



WAYFINDING FINANCIAL, LLC

PART 2A – FIRM BROCHURE

09/05/2021

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This brochure provides information about the qualifications and business practices of Wayfinding Financial, LLC (“Wayfinding”). If you have any questions about the contents of this brochure, please contact us at 425-361-0707. 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. Wayfinding Financial, LLC is a Registered Investment Adviser. Registration as an Investment Adviser with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Additional information about Wayfinding Financial, LLC is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as an IARD number. The IARD number for Wayfinding Financial is IARD# 306208.

ITEM 2 – MATERIAL CHANGES

SUMMARY OF MATERIAL CHANGES

This brochure is provided further to our last brochure dated July 14, 2021. For this update, we have provided more information for the Additional Services received as noted in Item 14.

In the future, this section will discuss specific material changes that are made to the Brochure and provide clients with a summary of such changes. Following the SEC and state rules, we will ensure that clients receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of the Advisor’s fiscal year. We will provide other ongoing disclosure information about material changes, as necessary.

Currently, a free copy of our Brochure may be requested by contacting Trent O’Neal, Chief Compliance Officer of Wayfinding Financial, at 425-361-0707. The Brochure is also available on our website www.wayfindingfinancial.com.

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ITEM 4 – ADVISORY BUSINESS

At Wayfinding Financial, LLC (“Wayfinding”) we are committed to helping clients build, manage, and preserve their wealth. Our Firm became a registered investment adviser in December 2019 and is owned by Donald O’Neal, Trent O’Neal, and Teresa Brokaw. Through our investment advisor representatives (“Representatives”) we provide investment advisory services for individuals, high net worth individuals, foundations, employer sponsored retirement plans, charitable organizations, institutions, trusts, and estates.

To help our clients achieve their financial goals we provide Investment Management Services and Financial Planning. In other situations, we may provide Investment Management Services for clients of a brokerage firm as described below under Financial Institution Consulting Services.

INVESTMENT MANAGEMENT SERVICES

We primarily manage advisory accounts on a discretionary basis, although we do have some existing clients who are managed on a non-discretionary basis. For discretionary accounts, we execute the day-to-day transactions without seeking prior client consent based on the client’s financial goals and objectives. Clients may impose restrictions on certain securities, industries, or sectors, but must advise us of any such restrictions in writing. We primarily allocate client assets among various equities, Exchanged Traded Funds (“ETFs”), no-load or load-waived mutual funds, or alternative investments.

In some cases when appropriate for the client, we may recommend utilization of a third-party money manager (“TPMM”). If a TPMM is recommended and selected by the client, we will assist the TPMM by gathering client information pertaining to financial situation, investment objectives, and reasonable restrictions to be imposed upon the management of the account. However, it is important to know that if a TPMM is utilized by the client, we will not offer advice on any specific securities or other investments in connection with the account(s) managed by the TPMM.

We have some existing clients who are utilizing the Envestnet Platform (“Envestnet”), which is a separate and unaffiliated company that provides portfolio modeling, account trading and administration systems. The services provided by Envestnet include assessment of the client investment needs and objectives, implementation of an asset allocation, delivery of style allocations, trading, ongoing investment monitoring and rebalancing, reporting, and billing. The relationship between Envestnet and the client is under a separate agreement from any agreement signed between the client and Wayfinding.

Clients may be referred to an automated investment program in a separate and unaffiliated web-based electronic algorithm asset management program provided by Betterment LLC (“Betterment”). Betterment’s CRD # is 149117. Betterment utilizes software algorithms that take into consideration the client’s risk tolerance, age, time frame, intended use of funds, financial objectives, and goals, in efforts to create a portfolio that closely matches the investor’s overall risk/reward profile. Betterment may rebalance portfolios periodically. All trading in the Robo-Managed Program is performed on a discretionary basis by Betterment.

For employer-sponsored retirement plans with participant-directed investments, our Firm provides its retirement advisory services (“Retirement Plan Services”) as an investment advisor as defined under Section 3(21) of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). When serving as an ERISA 3(21) investment advisor, the Plan Sponsor and our Firm share fiduciary responsibility. The Plan Sponsor retains ultimate decision-making authority for the investments and may accept or reject the recommendations in accordance with the terms of a separate ERISA 3(21) Plan Sponsor Investment Management Agreement between us and the Plan Sponsor. Under the 3(21) agreement, we provide the following services to the Plan Sponsor: (1) Screen investments and make recommendations; (2) Monitor the investments, suggesting replacement investments when appropriate; (3) Provide a quarterly monitoring report; (4) Assist the plan sponsor in developing an Investment Policy Statement (“IPS”); (5) Recommend QDIA alternatives; and (6) Recommend non-discretionary model portfolios.

We can also be engaged to provide Plan Consulting Services. Plan Consulting Services includes non-fiduciary financial education to Plan participants, initial and ongoing enrollment/education workshops, benchmarking the Plan services, education to fiduciary committee members, and monitoring the service provider. The scope of education provided to participants will not constitute “investment advice” within the meaning of ERISA and participant education will relate to general principles for investing and information about the investment options currently in the Plan.

For all Investment Management Services we determine the client's objectives, time horizons, risk tolerance, and liquidity needs through in-depth interviews, questionnaires, or general discussions. Based on client needs, we develop a client's personal profile and tailor an ongoing investment strategy. It is important that clients notify us immediately if circumstances have changed with respect to their financial situation. If a non-discretionary relationship is in place, we will make investment recommendations and trade only with client authorization. In some situations, and in our sole discretion, we may designate an account(s) as a standalone account ("Standalone Account"), in which a client has requested customized investment management, long-term holding, or other instructions.

FINANCIAL PLANNING

Through the financial planning process, our team strives to engage our clients in conversations around the family's goals, objectives, priorities, vision, and legacy – both for the near term as well as for future generations. With the unique goals and circumstances of each family in mind, our team will offer financial planning ideas and strategies to address the client's holistic financial picture; including estate, income tax, charitable, cash flow, wealth transfer, and family legacy objectives. Our team partners with our client's other advisors (CPAs, Enrolled Agents, Estate Attorneys, Insurance Brokers, etc.) to ensure a coordinated effort of all parties toward the client's stated goals. Such services include various reports on specific goals and objectives or general investment and/or planning recommendations, guidance to outside assets, and periodic updates.

All Financial Planning clients are unique and require different services that we provide such as: (1) Review and clarification of client's financial goals; (2) Assessment of client's overall financial position including cash flow, balance sheet, investment strategy, risk management, and estate planning; (3) Creation of a unique plan for each goal clients have for real estate, education, retirement or financial independence, charitable giving, estate planning, business succession, and other personal goals; (4) Development of a goal-oriented investment plan; (5) Design of a risk management plan including risk tolerance, risk avoidance and mitigation; and (6) Crafting and implementation of, in conjunction with estate and/or corporate attorneys as tax advisor, an estate plan to provide for clients and/or their heirs in the event of an incapacity or death.

A written evaluation of each client's initial situation or Financial Plan may be provided to the client. An annual review can be provided by the Advisor, if indicated by the client and Advisor per the Agreement. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

FINANCIAL INSTITUTION CONSULTING SERVICES

Our Firm has an agreement with EF Legacy Securities, LLC ("EF Legacy Securities") to provide investment consulting services to certain brokerage customers of EF Legacy Securities. EF Legacy Securities will pay compensation to our Firm for providing investment consulting services to its brokerage customers. This consulting arrangement does not include assuming discretionary authority over brokerage accounts or the monitoring of securities. These consulting services offered may include a general review of client investments holdings, which may or may not result in a Representative making specific securities recommendations or offering general investment advice.

This relationship presents a potential conflict of interest. It is up to the brokerage client to determine if they want Wayfinding engaged for these services, and if so, must provide Wayfinding third-party access to the investments. Further, no other additional compensation will be paid by EF Legacy Securities to our Firm in connection with the investment consulting services. Our Firm will not hold itself out to the public as engaging in brokerage activities. EF Legacy Securities and Wayfinding are separate and unrelated entities.

ASSETS

As of December 31, 2020, our Firm manages \$231,629,921 in total assets under management. We manage \$228,974,655 in discretionary assets and \$2,655,266 in non-discretionary assets.

INVESTMENT MANAGEMENT SERVICES

Our Firm charges an advisory fee (“Advisory Fee”) based on an annual percentage of client’s assets that we manage. Our maximum annual Advisory Fee is 1.25%. Advisory Fees are billed quarterly in advance based on the average daily balance during the previous calendar quarter. For any new accounts we will use the average daily balance at the end of the quarter to calculate the Advisory Fee for the partial quarter the account was open. Fees may vary and be negotiated based on the size of the account, complexity of the portfolio, familial relationship, extent of activity in the account, etc. The specific fee and billing arrangement is detailed in the Advisory Agreement that a client signs to engage our Firm. The Advisory Agreement also provides us authority to debit Advisory Fees directly from our clients’ account(s). All Advisory Fees are stated in the statements clients receive from the Custodian that holds the account(s).

For situations where we recommend, and the client engages a TPMM (such as Envestnet) through a separate agreement, it is important to know that the TPMM charges a fee that is separate, distinct, and in addition to the Advisory Fee we charge. For clients in the Envestnet program, the fees charged by Envestnet are disclosed in their paperwork and are separate, distinct, and in addition to our Advisory Fee. For clients who utilize Betterment, the Advisory Fee we charge is shared between us and Betterment. For Standalone Accounts, we charge the client 25 basis points (0.25%) annually, although in some cases we may waive the fee completely. While designating a Standalone Account is done to benefit the client, we have a conflict of interest to move the client out of the Standalone Account in order to earn more in Advisory Fees. In all cases, we must act as a fiduciary and place the client’s interests in front of our own.

Clients may terminate the Advisory Agreement immediately upon written notice. If terminated, any unearned Advisory Fees will be rebated back to the account through an electronic credit or check to the client. Upon termination, the client is responsible for monitoring the securities in their account, and we will have no further obligation to act or advise with respect to those assets. In the event of client’s death or disability, Wayfinding will continue management of the account until we are notified of client’s death or disability and given alternative instructions by an authorized party.

For Retirement Plan Services, we charge an annual fee (“Retirement Plan Fee”) as negotiated with the client and as disclosed in the Retirement Plan Services agreement (“Plan Sponsor Agreement”) and will not exceed 1.25% annually. The Retirement Plan Fee begins with the effective date of the Plan Sponsor Agreement. For that calendar quarter, fees will be adjusted pro rata based upon the number of calendar days in the calendar quarter that the Agreement was effective. Our Retirement Plan Fee is billed in arrears on the last business day of the quarter or as indicated on the Plan Sponsor Agreement. For plans where we are authorized in the Plan Sponsor Agreement to debit our fee from the Custodian, our Retirement Plan Fee is deducted directly from the participant accounts. Either party may terminate the Plan Sponsor Agreement at any time upon immediate notice. Clients are responsible to pay for services rendered until the termination of the agreement.

Unless the client directs otherwise, we will generally recommend TD Ameritrade Institutional to serve as the broker-dealer/custodian (“Custodian”) for client assets. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. (“TD Ameritrade”), Member FINRA/SIPC. TD Ameritrade charges transaction fees for effecting certain securities transactions (i.e. transaction fees for certain no-load mutual funds, individual equity, and fixed income securities transactions, etc.). In addition to our Advisory Fee and Custodian charges (transaction fees), clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). Accordingly, client should review the fees charged by the investments, Custodian, Third Party Money Managers, Envestnet, and our Advisory Fee to fully understand the total amount of the fees being paid. Additionally, the investments selected for the clients are not exclusively available to the Advisor and could be obtained through other unaffiliated firms and potentially at a lower fee.

In some cases, we may have the option to utilize an investment that has no transaction fees (“NTF”). In our decision to purchase any NTF, we consider our expected holding period of the fund, the position, performance, size, and the expense ratio of the fund versus alternative funds. Depending on our analysis and future events, NTF funds might not always be in a client’s best interest.

FINANCIAL PLANNING

For our Investment Management clients, financial planning services are included in the Investment Management fees described above. For stand-alone financial planning arrangements, Wayfinding will provide Financial Planning and charge the client a planning fee ("Planning Fee") using either a fixed fee or an hourly rate.

Under our fixed fee arrangement, any fee will be agreed upon in advance of services being performed and clearly shown on the Financial Planning Agreement. The fee will be determined based on factors including the complexity of the client's financial situation, agreed upon deliverables, and whether the client intend to implement any recommendations through Wayfinding. Fixed fees for financial plans range from \$1,000 to \$4,000. Clients who engage us for hourly planning will be charged up to \$250 per hour.

Typically, we complete a plan within a month and will present it to the client within 90 days of the contract date, provided all information needed to prepare the financial plan has been delivered to us. Planning Fees are billed at the execution of the Financial Planning Agreement. Clients may terminate the financial planning agreement by providing us with written notice. There is no penalty for termination of a financial planning agreement prior to the plan being delivered to the client. We will not require prepayment of more than \$1,200 in fees per client, six (6) or more months in advance of providing any services.

We may make recommendations to purchase insurance products during the Financial Planning process. This creates a conflict of interest to recommend products or services where Wayfinding and/or the Representative receives compensation. However, we will make all recommendations independent of such considerations and based solely on our obligations to consider the client's objectives and needs. Clients have the option to purchase investment products we recommend through us or through the agent of their choice.

FINANCIAL INSTITUTION CONSULTING SERVICES

For brokerage customers who have provided third-party access to Wayfinding, we receive a flat consulting fee of \$65 each quarter for each Contract with a market value equal to or greater than \$50,000 as of the calendar quarter end. No compensation is paid for those Contracts with values less than \$50,000. Client may terminate this authorization at any time with written notice to our Firm.

ITEM 6 - PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not charge advisory fees on a share of the capital appreciation of the funds or securities in a client account (so-called performance-based fees).

ITEM 7 - TYPES OF CLIENTS

We provide investment advice to individuals, high net worth individuals, foundations, employer sponsored retirement plans, charitable organizations, institutions, trusts, estates, and broker-dealers. We do not have minimum dollar amount to open and maintain an advisory account with our Firm.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

Wayfinding utilizes personalized investment strategies to meet the needs and goals of clients. We provide a consultative process which combine both comprehensive financial planning concepts along with a disciplined investment allocation aligned with planning based individualized client's risk/return needs.

Asset Allocation: Asset Allocation is the process of attempting to maximize our client's portfolio objectives while minimizing the associated risks. We manage diversified portfolios utilizing Exchange Traded Funds (ETFs) and actively managed institutional share class mutual funds to provide a long-term core strategic asset allocation. The strategic allocation decisions generally consider the recommendation of the recognized best in the business firms' security research (i.e. Morningstar, Fidelity Institutional Asset Management, Blackrock, and other third-party sources). These core allocations will focus on seeking non-correlated assets to reduce short-term volatility. We also will incorporate short-term tactical themes representing opportunities given the current state of the economy.

Mutual Fund and/or ETF Analysis: We use ETFs to appropriately weight sectors, geographies, market-caps, and styles to ensure portfolios accurately reflect opportunity within capital market assumptions over time. We look at the underlying assets in a mutual fund or ETF to determine if there is significant overlap in the underlying investments held in other fund(s) in the client's portfolio. We also monitor the funds or ETFs to determine if they are continuing to follow their stated investment strategy. A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. Since we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security thereby increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF which could make the holding(s) less suitable for the client's portfolio.

Constraints: We believe wealth can be achieved through a disciplined, managed approach that remains fully invested. Market timing techniques generally will not be employed. Over the course of a market cycle, we may be under or overweight in certain sectors to take advantage of potential market opportunities. Positions may be increased or reduced as price, performance, and market conditions warrant. Clients should keep in mind that historical short-term results have been a less reliable indicator of management performance than compounded returns generated over longer periods of time.

Ongoing Review: Communication with clients is ongoing with a focus on progress to the client's investment planning goals. In addition to quarterly account statements from the Custodian, we send clients a personalized quarterly performance evaluation. The evaluation reviews asset allocation and highlights account performance considering stated guidelines. It also supplies relevant benchmarks against which clients may use to help evaluate performance. Investment performance will be reviewed at least annually to determine the continued feasibility of achieving the client's objectives.

Wayfinding rebalances portfolios on a regular basis to ensure investment allocations remain consistent to client objectives. Periodically we may encounter economic conditions that warrant temporary adjustments to the asset allocation of an investment strategy or portfolio. If we believe that these conditions present either an increase in risk or opportunity for that particular asset class, we may alter the appropriate allocation to reflect this conviction.

Third Party Money Managers: As noted above, we may recommend the use of a TPMM to manage some or all a client's investments. A risk of investing with a TPMM who has been successful in the past is that they may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a manager's portfolio, there is also a risk that the manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory, or reputational deficiencies.

Alternative Investments: If deemed appropriate for a client's portfolio, we may recommend investments classified as "alternative investments". Alternative investments may include a broad range of underlying assets including, but not limited to, hedge funds, private equity, venture capital, and registered, publicly traded securities. Alternative investments are speculative, not suitable for all clients, and intended for only experienced, sophisticated investors who are willing to bear the high risk of the investment.

RISK OF LOSS

A client's investment portfolio is affected by general economic and market conditions, such as interest rates, availability of credit, inflation rates, economic conditions, changes in laws, and national and international political circumstances. Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Wayfinding will assist clients in determining an appropriate strategy based on their tolerance for risk.

Each client engagement will entail a review of the client's investment goals, financial situation, time horizon, tolerance for risk, and other factors to develop an appropriate strategy for managing a client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a client's account(s). Wayfinding shall rely on the financial and other information provided by the client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the client to inform Wayfinding of any changes in financial condition, goals, or other factors that may affect this analysis.

Our methods rely on the assumption that the underlying companies within our security allocations are accurately reviewed by the rating agencies and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investors should be aware that accounts are subject to the following risks:

Market Risk: Even a long-term investment approach cannot guarantee a profit. Economic, political, and issuer-specific events will cause the value of securities to rise or fall. Since the value of investment portfolios will fluctuate, there is risk of losing money and investment may be worth upon liquidation.

Foreign Securities and Currency Risk: Investments in international and emerging-market securities include exposure to risks such as currency fluctuations, foreign taxes and regulations, and the potential for illiquid markets and political instability.

Capitalization Risk: Small-cap and mid-cap companies may be hindered because of limited resources or less diverse products or services. Their stocks have historically been more volatile than the stocks of larger, more established companies.

Interest Rate Risk: In a rising rate environment, the value of fixed-income securities generally declines, and the value of equity securities may be adversely affected.

Credit Risk: The risk that the issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value and thus, impact the fund's performance.

Securities Lending Risk: Securities lending involves the risk that the fund loses money because the borrower fails to return the securities in a timely manner or at all. The fund could also lose money if the value of the collateral provided for loaned securities, or the value of the investments made with the cash collateral, falls. These events could also trigger adverse tax consequences for the fund.

Exchange Traded Funds: ETFs face market-trading risks, including the potential lack of an active market for shares, losses from trading in the secondary markets, and disruption in the creation/redemption process of the ETF. Any of these factors may lead to the fund's shares trading at either a premium or a discount to its "net asset value."

Performance of Underlying Managers: We select the mutual funds and ETFs in the asset allocation portfolios. However, we depend on the manager of such funds to select individual investments in accordance with their stated investment strategy.

Non-Liquid Alternative Investments: From time to time, we recommend to certain qualifying clients that a portion of such clients' assets be invested in private funds, private fund-of-funds, and/or other alternative investments (collectively, "Non-Liquid Alternative Investments"). Non-Liquid Alternative Investments are not suitable for all clients and are offered only to those qualifying clients for whom we believe such an investment is suitable and in line with their overall investment strategy. Non-Liquid Alternative Investments typically are available to only a limited number of sophisticated investors who meet the definition of "accredited investor" under Regulation D of the Securities Act of 1933, as amended (the "Securities Act"), or "qualified client" under the Investment Advisers Act of 1940, or "qualified purchaser" under the Investment Company Act of 1940. Non-Liquid Alternative Investments present special risks for our clients, including without limitation: limited liquidity, higher fees and expenses, volatile performance, no assurance of investment returns, heightened risk of loss, limited transparency, additional reliance on underlying management of the investment, special tax considerations, subjective valuations, use of leverage, and limited regulatory oversight. When a Non-Liquid Alternative Investment invests part or all of its assets in real estate properties, there are additional risks that are unique to real estate investing, including but not limited to: limitations of the appraisal value; the borrower's financial conditions (if the underlying property has been obtained by a loan), including the risk of foreclosures on the property; neighborhood values; the supply of and demand for properties of like kind; and certain city, state, and/or federal regulations. Additionally, real estate investing is also subject to possible loss due to uninsured losses from natural and man-made disasters. The above list is not exhaustive of all risks related to an investment in Non-Liquid Alternative Investments. A more comprehensive discussion of the risks associated with a particular Non-Liquid Alternative Investment is set forth in that fund's offering documents, which will be provided to each client subscribing to a Non-Liquid Alternative Investment, for review and consideration. It is important that each potential, qualified investor carefully read each offering or private placement memorandum prior to investing.

Options and Other Derivatives Risk: Client portfolios may purchase or sell options, warrants, equity-related swaps, or other derivatives that trade on an exchange. Both the purchasing and selling of call and put options entail risks. An investment in an option may be subject to greater fluctuation than an investment in the underlying securities. The effectiveness of purchasing or selling stock index options as a hedging technique depends upon the extent to which price movements in the hedged portfolios correlate with price movements of the stock index selected. Being that the value of an index option depends upon movements in the level of the index rather than the price of a particular security, whether a portfolio realizes a gain or loss will depend upon movements in the level of security prices in securities markets generally rather than movements in the price of a particular security.

Interest Rate Risk: Refers to the risk that the market value of bonds will go down when interest rates go up. Due to this risk, investors can lose money in any bond fund or laddered individual bond portfolio, if a bond is sold before its maturity date. Interest rate risk applies to investments in insured bonds and U.S. Treasury Bonds. Longer-term bonds and bond funds tend to have higher interest rate risks.

Credit Risk: The risk that companies or other issuers may fail to pay their debts (including the debt owed to holders of their bonds). Consequently, this affects individual bond ladders, mutual funds, and exchange traded funds (ETFs) that hold these bonds. Credit risk is less of a factor in investments including insured bonds or U.S. Treasury Bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.

Prepayment Risk: Issuers may choose to pay off debt earlier than the stated maturity date on a bond. For example, if interest rates fall, a bond issuer may decide to “retire” its debt and issue new bonds that pay a lower rate. When this happens, proceeds from the sale of individual bonds or a bond fund may not be able to be reinvested in an investment with as high a return or yield.

ITEM 9 - DISCIPLINARY INFORMATION

We do not have any legal, financial, or other “disciplinary” item to report.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

As noted above, some Representatives are also licensed to sell insurance and may receive commissions from the sales of insurance products such as life, disability, and fixed annuities. Should a client wish to purchase insurance from the Representatives with assets that are not advisory assets, the client will pay the premium or commission on those assets that are separate and distinct from any Advisory Fee. This could create a conflict for the Representative to sell a product to make a commission—but in all cases the client interests must be placed before ours. Representatives, when acting as an insurance Agent, may also receive commission trails from the sale of insurance products.

ITEM 11 - CODE OF ETHICS

We have implemented policies and procedures to govern our employees and to mitigate the conflicts of interest we encounter when providing our advisory services to clients. These include:

- A Code of Ethics that each employee is required to review and sign an acknowledgement of receipt and understanding (upon hire, and annually);
- Prohibitions on the misuse of material non-public information;
- Personal securities trading policies and procedures (governing not only our employee, but also the members of their household and any other securities or brokerage accounts where they have beneficial ownership of with a spouse, family member or other person). Employees are not allowed to:
 - Trade on inside information;
 - “Front-run” or trade in anticipation of client transactions;
 - Trade or participate in any activity prohibited under the federal securities laws; or
 - Place their interests in front of clients.

We strive to achieve the highest ethical and fiduciary standards (in dealing with clients, the public, vendors, prospective clients, and each other). As a fiduciary, we have an affirmative duty to act with integrity, competence, and care; this includes disclosing all potential and actual conflicts of interest.

It may be possible for the Representative to buy or sell securities in their personal accounts that were also purchased in client accounts. We have a strict policy against using the trade flow of clients to economically benefit our Firm or Representatives and we monitor the transactions of Representative's accounts to ensure that client interests are placed first.

We perform services for various other clients. We may give advice or take actions for our clients that differ from the advice given to other clients. The timing or nature of any action taken for all clients or other sponsors may also vary. For more information or to request a copy of our Code of Ethics, please contact us at 425-361-0707.

ITEM 12 - BROKERAGE PRACTICES

As noted above, we work primarily with TD Ameritrade for administrative convenience and because TD Ameritrade offers a good value to our clients for the transaction costs and other costs incurred. If a client is referred to Betterment, they will use Betterment Securities as their Custodian, which is the affiliated broker-dealer of Betterment. The client is not obligated to effect transactions through any broker-dealer recommended by Wayfinding. In recommending broker-dealers, we will comply with our fiduciary duty to seek best execution and will consider such relevant factors as: (1) price; (2) the Custodian's facilities, reliability, and financial responsibility; (3) the ability of the Custodian to effect transactions, particularly with regard to such aspects as timing, order size, and execution of order; and (4) Any other factors that we consider to be relevant.

We also participate in the institutional advisor program (the "Program") offered by TD. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. We receive some benefits from TD Ameritrade through participation in the Program (please see the disclosure under Item 14 below).

We may aggregate trades for clients. The allocations of a particular security will be determined before the trade is placed with the broker. When practical, client trades in the same security will be bunched in a single order ("block") to obtain best execution at the best security price available. When employing a block trade: (1) we will make reasonable efforts to attempt to fill client orders by day-end; (2) if the block order is not filled by day-end, we will allocate shares executed to underlying accounts on a pro rata basis, adjusted as necessary to keep client transaction costs to a minimum; (3) if a block order is filled (full or partial fill) at several prices through multiple trades, an average price and commission will be used for all trades executed; (4) all participants receiving securities from the block trade will receive the average price; and (5) only trades executed within the block on the single day may be combined for purposes of calculating the average price.

It is expected that this trade aggregation and allocation policy will be applied consistently. However, if application of this policy results in unfair or inequitable treatment to some or all our clients, we may deviate from this policy.

ITEM 13 - REVIEW OF ACCOUNTS

Accounts are reviewed by our Chief Compliance Officer who is responsible for overseeing all investment advisory activities for the firm, although such reviews may be assigned or delegated to an appropriate reviewer. The frequency of reviews is determined based on the client investment objectives. Accounts are generally reviewed quarterly, but in any event, no less than annually.

More frequent reviews may be triggered by a change in client's investment objectives, tax considerations, large deposits or withdrawals, large sales or purchases, loss of confidence in corporate management, or changes in the economic climate.

Investment advisory clients receive standard account statements from the Custodian of their accounts typically on a monthly basis. We may also provide clients with a written report summarizing their account(s). There may be a difference between the report provided by Wayfinding and the statement from the Custodian based on settlement versus trade date accounting, dividends, or accrued interest. It is important that clients rely on the value as provided by the Custodian for the actual value of their accounts.

Additionally, we have contracted with various technology firms ("Technology Firms"), all unaffiliated firms to utilize their technology platforms which support our data reconciliation, performance reporting, fee calculation, client relationship maintenance, quarterly performance evaluations, and other functions related to the administrative tasks of managing client accounts. Due to these arrangements, these Technology Firms will have access to client accounts, but will not serve as an investment advisor to our clients or bill the accounts. These Technology Firms charge us a fee to utilize the software that is born by our Firm.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

We pay referral fees to independent solicitors for the referrals of their clients in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940. Such referral fees represent a share of our investment advisory fee charged to our clients. This arrangement will not result in higher costs to our clients. In this regard, we maintain Solicitors Agreements in compliance with Rule 206 (4)-3 of the Investment Advisers Act of 1940 and applicable state and federal laws. All clients referred by Solicitors to our Firm will be given full written disclosure describing the terms and fee arrangements between our Firm and Solicitor(s). In cases where state law requires licensure of Solicitors, we ensure that no solicitation fees are paid unless the Solicitor is registered as an Investment Adviser Representative of our Firm. The Solicitor will not provide clients any investment advice on behalf of our Firm. Our Firm does not accept compensation for client referrals.

As disclosed under Item 12 Brokerage Practices, we participate in TD Ameritrade’s institutional client program and we may recommend TD Ameritrade for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give to our clients, although we receive economic benefits through our participation in the program that are typically not available to any other independent Investment Advisors participating in the program. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations, research related products and tools; consulting services; access to a trading desk serving advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third-party vendors. TD Ameritrade may also have paid for business consulting and professional services received by some of our related persons. Some of the products and services made available by TD Ameritrade through the program may benefit us, but may not benefit client accounts. These products or services may assist us in managing and administering accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by our Firm or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duties to clients, we always endeavor to put the interests of our clients first. Clients should be aware; however, that the receipt of economic benefits by our Firm or our related persons in and of itself creates a conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services.

Our Firm also receives from TD Ameritrade certain additional economic benefits (“Additional Services”) that may or may not be offered to any other independent Investment Advisors participating in the program. Specifically, the Additional Services include TD Ameritrade paying Technology Firms including, but not limited to RIA Systems, LLC (back-office service provider) and Right Capital (financial planning software). TD Ameritrade provides the Additional Services to our Firm in its sole discretion and at its own expense. Our Firm does not pay any fees to TD Ameritrade for the Additional Services.

Our Firm’s receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to our Firm, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, our Firm’s client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with our Firm, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, our Firm may have an incentive to recommend to its clients that the assets under management by our Firm be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. Our Firm’s receipt of Additional Services does not diminish its duty to act in the best interests of its clients, including to seek best execution of trades for client accounts.

ITEM 15 – CUSTODY

As noted in the Advisory Agreement signed by the client, we do have the ability to deduct our advisory fee directly from client accounts. Additionally, we are reporting custody on certain accounts where the client has requested the ability to electronically transfer assets to a third-party through a standing limited power of attorney (known as a SLOA). Although, we do not have any relationship, affiliation, or share an address with any of the third-parties, we are following SEC guidelines to report having custody of these assets. Other than these situations, we do not have custody of any client assets.

ITEM 16 – INVESTMENT DISCRETION

Clients grant us discretion through a limited power of attorney to select, purchase, or sell securities without obtaining client specific consent within client accounts. Our Advisory Agreement will provide us discretion authority to trade accounts.

ITEM 17 – VOTING YOUR SECURITIES

We will not vote proxies on clients' behalf. Clients are welcome to vote proxies or designate an independent third-party at their own discretion. Proxy voting authority is designated in the custodial account documents. Proxy materials must be sent directly to the client or assigned third-party. Clients can contact our office with questions about a particular solicitation by phone at 425-361-0707.

ITEM 18 – FINANCIAL INFORMATION

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year.

The Firm received a Paycheck Protection Plan Loan (\$26,557.00) through the SBA in conjunction with the relief afforded from the CARES Act. The Firm procured the loan to guarantee payroll due to the potential of decreased revenue associated with the unprecedented health pandemic. It also aids in supporting and retaining our staff and ongoing operations due to the potential for continued revenue decline in 2020.