400; all accounts are charged the minimum fee or a single percentage rate that declines as asset levels increase. These fees will be billed monthly, in arrears, per the following table.

Assets Under Management	Annualized Asset-Based Fee
\$0 - \$250,000	\$2,400 min fee
\$250,001 - \$1,000,000	\$2,400 min fee or 0.90% (90 basis points)
\$1,000,001 - \$2,500,00	0.85% (85 basis points)
\$2,500,001 - \$5,000,000	0.80% (80 basis points)
\$5,000,001 - Above	0.75% (75 basis points)

Accounts opened at Betterment will be assessed a 0.12% (12 basis points) annualized asset-based fee, which is in addition to our own fee per the fee schedule above. The Betterment fee covers a suite of platform services, including custody, brokerage, and sub-advisory services provided by Betterment. We are not directly involved in the billing process of Betterments accounts, as the Betterment fee is governed by a separate agreement between the client and Betterment.

For the benefit of discounting your asset-based fee, we will attempt to aggregate accounts for the same individual or two or more accounts within the same family, or accounts where a family member has power of attorney over another family member's or incompetent person's account.

Accounts will be assessed in accordance with asset values disclosed on the statement the client will receive from the custodian of record for the purpose of verifying the computation of the advisory fee.

Your first billing cycle will begin once your agreement is executed with our firm and assets have settled into your account held by the custodian of record. Average daily balance accounts will automatically be adjusted for partial periods. Accounts based on month-end values will be prorated based on the remaining days in the reporting period. Fee payments will generally be assessed within the first 10 days of each billing cycle. If required by jurisdiction, we will concurrently send you and the custodian of record a notice ("invoice") each billing period that describes the advisory fees to be deducted from your account at our direction. This notice will be delivered prior to the deduction of fees. Your notice will include the total fee assessed, covered time period, calculation formula utilized, and reference to the assets under management in which the fee had been based. It is important that you verify the accuracy of fee calculations; the custodian may not verify the accuracy of advisory fee assessments for you.

Pontera does not have trading authority on the held away account and will be paid by Redeem Wealth Management directly. Pontera does not bill nor invoice Redeem Wealth Management clients. Redeem Wealth Management bills Redeem Wealth Management clients directly. Pontera only communicates trading actions when directed by the Firm to Pontera. In order to facilitate order communications, Pontera will apply the percentage allocation that was submitted by the advisor to the balances in the account at the time Pontera communicates the order. Pontera may round partial percentages into whole percentages when required by the financial institution.

By signing our firm's engagement agreement, as well as the selected custodian account opening documents, you will be authorizing the withdrawal of advisory fees from your account. The fee withdrawal will be accomplished by the custodian of record at the request of our firm, and the custodian will remit our fee directly to our firm. All

fees deducted will be clearly noted on account statements that you will receive directly from the custodian of record on at least a quarterly basis. Alternatively, you may request to directly pay our advisory firm its portfolio management fee in lieu of having the advisory fee withdrawn from your investment account by the custodian. Our valuation assessment will remain the same as described above, and the client's direct payment must be received by our firm within 10 days of our invoice.

Personal Tax Return Preparation

The fees for Personal Tax Return Preparation will be determined on a case-by-case basis at the start of the engagement. Clients with more complex returns may be charged an additional fee based on our involvement in the process. A total estimate of the fees as well as any additional fees (if any) will be provided to the client and agreed upon prior to preparing their tax returns, and the final fee will be disclosed and invoiced prior to completion and filing of the client's tax returns.

Clients are not required to utilize any third-party products or services that we may recommend and they can receive similar services from other professionals at a similar or lower cost. Redeem Wealth Management does not receive any compensation from the third-party tax preparers in return for client referrals.

Discounting of Advisory Fees

The services to be provided to you and their specific fees will be detailed in your engagement agreement. Our published advisory fees may be discounted, and the final determination will be made by our firm. We strive to offer fees that are fair and reasonable in light of the experience of our firm and the services to be provided to you.

Additional Client Fees

Any transactional or service fees (sometimes termed *brokerage fees*), individual retirement account fees, qualified retirement plan fees, account termination fees, or wire transfer fees will be borne by the account holder per the separate fee schedule of the custodian of record. We will ensure you receive a copy of our recommended custodian's fee schedule at the beginning of the engagement, and you will be notified of any future changes to these fees by the custodian of record and/or third-party administrator for certain tax qualified plans.

Fees paid by our clients to our firm for our advisory services are separate from any of these fees or other similar charges. In addition, advisory fees paid to our firm for its services are separate from any internal fees or charges a client may pay involving mutual funds, exchange-traded funds (ETFs), exchange-traded notes (ETNs), or other similar investments.

Per annum interest at the current statutory rate in which the client resides may be assessed on fee balances due more than 30 days, and we may refer past due accounts to collections or legal counsel for processing. We reserve the right to suspend some or all services once an account is deemed past due.

Additional information about our fees in relationship to our brokerage and operational practices are noted in Items 12 and 14 of this document.

External Compensation for the Sale of Securities to Clients

Our firm does not charge or receive a commission or a mark-up on securities transactions, nor will the firm or an associate be paid a commission on the purchase of a securities holding that is recommended to a client. We do not receive "trailer" or SEC Rule 12b-1 fees from an investment company that may be recommended to a client. Fees charged by such issuers are detailed in prospectuses or product descriptions and interested investors are always encouraged to read these documents before investing. Our firm and its associates receive none of these

described or similar fees or charges. You retain the option to purchase recommended or similar investments through your own selected service provider.

Termination of Services

Either party may terminate the agreement at any time by communicating the intent to terminate in writing. If you verbally notify our firm of the termination and, if in two business days following this notification we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute. Our firm will not be responsible for investment allocation, advice or transactional services (except for limited closing transactions) upon receipt of a termination notice. It will also be necessary that we inform the custodian of record and/or sub-advisor that the relationship between parties has been terminated.

If a client did not receive our Form ADV Part 2 firm brochure at least 48 hours prior to entering into the firm's agreement, then that client will have the right to terminate the engagement without fee or penalty within five business days after entering into the agreement.

If a client terminates their agreement after the five-day period, the client will be assessed fees on a prorated basis for services incurred from either (i) as a new client, the date of the engagement to the date of the firm's receipt of the notice of termination, or (ii) all other engagements, the last billing period to the date of the firm's physical or constructive receipt of termination notice.

The firm will return any prepaid, unearned fees within 30 days of the firm's receipt of termination notice. Earned fees in excess of any prepaid deposit will be billed at the time of termination and will be due upon receipt of our invoice.

Our return of payment to a client for a financial planning service will only be completed via check from our firm's US-based financial institution; no credits or "transaction reversals" will be issued. We will coordinate remuneration of any prepaid asset-based fees to an investment account via the account custodian. Return of prepaid fees will never involve a personal check, cash or money order from our firm or from an associate of our firm.

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

Our firm's advisory fees will not be based on a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as performance-based fees. Our fees will also not be based on side by-side management, which refers to a firm simultaneously managing accounts that do pay performance based fees (such as a hedge fund) and those that do not.

Item 7 - Types of Clients

Our current client-base consists of individuals, high net worth individuals, and small businesses. We are available to provide advisory services to retirement plans. We do not require minimum income, minimum asset levels or other similar preconditions, and we will inform you in advance of any minimum criteria should a sub-advisor be engaged. We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements or preexisting relationships. Redeem Wealth Management reserves the right to decline services to any prospective client for any nondiscriminatory reason.

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

Methods of Analysis and Investment Strategies

We utilize what we believe to be an appropriate blend of fundamental and quantitative analyses. We evaluate various economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. In our selection of mutual funds or other forms of investment managers, we consider managers

that use mathematical and statistical methods in their decision-making process; essentially using a mathematical and statistical approach to assess an investment opportunity. Our firm's research is often drawn from sources such as financial periodicals and reports from economists and other industry professionals.

Generally, our investment advice is based on a globally diversified strategy involving a long-term, disciplined approach that manages risk through appropriate asset allocation. We recognize that each client's needs and goals are different; subsequently, portfolio strategies and underlying investment vehicles may vary. The following are common strategies utilized within our client's portfolios:

Active Management

A portfolio manager engaging in an active asset management strategy believes it is possible to create a profit from identifying or leveraging mispriced securities, or producing similar returns with less risk, or producing returns greater than a stated benchmark, such as a well-known index. For example, a "large cap stock" fund manager might attempt to outperform the Standard & Poor's 500 Index by purchasing underpriced stocks or derivative instruments representing these positions. An active management strategy may attempt to preserve capital during times of high risk through the use of cash and cash equivalents, and the percentage of account holdings invested in the market may vary substantially based on what is believed to be the prevailing risk in the market. If a manager feels risk in the stock market is low, that manager may increase exposure to equities to attempt to take advantage of growth opportunities.

Modern Portfolio Theory

Modern Portfolio Theory states that by employing securities whose price movements have historically low correlations, it is possible to create an efficient portfolio that can offer the highest expected return for a given level of risk, or one with the lowest level of risk for a given expected return. The practice of Modern Portfolio Theory does not employ market timing or stock selection methods of investing but rather a long term, buy-and-hold strategy with periodic rebalancing of the account to maintain desired risk levels.

Investment Vehicles Recommended

We strive to create portfolios that contain investment vehicles that are diversified, tax-efficient, and low cost investments whenever practical. Although it is common to find a broad range of mutual funds or ETFs within a portfolio, certain accounts may necessitate maintaining pre-existing individual equities and fixed income (stocks and bond) positions. In addition, we incorporate publicly traded real estate investment trusts (REITs), master limited partnerships (MLPs), and structured investment products within a portfolio when appropriate.

Risk of Loss

Our firm believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, there is no guarantee that an investment objective will be achieved. Investing in securities involves risk of loss that clients should be prepared to bear. We have offered examples of such risk in the following paragraphs, and we believe it is important that our clients review and consider each prior to investing.

Active Portfolio Management

A portfolio that employs active management strategies may, at times, outperform or underperform various benchmarks or other strategies. In an effort to meet or surpass these benchmarks, active portfolio management may require more frequent trading or "turnover." This may result in shorter holding periods, higher transactional costs and/or taxable events generally borne by the client, thereby potentially reducing or negating certain benefits of active asset management.

Charting and Technical Analyses

The risk of investing based on technical analyses and their supporting charts is that they may not consistently predict a future price movement; the current price of a security may reflect all known information. Further, a particular change in the market price of a security may follow a random pattern and may not be as predictable as desired.

Company Risk

When investing in securities, such as stocks, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as *unsystematic risk* and can be reduced or mitigated through diversification.

Cyclical Analysis

An economic cycle may not be as predictable as preferred; many fluctuations may occur between long term expansions and contractions. The length of an economic cycle may be difficult to predict with accuracy and therefore the risk of cyclical analyses is the difficulty in predicting economic trends. Consequently, the changing value of securities is affected.

Failure to Implement

As a financial planning client, you are free to accept or reject any or all of the recommendations made to you. While no advisory firm can guarantee future performance, no plan can succeed if it is not implemented. Clients who choose not to take the steps recommended in their financial plan may face an increased risk that their stated goals and objectives will not be achieved.

Financial Risk

Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Fundamental Analysis

The challenge involving fundamental analysis is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security's value. If a security's price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

Inflation

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

Market Risk

When the stock market as a whole or an industry as a whole fall, it can cause the prices of individual stocks to fall indiscriminately. This is also called *systemic* or *systematic* risk.

Passive Investing

A portfolio that employs a passive, efficient markets approach has the potential risk at times to generate lower-than-expected returns for the broader allocation than might be the case for a more narrowly focused asset class, and the return on each type of asset may be a deviation from the average return for the asset class.

Political Risk

The risk of financial and market loss because of political decisions or disruptions in a particular country or

region and may also be known as "geopolitical risk."

Research Data

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. While our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

Security-Specific Material Risks

ETFs and Mutual Funds

The risk of owning ETFs and mutual funds reflect their underlying securities (e.g., stocks, bonds, securities futures, etc.). These forms of securities typically carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. We do not recommend leveraged or inverse ETFs due to their inherent heightened risk.

Fixed Income

Various forms of fixed income instruments, such as bonds, money market or bond funds may be affected by various forms of risk, including:

- **Credit Risk** - The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.
- **Duration Risk** - Duration is a measure of a bond's volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.
- **Interest Rate Risk** - The risk that the value of the fixed income holding will decrease because of an increase in interest rates.
- **Liquidity Risk** - The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.
- **Reinvestment Risk** - With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

Index Investing

Certain ETFs and indexed funds have the potential to be affected by "active risk" (or "tracking error risk"), which might be defined as a deviation from a stated benchmark.

Third-Party Investment Managers

We will review with you the Form ADV Part 2A of any recommended sub-advisor to ensure you are familiar with the investment strategy and types of investment vehicles they employ so that they align with your investment policy, as well as discuss the risks these may impose on the account for your consideration.

Structured Investment Products

The risks involving structured investment products generally include those that fall into equity, fixed income, liquidity, market risk, etc., described in adjacent paragraphs. They may also include “real asset” risks, such as those involving real estate, currency, and commodities, as well as tax treatment, etc., among others. It is important that investors interested in a structured investment product review in detail the offering document(s) to identify the specific risks involved in that particular structured investment, and to ask questions if something involving risk is not clear.

Item 9 - Disciplinary Information

Neither the firm nor its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our offering advisory business or its integrity.

Item 10 - Other Financial Industry Activities and Affiliations

Firm policies require associated persons to conduct business activities in a manner that avoids conflicts of interest between the firm and its clients, or that may be contrary to law. We will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest involving its business relationships that might reasonably compromise its impartiality or independence.

Mr. Sharp is a licensed insurance agent and is able to sell annuities, life, health, and long-term care coverage to interested parties through various unaffiliated insurance companies via the insurance agency Redeem Wealth Insurance, LLC; an entity in which he has controlling interest. Please see Part 2B below for additional details.

Our advisory firm and its management are not registered nor have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm or associated person of such a firm, nor are we required to be registered with such entities. Neither our firm nor its management is or has a material relationship with any of the following types of entities:

- bank, credit union or thrift institution, or their separately identifiable departments or divisions ●
- lawyer or law firm
- pension consultant (other than our own services)
- real estate broker or dealer
- sponsor or syndicator of limited partnerships
- trust company
- issuer of a security, to include investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)

As referenced in Item 4 of this brochure, our firm recommends the portfolio management services offered through Betterment’s institutional sub-advisory platform. In the event that we recommend Betterment to clients, we do not share in Betterment’s respective advisory fee. Our fee is separate and in addition to Betterment’s

compensation (as noted in Item 5 of this Brochure) and will be described to the client prior to engagement. There is also the potential for clients' fees assessed via these engagements to be higher than if a client obtained them directly from the sub-advisor or the client were able to purchase similar underlying investments on their own. Clients are not obligated, contractually or otherwise, to use the services of Betterment or any sub-advisor we recommend. Clients are encouraged to review all of our offerings and their stated fees prior to the engagement, and each client has the option to purchase recommended or similar investments through their own selected service provider. As a fiduciary, the firm is committed to acting in its clients' best interests, despite any such conflicts of interest.

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

Redeem Wealth Management holds itself to a *fiduciary standard*, which means the firm and its associates will act in the utmost good faith, performing in a manner believed to be in the best interest of its clients. Our firm believes that business methodologies, ethics rules, and adopted policies are designed to eliminate or at least minimize material conflicts of interest and to appropriately manage any material conflicts of interest that may remain. You should be aware that no set of rules can possibly anticipate or relieve all material conflicts of interest. Our firm will disclose to its advisory clients any material conflict of interest relating to the firm, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Code of Ethics

We have adopted a Code of Ethics that establishes policies for ethical conduct for our personnel. Our firm accepts the obligation not only to comply with applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities.

Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. Our firm periodically reviews and amends its Code of Ethics to ensure that it remains current and requires firm personnel to annually attest to their understanding of and adherence to the firm's Code of Ethics. A copy of the firm's Code of Ethics is made available to any client or prospective client upon request.

Statement involving our Privacy Policy

We respect the privacy of all clients and prospective clients (collectively termed "customers"), both past and present. It is recognized that you have entrusted our firm with non-public personal information, and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information.

The firm collects personal information about customers from the following sources: • Information customers provide to complete their financial plan or investment recommendation; • Information customers provide in engagement agreements and other documents completed in connection with the opening and maintenance of an account;

- Information customers provide verbally; and
- Information received from service providers, such as custodians, about customer transactions.

The firm does not disclose non-public personal information about our customers to anyone, except in the following circumstances:

- When required to provide services our customers have requested;
- When our customers have specifically authorized us to do so;
- When required during the course of a firm assessment (i.e., independent audit); or • When permitted or required by law (i.e., periodic regulatory examination).

Within the firm, access to customer information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled in firm offices are confidential and they are instructed not to discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This includes, for example, providing information about a spouse's IRA or to children about a parent's account.

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information.

The firm will provide you with its privacy policy on an annual basis and at any time, in advance, if firm privacy policies are expected to change.

Firm Recommendations and Conflicts of Interest

Neither the firm nor an associate is authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a "related person" (e.g., associate, an immediate family member, etc.) has a material financial interest, such as in the capacity as a board member, underwriter or advisor to an issuer of securities, etc.

An associate is prohibited from borrowing from or lending to a client unless the client is an approved lending institution.

Our firm and its associates are able to provide a broad range of advisory and ancillary services to its clients, including financial planning and portfolio management. An advisory fee or insurance commission may be earned by the firm and/or an associate for some or all of these services. A conflict of interest exists within these various client relationships and we hereby note that you are under no obligation to act on a recommendation from an associate. If you elect to do so, you are under no obligation to complete all of them through our firm or a service provider whom we may recommend to you. Whether an associate is serving a client in one or more capacities, they will disclose in advance how they are being compensated and if there is a conflict of interest involving any service being provided.

Our firm may trade in its own employee retirement plan account on a discretionary basis; we do not, however, trade in clients' retirement plan accounts on a discretionary basis. The firm may buy or sell securities for its proprietary account that are the same as, similar to, or different from those recommended to our retirement plan clients. Likewise, the firm's related persons may buy or sell securities for their own personal accounts that are the same as, similar to, or different from, those recommended to clients. This poses a conflict of interest. We mitigate this conflict by ensuring that we have policies and procedures in place to ensure that the firm or a related person will not at any time receive preferential treatment over a client.

In an effort to reduce or eliminate certain conflicts of interest involving proprietary or personal trading (i.e., trading ahead of a client's order, etc.), firm policy requires the restriction or prohibition of related parties' transactions in specific securities. For example, we do not allow the firm or a related person to execute a contra-trade in a security or its derivative if a recommendation was made to or a trade executed for a client involving the purchase or sale of the same security if the firm or related person would benefit from such a recommendation and/or trade. In addition, any exceptions or trading pre-clearance must be approved by our Chief Compliance Officer in advance of the transaction in the firm's or a related person's account. Please refer to Item 6 of the accompanying Form ADV Part 2B for further details.

Item 12 - Brokerage Practices

Factors Used to Select Broker/Dealers for Client Transactions

Redeem Wealth Management does not maintain physical custody of your assets (see Item 15). Your account must be maintained by a qualified custodian (generally a broker/dealer, bank or trust company) that is frequently reviewed for its capabilities to serve in that capacity by their respective industry regulatory authority. Our firm is not a custodian nor is there an affiliate that is a custodian. Neither our firm nor any associate is registered with or supervised by any custodian.

If you engage us to provide periodic investment consultation through a financial planning engagement, you may choose to keep your assets with your present custodian/service provider. Should you prefer a new service provider, a recommendation may be made to you by our firm that is based on your needs, overall cost, and ease of use, and following our review of the recommended provider.

We encourage our portfolio management clients to use Altruist Financial LLC, and MTG, LLC doing business as Betterment Securities, Inc. Members FINRA/SIPC.³ While we recommend that you use a particular custodian for your account, you will decide whether to do so and you will open your account with them by entering into an account agreement directly with them. We do not open the account for you, but we will assist you in that process. We may also serve as portfolio manager for accounts maintained at a client's current custodian if their custodian's policies allow us to do so and following the client's written authorization via limited power of attorney.

The custodian we recommend for our portfolio management clients offers our firm various services which include custody of client assets, trade execution, clearance and settlement, etc. Our firm may receive other benefits from our preferred custodian through participation in their independent advisor support program, some of which may not be made available to a "retail investor." These benefits may include the following products and services (provided either without cost or at a discount):

- receipt of duplicate client statements and confirmations
- research related products and tools
- access to trading desks serving our clients
- access to block trading services
- the ability to have advisory fees deducted directly from a client's accounts (per written agreement)
- resource information related to capital markets and various investments
- access to electronic communications networks for client order entry and account information
- access to mutual funds with no transaction fees and/or select investment managers
- discounts on marketing, research, technology, and practice management products or services provided to our firm by third-party providers

Some of the noted products and services made available to our firm by our preferred custodian may benefit our advisory firm but may not directly benefit a client account, and certain research and other previously referenced services may qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934. The availability of these services benefits our firm because we do not have to produce or purchase them as long as clients maintain assets in accounts at our recommended custodian. There is a conflict of interest since our firm has an incentive to select or recommend a custodian based on our firm's interest in receiving these benefits rather than the client's interests in receiving favorable trade execution.

³Redeem Wealth Management is not a SIPC member, nor are we required to be. You may learn more about the Securities Investor Protection Corporation (SIPC) and how it serves member firms and the investing public by going to their website at <http://www.sipc.org>.

It is important to mention that the benefit received by our firm through participation in any custodian's program does not depend on the amount of brokerage transactions directed to that custodian, and our selection of a

custodian is primarily supported by the scope, quality, and cost of services provided as a whole -- not just those services that benefit only our advisory firm. Further, we will act in the best interest of our clients regardless of the custodian we may select. Our firm conducts periodic assessments of any recommended service provider which generally involves a review of the range and quality of services, reasonableness of fees, among other items, and in comparison, to industry peers.

Best Execution

"Best execution" means the most favorable terms for a transaction based on all relevant factors, including those listed in the paragraph titled *Factors Used to Select Broker/Dealers for Client Transactions*. We recognize our obligation in seeking best execution for our portfolio management services clients; however, it is our belief that the determinative factor is not always the lowest possible cost but whether the selected custodian's transactions represent the best "qualitative execution" while taking into consideration the full range of services provided. Our firm will seek services involving competitive rates, but it may not necessarily correlate into the lowest possible rate for each transaction.

We have determined having our clients' accounts trades completed through our recommended custodian is consistent with our obligation to seek best execution of client trades. A review is regularly conducted with regard to recommending a custodian to our clients in light of our duty to seek best execution.

Directed Brokerage

Our internal policy and operational relationship with our custodians require client accounts custodied with them to have trades executed per their order routing requirements. We do not direct which executing broker should be selected for client account trades; whether that is an affiliate of the custodian or another executing broker of the custodian's choice. As a result, a client may pay higher commissions or other transaction costs, experience greater spreads, or receive less favorable net prices on transactions than might otherwise be the case. In addition, since we routinely recommend a custodian for our advisory clients, and that custodian may choose to use the execution services of its broker affiliate for some or all of our client account transactions, there is an inherent conflict of interest involving our recommendation since our advisory firm receives various products or services described in this section from the custodian. Note that we are not compensated for trade routing/order flow, nor are we paid commissions on such trades. We do not receive interest on our client accounts' cash balances.

For those clients whom we serve as their portfolio manager, we are unable to engage in directed brokerage via our custodian. As a result, they may pay higher commissions or other transaction costs, potentially experience greater spreads, or receive less favorable net prices on transactions for their account than would otherwise be the case if they had the opportunity to direct brokerage.

Clients who maintain their account at a custodian of their choice (e.g., held-away accounts), the client may choose to request that a particular broker is used to execute some or all account transactions. Under these circumstances, the client will be responsible for negotiating, in advance of each trade, the terms and/or arrangements involving their account with that broker, and whether the selected broker is affiliated with their custodian of record or not. We will not be obligated to seek better execution services or prices from these other brokers, and we will be unable to aggregate transactions for execution via our custodian with other orders for accounts managed by our firm. As a result, the client may pay higher commissions or other transaction costs, potentially experience greater spreads, or receive less favorable net prices on transactions for their account than would otherwise be the case.

Aggregating Securities Transactions

Trade aggregation involves the purchase or sale of the same security for several clients/accounts at approximately the same time. This may also be termed "blocked," "bunched" or "batched" orders. Aggregated orders are affected in an attempt to obtain better execution, negotiate favorable transaction rates, or to allocate equitably

among multiple client accounts should there be differences in prices, brokerage commissions or other transactional costs that might otherwise be unobtainable through separately placed orders. Our firm may, but is not obligated to aggregate orders, and the firm does not receive additional compensation or remuneration as a result of aggregated transactions. Our firm nor any of our investment advisor representatives will ever block trade *with* its clients.

Transaction charges and/or prices may vary due to account size and/or method of receipt. To the extent that the firm determines to aggregate client orders for the purchase or sale of securities, including securities in which a related person may invest, the firm will generally do so in accordance with the parameters set forth in SEC No-Action Letter, *RWM, Inc.*, or similar guidance if the jurisdiction in which the client resides provides such direction.

Please note that when trade aggregation is not allowed or infeasible and necessitates individual transactions (e.g., withdrawal or liquidation requests, odd-lot trades, non-discretionary accounts, etc.), an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred. We review firm trading processes on a periodic basis to ensure they remain within stated policies and regulation. You will be informed, in advance, should trading practices change at any point in the future.

Trade Errors

The firm corrects its trade errors through an account maintained by our custodian, and the firm may be responsible for certain trading error losses that occur within a client account. Should there be a gain following the correction of a trading error, the firm may credit the client's account.

Client Referrals from Custodians

We do not receive referrals from our custodian, nor are client referrals a factor in our selection of our custodian.

Item 13 - Review of Accounts

Scheduled Reviews

Financial Planning Services

Periodic financial check-ups or reviews are recommended if you are receiving our financial planning services. We believe they should occur on an annual basis whenever practical. Reviews will be conducted by your assigned investment advisor representative and typically involves analysis and possible revision of your previous financial plan or investment allocation. A copy of revised plans or asset allocation reports will be provided to the client upon request.

Portfolio Management Services

Portfolios are reviewed on a quarterly or more frequent basis by your investment advisor representative. Client-level reviews are also completed by your investment advisor representative, and we recommend that they occur on at least an annual basis. A copy of a revised investment guideline or asset allocation reports will be provided to the client upon request.

For accounts serviced by Betterment, your investment advisor representative will periodically review reports provided to you by Betterment and we will contact you at least annually to review your financial situation and objectives. We will communicate information to Betterment as warranted and assist you in understanding and evaluating the services provided by the sub-advisor. In certain instances, you may be able to communicate directly with Betterment, but we ask that you coordinate the session through our firm.

Retirement Plans

Periodic plan sponsor reviews are encouraged, and we believe they should occur at least on an annual basis if practical. Reviews will be conducted by your investment advisor representative, and it typically involves an analysis and possible revision of previous plan recommendations. A copy of revised plans or other requested reports will be provided upon request. We will conduct annual plan participant group review sessions upon request.

Interim Reviews

Financial Planning Services

You should contact our firm for additional reviews when you anticipate or have experienced changes in your financial situation (i.e., changes in employment, an inheritance, the birth of a new child, etc.), or should you prefer to change requirements involving your investment account. Non-periodic reviews are conducted by your investment advisor representative, and a copy of revised plans or asset allocation reports will be provided to the client upon request.

Portfolio Management Services

Additional reviews by your portfolio manager and your investment advisor representative may be triggered by news or research related to a specific holding, a change in our view of the investment merits of a holding, or news related to the macroeconomic climate affecting a sector or holding within that sector. A portfolio may be reviewed for an additional holding or when an increase in a current position is under consideration. Account cash levels above or below what we deem appropriate for the investment environment, given the client's stated tolerance for risk and investment objectives, may also trigger a review.

Retirement Plans

Plan sponsors should contact our firm for additional reviews when there are material changes to the plan requirements or financial situation. The review is conducted by your portfolio manager and your investment advisor representative, and typically involves an analysis and possible revision of previous plan recommendations. A copy of revised reports will be provided upon request. We do not conduct unscheduled participant-level reviews.

Client Reports and Frequency

Whether you have opened and maintained an investment account on your own or with our assistance, you will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where your investments are held. We urge you to carefully review these account statements for accuracy and clarity, and to ask questions when something is not clear.

Our firm may provide portfolio "snapshots" if we are engaged to provide periodic asset allocation or investment advice, but we do not provide ongoing performance reporting through our financial planning service. Portfolio management services accounts may receive written performance reports from our firm that have been generated from our custodian's data systems; however, we do not create our own performance reports. We do not back-test nor certify reports provided by Betterment. Clients are urged to carefully review and compare account statements that they have received from their account custodian with any report they may receive from any source, including our advisory firm, if that report contains any type of performance information.

Item 14 - Client Referrals and Other Compensation

We do not engage in solicitation activities involving unregistered persons. If we receive or offer an introduction to a client, we do not pay or earn referral fee, nor are there established *quid pro quo* arrangements. Each client retains the option to accept or deny such referral or subsequent services.

An associate of the firm may hold individual membership or serve on boards or committees of professional

industry associations. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual participants within a selected state or region. These passive websites may provide means for interested persons to contact a participant via electronic mail, telephone number, or other contact information, in order to interview the participating member. The public may also choose to telephone associate staff to inquire about an individual within their area and would receive the same or similar information.

A portion of these participant's membership fees may be used so that their name will be listed in some or all of these entities' websites (or other listings). Prospective clients locating our advisory firm or an associate via these methods are not actively marketed by the noted associations. Clients who find our firm in this way do not pay more for their services than clients referred in any other fashion. The firm does not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

Item 15 - Custody

Accounts will be maintained by an unaffiliated, qualified custodian, such as a bank, trust company, broker/dealer, mutual fund companies or transfer agent. Assets are not maintained by our firm or any associate of our firm. In keeping with this policy involving our clients' funds or securities, our firm:

- Restricts the firm or an associate from serving as trustee or having general power of attorney over a client account;
- Prohibits any associate from having authority to directly withdraw securities or cash assets from a client account. Although we may be deemed to have custody of your assets since we may request the withdrawal of advisory fees from an account, we will only do so through the engagement of a qualified custodian maintaining your account assets and via your prior written approval.
- Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm; • Will not collect advance fees of \$500 or more for services that are to be performed six months or more into the future; and
 - Will not authorize an associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts) if such access would allow physical control over account assets.

Your custodian of record will provide you with your investment account transaction confirmations and account statements, which will include all debits and credits as well as our firm's advisory fee for that period. Statements are provided on at least a quarterly basis or as transactions occur within their account. Our firm will not create an account statement for a client or serve as the sole recipient of an account statement.

If you receive a report from any source that includes investment performance information, you are urged to carefully review and compare your account statements you have received directly from the custodian of record to determine the report's accuracy.

Item 16 - Investment Discretion

Portfolio Management

We generally provide our portfolio management services on a discretionary basis. Similar to a limited power of attorney, discretionary authority allows our firm to implement investment decisions, such as the purchase or sale of a security on behalf of your account, without requiring your prior authorization for each transaction in order to meet your stated investment objectives. This authority will be granted through your execution of both our engagement agreement and the selected custodian's account opening documents. Note that your custodian will specifically limit our firm's authority within your account to the placement of trade orders and the request for the deduction of our advisory fees.

Our firm prefers to not manage client portfolios on a non-discretionary basis, but we may accommodate such requests on a case-by-case basis. Such account authority requires your ongoing prior approval involving the investment and reinvestment of account assets, rebalancing, or for our firm to give instructions to the custodian maintaining your account (i.e., wire instructions, etc.). You will be required to execute our firm's client services agreement that describes our limited account authority, as well as the custodian of record's account opening document that includes their limited power of attorney form or clause. Please note that in light of the requirement for your pre-approval you must make yourself available and keep our firm updated on your contact information so that instructions can be efficiently effected on your behalf.

Financial Planning Services

If you ask us to assist you in any trade execution (including account rebalancing) under an investment consultation component of our financial planning engagement, such as assisting you with your held-away assets, it will typically be accomplished on a non discretionary basis.

Retirement Plans

Our firm does not serve as a plan's investment manager nor do we have trading authority within a plan participant (self-directed) account for firm clients.

Item 17 - Voting Client Securities

You may periodically receive proxies or other similar solicitations sent directly from your selected custodian or transfer agent. Should we receive a duplicate copy, note that we do not forward these or any correspondence relating to the voting of your securities, class action litigation, or other corporate actions.

Our firm does not vote proxies on your behalf, including accounts that we serve on a discretionary basis. We do not offer guidance on how to vote proxies, nor will we offer guidance involving any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets. We will answer limited questions with respect to what a proxy voting request or other corporate matter may be and how to reach the issuer or their legal representative.

Item 18 - Financial Information

Our advisory firm will not take physical custody of your assets, nor do we have the type of account authority to have such control. Fee withdrawals must be done through a qualified intermediary (e.g., your custodian of record), per your prior written agreement, and following your receipt of our firm's notice (sometimes termed "constructive custody").

Engagements with our firm do not require that we collect fees from you of \$500 or more for our advisory services that we have agreed to perform six months or more into the future.

Neither our firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

The firm and its management do not have a financial condition likely to impair its ability to meet commitments to clients, nor has the firm and its management been the subject of a bankruptcy petition.

Due to the nature of our firm's advisory services and operational practices, an audited balance sheet is not required nor included in this brochure.

Item 19 - Requirements for State-Registered Advisers

Principal Executive Officers and Management Persons

Owner/Investment Advisor Representative/Managing Member

Jeremy Edward Sharp

Year of Birth: 1985 / CRD Number: 5814705

Educational Background

Bachelor of Science (Finance), Liberty University; Lynchburg, VA
Chartered Financial Consultant® (ChFC®), The American College
Licensed Insurance Agent/Arizona Department of Insurance ¹

Business Experience

Redeem Wealth Management (03/2021 - Present)

Mesa, AZ

Owner

Investment Advisor Representative

Stewardship Financial (07/2015-06/2021)

Gilbert, AZ

Managing Partner/Managing Member (07/2015-Present)

Investment Advisor Representative (09/2015-Present)

Stewardship Planning, LLC (11/2015-06/2021)

Gilbert, AZ

Member/Agent

LPL Financial, LLC (07/2010-08/2015)

Scottsdale, AZ

Financial Advisor/Investment Advisor Representative

Other Business Activities

Please see Item 10 of this Brochure.

Performance-Based Fees

Our firm is not compensated by performance-based fees.

Material Disciplinary Disclosure

No management person at our firm has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships with Issuers of Securities

Our firm does not have any relationship or arrangement with issuers of securities.

Additional Compensation

Our firm does not receive any economic benefit from any person, company, or organization, in exchange for providing advisory services to our clients.

Supervision

Mr. Jeremy Sharp, Chief Compliance Officer, is responsible for supervision of our firm.

Requirements for State Registered Advisers

Our firm has not been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

For further information involving firm principal executive and management personnel, their business activities as well as material conflicts of interest, please refer to areas previously disclosed in this Brochure, as well as the accompanying Form ADV Part 2B brochure supplement that immediately follows this page.