

FIRM BROCHURE

Form ADV Part 2A

July 6, 2026

This brochure provides information about the qualifications and business practices of PeakStone Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (303) 539-9077. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

PeakStone Wealth Management, LLC, is a Registered Investment Adviser with the State of Colorado. Registration of an Investment Adviser does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training.

Additional information about PeakStone Wealth Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by using a unique identifying number, known as the CRD number. The CRD number for PeakStone Wealth Management, LLC is 226659.

You may contact us at hello@peakstonewealth.com, by phone at (303) 539-9077, online at peakstonewealth.com, or by mail at 8700 E Jefferson Ave #370272, Denver, CO 80237.

Item 2. Material Changes

This brochure has been updated to reflect changes to PeakStone Wealth Management, LLC's advisory services, fee schedule, disclosures, and related firm documents.

Material updates include:

- Updated the description of PeakStone's advisory services, including Private Wealth Advisory, Financial Planning, Compass by PeakStone, Compass Guided Planning, Business Advisory and Owner Planning, Retirement Plan and Organization Advisory, Financial Wellness through Compass by PeakStone, and Hourly Consulting.
- Updated fee disclosures to align with PeakStone's current fee schedule and service offerings.
- Clarified that PeakStone does not require a minimum portfolio size for all services, while certain comprehensive advisory relationships may be subject to minimum annual fees.
- Updated disclosures regarding insurance activity, including that Will Osagiede is licensed in his individual capacity and that PeakStone does not sell insurance products through its advisory business.
- Added disclosure regarding outside business, educational, technology, and content-related activities outside of PeakStone, including OnWealth and Edovest.
- Updated brokerage, custody, proxy voting, client review, and conflict disclosures to better reflect PeakStone's current advisory practices.
- Updated Form ADV Part 2B brochure supplement information for Will Osagiede, including education, business background, other business activities, supervision, and state-registered adviser disclosures.

Clients may request a current copy of PeakStone's Form ADV Part 2A brochure and applicable brochure supplement at any time.

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Item 4. Advisory Business

A. Description of the Advisory Firm

PeakStone Wealth Management, LLC (“PeakStone,” “firm,” “we,” or “us”) is a Colorado state-registered investment adviser. PeakStone was founded in 2015 and provides planning-led investment advisory services to individuals, families, business owners, retirement plans, organizations, and related entities. This brochure describes the advisory business conducted by the firm.

Mr. Uwaila “Will” Osagiede is the President, Principal Owner, and Chief Compliance Officer of PeakStone. He has been in the financial services industry since 2007. Additional information about Mr. Osagiede is available in Form ADV Part 2B, Brochure Supplement.

Throughout this brochure, “you” and “your” refer to clients and prospective clients, including engagements involving one person, a household, a plan sponsor, an organization, or another client relationship. The terms “advisor” and “adviser” may be used interchangeably.

PeakStone has no intermediate subsidiaries and does not control another reportable financial industry entity.

B. Types of Advisory Services

PeakStone provides advisory services through the following principal service areas:

- Private Wealth Advisory
- Investment Management
- Financial Planning Engagements
- Compass by PeakStone and Compass Guided Planning
- Financial Wellness through Compass by PeakStone
- Business Advisory and Owner Planning
- Retirement Plan and Organization Advisory
- Hourly Consulting

Private Wealth Advisory

Private Wealth Advisory is PeakStone’s comprehensive advisory relationship for households with more complex planning, investment, tax, retirement, liquidity, legacy, or business ownership needs. This service generally combines ongoing financial planning and investment management. We work with clients to understand their goals, responsibilities, balance sheet, cash flow, tax considerations, liquidity needs, investment objectives, risk tolerance, time horizon, and other relevant circumstances.

Private Wealth Advisory may include portfolio strategy, asset allocation, investment selection, rebalancing, retirement planning, cash flow planning, tax-aware coordination, liquidity planning, concentrated wealth planning, estate and legacy coordination, family planning priorities, and coordination with legal, tax, insurance, and other professionals. PeakStone does not provide legal or tax advice, but may coordinate with a client’s legal, tax, insurance, or other professional advisers at the client’s request.

Investment Management

PeakStone provides discretionary and non-discretionary investment management services. For discretionary investment management clients, PeakStone may buy and sell investments in client accounts without obtaining client approval before

each transaction, subject to the authority granted in the advisory agreement, custodial documents, limited power of attorney, or other written authorization. Clients may impose reasonable written restrictions on the management of their accounts, including restrictions on certain securities, industries, or types of investments.

PeakStone generally constructs diversified portfolios using exchange-traded funds (“ETFs”), mutual funds, cash or cash equivalents, and other publicly available investment vehicles where appropriate. Portfolio recommendations are based on client objectives, time horizon, liquidity needs, risk tolerance, tax considerations, account type, and other relevant information. PeakStone does not offer proprietary investment products.

PeakStone monitors ongoing advisory accounts periodically and generally reviews investment accounts at least quarterly. More frequent reviews may occur when there are material changes in a client’s circumstances, cash flow needs, portfolio, tax situation, business, market conditions, or other relevant factors. PeakStone may rebalance or reallocate client portfolios as appropriate based on the client’s investment strategy and advisory agreement.

Financial Planning Engagements

PeakStone provides financial planning as a standalone service when the scope is defined in advance. Financial planning may address balance sheet and cash flow, retirement planning, retirement income, investment analysis, tax-aware planning, insurance needs, education funding, estate and legacy considerations, debt management, charitable planning, and other financial planning topics.

Financial Planning Engagements are generally project-based and do not include ongoing investment management, continuous monitoring, or implementation responsibility unless separately agreed in writing. Implementation of financial planning recommendations is at the client’s discretion. If a client chooses to implement recommendations through other professionals, PeakStone may coordinate with those professionals at the client’s request.

Compass by PeakStone and Compass Guided Planning

Compass by PeakStone is a technology-supported planning experience used to organize financial information, planning priorities, goals, documents, cash flow, budgeting information, account visibility, and next steps. Compass Membership may be offered to households or members as a digital-first planning and organization platform.

Compass Membership does not include personalized financial advice, comprehensive private wealth advisory, discretionary investment management, ongoing monitoring, or fiduciary portfolio stewardship unless separately agreed in writing. Compass Guided Planning may include defined-scope advisor support, planning reviews, financial organization, prioritization, and recommendations tied to a specific planning need. Scope, deliverables, and follow-up support are documented before engagement.

Financial Wellness through Compass by PeakStone

PeakStone may offer Financial Wellness services to employers, organizations, associations, or other groups through Compass by PeakStone. Services may include employee access to Compass, financial education, planning content, group sessions, office hours, guided planning pathways, and advisor-supported next steps.

Financial Wellness services do not include retirement plan fiduciary advisory services, investment menu review, discretionary investment management, or individualized private wealth advisory unless separately agreed in writing.

Business Advisory and Owner Planning

PeakStone provides Business Advisory and Owner Planning services to business owners, founders, executives, and closely held business families. Services may address owner compensation, cash flow, liquidity, concentrated wealth, succession, exit readiness, retirement planning, family priorities, continuity risks, and coordination with tax, legal, insurance, valuation, lending, or other professionals.

Business Advisory and Owner Planning does not include legal, tax, accounting, valuation, or investment banking services unless separately provided by appropriately licensed or engaged professionals. The scope of each engagement is documented in the applicable agreement.

Retirement Plan and Organization Advisory

PeakStone provides advisory services to retirement plans and plan sponsors, including services that may be provided as fiduciary services under Section 3(21) and, in some cases, Section 3(38) of the Employee Retirement Income Security Act of 1974 (“ERISA”). The scope of the relationship, including any ERISA fiduciary status and duties, is defined in the written agreement with the plan sponsor or other responsible plan fiduciary.

Retirement Plan Advisory services may include investment menu review, investment selection and monitoring, provider coordination, fee and expense review, benchmarking, fiduciary governance support, participant education, and assistance with group enrollment or education meetings. Participant education is general in nature and does not provide individualized investment advice or individualized asset allocation recommendations unless separately agreed in writing.

Organization Advisory services may include fiduciary governance support, benefits-related planning, executive or key-person planning, workplace financial education, provider coordination, and other organization-level planning services. Retirement Plan and Organization Advisory does not include recordkeeping, third-party administration, legal, tax, accounting, or ERISA counsel services unless separately provided by appropriately licensed or engaged professionals.

Hourly Consulting

PeakStone may provide hourly consulting for limited reviews, second opinions, planning questions, or advisory work that does not require a fixed-fee or ongoing engagement. Hourly consulting is generally limited in scope and does not include ongoing monitoring, implementation responsibility, or investment management unless separately agreed in writing.

IRA Rollover Recommendations

When PeakStone provides investment advice regarding a retirement plan account or individual retirement account, we may be fiduciaries within the meaning of Title I of ERISA and/or the Internal Revenue Code, as applicable. We benefit financially when a client rolls assets from a retirement account to an account that we manage or advise on because those assets may increase the advisory fees we receive. This creates a conflict of interest. PeakStone will recommend a rollover only when we believe it is in the client’s best interest, based on the facts and circumstances known at the time of the recommendation.

C. Client Tailored Relationships and Imposed Restrictions

PeakStone tailors advisory services to the needs of each client. Client goals, objectives, circumstances, risk tolerance, time horizon, liquidity needs, tax considerations, and other relevant information are clarified through meetings, questionnaires, correspondence, planning technology, and documentation provided by the client.

Clients may request reasonable restrictions on investing in certain securities, industries, or types of securities. Restrictions must be provided in writing and accepted by PeakStone. Advisory agreements may not be assigned without client consent.

D. Wrap Fee Programs

PeakStone does not sponsor or serve as a portfolio manager in a wrap fee program.

E. Client Assets

As of July 2026, PeakStone manages approximately \$5,000 in discretionary client assets.

PeakStone has recently begun accepting advisory clients and provides discretionary investment management and financial planning services to households, founders, business owners, and organizations. As the firm establishes new client relationships, its assets under management will be updated accordingly.

Item 5. Fees and Compensation

A. Description of Fees and Compensation

PeakStone charges advisory fees based on the services provided, the scope and complexity of the engagement, the responsibilities involved, and the written agreement between PeakStone and the client. Fees may be structured as asset-based fees, fixed fees, subscription or membership fees, project fees, retainer fees, hourly fees, per-participant or workplace program fees, or other documented fee arrangements.

Private Wealth Advisory and Investment Management Fees

Private Wealth Advisory generally includes ongoing financial planning and investment management unless otherwise stated in the client agreement. Fees are generally charged as a percentage of assets under management, subject to a minimum annual fee.

ASSETS UNDER MANAGEMENT	ANNUAL ADVISORY FEE
First \$1,000,000	1.00%
Next \$2,000,000	0.80%
Next \$2,000,000	0.60%
Assets above \$5,000,000	0.50%
Minimum annual fee	\$5,000

Asset-based fees may be charged monthly or quarterly, in advance or arrears, as stated in the client agreement. Fees may be deducted from the client's custodial account when authorized by the client or invoiced directly. When fees are deducted from a custodial account, the qualified custodian sends account statements showing fee deductions. Clients should review custodial statements carefully.

Compass by PeakStone Fees

Compass Membership may be offered as a digital-first planning and organization experience.

SERVICE MODEL	FEE
Compass Membership	\$19/month
Annual Compass Membership	\$199/year
Founding member / launch offer	\$149/year

Compass Guided Planning may be offered for defined-scope advisor support.

SERVICE MODEL	FEE RANGE
One-time planning session	\$250-\$350
Limited-scope guided planning engagement	\$750-\$2,500
Focused planning review	\$750-\$1,500
Guided planning package	\$1,500-\$2,500

Compass Membership fees and Compass Guided Planning fees may be paid by invoice, card payment, electronic payment, or another method stated in the applicable agreement or platform terms.

Financial Wellness through Compass by PeakStone Fees

Financial Wellness services may be provided to employers, organizations, associations, or other groups.

SERVICE MODEL	FEE RANGE
Compass Workplace Access	\$5-\$10/month per eligible employee, subject to \$3,000 annual minimum
Financial Wellness Program	\$7,500-\$15,000/year
Financial Wellness Plus	\$15,000-\$25,000+/year
Group education session or workshop	\$1,000-\$2,500/session
Advisor office hours	\$300-\$500/hour
Custom enterprise implementation	Custom based on scope

Financial Planning Engagement Fees

Standalone financial planning fees are based on the scope, complexity, number of planning topics, required analysis, meeting cadence, and deliverables.

ENGAGEMENT TYPE	FEE RANGE
Focused financial planning engagement	\$1,000-\$2,500
Defined-scope financial plan	\$2,500-\$5,000
Comprehensive financial plan	\$5,000-\$10,000
Complex planning engagement	\$10,000+

Financial Planning Engagements are generally project-based and do not include ongoing investment management, continuous monitoring, or implementation responsibility unless separately agreed in writing.

Business Advisory and Owner Planning Fees

ENGAGEMENT TYPE	FEE RANGE
Business owner planning review	\$2,500-\$5,000
Defined-scope business planning engagement	\$5,000-\$10,000
Ongoing business owner advisory	\$10,000-\$25,000/year
Complex exit, succession, liquidity, or multi-stakeholder engagement	\$25,000+

Retirement Plan and Organization Advisory Fees

Retirement Plan Advisory fees may be structured as a flat annual fee, asset-based fee, per-participant fee, hourly fee, project fee, or hybrid fee. Fees may be paid by the plan, plan sponsor, plan provider, or another authorized party as permitted by the applicable agreement and law.

RETIREMENT PLAN ASSETS	ANNUAL ADVISORY FEE
First \$5,000,000	0.50%
Next \$5,000,000	0.40%
Amounts over \$10,000,000	0.30%
Minimum annual fee	\$5,000

Organization Advisory fees may be charged as fixed project fees, annual fees, retainers, or other documented fee arrangements.

ENGAGEMENT TYPE	FEE RANGE
Organization advisory review	\$2,500-\$5,000
Ongoing organization advisory	\$5,000-\$15,000/year
Executive or key-person planning engagement	\$5,000-\$15,000
Complex governance, benefits, or multi-stakeholder engagement	\$15,000+

Hourly Consulting Fees

SERVICE	FEE
Advisory consulting	\$350/hour
Specialized business, retirement plan, or organization consulting	\$500/hour

B. General Fee Terms and Information

Fees may be negotiable based on facts and circumstances, including client needs, relationship scope, assets under management or advisement, planning complexity, legacy arrangements, service model, and operational requirements.

PeakStone may waive, reduce, or modify fees at its discretion when appropriate and documented. The specific fee arrangement will be identified in the client agreement.

PeakStone may aggregate related client accounts for purposes of calculating asset-based advisory fees unless otherwise agreed. Special client requirements, investment restrictions, service complexity, or other facts and circumstances may result in different fee rates.

Because asset-based fees increase as managed assets increase, PeakStone has an incentive to encourage clients to place additional assets under our management or advisement. Clients should understand this conflict and ask questions about fees and services before entering into or changing an advisory relationship.

C. Other Fees and Costs

PeakStone's advisory fees are separate from other fees and expenses clients may pay. Clients may pay custodian fees, brokerage or transaction charges, mutual fund or ETF expenses, investment platform fees, Compass or technology platform costs, retirement plan recordkeeping fees, third-party administrator fees, legal fees, tax preparation or tax advisory fees, insurance costs, banking fees, and other professional or third-party costs.

Mutual funds and ETFs charge internal expenses that are disclosed in each fund's prospectus. These expenses are separate from PeakStone's advisory fees. PeakStone does not receive revenue from mutual fund or ETF operating expenses.

D. Billing, Advance Payment of Fees, and Termination

Fees may be charged in advance or arrears, monthly, quarterly, annually, upon completion of a project milestone, or as otherwise stated in the applicable agreement. Either party may terminate an advisory agreement as provided in the agreement. Upon termination, any earned unpaid fees will be due and payable, and any unearned prepaid fees will generally be refunded on a prorated basis as described in the client agreement.

For asset-based advisory relationships, fees are generally prorated for partial billing periods based on the number of days the account or relationship was open during the billing period. Termination does not affect the validity of any action previously taken by PeakStone, liabilities or obligations from transactions initiated before termination, or the client's obligation to pay earned fees through the termination date.

Under no circumstances does PeakStone require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

E. Compensation for the Sale of Securities or Other Investment Products

PeakStone does not accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. PeakStone does not sell insurance products or receive insurance commissions through its advisory business. Will Osagiede is separately licensed to sell insurance in his individual capacity. If insurance implementation is discussed or pursued outside the advisory relationship, any role, compensation, and potential conflicts will be disclosed before implementation.

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

PeakStone does not charge performance-based fees, which are fees based on a share of capital gains or capital appreciation of client assets. All advisory fees are calculated as described in Item 5 and are not based on investment performance, capital gains, or capital appreciation.

Item 7. Types of Clients

We generally provide advisory services to individuals, families, households, business owners, executives, retirement plans, plan sponsors, organizations, trusts, estates, charitable organizations, and related entities.

Client relationships vary in scope, complexity, and duration. PeakStone does not require a minimum income level or minimum portfolio size to access all services. Compass Membership, defined-scope planning, and other limited-scope services may be available at lower fee levels. Certain comprehensive ongoing advisory relationships, including Private Wealth Advisory, Retirement Plan Advisory, and Organization Advisory, may be subject to minimum annual advisory fees described in Item 5 and the applicable client agreement.

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

A. Methods of Analysis

PeakStone's investment analysis is planning-led and long-term in focus. We begin with each client's goals, time horizon, liquidity needs, tax considerations, risk tolerance, cash flow needs, account types, existing holdings, and broader financial circumstances. We use this planning context to help determine an appropriate investment strategy and portfolio allocation.

Our methods of analysis may include asset allocation research, portfolio analytics, fund and ETF due diligence, expense analysis, tax-awareness, risk and return data, liquidity analysis, market and economic information, commercially available research, financial planning software, account aggregation data, and other tools used to evaluate investments and portfolio construction. We may review prospectuses, annual reports, manager materials, third-party research, rating services, portfolio holdings, historical performance, risk characteristics, expenses, tax characteristics, and other information we believe is relevant.

PeakStone does not rely on short-term trading, market timing, charting, or technical analysis as a primary investment method. We do not represent that any method of analysis can predict future results, identify market tops or bottoms, or prevent investment losses.

B. Investment Strategies

PeakStone generally uses diversified, long-term portfolio strategies designed around each client's planning needs. Our investment approach emphasizes asset allocation, diversification, risk alignment, tax awareness, cost discipline, liquidity planning, and behavioral stewardship.

Client portfolios are generally constructed using ETFs, mutual funds, cash or cash equivalents, and other publicly available investment vehicles where appropriate. We may use passive, index-based, factor-based, active, or blended investment strategies depending on the client's circumstances and the role each investment is intended to play in the overall plan.

Asset allocation seeks to balance risk and return by adjusting the percentage of a portfolio invested in different asset classes, such as equities, fixed income, cash, and other appropriate investments. We generally seek broad diversification across asset classes, investment styles, sectors, geographies, and account types where appropriate.

PeakStone's strategies are generally intended to be long-term. We may rebalance portfolios, adjust allocations, raise or invest cash, realize gains or losses, or make other changes when we believe doing so is appropriate based on the client's investment strategy, planning needs, tax considerations, liquidity needs, or market conditions. Clients should notify PeakStone of material changes to their goals, financial circumstances, tax situation, income needs, liquidity needs, or risk tolerance.

C. Risk of Loss

All investments involve risk and may lose value. Clients should not assume that any investment strategy, recommendation, or method of analysis will be profitable or will achieve any particular result. Past performance is not an indication of future results.

Different types of investments involve different types and degrees of risk. Clients should review prospectuses, offering documents, custodial materials, and other disclosures for a more detailed discussion of risks associated with specific investments. Material risks may include, but are not limited to:

Market Risk: Investment values may decline because of general market conditions, economic developments, political events, interest-rate changes, investor sentiment, or other factors.

Equity Risk: Stocks and stock funds may fluctuate significantly and may decline in value due to market conditions, issuer-specific events, sector developments, or broader economic factors.

Fixed Income and Interest-Rate Risk: Bonds and bond funds are subject to interest-rate risk, credit risk, default risk, call risk, extension risk, and inflation risk. When interest rates rise, the value of existing bonds generally declines.

Inflation Risk: Inflation may reduce the purchasing power of investment returns and cash over time.

Liquidity Risk: Some investments may be difficult to sell quickly or at an acceptable price. Liquidity needs should be considered when designing and maintaining a portfolio.

Credit and Default Risk: Issuers of bonds or other debt instruments may fail to make timely interest or principal payments, which may reduce the value of the investment.

Concentration Risk: A portfolio concentrated in a particular security, issuer, sector, asset class, geography, employer stock, business interest, or strategy may be more volatile than a diversified portfolio.

International and Currency Risk: International investments may involve currency fluctuations, political risk, regulatory risk, accounting differences, market structure differences, and economic conditions outside the United States.

ETF and Mutual Fund Risk: ETFs and mutual funds are subject to the risks of their underlying holdings. They also may involve management fees, operating expenses, tracking error, liquidity risk, and trading risks.

Tax Risk: Investment decisions may have tax consequences. Tax laws and client tax circumstances may change. PeakStone does not provide tax advice, and clients should consult their tax professionals regarding tax matters.

Research and Data Risk: PeakStone may rely on information from clients, custodians, account aggregation providers, software tools, data vendors, research providers, fund companies, issuers, and other third parties. Inaccurate, incomplete, delayed, or unavailable information may affect analysis, recommendations, or implementation.

Technology and Platform Risk: Compass by PeakStone, client portals, account aggregation tools, custodial systems, and other technology platforms may experience outages, errors, data limitations, cybersecurity incidents, or connectivity issues.

Implementation Risk: Financial planning and investment recommendations may not achieve their intended results if they are not implemented, are only partially implemented, or are implemented after material changes in market conditions or client circumstances.

Business Owner and Held-Away Asset Risk: Planning involving privately held businesses, employer benefits, retirement plans, real estate, insurance, held-away accounts, or other assets not directly managed by PeakStone may depend on information, valuations, decisions, and implementation outside PeakStone's control.

Behavioral Risk: Clients may make decisions based on fear, urgency, overconfidence, or other behavioral factors. Such decisions may harm long-term outcomes.

No Guarantee: PeakStone does not guarantee investment results or financial planning outcomes and cannot eliminate the risk of loss.

Item 9. Disciplinary Information

PeakStone and its management persons have no legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Item 10. Other Financial Industry Activities and Affiliations

PeakStone is not an insurance agency and does not sell insurance products or receive insurance commissions through its advisory business.

Will Osagiede is separately licensed to sell life, accident, and health insurance in his individual capacity. If insurance implementation is discussed or pursued outside the advisory relationship, Mr. Osagiede may receive compensation in his individual capacity. This creates a conflict of interest because he may have an incentive to recommend insurance implementation that results in additional compensation.

Clients are not required to purchase insurance products through Mr. Osagiede or any particular insurance professional. Clients may implement insurance recommendations through the insurance professional of their choice. If insurance implementation is pursued outside the advisory relationship, any role, compensation, and potential conflicts will be disclosed before implementation.

Mr. Osagiede may also be involved with other business, educational, technology, or content-related activities outside of PeakStone, including OnWealth and Edovest. These activities are separate from PeakStone's advisory business and are not offered as investment advisory services of PeakStone unless specifically disclosed in writing. These activities may create a conflict of interest because they may involve Mr. Osagiede's time, attention, or economic interests outside of PeakStone.

Aside from the insurance activity described above, neither PeakStone nor its associated persons receive commissions for the sale of securities or other investment products.

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

A. Code of Ethics

PeakStone has adopted a Code of Ethics designed to set standards of conduct for the firm and its associated persons. The Code of Ethics is based on the principle that PeakStone and its associated persons owe a fiduciary duty to clients and must place client interests ahead of their own.

The Code of Ethics is designed to address, among other things, personal securities trading, conflicts of interest, confidentiality, insider trading, and other conduct that could create the appearance of impropriety or conflict with client interests. The Code requires associated persons to avoid placing personal interests ahead of client interests, taking inappropriate advantage of their position, or engaging in conduct that would violate applicable law or PeakStone policies.

PeakStone will provide a copy of its Code of Ethics to any client or prospective client upon request.

Associated persons who are CERTIFIED FINANCIAL PLANNER™ professionals, including Mr. Osagiede, are also subject to the CFP Board's Code of Ethics and Standards of Conduct.

B. Participation or Interest in Client Transactions and Personal Trading

PeakStone and its associated persons may buy or sell securities that are also held or recommended to clients. This creates a potential conflict of interest because associated persons could have an incentive to trade ahead of client transactions or otherwise benefit from securities transactions.

PeakStone has adopted policies and procedures designed to address personal trading conflicts. These policies are intended to prevent associated persons from receiving preferential treatment over clients, trading ahead of client transactions, or misusing information about client accounts or recommendations. PeakStone monitors and maintains records of personal securities transactions as required by its policies and applicable law.

When appropriate, PeakStone may aggregate client trades. Associated person trades may be aggregated with client trades only when permitted by PeakStone's policies and when all participating accounts receive fair and equitable treatment.

Item 12. Brokerage Practices

A. Factors Used in Selecting Brokerage Firms

PeakStone does not maintain physical custody of client assets. Client assets are maintained by qualified custodians, such as broker-dealers, banks, or trust companies. PeakStone is not a custodian and does not have an affiliate that acts as custodian.

PeakStone may recommend one or more qualified custodians or broker-dealers to maintain custody of client assets and effect trades for client accounts. In recommending or selecting a custodian or broker-dealer, PeakStone may consider factors such as financial strength, reputation, service quality, trade execution, transaction costs, available investment options, technology, reporting, client account access, fee deduction capabilities, operational support, and other services available to clients and to PeakStone.

PeakStone does not charge commissions or markups on client securities transactions and does not receive any portion of trading fees charged by custodians or broker-dealers. Clients may pay transaction fees, custody fees, platform fees, or other charges imposed by the custodian, broker-dealer, fund company, platform provider, or other third party.

PeakStone seeks to recommend custodial and brokerage arrangements that it believes are appropriate for clients. However, PeakStone may not always recommend the custodian or broker-dealer with the lowest possible cost for a particular transaction or account. PeakStone evaluates the overall services provided, including execution quality, cost, technology, operational support, reporting, and client service.

Research and Other Soft Dollar Benefits

Custodians, broker-dealers, and platform providers may provide PeakStone with access to products and services that support PeakStone's advisory business. These may include trading platforms, account management systems, reporting tools, research, market data, educational materials, compliance tools, practice management resources, technology, and operational support. These services may benefit PeakStone because we may not have to produce or purchase them separately.

The availability of these products and services creates a conflict of interest because PeakStone may have an incentive to recommend or continue using a custodian, broker-dealer, or platform provider based in part on services that benefit PeakStone. PeakStone seeks to address this conflict by considering the overall interests of clients when recommending custodial and brokerage arrangements and periodically reviewing the services and costs associated with those arrangements. PeakStone does not receive client referrals from custodians or broker-dealers in exchange for using their services, and PeakStone does not commit to any specific amount of client assets, trading volume, or revenue as a condition of receiving these services.

Brokerage for Client Referrals

PeakStone does not receive client referrals from a broker-dealer, custodian, or third party in exchange for recommending or using that broker-dealer, custodian, or third party.

Directed Brokerage

PeakStone generally does not accept client-directed brokerage instructions for specific transactions. If PeakStone agrees to a client-directed brokerage arrangement, the client should understand that PeakStone may be unable to obtain the most favorable execution, aggregate trades, or obtain the same prices or services that may be available through other custodial or brokerage arrangements.

B. Order Aggregation

PeakStone may, but is not obligated to, aggregate trades for multiple client accounts when we believe aggregation may help obtain more favorable execution, pricing, or operational efficiency. Aggregated trades will be allocated among participating client accounts in a manner PeakStone believes is fair and equitable. Trade aggregation may not be available or beneficial for all securities, account types, custodians, platforms, or trading circumstances.

Item 13. Review of Accounts

A. Frequency or Nature of Periodic Reviews and Triggers

Private Wealth Advisory and Investment Management

PeakStone monitors ongoing advisory accounts periodically and generally reviews investment accounts at least quarterly. Reviews may focus on investment allocation, diversification, cash needs, tax considerations, account activity, investment performance, risk alignment, planning priorities, and other relevant factors. More frequent reviews may occur when there are material changes in a client's circumstances, cash flow needs, portfolio, tax situation, business, market conditions, or other relevant factors.

Financial Planning Engagements and Compass Guided Planning

Financial Planning Engagements and Compass Guided Planning are generally reviewed according to the scope, deliverables, and timeline described in the client agreement. These engagements are generally project-based or limited in scope and do not include continuous monitoring unless separately agreed in writing.

Compass Membership and Financial Wellness

Compass Membership and Financial Wellness services may provide access to planning tools, dashboards, education, group sessions, office hours, or other resources. Unless separately agreed in writing, these services do not include ongoing investment management, continuous monitoring, individualized review of accounts, or fiduciary portfolio stewardship.

Business Advisory, Organization Advisory, and Hourly Consulting

Business Advisory, Organization Advisory, and Hourly Consulting reviews are conducted according to the scope and terms of the engagement. Reviews may occur at different stages depending on the nature of the engagement, deliverables, meeting cadence, and client needs.

Retirement Plan Advisory Services

Retirement Plan Advisory investment options are generally reviewed at least quarterly and upon client request. Reviews may focus on investment menu structure, investment performance, fees and expenses, provider information, participant education needs, fiduciary governance, and consistency with applicable investment objectives and guidelines.

The level and frequency of review will depend on the complexity of the engagement and the factors that trigger the review. PeakStone does not provide legal advice, and clients are responsible for consulting legal counsel as necessary. Mr. Will Osagiede, President of PeakStone, conducts or supervises these reviews.

B. Regular Reports

Clients are provided with transaction confirmations, account statements, and tax reporting documents directly from their broker-dealer, custodian, plan recordkeeper, fund company, or other applicable provider. Clients may also receive planning summaries, reports, dashboards, meeting notes, recommendations, or other materials from PeakStone depending on the scope of the engagement.

Portfolio values on custodial statements, planning dashboards, performance reports, and advisory fee invoices may differ because they may use different data sources, calculation methods, valuation dates, or billing conventions.

Clients should carefully review all statements and reports received from custodians, broker-dealers, recordkeepers, and other providers and promptly notify PeakStone of any questions or concerns.

Item 14. Client Referrals and Other Compensation

PeakStone does not receive referral fees, solicitor fees, or other compensation from third parties for providing advisory services to clients. PeakStone may receive client referrals from current clients, attorneys, accountants, other professionals, friends, family, and other sources. PeakStone does not pay cash referral fees or other compensation to persons who are not advisory personnel for client referrals.

PeakStone does not accept referral fees or other remuneration from professionals when we refer a client or prospective client to another professional. As described in Item 12, PeakStone may receive access to custodial, brokerage, technology, research, operational, or practice-management services that support our advisory business, but these are not compensation for client referrals.

Item 15. Custody

Client assets are maintained by unaffiliated qualified custodians, such as broker-dealers, banks, or trust companies. PeakStone is not a custodian and does not provide custodial services. PeakStone is not affiliated with client custodians, and custodians do not supervise PeakStone or its advisory activities.

PeakStone may be deemed to have custody of client assets for purposes of applicable rules solely because clients authorize us to deduct advisory fees from custodial accounts. Please see Item 5 for more information about advisory fee deduction.

PeakStone does not take physical custody of client funds or securities. In keeping with this policy, PeakStone:

- does not serve as trustee or hold general power of attorney over client accounts, unless separately disclosed and permitted by applicable law;
- prohibits associated persons from having authority to withdraw client funds or securities, except for authorized advisory fee deduction;
- does not accept client securities, such as stock certificates, except in limited circumstances permitted by

- applicable law;
- does not require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered; and
- does not ask clients to provide account login credentials when those credentials would allow PeakStone to control or withdraw client assets.

Clients will receive account statements directly from their qualified custodian at least quarterly. These statements will show account holdings, transactions, deposits, withdrawals, and advisory fee deductions when applicable. Clients should carefully review custodial statements and compare them with any invoices, reports, dashboards, or other information received from PeakStone. Clients should contact PeakStone and the custodian promptly if they identify any discrepancy or have questions.

Item 16. Investment Discretion

PeakStone may manage client accounts on a discretionary or non-discretionary basis, depending on the services provided and the terms of the client agreement.

When a client grants discretionary authority, PeakStone may buy, sell, or otherwise trade securities in the client's account without obtaining the client's approval before each transaction. Discretionary authority is limited by the client's advisory agreement, custodial documents, investment objectives, written restrictions, and any applicable investment policy statement. Discretionary authority does not give PeakStone authority to withdraw client funds or securities, except for authorized advisory fee deduction as described in Item 15.

Clients may impose reasonable written restrictions on PeakStone's discretionary authority, including restrictions on certain securities, industries, asset classes, or types of transactions. PeakStone will follow accepted restrictions unless we determine that the restriction prevents us from providing the agreed advisory services.

Clients who engage PeakStone on a non-discretionary basis retain responsibility for approving transactions before they are placed. PeakStone cannot implement non-discretionary recommendations until the client provides approval.

When required, clients grant trading authority through a limited power of attorney, custodial account documents, or other written authorization. This authority is limited to the functions necessary for PeakStone to provide the agreed advisory services.

PeakStone does not generally invest client assets in initial public offerings unless separately disclosed and agreed.

Item 17. Voting Client Securities

PeakStone does not accept authority to vote client securities and does not vote proxies on behalf of clients. Clients retain responsibility for receiving and voting proxies and other shareholder materials for securities held in their accounts.

PeakStone generally does not provide advice on proxy voting matters. Clients may contact PeakStone with questions about proxy materials, but PeakStone is not responsible for voting proxies or taking action with respect to shareholder matters unless separately agreed in writing.

Item 18. Financial Information

Registered investment advisers are required to provide certain financial information or disclosures about their financial condition when applicable.

PeakStone has no financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. PeakStone has not been the subject of a bankruptcy proceeding.

PeakStone is not required to provide a balance sheet because it does not serve as a custodian for client funds or securities, other than fee deduction authority described in Item 15. PeakStone does not require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered.

Item 19. Requirements for State-Registered Advisers

State-registered investment advisers are required to provide certain additional information.

A. Principal Executive Officers and Management Persons

Mr. Uwaila “Will” Osagiede is PeakStone’s President, Principal Owner, and Chief Compliance Officer. Additional biographical information is provided in Form ADV Part 2B, Brochure Supplement.

B. Other Business Activities

Please see Item 10 for information regarding Mr. Osagiede’s separate insurance license, other outside business activities, and related conflicts of interest.

C. Performance-based Fees

Please see Item 6.

D. Disciplinary Information

Please see Item 9 and Form ADV Part 2B, Brochure Supplement.

E. Relationship or Arrangement With Any Issuer of Securities

PeakStone has no relationship or arrangement with any issuer of securities.

Privacy Policy

PeakStone maintains a separate privacy notice describing how we collect, use, share, and protect personal information. Clients may request a copy of our privacy notice or review our website privacy policy at peakstonewealth.com/legal/privacy-policy.

For questions about our privacy practices, please contact us at compliance@peakstonewealth.com.

Business Continuity Plan

PeakStone maintains business continuity and disaster recovery policies designed to help the firm continue or resume critical business operations during a significant disruption. These policies address, as applicable, data backup and recovery, alternate communication methods, technology and service provider disruptions, remote work capabilities, and access to client records.

Because the timing and impact of a disruption can vary, PeakStone cannot guarantee that service will continue without

interruption. However, we seek to restore critical operations as promptly as reasonably possible under the circumstances. Clients should maintain current contact information with PeakStone and should also retain direct access to their custodians, account providers, and other financial institutions.