

Item 1: Cover Sheet



**INFORMATIONAL BROCHURE**

**ONEASCENT WEALTH MANAGEMENT, LLC**

23 Inverness Center Parkway  
Birmingham, AL 35242

(205) 313-9142  
(205) 313-9159 Fax

**October 8, 2021**

**This brochure provides information about the qualifications and business practices of OneAscent Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact Rob Grubb at the number listed above. 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. OneAscent Wealth Management, LLC is a registered investment adviser. Registration does not imply any certain level of skill or training.**

**Additional information about OneAscent Wealth Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2: Statement of Material Changes**

OneAscent Wealth Management, LLC is required to update its Form ADV in the event of a material change. There are currently no material changes to report.

**Item 3: Table of Contents**

TABLE OF CONTENTS

<b>Item 1:</b>	<b>Cover Sheet</b>	<b>1</b>
<b>Item 2:</b>	<b>Statement of Material Changes</b>	<b>2</b>
<b>Item 3:</b>	<b>Table of Contents</b>	<b>3</b>
<b>Item 4:</b>	<b>Advisory Business</b>	<b>4</b>
<b>Item 5:</b>	<b>Fees and Compensation</b>	<b>7</b>
<b>Item 6:</b>	<b>Performance-Based Fees</b>	<b>10</b>
<b>Item 7:</b>	<b>Types of Clients</b>	<b>10</b>
<b>Item 8:</b>	<b>Methods of Analysis, Investment Strategies and Risk of Loss</b>	<b>11</b>
<b>Item 9:</b>	<b>Disciplinary Information</b>	<b>16</b>
<b>Item 10:</b>	<b>Other Financial Industry Activities and Affiliations</b>	<b>16</b>
<b>Item 11:</b>	<b>Code of Ethics, Participation/Interest in Client Transactions and Personal Trading</b>	<b>18</b>
<b>Item 12:</b>	<b>Brokerage Practices</b>	<b>19</b>
<b>Item 13:</b>	<b>Review of Accounts</b>	<b>20</b>
<b>Item 14:</b>	<b>Client Referrals and Other Compensation</b>	<b>20</b>
<b>Item 15:</b>	<b>Custody</b>	<b>21</b>
<b>Item 16:</b>	<b>Investment Discretion</b>	<b>21</b>
<b>Item 17:</b>	<b>Voting Client Securities</b>	<b>22</b>
<b>Item 18:</b>	<b>Financial Information</b>	<b>22</b>

## ONEASCENT WEALTH MANAGEMENT, LLC

### **Item 4: Advisory Business**

The mission of OneAscent Wealth Management, LLC (“OneAscent”) is to provide investment advisory services to clients and their professional advisors through the offering of managed accounts, proprietary strategies and assistance to other investment advisors. OneAscent, founded in May, 2020, is owned by Harry Pearson and Rob Grubb.

#### Asset Management

Asset management services may be provided on either a “discretionary” or “non-discretionary” basis. When a client engages the firm to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your investment objectives. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others, utilizing a separate account (third party) manager or keeping the proceeds in cash. We may also allocate some or all of your assets to a Unified Managed Account platform through our advisory affiliate OneAscent Investment Solutions LLC. You may at any time place reasonable restrictions on the types of investments we may use on your behalf, or on the allocations to each security type, though such restrictions may limit the potential performance of your portfolio. You will receive at your request written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive statements directly from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as a written agreement that outlines the responsibilities of both the client and the firm.

In certain limited circumstances, and in the discretion of the firm, a client may engage the firm to provide investment management services on a non-discretionary basis. This means the firm monitors the accounts in the same way as for discretionary services. The difference is that changes to your account will not be made until we have confirmed with you (either verbally or in writing) that our proposed change is acceptable to you.

#### Unified Managed Accounts and OneAscent Investment Solutions LLC

As mentioned above, we may allocate some or all of your assets to our advisory affiliate, OneAscent Investment Solutions LLC (“OAIS”), an advisory affiliate of OneAscent. OAIS can create a Unified Managed Account or “UMA”, which is a single portfolio with a mix of asset classes and investment positions through the use of model portfolios, which may consist of third party managers, and to a lesser extent, other investment options such as mutual funds and exchange traded funds. This is accomplished with the use of an Overlay Manager. The Overlay Manager that OneAscent has selected is Adhesion Wealth Advisors Solutions (“Adhesion”), which provides portfolio trading, re-balancing, reporting and other administrative services. Each UMA is designed to meet a specific goal, while maintaining diversification to mitigate short term risk, and at the same time positioned to appreciate and create income for the investor. UMAs are created by OAIS and accessed by other advisors (including OneAscent’s advisory teams) for their clients.

OneAscent provides UMA services on a discretionary basis, meaning that you will grant OneAscent discretionary authority to manage your account through the selection of an Overlay Manager, third party managers, and other investment options. In addition, you will authorize your account custodian to follow

our instructions as well as instructions given by Adhesion to effect transactions, deliver securities, deduct fees and take other actions with respect to your account. We retain the right to replace any third party manager on discretionary basis. You will not have a direct contractual relationship with Adhesion or any other third party manager.

When clients engage OneAscent to provide UMA services, the client and OneAscent will execute an Investment Management Agreement that describes the services to be provided, the fees for the service, other expenses related to the provision of the investment management services, and how to terminate the agreement. Depending on the service a client has selected, OneAscent will separately provide each client with the applicable disclosure documents for any third party manager or service providers utilized, which includes information about their services, model portfolios, investment strategies at or before execution of our Investment Management Agreement.

### Tax Overlay Manager Services

For clients who elect, OneAscent offers tax overlay management services as an additional option for accounts utilizing the UMA Program through the Overlay Manager, Adhesion. Tax overlay management services are an additional service, and will increase the management fee. Clients are not under any obligation to elect to receive tax overlay management services. Adhesion will develop a tax strategy for your account based on the information and instructions provided by us on your behalf. Tax overlay management services in an investment account offer benefits and limitations, as described below. The tax strategy developed for you by Adhesion is provided solely in connection with your account and the Overlay Manager does not provide general tax planning services. If you do elect the tax overlay management services option, please consider the following:

- The Tax Overlay Manager will implement tax overlay management services based on the information and instructions provided for your account(s).
- The Tax Overlay Manager does not provide general tax advice, tax return preparation or tax planning services.
- The Tax Overlay Manager will seek to reduce the overall tax burden of the account while seeking to maintain the risk and return characteristics of the model portfolios received from Strategists and/or Managers.
- When providing tax overlay management services to the account, short-term gains are avoided where possible, but long-term gains are not limited unless you have requested a mandate to limit realized long-term gains.

The Overlay Manager will provide tax overlay management services with the assumption that the Overlay Manager will continue to provide services to the account for an entire tax year. The termination or removal of the overlay management services before the completion of an entire tax year may result in adverse tax consequences, including without limitation realization of short-term capital gains. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

The Tax Overlay Management Services are offered at an additional cost to you.

### FinLife Partners Service Offering

In an effort to enhance the quality and breadth of services that OneAscent provides to its clients, OneAscent utilizes a suite of digitally powered technology solutions offered by FinLife Partners, owned by Goldman

Sachs. FinLife Partners provide access to its technology platform to OneAscent that includes the use of certain technology platform, training relating to use of such technology platform, and if elected by OneAscent certain clerical document and data compilation services. FinLife Partners is not in any way involved in, or responsible for, the individual investment management or guidance provided to clients. OneAscent pays FinLife Partners a flat fee for its technology implementation services and fees calculated per percentage-basis formula in accordance with the volume of client for whom OneAscent utilizes such services and/or products. As such, for certain services offered, clients indirectly contribute to the payment of cost of services paid to FinLife Partners.

### *Financial Planning*

In most cases, the client will supply an OneAscent representative with information including income, investments, savings, insurance, age, the values the client would like to see advanced as part of their planning process, and many other items that are helpful to the firm in assessing financial goals. The information is typically provided during personal interviews and supplemented with written information. Once the information is received, we will discuss your financial needs and goals with you, and compare your current financial situation with the goals you state. Once these are compared, we will create a financial and/or investment plan to help you meet your goals, and work with you to educate you about household finances and investments.

The plan is intended to be a suggested way to achieve financial goals in keeping with the client's values. Not every plan will be the same for every client. Each one is specific to the client who requested it. Because the plan is based on information supplied by you, it is very important that you accurately and completely communicate to us the information we need. Also, your circumstances and needs may change as your engagement with us progresses. It is very important that you continually update us with any changes so that if the updates require changes to your plan, we can make those changes. Otherwise, your plan may no longer be accurate.

### *Financial Consulting*

OneAscent may provide financial consulting services (including investment and non-investment related matters, including estate planning, retirement planning, tax planning, etc.). Prior to engaging OneAscent to provide planning or consulting services, clients are generally required to enter into a written agreement with OneAscent setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to OneAscent commencing services.

### *Investment Advisory Services for Pooled Retirement Plans*

When Plan Sponsors have direct investment responsibility for Plan assets, unbiased council is mission critical. Our process begins with a detailed review of the Plan's assumptions and interviews with the overall committee, individual committee members, and management. This initial step helps to ensure the investment portfolio is best designed to meet the specific needs and objectives of the client within a framework incorporating specific risk tolerances, objectives, and constraints. We believe the best approach for establishing successful strategic asset allocation guidelines begins with a quantitative analysis of historical data (returns, risk, and correlation) as well as quantitative analysis of possible future results. Following the initial review, and completion of the Client Risk Profile, potential asset classes and strategies to be included in the portfolio are identified and defined based on their functional attributes (e.g., debt versus equity, domestic versus international, liquid versus illiquid, inflation sensitive versus deflation sensitive) in order to identify those asset classes and strategies we believe offer the

characteristics required for long-term investment success relative to the unique needs/objectives and risk tolerance of the client.

#### *Participant Directed Retirement Plan ERISA Investment Fiduciary Services*

As a plan sponsor you may want to appoint as qualified investment firm to serve as the named Investment Fiduciary for your plan to minimize your fiduciary responsibility regarding the investments available to your plan participants. OAWM may serve as the named Investment Fiduciary to a qualified retirement plan which may include being an "investment manager" within the meaning of ERISA Section 3(38) and a "fiduciary" within the meaning of ERISA Section 3(21). OAWM will acknowledge our fiduciary status and duties in writing. The primary clients for these services will be pension, profit sharing and 403(b) and 401(k) plans that provide for participant directed investments ERISA Investment Fiduciary Services are comprised of three distinct services. Clients may choose to use any or all of these services.

The Investment Fiduciary shall have the following discretionary authority and responsibility:

- to manage the investment of the Trust Fund using only the investment options available through the recordkeeper, products and/or platforms chosen by Plan Sponsor;
- to appoint and remove one or more investment managers;
- to establish, revise from time to time, and communicate to the Trustee and/or Investment Manager(s), assist in building an investment policy for the Plan. We will meet with your and/or you plan committee (in person or over the telephone) to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the overall plan. Our firm then prepares a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.

#### Assets Under Management

As of December 31, 2020, OneAscent has \$264,996,592 in assets under management across 1,390 accounts. OneAscent also provides consulting services for an additional \$58,946,212, giving OneAscent \$323,942,804 in assets under advisement.

### **Item 5: Fees and Compensation**

#### A. Fees Charged/ Fee Schedule:

##### Unified Managed Accounts

Generally, fees may vary from 0.50% to 2.00% per annum of the market value of a client's assets in the UMA. The Overlay Manager (Adhesion) and third party manager charge separate and additional fees with respect to client accounts for account model and administration. Portions of these fees are paid directly to OAS. In addition, the client will be billed for OneAscent's advisory fee. Fees are negotiable, based on

the nature of the account. Factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors.

### Financial Planning

Financial planning fees can be hourly, fixed fee basis (which may be per project or per month), or included with asset management services. Our hourly charge is between \$125 and \$500 per hour, depending on the professional working on the project. Fixed fees will typically be between \$0 and \$15,000, and in special circumstances, can be greater than \$100,000. The fee range stated is a guide. Fees may be higher or lower than this range, based on the nature of the engagement. Fees are negotiable, and will depend on the anticipated complexity of your plan and the professional(s) working on the plan.

### Asset Management for Non-UMA Clients

Generally, fees may vary from 0.50% to 2.00% per annum of the market value of a client's assets managed by OneAscent. In limited circumstances, asset management may also be done on a flat fee basis. Flat fees will be between \$1,000 and \$100,000 per annum. The fee ranges stated are a guide. Fees are negotiable, and may be higher or lower than this range, based on the nature of the account. Factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors.

### Separate Managers

When an OneAscent advisor allocates client assets to a separate manager, including an affiliated manager such as OAIS, fees payable to such managers are separate from, and in addition to, fees payable to OneAscent. This means that the overall fees to OneAscent and these managers may be significantly higher than if OneAscent had managed the assets directly. OneAscent will consider these fees in its decision to recommend the use of any third party manager, including OAIS. OneAscent has a conflict of interest because OneAscent has the incentive to refer clients to OAIS, because of common ownership, and therefore are likely to receive greater overall compensation if assets are allocated to their respective affiliated firms as opposed to a different third party manager or in-house management. This conflict of interest is disclosed to clients verbally and in this brochure. OneAscent also attempts to mitigate the conflict of interest by requiring employees to acknowledge the firm's Code of Ethics, their individual fiduciary duty to the clients of OneAscent, which requires that employees put the interests of clients ahead of their own.

### Financial Consulting

Financial consulting is done on a fixed fee basis (which may be per project or per month). Fixed fees will be between \$500 and \$4,000 per annum. The fee range stated is a guide. Fees may be higher or lower than this range, based on the nature of the engagement. Fees are negotiable, and will depend on the anticipated complexity of your plan.

### B. Fee Payment

#### Asset Management

Investment advisory fees will generally be debited directly from each client's account. The advisory fee is paid on a quarterly basis, in advance, with adjustments made for deposits and withdrawals greater than \$25,000 intra-quarter. Fees are calculated by multiplying the overall asset value of the account (or overall household, if applicable) by the annual fee rate, and then dividing the result by 4. Thereafter, adjustments



are made to pro-rate fees for any deposits or withdrawals greater than \$25,000 made during the prior quarter. Once the calculation is made, we will instruct your account custodian to deduct the fee from your account and remit it to the firm.

For clients who elect to be billed on a flat fee basis, fees are payable on a quarterly basis, in advance, and no adjustments are made for deposits and withdrawals made intra-quarter. The annual flat fee will renew upon the anniversary of the execution of the contract each year, and fees for renewal services will be agreed upon by the parties at the time of renewal. Once the fee calculation is made each quarter, we will instruct your account custodian to deduct the fee from your account and remit it to the firm.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. The client will also receive a statement from their account custodian showing all transactions in their account, including the fee. It is the responsibility of the client to verify the accuracy of all fee calculations. The client may terminate the investment advisory contract by notifying OneAscent in writing at its principal place of business.

The advisory agreement may be modified as mutually agreed upon in writing. The agreement is terminable by you at any time. The agreement is not assignable by OneAscent without the advance written consent of the client.

Please note that clients invested in certain programs with smaller accounts (roughly under \$10k) are likely to pay fees on a percentage basis higher than that of clients with larger accounts due to the fact that some costs incurred are fixed in terms of dollar amount. Your advisor will consult with you about your anticipated fees and costs prior to opening your account.

### Financial Planning

For financial planning clients, fees will generally be billed for fees incurred, but clients may request that planning fees be debited from an investment management account. The financial planning fee is billed in two payments, the first being approximately 50% of the estimated total bill, and is due upon the engagement. The second payment, which represents all outstanding amounts due, is billed upon completion.

### C. Other Fees

#### *Mutual Funds*

All fees paid to OneAscent for investment advisory services are separate and distinct from the fees and expenses charged by underlying investments such as mutual funds. In the case of mutual funds, these fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. Expenses of a fund, including management fees payable to the mutual fund manager, will not appear as transaction fees on a client's statement, as they are deducted from the value of the shares by the mutual fund manager. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a fund directly, without the services of OneAscent. In that case, the client would not receive the services provided by OneAscent which are designed, among other things, to assist the client in determining which fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by OneAscent to fully understand the total amount of

fees to be paid by the client and to thereby evaluate the advisory services being provided. OneAscent can provide or direct you to a copy of the prospectus for any fund that we recommend to you.

#### *Other Fees*

There are a number of other fees that can be associated with holding and investing in securities. You will be responsible for fees including transaction fees for the purchase or sale of other securities, including commissions for the purchase or sale of a stock or exchange traded fund. There also may be fees associated with the custody of assets.

When utilizing the services of a third party manager (as described more in Item 8), such managers will charge fees for their services. These fees are separate from, and in addition to, OneAscent's fees.

Please make sure to read Item 12 of this informational brochure, where we discuss broker-dealer and custodial issues.

#### D. *Pro-rata Fees*

If you become a client during a billing period, you will pay a management fee for the number of days left in that billing period. If you terminate our relationship during a billing period, you will be entitled to a refund of any pre-paid and unearned management fees for the remainder of the billing period. Once your notice of termination is received, we will refund the unearned fees to you in whatever way you direct (check, wire back to your account). Further, as discussed above, any deposits or withdrawals greater than \$25,000 will result in an adjusted fee calculation with respect to the account related to the deposit or withdrawal. Deposits will incur a pro-rated fee for the remained of the billing period. Withdrawals will result in a pro-rata refund of the unearned fee with regard to the withdrawn amount. OneAscent will cease to perform services, including processing trades and distributions upon termination. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be "de-linked", meaning they will no longer be visible to OneAscent and will become a retail account with the custodian.

#### E. Compensation for the Sale of Securities

This item is not applicable.

### **Item 6: Performance-Based Fees**

OneAscent will not charge performance based fees.

### **Item 7: Types of Clients**

OneAscent generally provides advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

OneAscent does not have a specified minimum account size. Some clients who wish to access multiple asset management styles, specifically third party managers, may be required to have an account minimum.

## **Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

### ***Methods of Analysis and Investment Strategies***

Each client portfolio is separately managed, and invested according to that client's investment objective. Once each account's objectives are ascertained, OneAscent will develop a set of asset allocation guidelines. An asset allocation guideline is a percentage-based allocation among different types of assets like stocks, fixed income, or third party managers with specific expertise (asset classes), or specific types of securities (large cap, mid-cap). For example, a client may have an asset allocation strategy that calls for 80% of the portfolio to be invested in equity securities and fixed income and the rest invested with third party managers. Within each main allocation may be sub-allocations. For example, a client with 80% in direct securities may have a mix of large cap, mid cap and small cap equities combined with mutual funds and fixed income, while another client's direct securities might be all in ETFs and mutual funds. Each client is managed individually.

The percentages in each asset type recommended by OneAscent are based on the typical behavior of that security type, individual securities we follow current market conditions, the client's current financial situation, financial goals, and the timeline to achieve those goals. Because OneAscent develops an investment strategy based on each client's personal situation and financial goals, each client's asset allocation guidelines may be similar to or different from another client's. It is important to remember that because market conditions can vary greatly, asset allocation guidelines are not necessarily strict rules. Rather, we review accounts individually, and may deviate from the guidelines as we believe necessary.

Assets may be managed through the use of a third party manager or directly managed by a OneAscent professional, depending on the professional advisor with whom the client works as well as client needs. When managing assets directly, the securities recommended may include stocks, index funds, exchange traded funds, mutual funds, options and bonds. Clients whose assets are managed through a UMA with OAIS will be given a separate disclosure statement for OAIS. Clients are encouraged to carefully review the disclosure information provided by OAIS.

Specific equity and fixed income securities are chosen based on a variety of factors including dividends, income, interest rates, company management, price to earnings ratios, and other factors. Specific mutual funds are chosen based on where its investment objective fits into the asset allocation recommended by OneAscent, its risk parameters, past performance, peer rankings, fees, expenses, and any other aspects of the fund OneAscent deems relevant to that particular fund. Specific third party managers are chosen based on their performance, investment style, investment consistency, experience, and expertise. OneAscent bases its conclusions on publicly-available research, such as regulatory filings, press releases, purchased research, and proprietary screens and analytics. We will also utilize technical analyses, which means that we will review the past behaviors of the security and the markets in which it trades for signals as to what might happen in the future.

### **Transitioning Accounts**

Upon engagement, each client will complete an Investor Profile and Application, which may utilize client information to give OneAscent a clearer picture of each client's financial circumstances, and the results of these questionnaires may be the basis for determining the client's investment strategy. The firm will also review a client's portfolios, discuss the client's investment objectives and risk tolerance as well as any potential investment restrictions, and plan a transition for the client's assets from their current accounts to accounts managed by the firm. Transition plans will involve the placement of each client's assets in an asset allocation strategy deemed appropriate by OneAscent. In many instances, but not

always, the assets will be placed in the OASIS UMA platform. These are described in the respective Form ADV of each manager, and clients whose assets are placed with OASIS should carefully review the Form ADV.

As assets are transitioned from a client's prior advisers to OneAscent, there may be securities and other investments that do not fit within the investment strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the investment strategy selected by OneAscent. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. In the event an investment in a client account is unable to be unwound for a period of time, OneAscent will monitor the investment as part of its services to the client. OneAscent may suggest that a given investment be moved to a separate account.

### ***Third Party Managers***

We may recommend that certain portions of a client's portfolio be managed by independent third-party managers or recommend direct investment with independent third-party managers, typically when those managers demonstrate knowledge and expertise in a particular investment strategy. We do not consider a mutual fund to be a separate account manager, as the mutual fund itself is a security.

We examine the experience, expertise, investment philosophies and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentration and leverage as part of our overall periodic assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks.

Based on a client's individual circumstances and needs, we will determine which selected money manager's portfolio management style is appropriate for that client. Factors considered in making this determination include account size, risk tolerance and the investment philosophy of the selected money manager. We encourage clients to review each third-party manager's disclosure document regarding the particular characteristics of any program and managers selected by us.

We will regularly and continuously monitor the performance of the selected money managers. If we determine that a particular selected money manager is not providing sufficient management services to the client, or are not managing the client's portfolio in a manner consistent with the client's investment objectives, we will remove the client's assets from that selected money manager and place the client's assets with another money manager at our discretion and without prior consent from the client, unless the client non-discretionary. Permission for non-discretionary accounts will be obtained before placing the client's assets with another money manager.

OneAscent will obtain appropriate due diligence on all independent third-party managers, making reasonable inquiries into their performance calculations, policies and procedures, code of ethics policies and other operational and compliance matters to account for performance and risk management. We examine the experience, expertise, investment philosophies and past performance of third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks.

The use of a third party manager, including OAIS and SEI Investments Company does not change the relationship between the OneAscent professional and the client, in that such professional will still manage the overall client portfolio, adding, subtracting and modifying the allocations to different strategies and managers.

### ***Risk of Loss***

There are always risks to investing. ***Clients should be aware that all investments carry various types of risk, including the potential loss of principal that clients should be prepared to bear.*** It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason, and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Strategy Risk.** When investments are made through a strategy, rather than individualized investment considerations, there is always the possibility that individualized investment choices would have produced a more positive result for a client than an approach where investments are made for a group of individuals with common characteristics.
- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading:** Clients should note that OneAscent may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies. OneAscent endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk.** The amount of debt or leverage determines the financial risk of a company.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Information Risk:** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data

accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.

- **Short Sales.** “Short sales” are a way to implement a trade in a security OneAscent feels is overvalued. In a “long” trade, the investor is hoping the security increases in price. Thus in a long trade, the amount of the investor’s loss (without margin) is the amount paid for the security. In a short sale, the investor is hoping the security decreases in price. However, unlike a long trade where the price of the security can only go from the purchase price to zero, in a short sale, the price of the security can go infinitely upwards. Thus in a short sale, the potential for loss is unlimited and unknown, where the potential for loss in a long trade is limited and knowable. OneAscent utilizes short sales only when the client’s risk tolerances permit.

- **Options.** The use of options transactions as an investment strategy involves a high level of inherent risk. Although the intent of many of the options-related transactions implemented by OneAscent is to hedge against principal risk, certain of the options-related strategies (i.e., straddles, short positions, etc.), may in and of themselves, produce principal volatility and/or risk. Thus, a client must be willing to accept these enhanced volatility and principal risks associated with such strategies. In light of these enhanced risks, client may direct OneAscent, in writing, not to employ any or all such strategies for his/her/their/its accounts. Clients participating in the Options Strategy should *carefully* consider all information regarding the strategy and its risks prior to participating.

- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.

- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up, or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company’s future. For example, a company’s management may lack experience, or the company’s capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.

- **Concentration Risk.** While OneAscent selects individual equities and bonds for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client’s equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client’s equity portfolio may be affected negatively, including significant losses.

- **Transition Risk.** As assets are transitioned from a client’s prior advisers to OneAscent there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by OneAscent. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client’s holdings into recommendations of

OneAscent may adversely affect the client's account values, as OneAscent' recommendations may not be able to be fully implemented.

- **Restriction Risk.** Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.
- **Risks specific to sub-advisors and other managers.** If we invest some of your assets with another advisor, including a private placement, there are additional risks. These include risks that the other manager is not as qualified as we believe them to be, that the investments they use are not as liquid as we would normally use in your portfolio, or that their risk management guidelines are more liberal than we would normally employ. Clients should *carefully* review the risks associate with each manager as such risks are disclosed in that firm's Form ADV and/or offering documents for the private placement, both of which are available from OneAscent.
- **Risks Related to Investment Term & Liquidity.** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.
- **Algorithms and Models.** When an investment manager develops a mathematical algorithm that identifies trigger points for the purpose of indicating a "buy" or "sell" signal, these trigger points are limited in that they are based on solely the data input into the algorithm. There is an unlimited amount of data that can be considered in making any given decision as to whether to buy or sell any given security. An algorithm, by design, ignores some data in favor of others. There is a risk that the data selected for the algorithm will not create a positive result, whereas other data, had it been considered, may do so.
- **REITs:** OneAscent may recommend that portions of client portfolios be allocated to real estate investment trusts, otherwise known as "REITs". A REIT is an entity, typically a trust or corporation, that accepts investments from a number of investors, pools the money, and then uses that money to invest in real estate through either actual property purchases or mortgage loans. While there are some benefits to owning REITs, which include potential tax benefits, income and the relatively low barrier to invest in real estate as compared to directly investing in real estate, REITs also have some increased risks as compared to more traditional investments such as stocks, bonds, and mutual funds. First, real estate investing can be highly volatile. Second, the specific REIT chosen may have a focus such as commercial real estate or real estate in a given location. Such investment focus can be beneficial if the properties are successful, but lose significant principal if the properties are not successful. REITs may also employ significant leverage for the purpose of purchasing more investments with fewer investment dollars, which can enhance returns but also enhances the risk of loss. The success of a REIT is highly dependent upon the manager of the REIT. Clients should ensure they understand the role of the REIT in their portfolio.
- **MLPs:** OneAscent may recommend that portions of client portfolios be allocated to master limited partnerships, otherwise known as "MLPs". An MLP is a publicly traded entity that is designed to provide tax benefits for the investor. In order to preserve these benefits, the MLP must derive most, if not all, of its income from real estate, natural resources and commodities. While MLPs may add diversification and tax favored treatment to a client's portfolio, they also carry significant risks beyond more traditional investments such as stocks, bonds and mutual funds. One such risk is management risk-the success of the MLP is dependent upon the manager's experience and judgment in selecting investments for the MLP. Another risk is the governance structure, which means the rules under which the entity is run. The investors are the limited partners of the MLP, with an affiliate of the manager typically the general partner. This means the manager has all of the control in running the entity, as opposed to an equity investment where shareholders vote on such matters as board composition. There is also a significant amount of risk

with the underlying real estate, resources or commodities investments. Clients should ask OneAscent any questions regarding the role of MLPs in their portfolio.

- **Funds Available Risk:** Clients who have check-writing authority for their accounts are responsible for losses related to trades not occurring due to a lack of cash within their account.

- **Excess Cash Balance Risk:** Client accounts may have cash balances in excess of \$250,000, which is the insurance limit of the Federal Deposit Insurance Corporation. For cash balances in excess of that amount, there is an enhanced risk that operation related counterparty risk related to the account custodian could cause losses in the account. We mitigate this risk by carrying cash balances in amounts either subject to protection or as limited as you, the client, directs. You may elect to participate in a “cash sweep” program through your account custodian which automatically moves excess cash from your investment account into a cash account and then invests that cash into cash based investments, such as money market funds. We do not receive compensation of any kinds for facilitating your participation in such cash sweep accounts.

#### **Item 9: Disciplinary Information**

In 2017, our Chief Compliance Officer, Ashleigh Swayze, signed a Consent Order with the Connecticut Department of Banking and Insurance. The underlying matter involved a client of Ms. Swayze’s that failed to register as an investment adviser representative in Connecticut. The state felt that Ms. Swayze’s firm should have followed this client’s activities and required her to register, despite not being engaged to do so.

#### **Item 10: Other Financial Industry Activities and Affiliations**

##### **A. Broker-dealer**

*Please see the response to Item 5E with regard to individuals registered in their individual capacities with broker-dealers.*

##### **B. Futures Commission Merchant/Commodity Trading Advisor**

Neither the principal of OneAscent, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

##### **C. Relationship with Related Persons**

Harry Pearson and Robert Grubb, owners of OneAscent, are also indirect owners of OneAscent Investment Solutions LLC (“OAIS”). When a OneAscent advisor allocates client assets to a separate manager, including an affiliated manager such as OAIS, fees payable to such managers are separate from, and in addition to, fees payable to OneAscent. This means that the overall fees to OneAscent and these managers may be significantly higher than if OneAscent had managed the assets directly. OneAscent will consider these fees in its decision to recommend the use of any third party manager, including OAIS. OneAscent has a conflict of interest because OneAscent has the incentive to refer clients to OAIS, because of common ownership, and therefore are likely to receive greater overall compensation if assets are allocated to their respective affiliated firms as opposed to a different third party manager or in-house management. Individual investment adviser representatives may also receive greater compensation for allocating assets to affiliated managers than to other non-affiliated managers. OneAscent also consults on



the Collective Invest Trusts that OASIS manages. This may present a conflict of interest for OneAscent to recommend the Collective Investment Trust if OASIS is serving as the investment manager. These conflicts of interest are disclosed to clients verbally and in this brochure. OneAscent also attempts to mitigate the conflict of interest by requiring employees to acknowledge the firm's Code of Ethics, their individual fiduciary duty to the clients of OneAscent, which requires that employees put the interests of clients ahead of their own.

Harry Pearson and Robert Grubb, owners of OneAscent, are also indirect owners of OneAscent Financial Services LLC. OneAscent Financial Services LLC ("OAFS") provides investment advice to clients, but does not perform investment advisory services for OneAscent Wealth Management, LLC. It does, however, provide back office services to OneAscent. "back office" services include compliance, trading and trade reconciliation, billing, marketing, technology and business continuity. In addition, the errors and omissions insurance for OneAscent is purchased through OneAscent Financial Services LLC. OAFS is also set up as a Turnkey Asset Management Platform which will bill client accounts on behalf of OAWM, and will also have the authority to affect trades.

Please see Item 4 for more details on this conflict and mitigation efforts.

#### *OneAscent Legacy Coaching LLC*

OneAscent may provide financial coaching services through an affiliate firm, OneAscent Legacy Coaching, LLC (OALC), to financial planning clients either prior to engagement or in conjunction with a financial planning engagement. The services include legacy coaching, charitable giving coaching and business coaching. All services for OALC will be done under a separate agreement specific to that entity. OneAscent advisors will receive compensation from OALC when they refer a client of OneAscent to OALC.

#### *Insurance*

Certain professionals of OneAscent are separately licensed as independent insurance agents. As such, these professionals may conduct insurance product transactions for OneAscent clients, in their capacity as licensed insurance agents, and will receive customary commissions for these transactions in addition to any compensation received in his capacity as employees of OneAscent. Commissions from the sale of insurance products will not be used to offset or as a credit against advisory fees. These professionals therefore have incentive to recommend insurance products based on the compensation to be received, rather than on a client's needs. The receipt of additional fees for insurance commissions is therefore a conflict of interest, and clients should be aware of this conflict when considering whether to engage OneAscent or utilize these professionals to implement any insurance recommendations. OneAscent attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products through other agents that are not affiliated with OneAscent, or to determine not to purchase the insurance product at all. OneAscent also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of OneAscent, which requires that employees put the interests of clients ahead of their own.

#### *Vendor Sponsorships*

In limited circumstances, certain vendors who are considered business partners of OneAscent will assist in covering advertising costs of OneAscent in exchange for being able to demo their products on various

OneAscent platforms. OneAscent attempts to mitigate this conflict of interest by disclosing these relationships to clients.

#### *Investment Advisor Representatives*

Our firm offers services through our network of investment advisor representatives ("Advisor Representatives" or "IARs"). IARs may have their own legal business entities whose trade names and logos are used for marketing purposes and may appear on marketing materials or client statements. The client should understand that the businesses are legal entities of the IAR and not our firm OneAscent. The IARs are under the supervision of our firm OneAscent, and the advisory services of the IAR are provided through our firm OneAscent. Please refer to the ADV Part 1 for more information regarding these advisors.

#### D. Recommendations of Other Advisers

See Item 4 with regard to discussion of OneAscent Investment Solutions LLC.

Please see Item 8 regarding Third Party Managers in general.

### **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

A. A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.

B. On occasion, OneAscent may recommend to clients that they invest in any security in which OneAscent or any principal thereof has any financial interest. Cole Pearson has an equity interest in Eventide Asset Management. Mr. Pearson does not have an active role with the company; however he does receive profit sharing distributions based on his equity ownership giving him an incentive to recommend investment products based on the compensation received, rather than on the client's needs. In the case of discretionary accounts, it may not always be feasible for clients to direct OneAscent to invest in non-Eventide mutual funds unless clients provide specific investment restrictions in their investment policy statements. Finally, Clients are not always in a position to select non-Eventide mutual funds since they are relying on OneAscent for investment management unless OneAscent provides alternate mutual funds for clients to select. OneAscent attempts to mitigate this conflict of interest by disclosing the conflict to clients and allowing them to (a) decline the use of Eventide funds in their entirety or (b) allowing the use of Eventide funds so long as other options were considered and the Eventide fund is determined to be in the best interests of the client.

C. On occasion, an employee of OneAscent may purchase for his or her own account securities which are also recommended for clients. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

D. On occasion, an employee of OneAscent may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Our Code of

Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

## **Item 12: Brokerage Practices**

### **A. Recommendation of Broker-Dealer**

OneAscent recommends that investment accounts be held in custody by TD Ameritrade Institutional ("TD Ameritrade"), Schwab Advisor Services ("Schwab"), or SEI Investments Company (SEI). These custodians offer enhanced services to independent investment advisors. These services include custody of securities, trade execution platforms, and access to research not available to the general public. These custodians are wholly independent from OneAscent. It is expected that most, if not all, transactions in a given client account will be cleared through the custodian of that account in its capacity as a broker-dealer.

OneAscent has chosen to recommend Schwab, TD Ameritrade, and SEI to its clients based on a variety of factors. These include, but are not limited to, commission costs. These custodians have what can be considered discounted commission rates. However, in choosing a broker-dealer or custodian to recommend, we are most concerned with the value the client receives for the cost paid, not just the cost. These custodians add value beyond commission cost. Other factors that may be considered in determining overall value include speed and accuracy of execution, financial strength, knowledge and experience of staff, research and service. They also have arrangements with many mutual funds that enable us to purchase these mutual funds for client accounts at reduced transaction charges (as opposed to other broker-dealers). Schwab, TD Ameritrade, and SEI have very high market shares of the investment adviser business which makes them the most experienced in matters likely to arise for our clients. OneAscent re-evaluates the use of these custodians at least annually to determine if they are still the best value for our clients.

We do not consider whether TD Ameritrade or any other broker-dealer/custodian, refers clients to OneAscent as part of our evaluation of these broker-dealers.

### Overlay Manager

OneAscent has entered into an agreement with Adhesion Wealth Advisor Solutions to provide Overlay Portfolio Management services to Unified Managed Accounts managed by OneAscent or its Investment Advisor Representatives.

Adhesion's overlay portfolio management services are only available to accounts held at TD Ameritrade, Schwab Advisor Services ("Schwab"), TD Ameritrade Institutional Wealth Services ("TD Ameritrade"), or Pershing Advisor Solutions ("Pershing"), although they may in the future accept other custodian brokers. Adhesion has arranged with these custodians the capability to electronically place trades in your accounts on your behalf. This electronic trading capability is generally required for effective provision of our OPM services.

Typically, trading and transaction clearing services will be provided by the client's custodian, at fee rates previously agreed to by the custodian and OneAscent. Transactions for accounts at one Supported

Custodian may be effected either before or after transactions effected by another Supported Custodian. Consequently, an account held at one Supported Custodian may experience performance results different from an account held at another Supported Custodian due to differing brokerage fees, commissions and trade executions.

**B. Aggregating Trades**

Commission costs per client may be lower on a particular trade if all clients in whose accounts the trade is to be made are executed at the same time. This is called aggregating trades. Instead of placing a number of trades for the same security for each account, we will, when appropriate, execute one trade for all accounts and then allocate the trades to each account after execution. If an aggregate trade is not fully executed, the securities will be allocated to client accounts on a *pro rata* basis, except where doing so would create an unintended adverse consequence (For example, if a *pro rata* division would result in a client receiving a fraction of a share, or a position in the account of less than 1%.)

**Directed Brokerage**

OneAscent allows clients to direct brokerage. “Directing” brokerage means choosing to maintain all or some of their assets with a broker-dealer that is not recommended by OneAscent. OneAscent may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients’ money because without the ability to direct brokerage OneAscent may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

**Bank Account Marketer**

OneAscent is a marketer for Galileo Money+ bank accounts. The recommendation by an OneAscent advisor that clients use certain bank accounts presents a conflict of interest, as an OneAscent advisor has an incentive to recommend the use of certain bank accounts rather than on a particular client’s need. No client is under any obligation to use the Galileo Money+ bank accounts. Clients are reminded that they may patronize any bank and are not required to use the bank accounts recommended by our advisors.

**Item 13: Review of Accounts**

All accounts will be reviewed by a senior professional on at least an annual basis. However, it is expected that market conditions, changes in a particular client’s account, or changes to a client’s circumstances will trigger a review of accounts.

The annual report in writing provided by OneAscent is intended to review asset allocation. All clients will receive statements and confirmations of trades directly from their account custodian. Please refer to Item 15 regarding Custody.

**Item 14: Client Referrals and Other Compensation**

A. Economic Benefit Provided by Third Parties for Advice Rendered to Client.

*Please refer to Item 12, where we discuss recommendation of Broker-Dealers.*

## B. Compensation to Non-Advisory Personnel for Client Referrals.

Clients may be introduced to OneAscent via other third parties. In the event that OneAscent compensates any party for the referral of a client to OneAscent, any such compensation will be paid by OneAscent, and not the client. If the client is introduced to OneAscent by an unaffiliated third party, that third party will disclose to the client the referral arrangement with OneAscent, including the compensation for the referral, and provide the client a copy of OneAscent's ADV Part 2A and 2B. The referral source will also provide a written disclosure to the client regarding the relationship between OneAscent and the referral source, including the fact that referral fees will be paid.

### **Item 15: Custody**

There are two avenues through which OneAscent has custody of client funds; by directly debiting its fees from client accounts pursuant to applicable agreements granting such right, and potentially by permitting clients to issue standing letters of authorization ("SLOAs"). SLOAs permit a client to issue one document that directs OneAscent to make distributions out of the client's account(s).

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. The client will also receive a statement from their account custodian showing all transactions in their account, including the fee.

We encourage clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on your quarterly report prepared by OneAscent against the information in the statements provided directly from their account custodian. Please alert us of any discrepancies.

In addition to the account custodian's custody procedures, OneAscent will confirm that, for clients issuing SLOAs, the accounts to which funds are distributed are parties unrelated to OneAscent.

### **Item 16: Investment Discretion**

Asset management services are provided on a "discretionary" basis. When OneAscent is engaged to provide asset management services on a discretionary basis, OneAscent will monitor the accounts to ensure that they are meeting the client's agreed upon guidelines. If any changes are needed, OneAscent will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. Clients may at any time place restrictions on the way their account is managed. For example, a client may restrict the types of investments OneAscent may use in the client's account, or the allocations to a security type. Clients engaging OneAscent on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and OneAscent.

In the event that you are invested in an account that utilizes an Overlay Manager, such as an UMA, you will grant the Overlay Manager complete and unlimited discretionary trading authority with respect to your account. The Overlay Manager will be solely responsible for the day-to-day investment management decisions for your account, and neither OneAscent nor any third party manager will be responsible for implementing the investment trading decisions.

**Item 17: Voting Client Securities**

Copies of our Proxy Voting Policies are available upon request.

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. At our discretion, OneAscent will vote proxies on behalf of its clients.

**Item 18: Financial Information**

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per account and more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.