



Form ADV Part 2A – Disclosure Brochure

Wisdom Index Advisors

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This Brochure provides information about the qualifications and business practices of Wisdom Index Advisors, LLC. If you have any questions about the contents of this Brochure, please contact us at (972) 923-0063 or compliance@wisdomindex.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Wisdom Index Advisors, LLC is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training. Additional information about Wisdom Index Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov by conducting a firm search using our CRD number 132567.

Item 2 – Material Changes

We will initially provide you with a copy of our Brochure when we enter into an advisory agreement with you. On an annual basis, we will provide you with a Summary of Material Changes within 120 days of our fiscal year end. In the alternative, we could choose to provide you with a complete copy of our Brochure. We will also promptly update and deliver this Brochure when material changes occur. Material changes are summarized in this section.

Since the last annual update to our Brochure dated March 30, 2026, we have made the following material changes:

-  We have updated Item 4 – Advisory Business to provide clarification and additional detail in the services we provide. Our core offering is comprehensive Wealth Management, which integrates investment management and advanced financial planning using the Wisdom Index®, an executive summary of key financial planning considerations. We also offer project-based Investment Consulting and Retirement Plan Services to plan sponsors of employer-sponsored retirement plans.
-  We have updated Items 5, 11, 12, 14, and 15 to clarify our advisory fees, personal trading practices, brokerage practices, custodial relationships, and custody disclosures.

Note that we could have made other changes that are editorial in nature, to correct grammatical or typographical errors, to provide additional information or clarifications, or to correct formatting issues. We do not consider these changes to be material.

You can request a current copy of our Disclosure Brochure at any time without charge by contacting us at (972) 931-0063 or by email at compliance@wisdomindex.com. You can also obtain a copy of our current Brochure from the SEC's website as described in Item 1 above.

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Item 4 – Advisory Business

Firm Overview

Wisdom Index Advisors, LLC is a limited liability company formed in the State of Texas in July 2004. We are a registered investment adviser registered with the United States Securities and Exchange Commission. The firm is solely owned by Michael J. Davidson.

Advisory Services


We offer personalized Wealth Management and Investment Consulting services for individuals, corporations and small businesses. We also provide Retirement Plan Services to plan sponsors of employer-sponsored retirement plans.


Wealth Management

Our core offering is comprehensive Wealth Management, which combines ongoing discretionary investment management with ongoing financial planning to help clients make informed financial decisions and coordinate all aspects of their financial lives. Rather than treating investment management and financial planning as separate engagements, we integrate both services into a single ongoing advisory relationship. The scope and frequency of planning discussions vary based on each client's needs and circumstances.


Our Wealth Management process begins with developing an understanding of each client's financial situation, objectives, values, risk tolerance, time horizon, and other relevant factors. Using this information, we develop an investment strategy and provide ongoing monitoring and advice. As part of this process, we utilize our proprietary **Wisdom Index**[®], which serves as an executive-level financial planning summary. The Wisdom Index helps evaluate a client's progress toward both short-term and long-term financial objectives by calculating present-value funding ratios across multiple planning areas, which may include:


 Emergency reserves


 Debt management

 Long-term care planning

 Charitable giving

 Education funding

 Disability income planning

 Savings goals

 Retirement planning

 Estate planning

The Wisdom Index is intended to facilitate planning discussions, prioritize financial objectives, and monitor progress over time. It is one component of our broader Wealth Management process and should not be viewed as a guarantee of future results or a prediction that financial goals will be achieved.

As part of our ongoing advisory relationship, we may also coordinate with a client's attorney, accountant, insurance professional, or other advisers, with the client's permission, to assist in implementing planning recommendations.

Once your financial circumstances and investment objectives are determined, we develop an investment strategy and document that strategy in an Investment Policy Statement ("IPS"). Your investment portfolio is then invested and monitored on an ongoing basis. We review your portfolio regularly to evaluate investment performance, asset allocation, cash needs, and other relevant factors. Portfolios are generally rebalanced as needed to maintain alignment with your Investment Policy Statement. We manage your portfolio on a discretionary basis, which means that you grant us the authority to buy and sell investments without obtaining your approval before each transaction, provided the transactions are consistent with your IPS and any reasonable restrictions you place.

When appropriate, we discuss with clients the advantages and disadvantages of transferring retirement assets, including leaving assets in an employer-sponsored retirement plan, rolling assets to another retirement plan, rolling assets to an IRA, or taking a distribution, as applicable. We assist clients in evaluating these alternatives based on their individual circumstances, including investment options, services, expenses, distribution alternatives, creditor protections, and other relevant factors. The decision to proceed with a rollover remains with the client, and the client's decision should be documented. If a client elects to move retirement assets into an account managed by us, we receive additional advisory fees. This creates a conflict of interest. We address this conflict by providing objective information regarding available alternatives and assisting clients in evaluating their options while the client retains responsibility for the ultimate decision.






Similarly, if clients have an existing annuity contract, we discuss the advantages and disadvantages of implementing a tax-free exchange under Section 1035 of the Internal Revenue Code. In some cases, it may be possible for clients to process a Section 1035 exchange into a lower-cost advisory annuity that allows us to manage the underlying investments. The decision to proceed with the exchange remains with the client, and the client's decision should be documented. If a client elects to proceed with the exchange, we do not receive commissions but we do receive our normal advisory fee on assets managed within the advisory account. Accordingly, we have a financial incentive to recommend these exchanges. This creates a conflict of interest. We address this conflict by providing objective information regarding available alternatives and assisting clients in evaluating their options while the client retains responsibility for the ultimate decision.

Investment Consulting

Although not a primary service offering, we can also provide Investment Consulting on an hourly basis when requested by a client or prospective client. These engagements are generally limited in scope and may include consultation regarding investment portfolios, asset allocation, retirement planning, financial planning, or other financial matters. Clients receiving project-based Investment Consulting services are responsible for implementing any recommendations unless they subsequently engage the firm for ongoing Wealth Management services.

Retirement Plan Services

We provide discretionary investment management services to plan sponsors of employer-sponsored retirement plans. Depending on the engagement, the firm may serve as an ERISA Section 3(38) Investment Manager with discretionary authority to select, monitor, and replace investment options for the plan. Services may also include:

-  Development or review of the plan's Investment Policy Statement;
-  Selection and ongoing monitoring of plan investment options;
-  Construction and maintenance of investment models;
-  Fiduciary investment guidance to plan sponsors regarding the plan's investment lineup; and
-  Ongoing investment reporting and periodic reviews.

The specific services provided are determined by the agreement between the firm and the retirement plan sponsor.

Types of Investments

We generally employ long-term buy-and-hold passive investment strategies, and we do not engage in market timing. We typically recommend mutual funds, exchange-traded funds, stocks, and bonds for our clients' investment portfolios, but ~~do not~~ also recommend other types of investments when appropriate based on a client's circumstances. See [Item 8](#) below for additional information on our portfolio management practices.

C. Tailored Relationships and Client Imposed Restrictions

We tailor our advisory services to your individual needs. We will conduct an initial interview and data gathering process to determine your financial situation and investment objectives. We provide our advisory services consistent with your objectives and with our fiduciary duty to you. Because our advisory services are based on your specific financial circumstances, you are urged to promptly notify us any time you experience changes to your circumstances, so we can determine if any changes to your investment strategy or our recommendations are necessary.

You can request reasonable restrictions on investing in certain securities, types of securities, or industry sectors. We will make a reasonable attempt to honor any restrictions you request, but in the case of pooled investment vehicles, such as mutual funds or exchange-traded funds where underlying holdings change frequently, we cannot guarantee restrictions will always be enforced. In addition, such restrictions could cause us to deviate from the investment decisions we would otherwise make in managing your account. In some cases, we could be unable to accommodate restrictions if they do not allow us to manage your portfolio in a prudent manner.

D. Wrap Fee Programs

We do not participate in any wrap fee programs.

E. Assets Under Management

As of 12/31/2025, we managed approximately \$221,288,917 in assets on a discretionary basis. We do not manage assets on a non-discretionary basis.

Item 5 – Fees and Compensation

We are compensated solely by our clients for the services we provide. We do not receive commissions, referral fees, revenue sharing, or other compensation for the investments we recommend or advisory services we provide. Fees could be negotiable based on factors such as the complexity of your financial situation or total assets under management. Complexity considers various factors of your financial circumstances, such as income, assets, liabilities, marital and family status, employment status, and number of financial areas that need to be addressed. In addition, we reserve the right to offer fee waivers or discounts at our sole discretion. Therefore, some clients could pay different fees than the fee schedule shown below. Your exact fee and other terms will be outlined in your advisory agreement.

Wealth Management Fees

For our Wealth Management services, we charge an advisory fee based on a percentage of your assets under management, according to the following schedule:

Assets Under Management	Annual Fee
\$0 up to \$500,000	1.0%
Over \$500,000 up to \$1,000,000	0.9%
Over \$1,000,000 up to \$1,500,000	0.8%
Over \$1,500,000 up to \$2,000,000	0.7%
Over \$2,000,000	0.5%

This is a blended tier fee schedule, which means that different fees are applied to the different levels of assets under management. For example, for \$2,000,000 in assets under management, the first \$500,000 would be charged 1.0%, the next \$500,000 would be charged 0.9%, the next \$500,000 would be charged 0.8%, and the remaining \$500,000 would be charged 0.7%.

Fees are generally payable monthly in advance, and calculated on the fair market value of your investment portfolio as of the last day of the prior month. In some cases, fees may be paid quarterly in advance. Your fee will be deducted from your brokerage account and paid directly to us by the qualified custodian that holds your account. You will authorize the custodian to deduct fees from your account and pay them to us. For business, retirement plan, or non-profit clients, upon mutual agreement between us and the client, fees may be paid directly by the client to us (rather than deducting from the brokerage account).

Your portfolio will typically hold investment options that are regularly traded on an open exchange with an observable market value, which is used to calculate the advisory fee. The custodian provides the valuation of these securities. In the rare event your portfolio includes a holding which does not have an observable market value, we will use accepted industry methods for determining a fair market value for such a holding. If you dispute our fair market valuation analysis, you can provide us with additional information to substantiate a different fair market value.

We aggregate your related accounts into a “household” for purposes of calculating the total assets under management to meet the breakpoints shown in the schedule above. Generally, a household would include your accounts, accounts of your spouse or partner and minor children residing at your residence, and the accounts of any trust whose beneficiaries are any of the above-described persons. However, we may include or exclude accounts at our discretion.

You can terminate Wealth Management services at any time by providing us notice. Fees for partial periods are prorated. Upon termination, any unearned fees in advance will be refunded.

Investment Consulting Fees

Investment Consulting services are provided on an hourly basis at the rate of \$250 per hour. Services are typically billed upon completion of the project. Services automatically conclude upon the completion of agreed-upon services. Because fees are paid in arrears, no refunds are due upon completion.

Retirement Plan Services Fees

Due to the wide variance in complexity and scope of work with plan sponsors, as well as the requirements of plan service providers, the method of billing and amount of fees charged for these services are negotiable. Generally, fees ~~to be~~ are either an asset-based fee based on a percentage of plan assets or a fixed fee, typically paid quarterly in arrears. The plan sponsor ~~to choose~~ choose to pay fees from plan assets or pay fees directly.

Retirement Plan Services can be terminated by either party according to the terms outlined in the advisory agreement. Fees for partial billing periods will be prorated. If fees are paid in arrears, no refunds will be given. If fees are paid in advance, any unearned fees will be returned.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses. You could incur certain charges imposed by custodians, brokers, and other third-parties, such as custodial fees, deferred sales charges, transfer taxes, wire and electronic fund transfer fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund’s prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we do not receive any portion of these commissions, fees, and costs.

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

We do not charge performance-based fees, which are fees based on a share of capital gains in your account. In addition, we do not perform side-by-side management, which refers to the practice of simultaneously managing accounts that pay performance-based fees (such as a hedge fund) and those that do not.

Item 7 – Types of Clients

We offer personalized Wealth Management and Investment Consulting services for individuals, corporations and small businesses. We also provide Retirement Plan Services to plan sponsors of employer-sponsored retirement plans.







For Wealth Management, we typically require minimum assets under management of \$1,000,000; however we may waive or reduce this minimum at our discretion. We do not impose a minimum for Investment Consulting or Retirement Plan Services.

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

Methods of Analysis

Our investment philosophy is grounded in academic research and evidence-based investing principles. We believe that broadly diversified portfolios, thoughtful asset allocation, disciplined rebalancing, and maintaining a long-term perspective provide a sound framework for helping clients pursue their financial objectives. Our analysis incorporates information from commercially available research, financial publications, market data, and portfolio management software. We also consider research published by independent investment firms and academic institutions.

When constructing and managing portfolios, we evaluate factors including:



-  A client's investment objectives, financial circumstances, time horizon, liquidity needs, and risk tolerance;
-  Current asset allocation;
-  Diversification across asset classes, sectors, geographic regions, and investment styles;
-  Expected risk and return characteristics of available investments;
-  Tax considerations, where appropriate; and
-  Overall portfolio costs and investment expenses.

Investment decisions are made within the framework established by each client's Investment Policy Statement and are reviewed periodically as client circumstances or market conditions change.

Investment Strategies

Our investment philosophy is based on the belief that disciplined, long-term investing provides clients with the greatest opportunity to achieve their financial objectives. Rather than attempting to consistently predict short-term market movements or select individual securities expected to outperform the market, we emphasize broad diversification, strategic asset allocation, disciplined portfolio management, and long-term ownership of investments.

Our investment approach is influenced by Modern Portfolio Theory and decades of academic research demonstrating the relationship between risk and expected return. We believe:

-  Diversification can reduce uncompensated investment risk.
-  Asset allocation is a primary driver of a portfolio's long-term risk and return characteristics.

Investors should maintain a long-term perspective and avoid attempting to time market movements.

Periodic portfolio rebalancing helps maintain a portfolio's intended risk profile.

Depending on the client's objectives, portfolios may include exchange-traded funds (ETFs), mutual funds, individual fixed-income securities, and, when appropriate, other registered investment vehicles, including interval funds. Investment recommendations are based on each client's individual circumstances and may change over time.

As part of our ongoing portfolio management process, client accounts are monitored regularly for changes in asset allocation, investment performance, cash flows, and other factors that may warrant review or rebalancing.

When investing in equities (stocks), there are many risks investors should avoid, but the following are three risk factors that investors should consider:

Market Risk – Equity/stock markets are riskier than credit markets (bonds); therefore, stocks have greater expected returns than bonds.

Size Risk – Smaller company stocks are riskier than larger companies; therefore, small company stocks have higher expected returns than large company stocks.

Price Risk – Growth stocks have a higher price per share compared to value stocks relative to book value or earnings. Investors are generally willing to pay more per share for companies that are more established or “healthy”. Investing in lower priced stocks generally provides greater upside compensation as these companies’ prices reflect higher underlying risk.

We typically use asset-class funds, index funds and interval funds to build global equity portfolios to capture these risks and expected returns.

As with equities, the risk and expected return of fixed income securities are also related. Understanding this relationship enables investors to plan the total risk/return profile of their Portfolio. The two primary risk factors that we consider when looking at fixed income are:

Maturity – Longer-term bonds are riskier than shorter-term bonds. They are more sensitive to changes in interest rates.

Default – Bonds with lower credit quality are riskier than bonds with higher credit quality.

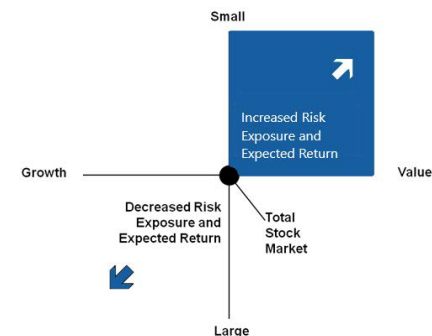
We believe that increasing bond portfolio durations generally provides smaller incremental returns with higher incremental risk.

We focus on shorter-term, high-quality (investment grade) instruments. Generally, the aggregate duration is less than five years.

Risk of Loss

Investing in securities involves risk, including the possible loss of principal. No investment strategy or asset allocation program can guarantee a profit or protect against loss in all market conditions.

Depending on the investments selected, your portfolio could be subject to risks including, but not limited to:



- ▮ **Financial Risk:** This is the risk that the companies we recommend to you perform poorly, which affects the price of your investment.
- ▮ **Market Risk:** This is the risk that the stock market will decline, thereby decreasing the value of the securities we recommend to you.
- ▮ **Inflation Risk:** This is the risk that the rate of price increases in the economy deteriorates the returns associated with your investments.
- ▮ **Political and Governmental Risk:** This refers to the risk that the introduction of new laws or regulations may impact the value of your investment.
- ▮ **Interest Rate Risk:** This is the risk that the value of the investments we recommend to you will fall if interest rates rise.
- ▮ **Call Risk:** This is the risk that your investment will be called or repurchased by the bond issuer when conditions are favorable to them and unfavorable to you.
- ▮ **Default Risk:** This is the risk that the issuer is unable to pay the contractual interest or principal on the investment promptly or at all.
- ▮ **Manager Risk:** This is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- ▮ **Industry Risk:** The risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- ▮ **Liquidity Risk:** Investments in interval funds are illiquid.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose certain legal or disciplinary events that are material to a client's evaluation of the firm or its management. Neither our firm nor any of its management personnel have any legal or disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

Neither our firm nor any of our management personnel are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer. In addition, neither our firm nor any of our management personnel are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or associated person of the foregoing entities.

Michael J. Davidson is currently a licensed insurance agent for purposes of advising clients on insurance coverage. However, he no longer sells any insurance products and will not sell any insurance products to clients or prospective clients.

We do not recommend other financial advisors or third-party money managers. We do not engage in any relationship or arrangement with financial services entities that create any material conflicts of interest between us and our clients.

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

Code of Ethics

As a fiduciary, our firm and associated personnel have a duty to act solely in the best interests of each client, which includes, but is not limited to, a duty of care, loyalty, fairness, and utmost good faith. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. As such, we have adopted a formal Code of Ethics

to govern our business practices. We will provide a copy of our Code of Ethics to any client or prospective client upon request. All associated persons are required to acknowledge their responsibilities under the Code of Ethics and to agree to adhere to all provisions.

Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The Code of Ethics includes policies regarding standards of professional conduct, conflicts of interest, insider trading, and personal securities trading. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations, but also to act in an ethical and professionally responsible manner in all professional services and activities. The firm also adheres to the *Code of Ethics and Standards of Conduct* adopted by the Certified Financial Planner Board of Standards, Inc.

Participation or Interest in Client Transactions

We do not manage any proprietary funds or private investments; therefore, we do not have any material financial interest in any investments that may be used in client portfolios. We do not engage in principal transactions or agency cross transactions.

We invest predominantly in open-end mutual funds and exchange-traded funds, which helps to reduce conflicts of interest between trades made in the accounts of our firm and our associated personnel, even when such accounts invest in the same securities. However, in the event of other identified potential trade conflicts of interest, our goal is to place client interests first.

You should be aware that we manage investments for other clients and could give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell, or recommend to you any security or other investment we could buy, sell, or recommend for any other clients or for our own accounts.

Personal Trading

Our firm and associated personnel can invest in the same securities that we recommend to clients. As a result, transactions made by or on behalf of our firm or our associated personnel could be executed before, after, or at the same time as client transactions. In certain circumstances, employee trades may be aggregated with client trades and allocated at the average execution price using the same allocation methodology applied to client accounts. Additional information regarding our trade aggregation practices is provided in Item 12.

Personal trading presents a potential conflict of interest because our firm or its associated persons could have an incentive to place their own interests ahead of those of clients. To address this conflict, our Code of Ethics requires all supervised persons to place client interests first, prohibits trading practices that disadvantage clients, and requires ongoing review of personal securities transactions for compliance with our policies.

Because client portfolios are invested primarily in diversified mutual funds and exchange-traded funds, which generally trade in highly liquid markets, we believe the potential for personal trading to adversely affect client transactions is limited. Personal securities transactions remain subject to our Code of Ethics and are reviewed periodically by our Chief Compliance Officer for compliance with our firm policies.

Item 12 – Brokerage Practices

Our firm is not affiliated with any broker-dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation of and services provided by the firm.

For accounts managed under our Wealth Management services, we have established relationships with qualified custodians and will recommend you use one of these custodians to facilitate our management of your accounts. These custodians include Charles Schwab & Co., Inc. (“Schwab”), Axos Clearing LLC (“Axos”), and Nationwide Securities, LLC (“Nationwide”). These qualified custodians are members of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). We may use other custodians in the future. We

execute client transactions directly with the custodian that holds the client's account. Clients generally agree to maintain their investment accounts with one of our recommended custodians as part of our advisory relationship.

These custodians will hold your assets in a separate brokerage account and will buy and sell securities when we and/or you instruct them. Although we could recommend you use a particular custodian, you have the discretion to decide whether to do so and will open your account directly with them by entering into an account agreement. We do not open the account for you, although we can assist you in doing so.

Through our participation in the adviser programs offered by these custodians, we receive various benefits, provided without cost or at a discount, which might not be available to retail clients. These benefits include access to certain investment options; execution of securities transactions; custodial services; access to an electronic trading platform, including access to aggregated block trading; the ability to deduct our advisory fee from client accounts; access to client account data; receipt of duplicate trade confirmations and account statements; research-related products and tools; pricing and market data; access to software, technology, or other services; attendance at educational conferences and events; consulting on technology, compliance, or other business matters; and access to industry publications. Some of these products and services could benefit you directly, while others could benefit us by assisting us in the administration of our business and the management of client accounts, including accounts held with other custodians.

We do not participate in soft dollar arrangements and do not direct client brokerage to obtain research or other products or services in exchange for brokerage commissions. The products and services described above are generally made available to advisers participating in the custodians' advisory programs and are not conditioned upon the amount or value of client brokerage directed to the custodians. The receipt of these benefits from the custodians creates a potential conflict of interest, as we could have an incentive to recommend you maintain your account with a specific custodian. However, we strive to recommend the custodian that is most appropriate for you based on your individual needs.

Best Execution

We recognize our obligation to seek best execution for our 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. Therefore, our firm will seek services involving competitive rates, but they will not necessarily correlate into the lowest possible rate for each transaction. We have determined trading our clients' accounts through a preferred custodian is consistent with our firm's obligation to seek best execution of client trades. We regularly review and consider the overall quality and price of the services received from our preferred custodians in light of our duty to seek best execution.

Brokerage for Client Referrals

We do not receive client referrals from any broker-dealer or custodian.

Order Aggregation

Client transactions in the same security executed through the same broker-dealer could be aggregated to achieve best execution or for operational efficiencies. Each client will receive the average share price of all orders executed to fill the aggregated order. Transaction fees, brokerage fees, and commissions will be allocated on a pro rata basis. Transactions in accounts held by our firm or associated personnel could participate in aggregated trading blocks along with client transactions; in such cases, share prices and expenses will be allocated equally among client accounts and those accounts of our firm and Supervised Persons.

Item 13 – Review of Accounts

Wealth Management

With our Wealth Management services, we review client accounts at least quarterly to assess the performance of your accounts and the applied investment strategy to ensure it remains appropriate. Accounts are also monitored on an ongoing basis for divergence from the target portfolio. We periodically adjust your account (a process referred to as rebalancing) to help ensure your investment portfolio remains consistent with your objectives, goals, and risk tolerances. Additional as-needed reviews and rebalancing may be conducted due to factors such as unusual or volatile performance, additions or deletions of client restrictions, or excessive withdrawals. Accounts could also be reviewed upon significant market, economic, or political events.

You will receive account statements directly from the account custodian. We also provide access to a client portal where you can run reports on demand. We post reports to the client portal on a monthly and quarterly basis. We encourage you to compare our reports to the account statements received from the custodian, and to contact us if you have any questions.

Investment Consulting

Investment Consulting services are typically provided on a one-time project basis. We typically do not provide any ongoing review, monitoring, or reporting.

Retirement Plan Services

For our Retirement Plan Services, our obligation to provide ongoing review, monitoring, or reporting will be as agreed to between us and the plan sponsor and as outlined in the advisory agreement.

Item 14 – Client Referrals and Other Compensation

Other than the benefits from custodians disclosed in [فصل ٤](#) above, we do not receive any economic benefit, directly or indirectly, from any third-party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

Item 15 – Custody

We do not accept physical custody of your funds or securities. However, as explained below, we could be deemed to have limited custody in some cases.

Deduction of Investment Advisory Fees

Under applicable securities regulations, we are deemed to have custody of client funds or securities if we debit our investment advisory fees directly from your account. When our fees are deducted from your account, we will obtain your written authorization to deduct our investment advisory fees from your account. The custodian will send you statements, on at least a quarterly basis, showing all disbursements from the account, including the amount of fees deducted.

Use of Standing Letters of Authorization

Qualified custodians offer clients the ability to establish a standing letter of authorization (“SLOA”) that allows their adviser to initiate transfers between client accounts at the same custodian, to initiate transfers to external accounts, or to request checks to be distributed from the client’s account. These transactions can be first-party transactions (that is, transfers between internal or external accounts with the same account holder or checks distributed to the client at the client’s address of record) or third-party transfers (that is, transfers or checks to other parties).

Under applicable securities regulations, advisers are considered to have custody of client funds and securities if the adviser has the ability to initiate transfers from client accounts to third-parties under a SLOA. However, an adviser is not deemed to have custody in the event of a first-party transaction.

When a client establishes a SLOA for a third-party transfer, we will comply with each of the requirements and conditions outlined below:

- You will provide instruction to the custodian in writing, which includes your signature, the third-party's name, and either the third-party's address or the third-party's account number at a custodian to which the transfer should be directed.
- You will authorize us in writing, either on the custodian's form or separately, to direct transfers to the third-party either on a specified schedule or from time to time.
- Your custodian will perform appropriate verification of the instruction, such as a signature review or other method to verify your authorization, and will provide a transfer of funds notice to you promptly after each transfer.
- You have the ability to terminate or change the instruction with your custodian at any time.
- We have no authority or ability to designate or change the identity, the address, or any other information about the third-party contained in your instruction.
- We will maintain records showing that the third-party is not a related party to or located at the same address as our firm or Associated Persons.
- Your custodian will send you an initial written notice confirming the instruction and an annual written notice reconfirming the instruction.

Item 16 – Investment Discretion

Wealth Management

With our Wealth Management services, you grant us discretionary authority to buy and sell securities in your accounts. This authority is established and agreed upon in the advisory agreement. With this authority we can transact securities without obtaining approval or consent from you prior to effecting the transaction. However, these transactions are subject to the investment strategy we have established with you.

Investment Consulting

Our recommendations provided under our Investment Consulting services with regard to accounts for which we do not provide Wealth Management Services are made on a non-discretionary basis. You are responsible for initiating any transactions necessary to implement our recommendations.

Retirement Plan Services

For our Retirement Plan Services, when serving as a Section 3(38) Investment Manager, we exercise discretionary authority over the selection, monitoring, and replacement of plan investment options as authorized by the advisory agreement.

Item 17 – Voting Client Securities

We do not accept voting authority for securities held in client investment accounts, but we may provide guidance on a particular proxy vote upon your request. You maintain exclusive responsibility for voting proxies and acting on corporate actions pertaining to your investment assets. Additionally, we do not take any action on behalf of clients or provide advice to clients

with regard to any class action lawsuit or bankruptcy related to securities held in their investment accounts. You should instruct the custodian to forward copies of all proxies and shareholder communications relating to their investment assets directly to you.

Item 18 – Financial Information

We do not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance. Therefore, we are not required to include our balance sheet in this section. We do not have any financial condition reasonably likely to impair our ability to meet our contractual requirements to clients. We have not been the subject of a bankruptcy petition at any time.

Privacy Policy

Our Promise

You have entrusted Wisdom Index Advisors with very important, nonpublic information. This personal and financial data is yours; therefore, it should remain private. We will not sell or share, for marketing purposes, any client, former client or prospective client information that we collect. We will use your non-public information only to complete transactions or services that you request.

Information We Collect

To provide advisory services, we will need information including name and address, social security or tax identification number, date of birth, assets, income, account balances, investment history, account information, important relationships, financial goals and values and risk tolerance information. We may receive information about you that you authorize third parties to provide to us. We also may obtain personal information from third parties to verify your identity, to prevent fraud, comply with legal or regulatory obligations, and to provide requested advisory services.

Information We Disclose

We are permitted by law to disclose non-public information about you to unaffiliated third-parties in certain circumstances. We could disclose your information to individuals or entities not affiliated with our firm, including, but not limited to, certain service providers (such as the custodian that holds your investment account, third-party investment advisers, or software or web-based application providers) as necessary to service your accounts, to your authorized representative or power of attorney, or otherwise permitted to do so in accordance with the parameters of applicable federal or state privacy regulations.

Because we share non-public information solely to service your accounts, you cannot opt out of allowing us to share your information. In the event we have a change to our business practices that allow nonpublic information to be shared with other third-parties, our Privacy Policy will be amended to allow you the opportunity to opt-out of such disclosure.

Mobile Opt in, SMS Consent, and phone numbers collected for SMS communication purposes will not be shared with any third party and affiliates for marketing purposes. Further, SMS communications are used by our office for appointment scheduling and appointment reminders as well as for follow-ups if requested by the client. The frequency of SMS communications may vary, and a client may Opt-out at any time by notifying our office. Standard message and data rates may apply.

We may use artificial intelligence ("AI") technologies to assist our personnel with administrative, analytical, compliance, and communication functions. AI tools are used under appropriate human supervision and do not replace the judgment of our investment professionals. We maintain policies and procedures designed to protect confidential client information when using these technologies. We remain committed to transparency, data privacy, and compliance with all applicable laws and regulations governing the advisory industry.

Safeguards

We maintain administrative, technical, and physical safeguards reasonably designed to protect the security, confidentiality, and integrity of your personal information and to protect against anticipated threats or unauthorized access consistent with applicable federal law. We require firms that provide us with services for your account to execute contracts providing confidential treatment of your information. Our Custodian and Client Portal(s) use data encryption technologies, including user names and passwords, to provide a high level of security and privacy when accessing your account information online.

Other Advisors

To benefit from Walking in Wisdom®, our Wealth Management process, we may communicate with your attorney, accountant, insurance professional, or other financial professionals to coordinate the advisory services we provide. We will obtain your authorization to make these communications.

Updates

We will provide our privacy notice at the start of our relationship with you and thereafter as required by applicable law, including whenever our privacy practices materially change. Should you have any concerns, please call us at (972) 931-0063.