

## Item 1: Cover Page



### **IMPACTfolio<sup>®</sup>, LLC**

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Denver, CO 80206

(844) 218-3800

### **Form ADV Part 2A – Firm Brochure**

February 9, 2026

This Brochure provides information about the qualifications and business practices of IMPACTfolio<sup>®</sup>, LLC, "IMPACTfolio<sup>®</sup>". If you have any questions about the contents of this Brochure, please contact us at (844) 218-3800. 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.

IMPACTfolio<sup>®</sup>, LLC is registered as an Investment Adviser with the Securities & Exchange Commission "SEC". Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about IMPACTfolio<sup>®</sup>, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the firm's identification number 291716.

## Item 2: Material Changes

Since IMPACTfolio®'s previous annual amendment, dated February 18, 2025, the following are material changes:

- Item 4 has been updated to show assets under management on 12/31/2025.
- Item 8 has been updated to remove technical and charting methods of analysis.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of IMPACTfolio®.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 291716.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (844) 218-3800 or [info@impactfolio.co](mailto:info@impactfolio.co).

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## Item 4: Advisory Business

### Description of Advisory Firm

IMPACTfolio®, LLC is registered as an Investment Adviser with the Securities & Exchange Commission. IMPACTfolio® became licensed as an investment Adviser in January 2018. Jeffrey Scott Arnold is the Chief Compliance Officer and a Managing Member. Rebecca Laelia Kennedy and Julie Denise McDaniel are Managing Members of IMPACTfolio®, LLC. As of December 31, 2025, IMPACTfolio®, LLC reported \$288,881,574 in discretionary and zero non-discretionary Assets Under Management.

### Types of Advisory Services

#### Investment Management Service & Ongoing Financial Planning Services

We are in the business of managing individual investment portfolios utilizing an asset allocation model approach that provides several investment model options for clients based on their investment policy statement. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's circumstances are established, we develop a client's personal investment policy with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We provide our investment management services on a discretionary basis and will not give advance notice or seek the Client's consent when making changes or adjustments to the Portfolio. We may also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure.

IMPACTfolio® integrates environment, social responsibility, and corporate governance (ESG) factors with traditional financial analysis. Responsible investing and ESG strategies may operate by either excluding the investments of certain issuers or by selecting investments based on their compliance with factors such as ESG. These strategies may exclude certain securities, issuers, sectors, or industries from a client's portfolio, potentially negatively affecting the client's investment performance if an excluded security, issuer, sector, or industry outperforms. Responsible investing and ESG are subjective by nature, and IMPACTfolio® may rely on rankings, ratings, scores, and other analytic metrics provided by third parties in determining whether an issuer meets our standards for inclusion or exclusion. A client's perception may differ from that of IMPACTfolio® or a third party on how to judge an issuer's adherence to responsible investing principles.

This service also involves working with an Adviser on an ongoing basis to build and customize a holistic financial plan, monitor the plan's progress, and amend the plan over time for changes in the client's situation and goals.

As part of the ongoing financial planning process, a client will still receive a written or electronic financial plan designed to help achieve his or her stated financial goals and objectives. Follow-up meetings will be conducted as necessary and at the client's convenience. On at least an annual basis there will be a full review of the financial plan to ensure its accuracy and ongoing appropriateness. Updates and changes to the plan can be implemented at that time or sooner, if requested by the client.

### **Project-Based Financial Planning (Hourly)**

Project-based financial planning includes an evaluation of a client's current and future financial state by using currently known variables to estimate future cash flows, asset values and withdrawal plans. Once the information is reviewed, the Adviser will conduct various analyses and discuss the findings with the client. Ultimately, the client will receive a written or an electronic report, providing the client with a detailed financial plan designed to help achieve his or her stated financial goals and objectives.

The client and Adviser will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Planning:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren's education expenses (if appropriate).
- **Employee Benefits Optimization:** We can provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time to time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

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

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

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Excluding the aforementioned investment management services, our clients retain full control over all implementation decisions and are free to accept or reject any recommendation we make in their financial plan. If a client so chooses, we will guide them in the implementation of some or all of the recommendations. However, an additional fee for implementation help may be required if engaged in a project-based financial planning. See Item 5 below for additional information on fees and compensation.

### **Client Tailored Services and Client Imposed Restrictions**

All of our clients are offered the same suite of services. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client’s current situation and is used to construct a client specific plan to aid in the selection of a portfolio model that matches restrictions, needs, and targets of the client. Using an asset allocation model approach to portfolio management does have limitations in that we do not create customized or tailored portfolios for every client, other than to accommodate their investment restrictions.

### **Wrap Fee Programs**

We do not participate in wrap fee programs.

## **General Information**

IMPACTfolio<sup>®</sup>, LLC does not provide legal, accounting or insurance services. With your consent, we may work with other professional Advisers, such as an estate planning attorney, to assist with the coordination and implementation of accepted strategies. You should be aware that these other Advisers will charge you separately for their services and these fees will be in addition to our own Advisory fees.

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

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent

person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; any act or failure to act by a service provider maintaining an account.

Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document shall constitute a waiver of any rights that a client may have under federal and state securities laws.

## Item 5: Fees and Compensation

IMPACTfolio® is compensated only by the quarterly retainer fee or hourly financial planning fees paid by its clients. IMPACTfolio® and its agents are not affiliated with a broker/dealer or insurance broker, and as such do not carry licenses necessary to receive securities or insurance commissions. Please refer to section 12) Brokerage Practices for more information.

If our ADV Part 2A firm Advisory brochure was not delivered to you at least 48 hours prior to entering the contract with our firm, then you have the right to terminate the engagement without penalty within five (5) business days after entering into the agreement. How we are paid depends on the type of Advisory service we are performing. Please review the fee and compensation information below.

### **Retainer Fee**

The fee for clients with assets under management (AUM) less than \$3,000,000 is \$7,500 annually per client or \$1,875 per quarter, not to exceed 2% of client assets under management. Fees will be reassessed quarterly to detect a decline in assets that merits a reduction in fee, and the fee will be adjusted at that time. For clients in excess of \$3,000,000 of AUM, the annual fee is between \$7,501-\$50,000 based on complexity and needs of the client. For clients who are moving into a new fee structure, an updated Advisory contract will be signed prior to the commencement of the new fee.

Advisory fees are directly debited from client accounts and paid in arrears on a quarterly basis. See Item 15 of Form ADV Part 2A for requirements of the firm, when fees are directly debited from client accounts. Accounts initiated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. Accounts terminated during a calendar quarter will be charged based on the number of days the account was under management during the calendar quarter, up to the date of termination. An account may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account. Our fees are not exclusively tied to the value of the client's investment portfolio. We feel strongly that this structure is the most equitable to investors and helps to reduce the conflicts of the asset-gathering model.

***No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current Advisory agreement.***

## ***Project-based Financial Planning (Hourly Fees)***

Alternatively, we may be engaged for financial planning under a Project-Based Financial Planning arrangement, the cost of which is estimated based upon the scope and complexity of the project as well as the time involved. The firm's hourly rate is \$275 per hour, billed in 15-minute increments. Prior to entering into an agreement with the firm, you will receive an estimate of the overall cost, which may contain a fee range rather than one, fixed price. We require a deposit in advance for financial planning engagements; this deposit will be half of the lowest estimated total fee. The balance of our planning fee is generally due upon delivery of your plan. We do not charge fees of \$500 or more six months or more in advance; please see Item 15 for more information on issues related to custody of client funds and securities.

## **Other Types of Fees and Expenses**

Our fees are exclusive of trading commissions, transaction fees, and other related costs and expenses which may be incurred by the client at the custodian. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

We do not offer performance-based fees and therefore do not engage in side-by-side management.

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

We provide financial planning and portfolio management services to individuals, high net-worth individuals, trusts and estates, banking or thrift institutions, pension and profit sharing plans, charitable organizations, corporations or other businesses, and other investment Advisers.

We do not have a minimum account size requirement.

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

Our primary methods of investment analysis are fundamental, ESG analysis and asset allocation.

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

### **ESG (Environment, Social responsibility, and Governance)**

IMPACTfolio® integrates environment, social responsibility, and corporate governance (ESG) factors with traditional financial analysis. Responsible investing and ESG strategies may operate by either excluding the investments of certain issuers or by selecting investments based on their compliance with factors such as ESG. These strategies may exclude certain securities, issuers, sectors, or industries from a client's portfolio, potentially negatively affecting the client's investment performance if an excluded security, issuer, sector, or industry outperforms. Responsible investing and ESG are subjective by nature, and IMPACTfolio® may rely on rankings, ratings, scores, and other analytic metrics provided by third parties in determining whether an issuer meets our standards for inclusion or exclusion. A client's perception may differ from that of IMPACTfolio® or a third party on how to judge an issuer's adherence to responsible investing principles.

**Asset allocation** is the focus of our investment strategy. In the portfolio construction process, we focus not only on asset classes such as equities, fixed income, and cash, but also on investment strategy styles such as fundamental, quantitative, active, and passive. We believe that diversification across both asset classes and investment strategies is critical for achieving an attractive reward-to-risk ratio in the portfolio.

We employ strategic asset allocation portfolios. Strategic allocations are managed to a specific allocation target and rebalanced periodically to ensure that the allocation remains on track. Through strategic asset allocation, we construct our long-term target weights for asset classes and strategies based on the client's time horizon, risk tolerance, and required rate of return to meet his or her financial goals.

### **Material Risks Involved**

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Concentration Risk:** Certain investment strategies focus on asset classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds

carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Options** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price. We have one investment strategy that may involve the use of options, however, this will be limited to covered calls and/or protective puts.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

## Item 9: Disciplinary Information

### Criminal or Civil Actions

IMPACTfolio®, LLC and its management have not been involved in any criminal or civil action.

### Administrative Enforcement Proceedings

IMPACTfolio®, LLC and its management have not been involved in administrative enforcement proceedings.

### Self-Regulatory Organization Enforcement Proceedings

IMPACTfolio®, LLC and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of IMPACTfolio®, LLC or the integrity of its management

## Item 10: Other Financial Industry Activities and Affiliations

No IMPACTfolio®, LLC employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No IMPACTfolio®, LLC employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading Adviser.

IMPACTfolio®, LLC does not have any related parties. As a result, we do not have a relationship with any related parties.

IMPACTfolio®, LLC only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

### **Recommendations or Selections of Other Investment Advisers**

IMPACTfolio®, LLC does not recommend clients to Outside Managers to manage their accounts for which compensation is received. If IMPACTfolio®, LLC provides you with a recommendation to an unaffiliated registered investment Adviser firm for management of your investment portfolio, we will first ensure we have conducted what we believe is an appropriate level of due diligence on the recommended Adviser. Please note that we are not compensated for any type of referral nor do we share in any fees such a firm receives for managing your account.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc. and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

### **Code of Ethics Description**

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to Advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- **Integrity** - Associated persons shall offer and provide professional services with integrity.
- **Objectivity** - Associated persons shall be objective in providing professional services to clients.
- **Competence** - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- **Fairness** - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- **Confidentiality** - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.

- **Professionalism** - Associated persons' conduct in all matter shall reflect credit of the profession.
- **Diligence** - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

## **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, Adviser to the issuer, etc.

## **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. In an effort to mitigate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

## **Trading Securities At/Around the Same Time as Client's Securities**

From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as clients. This will usually occur when utilizing block trading a security or securities across client accounts and our firm or "related person" is included in the block trade. See below in Item 12 under "Aggregating (Block) Trading for Multiple Client Accounts" for details on our block trading practices.

# **Item 12: Brokerage Practices**

## **Factors Used to Select Custodians and/or Broker-Dealers**

IMPACTfolio®, LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

## The Custodian and Brokers We Use

We recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Company, Inc. (Schwab), a registered broker/dealer, member FINRA/SIPC, to act as the custodian of clients' assets and to effect trades for their accounts. We are independently owned and operated and not affiliated with Schwab. Schwab provides us with access to its institutional trading and custody services, which are typically not available to its retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge once the custodial relationship is established. Schwab's services include custody, brokerage, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Commission rates and securities transaction fees charged to affect a client's transactions are established by Schwab.

For client accounts in its custody, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab.

### *“Soft Dollars”*

Charles Schwab makes available various support services that may not be available to retail customers. Some of those services help manage or administer clients' accounts, while others help us manage and grow our business. These support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us.

### Services that Benefit Clients

Charles Schwab provides clients with access to a range of investment products, execution of securities transactions, and custody of client assets. Services described in this paragraph generally benefit the client and their account. The investment products available through Charles Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by clients.

### Services That May Not Directly Benefit Clients

Charles Schwab also makes other products and services available to us that benefit us but may not directly benefit the client or their account. These products and services assist us in managing and administering client accounts. In addition to investment research, Charles Schwab also makes available software and other technology that:

- Assists with back-office functions, recordkeeping, and client reporting for client accounts.
- Provides access to client account data (such as duplicate trade confirmations and account statements).
- Provides pricing and other market data.

### Services That Generally Benefit Only Us

By using the services of Charles Schwab, we are offered other services intended to help us manage and further develop our business. These services include:

- Educational conferences and events.
- Consulting on technology, compliance, legal, and business needs.
- Publications and conferences on practice management and business succession.

### Our Interest in Charles Schwab Services

The availability of these services from Charles Schwab benefits us as we do not have to produce or purchase them independently. In addition, we do not pay Charles Schwab for these services. This presents a conflict of interest in that we have an incentive to recommend Charles Schwab based on our interest in these services. However, we observe our duty as a registered investment advisory firm to put our client's best interest first. We believe the selection of Charles Schwab as custodian and broker is in the best interests of clients based on the scope, quality, price, and overall value of services to clients rather than on those services that benefit us.

## **Aggregating (Block) Trading for Multiple Client Accounts**

Generally, we combine multiple orders for shares of the same securities purchased for Advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a flat fee for the transaction. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

## **Item 13: Review of Accounts**

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Jeffrey Scott Arnold, Chief Compliance Officer. The account is reviewed with regard to the client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the custodian for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

IMPACTfolio<sup>®</sup>, LLC will provide written and/or electronic reports to Investment Management clients on a quarterly basis. We urge clients to compare these reports against the account statements they receive from their custodian.

## Item 14: Client Referrals and Other Compensation

Other than services discussed in Item 12, above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not Advisory personnel for client referrals.

## Item 15: Custody

IMPACTfolio<sup>®</sup>, LLC does not accept custody of client funds except in the instance of authorized withdrawal of client fees from client accounts.

For client accounts in which IMPACTfolio<sup>®</sup>, LLC directly debits their Advisory fee:

1. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the Advisory fee.
2. The client will provide written authorization to IMPACTfolio<sup>®</sup>, LLC, permitting them to be paid directly for their accounts held by the custodian.

Clients will receive at least quarterly statements from the qualified custodian that holds and maintains the client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the reports that we may provide to you. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16: Investment Discretion

For those client accounts where we provide investment management services, we require discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an Advisory relationship has commenced. At the start of the Advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the Advisory contract and signed by the client.

## Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$1,200 in fees per client six months in advance.

## Privacy Policy

IMPACTfolio® recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. IMPACTfolio® will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information. IMPACTfolio® will provide the privacy statement to all clients annually.

We want our clients to understand what information we collect, how we use it, and how we protect it responsibly.

### Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment and planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

### What Information We Collect and Maintain

We may collect the following types of “nonpublic personal information” about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.

### What Information We Disclose

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. For example, in order for us to provide planning or investment management services to you, we

may disclose your personal information in limited circumstances to various service providers, such as our clearing firm. If the Financial Planner/Financial Adviser leaves IMPACTfolio® to join another firm, he or she may be permitted to retain copies of client information so that they can assist with the transfer of client accounts and continue to serve the client at their new firm.

“Opting-Out” of Third-Party Disclosures: If you do not want your Financial Planner/Financial Adviser to retain copies of your client sensitive information when he or she leaves us to join another firm, you may contact us by calling (844) 218-3800.

Otherwise, IMPACTfolio® will not disclose any personal information about you or your account(s) unless one of the following conditions is met:

- We receive your prior written consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient

Arrangements with companies not affiliated with IMPACTfolio® will be subject to confidentiality agreements.

#### How We Protect Your Personal Information

Privacy has always been important to IMPACTfolio®. We restrict and limit access to client information only to those who need to carry out their business functions. We educate employees about safeguarding client information and preventing unauthorized access, disclosure, or use. Employees will be required to acknowledge their acceptance and understanding of the privacy policy in writing. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information.



**IMPACTfolio<sup>®</sup>, LLC**

44 Cook Street, Suite 100  
Denver, CO 80206

(844) 218-3800

**Form ADV Part 2B – Brochure Supplement**

February 9, 2026

*For*

**Jeffrey Scott Arnold - Individual CRD# 3034274**

Partner, Portfolio Manager and Chief Compliance Officer

This brochure supplement provides information about Jeffrey Scott Arnold that supplements the IMPACTfolio<sup>®</sup>, LLC (“IMPACTfolio<sup>®</sup>, LLC”) brochure. A copy of that brochure precedes this supplement. Please contact Jeffrey Scott Arnold if the IMPACTfolio<sup>®</sup>, LLC brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Jeffrey Scott Arnold is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 3034274.

## Item 2: Educational Background and Business Experience

### Jeffrey Scott Arnold

Born: 1974

#### Educational Background

- 1997 – Bachelor of Science - Finance, West Virginia University
- 1997 – Bachelor of Science - Marketing, West Virginia University

#### Business Experience (past five years)

- 11/2017 – Present, IMPACTfolio®, LLC, Partner, Portfolio Manager and CCO
- 04/2014 – 10/2017, G&S Capital, Senior Financial Adviser
- 09/2009 – 04/2014, Schwab Private Client Investment Advisory, Inc., Portfolio Consultant

#### Professional Designations, Licensing & Exams

**CFP (Certified Financial Planner)®:** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 103,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.
- Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.
- CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3: Disciplinary Information

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

### Item 4: Other Business Activities

Jeffrey Scott Arnold is not involved with outside business activities.

### Item 5: Additional Compensation

Jeffrey Scott Arnold does not receive any economic benefit from any person, company, or organization, in exchange for providing clients Advisory services through IMPACTfolio®, LLC.

### Item 6: Supervision

Jeffrey Scott Arnold, as Partner, Portfolio Manager and Chief Compliance Officer of IMPACTfolio®, LLC, will adhere to the firm’s policy and procedures. He may be contacted at the phone number on this brochure supplement.



**IMPACTfolio<sup>®</sup>, LLC**

44 Cook Street, Suite 100  
Denver, CO 80206

(844) 218-3800

**Form ADV Part 2B – Brochure Supplement**

February 9, 2026

*For*

**Rebecca Laelia Kennedy - Individual CRD# 4649326**

Partner, Financial Planner

This brochure supplement provides information about Rebecca Laelia Kennedy that supplements the IMPACTfolio<sup>®</sup>, LLC (“IMPACTfolio<sup>®</sup>, LLC”) brochure. A copy of that brochure precedes this supplement. Please contact Jeffrey Scott Arnold if the IMPACTfolio<sup>®</sup>, LLC brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Rebecca Laelia Kennedy is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 4649326.

## Item 2: Educational Background and Business Experience

### Rebecca Laelia Kennedy, CFP®

Born: 1975

#### Educational Background

- 1998 – Bachelor of Science – Environmental Science, The Ohio State University

#### Business Experience (past five years)

- 2019 – Present, IMPACTfolio®, LLC, Partner and Financial Planner
- 2014 – 2019, Kennedy Financial Planning, Founder & Chief Compliance Officer
- 2006 – 2013, Brown & Tedstrom, Inc., Client Relationship Manager, Registered Assistant

#### Professional Designations, Licensing & Exams

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To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- **Ethics** – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.
- Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.
- CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3: Disciplinary Information

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

### Item 4: Other Business Activities

Rebecca Laelia is not involved with outside business activities.

### Item 5: Additional Compensation

Rebecca Laelia Kennedy does not receive any economic benefit from any person, company, or organization, in exchange for providing clients Advisory services through IMPACTfolio®, LLC.

### Item 6: Supervision

Rebecca Laelia Kennedy, as Partner, Financial Planner of IMPACTfolio®, LLC, will adhere to the firm’s policy and procedures. All supervision is handled by Jeffrey Scott Arnold, Chief Compliance Officer. He may be contacted at the phone number on this brochure supplement.



**IMPACTfolio<sup>®</sup>, LLC**

44 Cook Street, Suite 100  
Denver, CO 80206

(844) 218-3800

**Form ADV Part 2B – Brochure Supplement**

February 9, 2026

*For*

**Julie Denise McDaniel - Individual CRD# 4673079**

Partner, Financial Planner

This brochure supplement provides information about Julie Denise (Fletcher) McDaniel that supplements the IMPACTfolio<sup>®</sup>, LLC (“IMPACTfolio<sup>®</sup>, LLC”) brochure. A copy of that brochure precedes this supplement. Please contact Jeffrey Scott Arnold if the IMPACTfolio<sup>®</sup>, LLC brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Julie Denise (Fletcher) McDaniel is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 4673079.

## Item 2: Educational Background and Business Experience

### Julie Denise McDaniel, CFP®

Born: 1983

#### Educational Background

- 2006 – Bachelor of Science – Personal Financial Planning, Kansas State University

#### Business Experience (past five years)

- 2019 – Present, IMPACTfolio®, LLC, Partner and Financial Planner
- 2013 – 2019, Sharkey, Howes & Javer, Financial Planner

#### Professional Designations, Licensing & Exams

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The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 103,000 individuals have obtained CFP® certification in the United States.

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- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- **Ethics** – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.
- Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.
- CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3: Disciplinary Information

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

### Item 4: Other Business Activities

Julie Denise McDaniel is not involved with outside business activities.

### Item 5: Additional Compensation

Julie Denise McDaniel does not receive any economic benefit from any person, company, or organization, in exchange for providing clients Advisory services through IMPACTfolio®, LLC.

### Item 6: Supervision

Julie Denise McDaniel, as Partner, Financial Planner of IMPACTfolio®, LLC, will adhere to the firm’s policy and procedures. All supervision is handled by Jeffrey Scott Arnold, Chief Compliance Officer. He may be contacted at the phone number on this brochure supplement.

## IMPACTfolio<sup>®</sup>, LLC | Form CRS Relationship Summary | Dated February 9, 2026

IMPACTfolio<sup>®</sup>, LLC is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### What investment services and advice can you provide me?

We offer investment advisory services to retail and institutional investors. Our services include Investment Management Services, Ongoing Financial Planning, & Hourly Financial Planning.

**Monitoring:** Under our investment management services, your investment accounts will be monitored and reviewed regularly on at least a quarterly basis by our firm. We will provide advice to you regarding the investments and allocation of your accounts to ensure they are positioned appropriately based on your goals and objectives.

If you are only engaging our firm in hourly or ongoing financial planning services, separate from or in conjunction with Investment Management, we will work with you to review certain held away investment accounts that we provide advice to you on but will not be monitoring or reviewing those held away investment accounts, unless otherwise agreed upon as part of your financial planning engagement.

**Investment Authority:** Through our investment management service, we require that you grant us the authority to purchase or sell securities without obtaining your consent in advance (**Discretionary Authority**). We will always manage accounts in accordance with the goals, objectives, and restrictions set forth between you and us at the start of the engagement.

**Limited Investment Offerings:** Our Investment Recommendations will be limited to publicly traded stocks, bonds, mutual funds and exchange traded funds. Other firms may provide wider investment recommendations, at the same or differing costs.

**Account Minimums and other Requirements:** There are no requirements for investors to open or maintain an account or establish a relationship.

For **Additional Information** regarding the services we make available to you, please review Item 4 of our Form ADV Part 2A.

#### **Ask your Adviser:**

***“Given my financial situation, should I choose an investment advisory service? Why or why not?”***

***“How will you choose investments to recommend to me?”***

***“What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?”***

### What fees will I pay?

The amount of fees you pay to our firm and the frequency in which you are billed depends on the services being provided. For investment management service, we will deduct fees directly from your managed account (asset-based fees) on a quarterly basis. Hourly financial planning fees require an initial deposit with the remainder being paid upon completion of the engagement.

We are paid for investment management and financial planning services based on a fixed retainer that will not exceed 2% of your assets under advisement. Our fees are not exclusively tied to the value of the client's investment portfolio. We feel strongly that this structure is the most equitable to investors and helps to reduce the conflicts of the asset-gathering model.

Unless we indicate that your assets are managed through a Wrap Fee Program, our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which you may incur. Additional fees you may pay include certain charges imposed by custodians such as custodial fees, deferred sales charges, or other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

***Ask your Adviser: "Help me understand how these fees and costs might affect my investments. If I give you \$1,000,000 to invest, how much will go to fees and costs, and how much will be invested for me?"***

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

***Ask your Adviser: "How might your conflicts of interest affect me, and how will you address them?"***

**How do your financial professionals make money?**

Our financial professionals are compensated on a salary basis and are not paid commissions or other compensation based on the amount of the business generated from their work.

**Do you or your financial professionals have legal or disciplinary history?**

No. You can visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

***Ask your Adviser: As a financial professional, do you have any disciplinary history? For what type of conduct?***

**For additional information** about our services, visit our website [www.impactfolio.co](https://www.impactfolio.co). If you would like additional, up-to-date information or a copy of this disclosure, please call (844) 218-3800.

***Ask your Adviser: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?***