

Client Relationship Summary

Moneta Group Investment Advisors, LLC ("Moneta") is registered with the Securities and Exchange Commission as an investment adviser. Investment advisory services and fees differ from those of a broker-dealer, 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://investor.gov/CRS), which also provides educational materials about the differences between investment advisers and broker-dealers, as well as basic tutorials on investing. We have also created an online resource to help you discern the important differences between investment advisers and broker-dealers, available at www.monetagroup.com/Reg-BI.

What investment services and advice can you provide me?

- Moneta is a fiduciary and offers investment advisory services, including financial, tax, estate and retirement planning; business consulting; family office services; financial education; and concierge services (e.g., bill pay and bookkeeping) to individual investors and institutions. Clients often engage us for comprehensive financial management as their "Family CFO."
- As part of our standard account management services, we will discuss your goals with you and help design a strategy to achieve them. We regularly monitor your portfolio and meet with you at least annually to address any changes in your financial situation and review any recommended changes to your portfolio, if appropriate.
- You may allow us to buy and sell investments in your account(s) without asking you in advance (a "discretionary relationship"), or we may give you advice and you make the final decision regarding what investments to purchase or sell (a "non-discretionary relationship"). If we have a discretionary relationship with you, we will seek your consent prior to substantially changing the agreed-upon investment strategy or asset allocation for your account(s). You may also contact us to impose reasonable restrictions on the management of your account(s).
- We do not offer proprietary investment products, with the exception of collective investment trusts that we sub-advise and make available to certain retirement plan clients. We generally seek to manage client accounts using an array of investments, which may include domestic and international Exchange-Traded Funds (ETFs), mutual funds, fixed income securities, Master Limited Partnerships (MLPs), Real Estate Investment Trusts (REITs), hedge funds, separately managed accounts and private equity funds.
- We have no formal account minimums, size restrictions or other requirements to open or maintain account(s), and we seek clients who prefer a long-term investment focus.

For additional information, please see [Items 4 and 7 of our Form ADV, Part 2A Brochure](#).

Ask Your Moneta Financial Advisor

- 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?

- We generally charge an asset-based fee (a percentage of the assets in your account(s)) and typically bill on a quarterly basis in advance, subject to negotiation. We may also charge fees for additional services that you request such as for concierge services.
- The more assets you have under our management, the more you will pay in fees, so we may have an incentive to encourage you to increase your assets under our management. For example, if deemed appropriate and in the best interest of the client, we may recommend that clients withdraw assets from an employer's retirement plan (or other qualified account) and roll the assets over to an individual retirement account (an "IRA") that we manage. This presents a potential conflict of interest because it may increase the amount of assets under our management and subject to our billing.
- Clients may also expect to pay the following fees to third parties (not Moneta): a) brokerage fees for securities transactions; b) fees charged by ETFs, mutual funds, and any other investment companies in which they invest; and c) fees to third-party advisers if they engage one.

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. For additional information, please see Item 5 of our Form ADV, Part 2A Brochure.

Ask Your Moneta Financial Advisor

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 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 must 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. Here are some examples to help you understand what this means:
 - Several of our investment adviser representatives also own Argent Capital Management, LLC ("Argent"), an investment adviser with proprietary investment companies that charge fees. Because of this affiliation, we may be perceived as having an incentive to recommend that clients engage Argent, and if the client agrees they may pay fees to both Moneta and Argent, unless one or both parties agrees to waive its fee(s).
 - Certain custodians make services and technology available to us at no cost, including consulting, access to research, and attendance to conferences on practice management. These services may give Moneta an incentive to recommend that clients open or maintain accounts with these custodians.

For additional information, please see Items 10, 11, and 12 of our Form ADV, Part 2A Brochure.

Ask Your Moneta Financial Advisor

- How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

- Our advisors are either Partners or employees of Moneta. Employees are paid a salary and may receive additional compensation based on a variety of factors, including business development. Partners are paid from firm profits (derived from advisory fees less expenses). Generally, compensation is related to the amount of client assets serviced by our professionals. This presents a potential conflict of interest in that our professionals are incentivized to encourage you to increase the amount of assets in your account(s) managed by us or to otherwise transition accounts/assets to our management.

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

- Yes. Certain of our professionals have disclosures reported in their Form U4. 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 Moneta Financial Advisor

- As a financial professional do you have any disciplinary history? For what type of conduct?

Additional Information

For additional information about our investment advisory services or to request a copy of our latest Client Relationship Summary, please visit our website at monetagroup.com or call us at 314-726-2300.

Ask Your Moneta Financial Advisor

- 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?

Item 1: Cover Page -**Moneta Group Investment Advisors, LLC**

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FORM ADV PART 2A BROCHURE

Dated: March 30, 2026

This Brochure provides information on the qualifications and business practices of Moneta Group Investment Advisors, LLC ("Moneta"). If you have any questions regarding the contents of this Brochure, please contact us at (314) 726-2300. The information contained in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Moneta is available at the SEC's website at www.adviserinfo.sec.gov, or our website at www.monetagroup.com.

Moneta is registered as an investment adviser with the SEC pursuant to the Investment Advisers Act of 1940, as amended, (the "Advisers Act"). Registration as an investment adviser does not imply a certain level of skill or training.

Item 2: Material Changes

This Form ADV Part 2A amends and replaces the November 26, 2025 submission. Item 2 discusses material changes since the last annual update, consisting of streamlines and updates to Items 7, 8, 11, 13 and 14, and incorporating additional terms or clarifications in Items 4, 5, 10, 12, and 15 to provide further details on Moneta's activities.

Introduction

Dear Current and Prospective Moneta Clients:

As a fiduciary, we are committed to placing your interests above our own and strive to continually reaffirm the trust you place in us. This Brochure provides detailed and important information about us, our business affiliations, our investment processes, our service offerings, our fees and other compensation, and information regarding potential conflicts of interest.

The continued trust and confidence of our clients is something we do not take lightly. **It is our mission to help navigate your life's path and protect what you cherish most.** To that end, I hope the information provided in this Brochure provides you with a better understanding of Moneta, our philosophy and our business practices as you consider becoming, or continue as, a Moneta client.

If you have any questions regarding the information provided in this Brochure, or would like more information about any of the topics or issues detailed herein, please feel free to contact me.

Sincerely,

Eric Kittner
CEO and Board Chair
Moneta Group Investment Advisors, LLC

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Item 4: Advisory Business

Description of Moneta

Moneta traces its roots back to 1869, and has continuously offered services as a registered investment adviser since 1989. Moneta provides five primary categories of services: Discretionary Account Services; Non-Discretionary Account Services; Held-Away Asset Services; Financial Planning, Family Office and Consulting Services; and Bill Pay and Bookkeeping Services.

We offer our advisory services to high-net-worth families, individuals and institutional clients, covering investment management, financial planning, tax planning, estate planning, risk management and insurance analysis, retirement planning, business consulting (e.g., succession, transactions), and concierge services (e.g., bill pay, bookkeeping and non-securities related services).

Moneta is a wholly owned subsidiary of Moneta Group, LLC (“Moneta Group”). Moneta Group is wholly owned by the Moneta Partners (“Partners”) and Professional Staff. Moneta is comprised of almost 30 Partner-led and Partner-supervised teams (collectively the “Teams”). Each Team, consisting of at least one Partner and one or more Advisors and/or support staff, offers a range of financial and investment advisory services to high-net-worth families, individuals and institutional clients. Furthermore, Moneta provides services to institutional clients including plan consulting and design, participant education and enrollment, investment policy statement development assistance and investment menu selection. Moneta also provides both discretionary and non-discretionary advisory services to its retirement plan clients.

Today, Moneta has grown to become a leading provider of investment advisory services with approximately 585 employees and approximately \$50.54 billion in regulatory assets under management as of December 31, 2025, comprised of \$42.56 billion of discretionary assets, and \$7.98 billion of non-discretionary assets under management. These are securities portfolios where Moneta provides continuous and regular supervisory or management services.

Moneta also provides advice or consultation to assets under advisement (“AUA”) where the firm does not otherwise provide continuous and regular supervisory or management services. Such AUA include, for example, financial planning, 401(k) allocation reviews, advice to certain retirement plans, or other consulting services where the assets are used for informational purposes to gain a full perspective of a client’s financial situation, but Moneta does not direct trading activity or have authority over the securities portfolios. As of December 31, 2025, Moneta provides advice or consultation to approximately \$18.65 billion of AUA.

Moneta was founded with the purpose of assisting clients in planning and managing all aspects of their financial affairs. Moneta believes that when it comes to individuals, proper financial advice requires specific goals and objectives, and, in many cases, a comprehensive review of a client’s assets, potential income, applicable tax rates (including estate taxes), available retirement benefit programs, insurance contracts, wills and trust agreements and other related matters. Moneta works with each client to assess their individual goals and needs, and the advice given and the actions taken with respect to each client differs from advice given or the timing and nature of actions taken with respect to the other clients and accounts. Moneta relies on information provided by its clients to craft investment advice designed to fit the client’s risk profile and return goals.

Moneta is governed by its Board of Managers, which is headed by Chief Executive Officer and Board Chair Eric Kittner and supported by the following Executive Officers named in Moneta’s ADV Part 1: President and Chief Operating Officer, Keith Bowles; Chief Compliance Officer, Adam Kruger; Chief Platform Officer, Amanda Barrale; Chief Investment Officer, Andrew Kelsen; Chief Technology Officer, Dan Sherman; and Chief Talent Officer, Bethany Wilkinson. This group, alongside other members of Moneta’s Enterprise Service Team, provides the leadership and structure that allows Moneta to focus exclusively on the many needs of its clients. Mr. Kittner, as Moneta’s CEO, is also ultimately responsible for supervising the Teams.

As a result of our independence, and “open architecture”, we are agnostic to the type of investments selected for client portfolios. Our multi-criteria investment selection process (described in more detail in Item 8) forms the primary basis upon which our clients’ investment portfolios are constructed.

Individual, Retail & and Family Office Services

Moneta provides services to high-net-worth families and individuals. These services can be best defined as giving continuous financial, investment advice and related services to individuals, spouses and families based on their particular needs. Specific client investment strategies are crafted to focus on the client's specific goals and objectives.

The services Moneta offers encompass five primary categories of services: Discretionary Account Services; Non-Discretionary Account Services; Held-Away Asset Services; Financial Planning, Family Office and Consulting Services; and Bill Pay and Bookkeeping Services. We provide further detail on each of these services below. These five primary categories are not mutually exclusive. Therefore, Comprehensive Financial Management, which is an umbrella offering, can at times include all five primary categories as Comprehensive Financial Management is designed to address all aspects of a client's financial management plan. Held-Away Asset Services usually interface with Moneta's Discretionary Account Services, Non-Discretionary Account Services and Financial Planning, Family Office and Consulting Services. Held-Away Asset Services are designed to provide investment advice in connection with assets not held in the custody of the qualified custodian(s) recommended by Moneta (Fidelity and Schwab).

As part of its range of services, Moneta provides services and advice tailored to the unique and complex financial situations of clients. This can include clients in certain industries or phases of life. For example, Moneta provides services to professional and developing athletes where certain Moneta Teams provide financial planning and career strategy advice that is tailored to the unique and complex financial situations of professional and developing athletes. This service includes educational coaching and planning around common challenges for athletes, which can include coordination of any legal entities to receive income, tax consultation when earning compensation across multiple states or countries, analysis of cash flows for name-image-likeness licensing and/or product royalties, and expense coordination of agents and licensing. This service is often paired with either the Comprehensive Financial Management or Investment Supervision services.

Comprehensive Financial Management

For most clients, Moneta's services will begin with a comprehensive financial management plan tailored to the prospective Moneta client. The planning process is organic and involves a close review of existing financial positions of each prospective client and an investment plan for each client. However, each client's situation is unique and, as a result, financial plans vary in length and scope and in certain instances are foregone in their entirety. Once the financial plan is mutually agreed upon by the applicable client and the client's Team, the Team begins to implement the plan. On an ongoing basis an advisor will review and update portions of the financial plan, meet with the client and bring attention to any issues deemed worthy of closer review.

In order to fully prepare a financial plan, the Team engages in a series of meetings with the prospective client. In these meetings, the Team reviews the client's goals and investment objectives, and formulates a plan that addresses some or all of the following key issues: 1) Financial Management; 2) Financial Independence; 3) Money Management; 4) Income Tax Planning; 5) Investment Planning; 6) Risk Management and Insurance Analysis; 7) Estate Planning; and 8) Business Consulting. Our Teams focus on the specific personal goals articulated by the client. Each prospective client is expected to provide complete information in all relevant areas. Careful consideration is given to subjective factors such as a client's prior investment experience, ability and desire to manage their assets, risk tolerance and familiarity with various investment vehicles. The goal is to determine the optimum course of action necessary to realize the client's short-term and long-term objectives. The Teams will then develop and propose an investment plan that includes an asset allocation model specifically designed to meet the client's goals. Moneta's portfolio allocations typically include a mix of the following: taxable, municipal and government bonds; cash and cash equivalents (e.g., money markets and certificates of deposit); large cap, mid cap, small cap and international equities; and a variety of alternative investments.

Investment-Only & Financial Planning

Moneta recommends its full suite of services, as described above, to those clients whose needs and financial circumstances warrant such services. In other instances, for those clients who either do not need or desire comprehensive financial planning services, Moneta offers investment-only services. As part of this service, an advisor will analyze the client's current investment portfolio and will, as necessary, make recommendations relative to the portfolio and its holdings. Those recommendations are based on the client's stated investment goals, objectives and risk tolerance. These services generally fall under Discretionary Account Services and Non-Discretionary Account Services, but can include Held-Away Asset Services.

Similarly, some clients benefit from only receiving financial planning services. As part of this service, a Team analyzes the client's financial situation and prepares a financial plan for the client but does not provide specific investment recommendations or ongoing investment advisory / management services to the client.

Investment Management

Moneta provides Discretionary Account Services and Non-Discretionary Account Services to clients. These services are based on the recommendations of individual Teams based on Moneta's Investment Department's information provided to individual Teams. The Investment Department serves as a centralized resource to Teams, providing input to Teams. Teams monitor those investments that are subject to our management to ensure conformity with the client's goals and objectives. As noted earlier, the Teams also rely on the Moneta Investment Department as part of providing investment management services and there is a collaborative relationship between the Investment Department and the Teams.

Discretionary Investment Management

Moneta Teams can provide discretionary investment management services, where the client delegates full investment authority to Moneta to determine which securities are to be bought or sold in the client's portfolio. Teams managing discretionary accounts have the authority to invest client assets in stocks, bonds, mutual funds and other investments as deemed appropriate for the individual client. Recommendations will vary between, and within, Teams based on the client's particular needs and goals. Discretionary clients have the right to impose reasonable restrictions on Moneta's authority to purchase certain investments for the portfolio. Changes to the portfolio investments are made based on, among other factors, changes in general market conditions, factors affecting the specific investments, or to rebalance the portfolio or incorporate changes in the client's circumstances. However, because each client's portfolio will generally contain a different mix of investments, and Teams have the ability to trade their clients' holdings independent of one another, client orders for the same security will not always be submitted at one time, which can result in variances to prices received by clients buying or selling the same security. Moneta provides each discretionary client with periodic reports detailing all investments within the portfolio for the prior reporting period. From time to time, the Team will rebalance portfolios and remove investments (i) that no longer meet the client's goals and objectives, or (ii) to address other changes to the client's financial situation, and/or to add or remove investments based on Moneta's Investment Department's recommendations.

Non-Discretionary Investment Advice

Moneta Teams can manage client assets on a non-discretionary basis and, as such, each client must approve each recommendation before a specific trade can be placed. Following the initial implementation, the Team reviews and monitors the portfolio for adherence to the agreed-upon asset allocation model. Recommendations will vary between, and within, Teams based on the client's particular needs and goals. From time to time, the Team will recommend changes to the underlying investments to rebalance the portfolio, recommend removing investments that no longer meet the client's goals and objectives, or to address other changes to the client's financial situation, and/or to add or remove investments based on Moneta's Investment Department's recommendations.

Held-Away Assets Services

Moneta Teams can provide investment advice in connection with assets not held in the custody of the qualified custodian(s) recommended by Moneta. Certain of these assets, subject to client authorization and as outlined in the engagement agreement, are also subject to discretionary and non-discretionary management. Held-Away Asset Services can also be a subset of Moneta's Financial Planning, Family Office and Consulting Services.

Bill Pay, Bookkeeping & Other Concierge Services

For clients who desire bill payment, bookkeeping, or other concierge services, a Moneta Team can provide such services itself or through Moneta's centralized resources.

Institutional Client Services, including Retirement/Pension Plan Services

Institutional Clients (Non-Retirement Services)

Moneta provides Discretionary Account Services, Non-Discretionary Account Services and Held-Away Asset Services (as described above) to institutional clients. Moneta also provides certain consulting services (a subset of Moneta's Financial Planning, Family Office and Consulting Services) to institutional clients.

Institutional Client Services, including Retirement/Pension Plan Services

Moneta provides fiduciary management and investment advisory services, and non-fiduciary education and consulting services to a variety of retirement plans, pensions and profit-sharing clients, including, but not limited to, the following: 401(k), 403(b), 457(b) and 409(a) plans; defined benefit plans; balance forward plans; and profit-sharing plans. Moneta is engaged by plan fiduciaries to define the investment options available to the plan as a whole, the menu of options available to the individual plan participants, or to select plan investments. When we provide investment advice to a client regarding their retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title 1 of the Employment Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts.

More specifically, Moneta provides the following services involving retirement plans:

Non-Discretionary Retirement Consulting

Moneta offers non-discretionary investment advisory services to qualified retirement plans under Section 3(21) of ERISA, or to non-qualified retirement plans under a non-discretionary engagement. As a Section 3(21) investment advisor or non-discretionary advisor, Moneta's typical service offering includes consulting with and advising the plan fiduciaries on the development of an Investment Policy Statement designed to reflect the investment objectives, policies, constraints and risk tolerance of the plan. Moneta is responsible for making investment recommendations to the plans regarding the fund options made available to plan participants. The plan fiduciaries are ultimately required to exercise their discretion to act upon the investment options recommended by Moneta.

Discretionary Retirement Management

Moneta offers full discretionary investment management services to qualified retirement plan clients under Section 3(38) of ERISA. As a Section 3(38) ERISA investment manager, Moneta deploys a distinct and customizable Investment Policy Statement which is subsequently approved by the plan fiduciaries. As the discretionary investment manager, Moneta is solely responsible for determining the appropriate investment options available to plan participants and/or the plan, as applicable. Moneta works with the plan's third-party administrator and qualified custodian to ensure the selected investment options are available within the plan. Moneta is responsible for the ongoing monitoring of investment options and implementing changes as necessary. Plan fiduciaries are given notice of changes to existing allocations and/or menu choices; Moneta implements those changes as promptly as practicable in coordination with the plan's third-party administrator and plan custodian. Consent of the plan for investment option changes is not required.

Collective Investment/Retirement Advocate Funds Sub-Advisor

Moneta acts as the sub-advisor for several Retirement Advocate Funds ("RAFs"). The Matrix Trust Company is the Trustee and custodian of the RAFs and provides the general administration. Matrix Trust Company engages the advisory services of Moneta to provide asset allocation targets, fund recommendations, and occasionally, direction to rebalance outside of the quarterly regimen. Currently, the availability of the RAFs is limited to Moneta's institutional 401(k) and retirement planning clients. Moneta uses a proprietary investment allocation methodology to manage the RAFs' assets. The RAFs have five model strategies: Conservative, Moderately Conservative, Moderate, Moderately Aggressive and Aggressive. Each model strategy employs a unique portfolio allocation that is assessed against an appropriate performance benchmark chosen by the Investments Department. Plan participants select the model strategy best suited to their individual investment goals and objectives. Moneta does not receive fees for its sub-advisory services to the RAFs but does receive customary advisory fees from plans (or participants, as applicable) for its advisory/management services to the plan. However, these fees are independent of any plan's use of the RAFs.

Item 5: Fees and Compensation

Methods of Compensation

Individuals, Retail & Family Office Service Clients

Fees are set forth in each client's engagement agreement and are shown annualized unless otherwise specifically provided. Fees are structured to usually include one or more of the following components: (1) an annual flat/fixed fee basis, which can be for financial planning or for managing assets, (2) hourly (for certain services rendered, including financial planning) and (3) based on the aggregate market value of the client accounts advised on by Moneta. Variable fees based on the aggregate market value of the client accounts generally range from 20 to 100 basis points (1 basis point = 1/100th of 1% or .01%). Fees for any service are negotiated on an individual, client-by-client basis and can include fee waivers at certain times and for certain situations. Annual asset-based fees can at times exceed this range. Different clients will have different fee schedules as a result of differing client needs and services. Clients with questions regarding Moneta's fees or what assets or accounts are subject to billing should contact their Advisor specifically or Moneta Team generally.

Clients will be billed on a quarterly basis in advance or in arrears, depending on the negotiated client preference, account structuring and Moneta requirements. Fees, with few exceptions, shall be pro-rated for any period less than a full calendar quarter. For such periods, the fees are generally billed and amounts owed are based on the market value of the portfolio on the last business day in which the Services were provided. Alternatively, Teams can agree with the Client to bill prospectively on the amounts brought over from another firm as of the date they are transferred, then move to a quarterly billing cadence thereafter. Where appropriate, Moneta will rely on the valuation and other relevant information provided by third-party asset managers, brokers, or custodians. For private fund investments and other investments, Moneta will rely on information from the relevant custodian data feeds, but can at times rely on information provided by the issuer or their agent if such information is not available from the custodian.

Fees are generally deducted from client-designated accounts, although clients can choose to be invoiced and pay fees separately. If a client has insufficient cash within their account to cover Moneta's fees, Moneta will, under limited circumstances, create sufficient cash for its fees by liquidating certain investments, subject to any restrictions imposed by the applicable client.

Clients can choose to use margin in their account(s), whether to withdraw funds from the account, or to purchase additional securities. The use of margin will usually amend or replace existing Fee Schedules in client advisory agreements. In circumstances where margin is utilized as a tool within the client's portfolio, Moneta will consider the total market value of the assets in a client's account regardless of the margin balance. This means that if a client chooses to use margin to purchase securities, the total value of the account, including those margin securities, will be considered when determining the advisory fee payable by the Client. Therefore, the use of margin usually raises the advisory fee, as further described below.

The corresponding increase in advisory fee as a result of margin creates a conflict of interest for Moneta. The more a client borrows on margin to purchase securities, the higher the Moneta advisory fee will be. If a client chooses to make a withdrawal of cash on margin from the account, the total market value of the assets in the account remains unchanged. If a client utilizes margin, margin fees and costs (in the account where margin is used) can vary when comparing custodial account statements to Moneta statements. The variance can occur because of transactions placed in the client account that have not yet settled, and related accounting variances, such as mechanisms for including accrued interest in account statements or timing of reporting.

Moneta seeks to mitigate this conflict by executing a margin loan for a client only when specifically requested by the client and when using margin would be beneficial for the client's overall circumstances. Moneta will also mitigate the conflict of interest by conducting surveillance on accounts where clients have elected to use margin. The client can terminate the advisory relationship by written notice provided in accordance with the client's engagement agreement. If the client's advisory relationship is terminated, any fees for services not yet provided will be refunded to the client, as outlined in the engagement agreement. We encourage clients to discuss the use of margin with their Moneta Team member and seek advice on whether there are alternatives to using margin, particularly on a long-term basis. We also encourage clients to understand the additional risks associated with using margin and discuss those risks, and additional fees including interest charges, with their Moneta Team prior to electing to use margin.

Institutional Clients

Fees are set forth in each client's engagement agreement and are shown annualized unless otherwise specifically provided. Fees generally follow the same approach as outlined above (see fee disclosure for Individuals, Retail & Family Office Service Clients). Different clients will have different fee schedules as a result of differing client needs and services.

Fees are generally deducted from client-designated accounts, although clients can choose to be invoiced and pay fees separately. If a client has insufficient cash within their account to cover Moneta's fees, Moneta will, under limited circumstances, create sufficient cash for its fees by liquidating certain investments, subject to any restrictions imposed by the applicable client. For institutional clients that are retirement plan clients, fees are typically deducted by the client's third-party administrator.

Clients can terminate the advisory relationship by written notice provided in accordance with the client's engagement agreement. Any fees received for services not yet provided will be refunded to the client. Please see above for additional information on the use of margin.

Other Fees and Costs to Clients

Other Fees and Costs to Clients – General

Individual, Retail & Family Office client and institutional clients will typically bear expenses in connection with account transactions and investment activities, including brokerage costs and securities transaction fees. Please see Item 12 for a more detailed discussion of brokerage expenses and practices. Investment companies (mutual funds, exchange-traded funds, etc.) in which a client's assets are invested charge additional management fees and other expenses, as described in each fund's prospectus. In addition, if a client engages a third-party investment adviser to manage the client's account(s), the client will pay the fees and expenses set forth in the client's agreement with the third-party. Should a client engage an insurance broker, upon their Moneta Advisor's recommendation or otherwise, that insurance agent will typically receive compensation for any products purchased by the client through that broker. Neither Moneta nor any of its personnel receives any compensation in connection with the sale of insurance products.

Other Fees and Costs to Clients – Mutual Fund Share Class Considerations

When aligned with a client's objectives and profile, Moneta recommends mutual fund investments. It is Moneta's practice to recommend to clients the lowest share class available to Moneta clients through the qualified custodian(s) recommended by Moneta (Fidelity and Schwab). As client accounts are held with one of those two qualified custodians, in practice this means that Moneta will recommend the lowest share class available to Moneta clients through the qualified custodian where the client's account(s) are managed. Lowest share class available means the share class with the lowest possible fees and expenses, where possible, taking into account other share class features. Moneta's Investments Department works with qualified custodians and mutual fund issuers to gain Moneta clients access to the lowest cost share class available, though it is possible lower cost share classes are available through other qualified custodians beyond the ones recommended by Moneta. In addition to the analysis regarding the lowest share class available through the relevant custodian, Moneta's Teams also take into account an individual client's financial plan and client profile before recommending a specific share class.

The above considerations necessarily cannot apply to Held Away Assets, including but not limited to 401(k) and 529 Plan holdings.

Item 6: Performance-Based Fees and Side-by-Side Management

Moneta does not receive any performance-based fees.

Item 7: Types of Clients

Moneta provides services to a wide array of clients; however, Moneta generally categorizes its clients into two broad categories: (i) Individual, Retail & Family Office Clients primarily consisting of high-net-worth individuals, families, trusts and estates, and (ii) Institutional Clients consisting of 401(k) and other pension plans and profit-sharing plans, foundations, endowments and other charitable (i.e., not-for-profit) organizations.

Item 8: Methods of Analysis, Investment Strategies and Aspects Relative to the Risk of Loss

INVESTMENT STRATEGIES AND METHODS OF ANALYSIS

Investment Objectives, Risk and Performance

General Objectives.

No two clients are the same, and a client's investment strategy will differ from other clients and change over time based on multiple considerations. The investment allocations developed between a client and their Team are expected to offer the opportunity to diversify their portfolio in a manner consistent with the client's investment objectives and risk tolerance. In light of these considerations, the objective, limitations and structure of the client's portfolio will be established between the client and their Team, and will be updated from time to time. These objectives will be based on the client's stated investment time horizon and are intended to align with their risk tolerance.

Risk Tolerance.

Moneta recognizes that some risk must be assumed to achieve a client's investment objectives. In establishing recommendations for investments based on the client's risk tolerance, the ability to withstand short and intermediate term fluctuations in market value will be considered and, in particular, what level of interim fluctuations in the market the client can tolerate. We work within the client's risk tolerances and ability to withstand fluctuations in the market, and recommend diverse portfolios designed to grow over time. However, investing in securities involves risk of loss that clients should be prepared to bear.

Performance Expectations.

Rates of return achieved will be in large part dictated by the client's investment objectives, risk tolerance, investment time horizon and, ultimately, asset allocation mix. Projections of investment performance prepared by Moneta assume certain long-term rates of return and will be displayed net of any management fees, or both net-and-gross returns will be shown with equal prominence. Notwithstanding, market performance varies and no guarantees or assurances can or will be made regarding the likelihood that anticipated returns will be realized. Furthermore, actual performance results are based on a multitude of circumstances beyond Moneta's control. Client investments will be benchmarked against various indices corresponding to particular peer groups. The "Investment Selection and Monitoring Process" section below provides a further discussion of the benchmarks and peer groups utilized by Moneta.

Economic Considerations.

We Monitor current and anticipated economic cycles and macroeconomic changes to analyze and attempt to better understand the growth, decline and trajectory of markets and sectors. Moneta believes successful investment performance is primarily a function of proper asset allocation rather than market timing or specific investment selection. Macroeconomic factors such as money supply, interest rate environment, inflation forecasts and the overall political environment are also analyzed to help measure economic conditions. This analysis is part of our due diligence on investments, and we monitor how specific investments respond to economic factors and respond accordingly.

Asset Category Guidelines

As noted above, long-term investment performance is primarily a function of asset category mix. Moneta views risk and rewards broadly by asset category (i.e. Fixed Income, Equities and Alternative Investments). Moneta's investment philosophy with respect to each broadly defined asset category is as follows:

Fixed Income.

The role of fixed income is to provide ongoing liquidity for income needs and to create equity market risk mitigation. In general, Moneta's investment philosophy when it comes to recommending Fixed Income is as follows:

- Hold a diversified portfolio of high-quality individual bonds, bond funds, and/or CDs to maintain control and transparency of holdings at minimal cost
- Securities are chosen with the intent of holding to maturity
- First priority is quality, second priority is yield

Equities.

The role of core global growth equities is to provide total return to the overall portfolio. In general, Moneta's investment philosophy when it comes to recommending investments in Equities is as follows:

- Core equities provide equity market risk premium and capital appreciation
- Produce dividend income
- Minimize cost/expenses
- Control capital gains exposure for income tax purposes

Alternative Investments.

An allocation to alternative investments can be appropriate for some investors. An investment could be considered an alternative based on the strategy it pursues (i.e., hedge funds) or the structure of the investment itself (private capital). For example, a real estate investment trust is a pass-through vehicle that could be listed on a public exchange or offered privately. A limited partnership typically has limited liquidity and can be used to invest in less liquid assets. Moneta's investment philosophy when it comes to recommending investments in Alternative Investments is as follows:

- Focus on low leverage
- Focus on active management
- Control manager risk
- Attempt to improve the portfolio through either diversification or the opportunity for increased returns

Investment Selection – Process, Analysis, and Monitoring

This section outlines the steps Moneta takes to identify and monitor the funds and investments on which it advises. In providing investment advice to clients, Moneta conducts research and analysis on mutual funds, ETFs, stocks, bonds and other securities, along with investment managers and fund companies.

The Moneta Investment Department uses this broad data to form guidance on managers, market research, client model portfolios (e.g., asset allocation models that assist in determining an appropriate mix of equities, fixed income, and other asset categories), and other expertise as it relates to investments. This guidance is subject to change based on internal reviews performed by Moneta's Investment Department. No investment consultants have been or will be given discretion over any client accounts, nor do they have the ability to make any recommendations directly to our clients unless the client separately contracts with the third-party investment consultant. Any alternative investment or private investment recommendations provided by a third-party investment consultant are subject to review and approval by Moneta's Investment Department prior to being recommended or implemented in any client portfolios.

Due Diligence Procedures on Certain Second Segment Asset List Holdings.

Clients at times hold assets that are not on Moneta's Recommended List (referred to as "Second Segment Assets"). For a variety of reasons (e.g., low-cost basis, long-time historical holding resulting in lower costs), Moneta could recommend that such investments be retained by the client, or the client could independently wish to retain such assets. All holdings that are not on Moneta's Recommended List but that are subject to Moneta's fee billing calculation will be subject to alternative due diligence procedures. In determining whether an investment remains appropriate for a client, the Team will analyze various factors including quantitative aspects of the investment, Client investment objectives and risk tolerances, whether other Recommended List options are available to the client as alternatives, and any instructions (or restrictions) the client gives relative to such holdings.

Moneta Monitoring of Investments.

We will at least annually review client investments subject to our oversight to determine the continued prudence of each such investment/fund's inclusion within the client's portfolio. The determination of whether to retain, purchase or liquidate any security remains with the client; however, if the client has granted Moneta discretionary oversight over the client's account, Moneta will act on the client's behalf to make these determinations (for more information see Item 16 herein). Performance benchmarks have been established for asset categories and segments for reporting purposes. Performance of an asset category or segment will be evaluated in terms of an appropriate market index and the relevant peer group (e.g., the large-cap growth mutual fund universe corresponding to the recommended large-cap growth mutual fund). Clients can obtain a list of Moneta's currently applicable asset segment benchmarks from the Client's Team upon request.

Criteria for Addition and Removal from Recommended, Watch and Sell Lists

Overall Philosophy.

Moneta evaluates decisions on whether to remove or add a fund/investment to Moneta's Recommended, Watch or Sell Lists on a case-by-case basis. Decisions will be based on the totality of the circumstances, which will vary depending on the various factors that exist at the time of the determination.

Recommended List.

1. **Addition.** When evaluating a potential new fund, Moneta focuses on the fund's fee structure, the fund manager's tenure, and past successes, among other criteria, as a basis for its decision. Moneta reserves the right to utilize third-party investment consultants for additional evaluation of some asset types.
2. **Removal.** If Moneta's Investment Department through the Manager Due Diligence Committee determines that a fund should be removed from the Recommended List, Moneta can, in its sole discretion and prior to such removal, request a meeting with senior personnel at the fund or investment manager.
3. **Future Inclusion.** Following a fund or investment's removal from the Recommended List, if the Moneta Investment Department determines, in its sole discretion, that such fund or investment meets Moneta's Recommended List criteria, the Moneta Investment Department can seek the approval of the Manager Due Diligence Committee to add such fund or investment back to the Recommended List.

Watch List.

Placement on Moneta's Watch List is meant to convey Moneta's increased level of concern about a particular issue or event applicable, or potentially applicable, to the investment or fund. Moneta can move a fund or investment to the Watch List if it determines, in its sole discretion after contemplating information provided by Moneta's third-party investment consultant and through its own research efforts, that movement of the investment or fund to the Watch List is warranted. A fund could be moved to the Watch List for a variety of reasons, including (but not limited to) the following:

- Significant style drift or deviation from stated investment process.
- Fund manager underperformance over at least one market cycle, especially when attributable to poor security selection.
- Major changes to firm ownership structure and/or compensation practices.
- Investment results that consistently deviate from the expected level for the strategy.
- Holdings turnover consistently exceeding the expected level for the strategy.
- Any other factor deemed to be of concern by the Moneta Investment Department.

If placed on the Watch List, Moneta will typically monitor and evaluate the investment to determine whether the fund or investment should: (i) regain Recommended List status, (ii) have its Watch List status extended, or (iii) be moved to the Sell List. The length of time given to the fund or investment to stay on the Watch List will vary depending on the facts and circumstances that caused it to be moved to the Watch List initially as well as other considerations.

Sell List.

1. **Criteria.** From time-to-time, Moneta will determine that a fund or investment needs to be placed on its Sell List. Most often, this is due to a major, unforeseeable event. Criteria for moving a fund or investment to the Sell List include, but are not limited to, the following:
 - Major change to the fund's management team or strategy;
 - Event impacting the fund or investment; or
 - Decision by the fund or investment manager contrary to the best interests of investors.
2. **Portfolio Impact.** If a fund or investment is added to the Sell List and such investment/fund is part of a client's portfolio, we will analyze the portfolio and this change to determine whether liquidation and reinvestment into other positions is appropriate immediately or over a period of time.

Risk Analysis

Moneta makes a number of assumptions when formulating the asset allocations for its clients. These assumptions involve a high degree of speculation and, as a result, actual returns will often be more or less than anticipated.

While Moneta recommends a variety of investment securities, our primary recommendations include mutual funds, ETFs, international equity funds, fixed income securities and alternative investments. All Moneta investment recommendations are subject to general market risk, namely, that the value of those investments will decline because of downturns in the general securities markets. Below is a summary of potential material risks for each significant Moneta investment strategy and/or the particular types of investments used to manage client portfolios. All investing involves the risk of loss that clients should be prepared to bear, including the risk that the entire amount invested will be lost.

General Economic and Market Conditions.

The value of investments held in a client's portfolio can fall or fail to rise over extended periods of time for a variety of reasons, including general economic and market conditions, changing market perceptions (including perceptions about monetary policy, interest rates, or the risk of default), national and international political circumstances (including wars and government intervention in financial markets), and factors related to a specific industry, issuer or sector. These factors can affect the level of volatility of security prices and the liquidity and value of investments held by a client's portfolio.

Management Risk.

Investing in securities exposes the Client to risks surrounding the management of any investment or company. Such risk can be financial, ethical, or other forms of liability that can impact a company or investment if the individual(s) who manage the company or investment are ineffective, detrimental, or volatile. Moneta's evaluation of any asset, individual fund or security, or class of assets, attempts to assess the attractiveness, growth prospects and quality of management that exist within the asset, security, or class of assets. Moneta's evaluation could prove to be incorrect, and there is no guarantee that the securities or investment strategies recommended or used by Moneta to manage client accounts will address management risk as anticipated.

Interest Rate Risk.

Fluctuations in interest rates cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Inflation Risk.

Inflation reduces the buying power of a dollar, and could cause uncertainty among individual investors, possibly resulting in corporations backing away from projects which could further reduce the value of corporate equities.

Regulatory Risk.

Legislative, regulatory, and/or judicial changes that impact businesses can drastically change entire industries.

Trading on Margin.

In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring the account back up to maintenance levels. If the client cannot comply with such a margin call, the client's portfolio could be sold out or bought in by the brokerage firm.

Allocation Risk.

Although Moneta typically seeks to allocate a client's assets among different asset categories and strategies to limit risk exposure, a client's portfolio could still at times have significant exposure to an asset category or strategy that performs poorly relative to other asset categories or strategies. To the extent a client's portfolio is invested in asset categories or strategies that underperform the general stock market, the portfolio will likely underperform relative to a portfolio invested primarily in the general stock market.

Investment Companies.

Careful consideration should be given to the investment objectives, risks, charges and expenses associated with an investment in investment companies, including mutual funds and ETFs, before investing. Client accounts invested in investment companies

will indirectly bear the fees and expenses payable directly to the investment company. Therefore, the client will incur fees associated with the management of the company, resulting in an increase in fees payable by the investor. Investments in investment companies are subject to the same risks as the underlying securities (including those described below) in addition to management risk. Investment company returns fluctuate and are subject to market volatility. In addition, the value of a client's investment in an investment company will depend on the skill of the investment company's adviser, and will be subject to risks arising from the investment practices of the investment company. ETFs are subject to additional risks, including the risk that the market price of the shares of the ETF are above or below its net asset value.

Equity Investments.

- *Common Stocks.* The value of a company's common stock generally increases or decreases in value based on factors directly relating to that company, such as demand for the company's products or decisions by management. The value of a company's common stock is also affected by other factors not directly affecting the company, such as general industry or market conditions.
 - *Growth Stocks.* The stocks of companies believed to be fast-growing can trade at a higher multiple of earnings-per-share than other stocks. Although Moneta does not project any single company's growth potential or valuation, the Investment Department uses internal and external research sources to evaluate the holdings of investment companies' securities that are focused on growth and growing companies, in an effort to identify valuable exposure to growth stocks. Moneta's evaluation could prove to be incorrect, and there is no guarantee that the growth-focused securities or investment strategies recommended or used by Moneta to manage client accounts will be profitable. Growth stocks can fluctuate in value more than other investments in reaction to changing market conditions.
 - *Value Stocks.* Companies that are believed to be undervalued can be subject to special risks or have suffered adverse developments that have caused their stocks to fall out of favor. If Moneta's perception of a company's prospects is wrong, or if other investors do not agree that a company's stock is undervalued, the value of the stock could fall or not perform as expected.
- *Preferred Stocks.* Market prices of preferred stocks are generally subject to changes in interest rates and are more sensitive to changes in an issuer's creditworthiness than are prices of debt securities. Unlike interest payments on debt securities, dividend payments on preferred stock generally must be declared by the issuer's board of directors. An issuer's board of directors is typically under no obligation to pay a dividend (even if dividends have accrued) and can suspend the payment of dividends at any time. Preferred stock shareholders could suffer a substantial loss in value if dividends are not paid.
- *Small- and Mid-Cap Companies.* Stocks of small- and mid-cap companies are historically more volatile than stocks of larger companies. Small- and mid-cap companies in many cases lack the managerial, financial or other resources necessary to implement their business plans or succeed in the face of competition. Many of these companies are young and have a limited track record. Thus, small- and mid-cap companies are more vulnerable to adverse business or market developments than larger companies. Their stock generally also trades less frequently and in more limited volume than those of larger companies, which can make it difficult to sell a small- or mid-cap stock on favorable terms.

Fixed Income Investments.

- *Credit Risk.* The issuer of a fixed-income security could be unable or unwilling to make interest and/or principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If this occurs, or is perceived as likely to occur, the value of the fixed-income security can fall significantly.
- *Issuer Risk.* The value of a fixed-income security will fluctuate due to a number of factors relating to the issuer or its industry or economic sector. This risk is heightened for lower rated fixed-income securities.
- *Interest Rate Risk.* As nominal interest rates rise, the value of fixed income securities is likely to decrease. A nominal interest rate is the sum of real interest rates and an expected inflation rate.
- *Municipal Securities Risk.* The value of a municipal security will fluctuate over time and can be affected by adverse political, legislative and tax law changes, as well as by financial developments that affect the municipal issuers. Liquidity in the municipal bond market (the ability to buy and sell bonds readily) is subject to change based on a

variety of factors, including, but not limited to, overall economic conditions and credit tightening. During times of reduced market liquidity, a client's portfolio or an investment company might not be able to sell bonds readily at prices reflecting the values at which the bonds are carried. In addition, in order to be tax-exempt, municipal securities must meet certain legal requirements. Failure to meet such requirements could result in either the interest received or distributed to clients being deemed taxable. Changes or proposed changes in federal tax laws could also cause the prices of municipal securities to fluctuate (up or down).

- *Government Securities Risk.* Securities of U.S. government sponsored entities, such as Freddie Mac or Fannie Mae, are neither issued nor guaranteed by the U.S. government. It is possible that the U.S. government would not provide financial support to its agencies or instrumentalities if it is not required to do so by law. If a U.S. government agency or instrumentality in which a client's portfolio or investment company invests defaults and the U.S. government does not stand behind the obligation, the value and yield of the security could fall.

Foreign Securities.

Moneta often recommends that a portion of the client's portfolio be invested in foreign securities, typically through investment companies that invest primarily in foreign securities, rather than single foreign equity security. Investment in foreign securities involves special risks. Foreign issuers and markets are in many cases not subject to the same degree of regulation and accounting discipline as U.S. issuers and markets. In addition to credit and market risk, investments in foreign securities involve sovereign risk, which includes fluctuations in foreign exchange rates, future political and economic developments, and the possible imposition of exchange controls or other foreign governmental laws or restrictions. In addition, with respect to certain countries, there is the possibility of expropriation of assets, confiscatory taxation, political or social instability or diplomatic developments that could adversely affect investments in those countries. There is often less publicly-available information about a foreign company than about a U.S. company. Securities of foreign companies can be less liquid and their prices more volatile than securities of comparable U.S. companies. Dividend and interest income from foreign securities will generally be subject to withholding taxes by the country in which the issuer is located and the client (or investment company) should anticipate difficulties in attempting to recover any such funds. These risks can be greater in less developed countries, which are sometimes referred to as "emerging markets."

Alternative Investments.

Alternative investments (including but not limited to hedge funds, certain private funds (such as private debt, private credit, and private real estate), opportunistic funds, and other real estate-related investments) present unique risks, including decreased liquidity and transparency while increasing complexity. In addition, to the extent that the alternative investment includes the use of commodities (or commodity-based derivatives), the investment return will also vary as a result of fluctuations in the demand and supply of the underlying commodities. If Moneta makes a recommendation on any alternative investments, the risks will be discussed with the client and the recommendation will be aligned with the client's suitability and objectives.

Alternative investments and investment companies often use derivative instruments (such as options, futures, and swaps) to a significant extent. The use of derivative instruments involves multiple risks, including counterparty risk (i.e., the risk that the institution on the other side of the trade will default), as well as the risk that the instrument will not work as intended due to unanticipated developments in market conditions.

Third Party Vendors.

Third-party vendors engaged by a client might be responsible for a variety of services, from insurance sales to tax preparation. In any case, the specific engagement and services provided will need to be determined on a case-by-case basis. In many cases, however, Moneta is able to provide reference to clients for particular kinds of service providers or vendors, but it shall be the client's responsibility, and at the client's discretion, to engage and monitor any such party.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding legal, disciplinary, or financial events that would be material to your evaluation of us or the integrity of our management. We have no reportable disciplinary history information applicable to this item.

Item 10: Other Financial and Industry Activities and Affiliations

Material Business Activities and Affiliations

Moneta and/or one or more Partners have the following material business activities and/or affiliations:

Argent Capital Management, LLC

When appropriate, a Team can recommend individual equity management services of Argent Capital Management, LLC (“Argent”), a registered investment adviser. Any client that engages Argent is subject to Argent’s management fees, as described in the client’s management contract with Argent. Moneta retains supervisory responsibility over the assets allocated to Argent to the extent recommended by Moneta and, as such, Moneta may receive customary advisory fees from the client for supervising such assets except as is otherwise negotiated by the client and Moneta on a case-by-case basis (see Item 5 herein). Steven Finerty and Logan Finerty are investment advisor representatives of Moneta and owners of Argent. As such, these individuals receive a pro-rata portion of any equity distributions made by Argent to its owners.

Other Registered Investment Advisers

When appropriate, a Team can recommend individual equity management services of other registered investment advisers (e.g. Parametric Portfolio Associates, LLC (“Parametric”), Vanguard Advisers, Inc.) to oversee certain aspects of an advisory account. When a Team engages a sub-adviser for part or all of a client’s portfolio, the client is required to sign an agreement with Moneta and the third-party adviser.

Moneta Trust

Moneta Trust is a corporation domiciled in Kansas and is a wholly owned subsidiary of Moneta Holding Corp., which itself is a wholly owned subsidiary of Moneta Group, LLC. Moneta Trust is chartered pursuant to Kansas statutes as a non-depository retail trust company and regulated by the Kansas Office of State Bank Commissioner. Moneta Trust was created to provide trust administrative services for Moneta clients whose financial, family, or business needs require the services of a professional fiduciary and trust company. Specific services provided by Moneta Trust include: (1) corporate trustee services for personal trusts or certain retirement plan accounts, (2) corporate trustee for life insurance trusts, and (3) trustee services for charitable trust accounts. Moneta Trust’s services include the safekeeping of all trust assets, held via segregated trust accounts at qualified third-party custodians identifying Moneta Trust as trustee. Generally, assets are not held in the name of or directly by Moneta Trust unless the needs of the client dictate such an arrangement. Certain Moneta employees perform work related to Moneta Trust in addition to their Moneta responsibilities. Additionally, Moneta and Moneta Trust have entered into an agreement that delegates the performance of investment advisory functions to Moneta. Fees and expenses paid by clients to Moneta Trust are separate from and in addition to the fees charged by Moneta. Members of Moneta Group, LLC receive a pro rata portion of any distributions made by Moneta Trust to its owners. Because of Moneta’s affiliation with Moneta Trust, Moneta has a conflict of interest in recommending Moneta Trust to clients. Clients are not obligated to use the services of Moneta Trust and can establish their trust account at any custodian or trustee of their own choosing.

Banking & Cash Management Arrangements

In some instances, Moneta refers clients to Enterprise Bank and Trust for custodial services. Moneta currently receives no compensation for client referrals to Enterprise Bank and Trust.

Additionally, Moneta can offer clients the option to obtain certain cash management services from Flourish Financial LLC, (“Flourish”) a registered broker-dealer and FINRA member. Flourish seeks to provide its clients with competitive APY and elevated FDIC coverage for their deposits placed at program banks. Moneta does not receive any compensation from Flourish based on any clients that elect to obtain services from Flourish. Moneta is not affiliated with Flourish or any of the program’s banks. Clients who choose to use Flourish’s services will receive notices and disclosures directly from Flourish. For clients who authorize Moneta to charge an advisory fee on the value of a Flourish account, the client authorizes Flourish to debit their account the advisory fee and remit to Moneta.

Additional Information about Mitigating Conflicts and Risks

The above describes certain affiliations and business relationships that have the potential to create conflicts of interest within the context of particular client relationships. The potential conflict in this context is between Moneta and Partners' obligations to act in the best interests of clients and Moneta and/or Partners' interests in receiving revenues from these related service providers or business activities. Moneta takes reasonable steps to ensure that all material conflicts are fully disclosed to clients. Where applicable, each Partner is required to disclose to clients any other specific compensation received from a third party in connection with either financial or other advice provided to clients. Moneta Teams also have the authority to waive all or a portion of any affiliated service provider's fee. Such aspects of Moneta's engagement with a particular client are typically negotiated on a client-by-client basis. Clients should contact their Team if they have any questions regarding any affiliated service providers.

Item 11: Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics and Personal Trading

Moneta has adopted a Code of Ethics (the "Code") pursuant to Rule 204A-1 under the Advisers Act. The Code is based on the fiduciary duty we owe to our clients. In complying with this duty, we require our advisory personnel to avoid activities or interests that might interfere with making investment decisions that are in the best interests of clients. This requirement applies even when our advisory personnel are trading for their own personal accounts. For example, each advisory person serving on a Team is prohibited from trading within a specified time period of a client trade in the same security, unless the security or transaction is otherwise exempt from the restrictions (e.g., the Code also requires advisory personnel to report all accounts and securities holdings covered by the Code at the commencement of their employment and annually thereafter.) In addition, on a quarterly basis, all advisory personnel are required to report all securities transactions executed during the quarter. Certain securities are exempt from the requirements of the Code, including: mutual funds, money market funds, money market instruments, and U.S. Government securities. Moneta will provide a free copy of its Code to any client or prospective client upon request.

Participation in Client Transactions

Personal Trading Activities of Advisory Personnel

Moneta primarily recommends mutual funds, which are exempt from Moneta's Code. However, from time to time our advisory persons purchase, sell or hold other securities for their own accounts that are also held, have been or will be purchased or sold for the accounts of Moneta's clients. This presents a conflict of interest by creating opportunities for the advisory person to take advantage of the client by, for example, trading ahead of a substantial pending client trade. As discussed above, our Code specifically prohibits our advisory personnel from taking advantage of clients in their personal trading activities. Any person who violates our Code is subject to sanctions and possible disciplinary actions, which vary depending on the severity of the violation and the person's record of compliance.

Subject to the Code, the limitations on advisory person activities, and the foregoing discussion, Moneta and its advisory persons can purchase or sell securities in which Moneta or its affiliates, officers, directors, employees, agents, and/or clients have or acquire direct or indirect positions of interest.

Item 12: Brokerage Practices

Moneta typically recommends that clients establish a brokerage account with Charles Schwab & Co., Inc. (“Schwab”) or Fidelity Brokerage Services, LLC (“Fidelity”) to serve as qualified custodian for the client’s assets and to execute securities transactions. However, clients retain sole authority to select a different custodian. If Moneta is unable to adequately provide services to a client through the client’s preferred custodian, Moneta has the right to terminate its relationship with the client pursuant to the terms of Moneta’s engagement agreement or to recommend a different custodian.

How Moneta Selects Brokers/Custodians

When recommending a custodian that will also provide brokerage services (a “custodian/broker”), Moneta seeks to recommend custodian/brokers who will hold client assets and execute client transactions on terms that are overall most advantageous when compared to other available providers. We consider a number of factors in recommending a custodian/broker for a client, which typically include:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody);
- capability to execute, clear and settle trades (buy and sell securities for a client’s account);
- capability to facilitate transfers and payments to and from accounts (wire transfers check requests, etc.);
- breadth of investment products made available and quality of services;
- availability of investment research/tools that assist us in making investment decisions for client accounts;
- competitiveness of the price of those services (commission rates, margin rates, dealer spreads, etc.);
- reputation, financial strength, security and stability of the provider;
- access to certain mutual funds and mutual fund share classes that generally require higher initial minimum investments or are generally available only to institutional investors;
- technological capabilities including platform security and ability to maintain confidentiality;
- frequency and manner of error resolution;
- block trading capabilities along with best execution reporting.
- the provider’s prior service to us and our other clients; and
- availability of other products and services that benefit us, as discussed below.

Custody and Brokerage Costs

Schwab and Fidelity provide both custodian and brokerage services. These custodians/brokers generally do not charge a separate fee for custody services, but are instead compensated by charging commissions or other fees on trades that it executes or that settle into a client’s account. Certain trades do not incur commissions or transaction fees. Schwab can also be compensated by earning interest on the uninvested cash in a client’s account in Schwab’s Cash Features Program. For some accounts, Schwab or Fidelity, upon mutual agreement with the client, charge a percentage of the dollar amount of assets in the account in lieu of commissions. In addition to commissions and asset-based fees, Schwab and Fidelity charge a “trade away” fee for each trade executed by a different broker-dealer where the securities purchased or funds from the securities sold are deposited (settled) into the client’s Schwab/Fidelity account. Because of these “trade away” fees, in order to minimize client transaction costs, we have the client’s custodian/broker execute most trades for the client’s account.

Products and Services Available to Moneta from Custodians/Brokers

Schwab and Fidelity provide Moneta with access to their institutional brokerage services—including trading, custody, automated trading platforms, reporting and related services—many of which are not typically available to retail customers. Schwab and Fidelity also make available various support services, which assist Moneta in managing or administering client accounts. However, certain retail investors can get institutional brokerage services from Schwab or Fidelity without going through Moneta. These services are available at no charge to Moneta so long as a certain dollar value of Moneta-client assets is maintained with the applicable custodian/broker. None of the products or services described in this Brochure are provided in consideration of brokerage commissions directed to the custodian/broker.

Services that Benefit Clients

Schwab and Fidelity brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab and Fidelity include some that clients would not otherwise have access to or that would require a significantly higher minimum initial investment.

Additionally, Moneta participates in a short interest rebate program offered by Schwab through which a client can receive a periodic (e.g., monthly) credit directly to their account for short interest received based on the value of the client's short position(s) within certain long-short investment strategies which are eligible for the program. This program from Schwab, including which investment strategies can be eligible, is subject to change at any time based on the sole discretion of Schwab, and no part of the credit is paid to Moneta.

Services that Do Not Directly Benefit Clients

Schwab and Fidelity also make available to Moneta other products and services that benefit us but do not directly benefit clients or client accounts. These products and services assist Moneta in managing and administering client accounts. They include investment research, both third-party research and research created by the applicable custodian/broker. Research includes reports and publications on investment companies issued by Morningstar, Inc. We use this research to service our clients' accounts, including accounts not maintained at Schwab or Fidelity. Schwab and Fidelity also make available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of Moneta's advisory fee from our clients' accounts; and
- assist with certain back-office functions, recordkeeping and client reporting.

Services that Generally Benefit Only Moneta

Schwab and Fidelity provide Moneta with other services intended to help us further develop our business. These services include:

- educational conferences and events;
- technology, compliance, legal, and business consulting, as well as marketing consulting and support;
- publications and conferences on practice management and business succession;
- access to employee benefits providers, human capital consultants, and insurance providers; and
- recruiting and custodial search consulting.

Schwab and Fidelity provide some of these services themselves. In other cases, Schwab and Fidelity arrange for third-party vendors to provide these services to us. Each of Schwab and Fidelity also discount or waive their fees for some of these services or pay all or a part of a third party's fees. Schwab and Fidelity also provide us with other benefits such as occasional business entertainment for our personnel, and agree to pay for certain marketing expenses.

Moneta's Interest in Schwab's and Fidelity's Services

The availability of these services from Schwab and Fidelity benefits Moneta because Moneta does not have to produce or purchase these services separately. Moneta is not required to pay Schwab or Fidelity for these services because of the volume of Moneta client assets held at Schwab and Fidelity. However, Moneta's receipt of these services is not contingent on Moneta committing any specific amount of business to Schwab or Fidelity, including in trading commissions. While there is no specified dollar amount of Moneta client assets that must be maintained with Schwab or Fidelity for Moneta to continue to receive these benefits, Moneta could be perceived as having an incentive to recommend that clients maintain their accounts with Schwab or Fidelity based on our interest in continuing to receive Schwab's or Fidelity's services that benefit our business rather than based on the interests of clients receiving the best value in custody services and the most favorable execution of client transactions. This is a conflict of interest. We believe, however, that our recommendation of Schwab or Fidelity as custodian and broker is in the best interests of our clients. Our belief is primarily supported by the scope, quality, and price of Schwab's and Fidelity's services (based on factors discussed above) and not Schwab's or Fidelity's services that benefit only us.

Best Execution

For accounts custodied at Schwab, Fidelity, or another custodian that also provides brokerage services, we generally have the client's custodian/broker execute most trades for the client's account. Given the general nature of these arrangements—including: 1) pre-negotiated brokerage costs; 2) operational methodologies that must be employed to trade accounts custodied with these brokers; and 3) additional trade away charges for trades executed through a different broker-dealer—it is often infeasible or impracticable for Moneta to trade these accounts with broker-dealers other than those at which the accounts are maintained. Also, having the client's custodian/broker execute most trades is consistent with our duty to seek "best execution" of client trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see How Moneta Selects Brokers/Custodians). By using another broker or dealer a client could pay lower transaction costs.

For certain discretionary clients, Moneta recommends, or the client will select, a custodian that does not also provide brokerage services, such as certain banks and trust companies. Moneta is typically authorized to select the broker-dealer to execute client transactions for accounts held at custodians such as these. In selecting brokers for these accounts, Moneta seeks to select the broker-dealer that provides the best available price and most favorable execution. While not required to select the broker or dealer that charges the lowest cost, Moneta typically considers the services that the broker or dealer can provide and some or all of the factors outlined above (see How Moneta Selects Brokers/Custodians).

The applicability of specific criteria will vary depending upon the nature of the transaction, the market in which it is executed, and the extent to which it is possible to select from among multiple broker-dealers capable of effecting the transaction. While Moneta generally seeks reasonable and competitive commission rates for client transactions, a client will not necessarily pay the lowest spread or commission available. In Moneta's experience, neither the lowest commission rate nor the most expeditious execution necessarily correlates to the best execution for a client. In certain circumstances, transactions in a specific security might not be accomplished for all accounts or assets managed by Moneta at the same time or at the same price.

Aggregating Orders

Bond transactions are typically executed on a block basis when practicable. The Moneta Fixed Income Trading Desk maintains a list of all Moneta clients seeking to purchase bonds, including particulars about the bonds to be purchased. When bonds satisfying the stated particulars are available, the bonds are typically purchased in blocks and allocated to interested clients on a first-come, first-served basis.

Moneta performs Advisory Services for various other clients ("Other Accounts"), and Moneta can, in its discretion, and depending on many factors (such as client risk tolerance, strategy considerations, etc.), aggregate purchases and sales of securities for the Discretionary Accounts and the Non-Discretionary Accounts with purchases and sales of securities of the same issuer for the Other Accounts occurring on the same day, as well as for the accounts of the Moneta's affiliates. When transactions are so aggregated, the actual prices applicable to the aggregated transactions shall generally be averaged, and the Discretionary Accounts and the Non-Discretionary Accounts and the Other Accounts shall be deemed to have purchased or sold their proportionate shares of the securities involved at the average price so obtained; provided however, that aggregation, purchasing and pricing considerations are to be determined at the reasonable discretion of Moneta.

Our Teams have the option to bunch orders of various discretionary clients for execution in order to attain lower commission rates, but are not required to do so; thus, client portfolios are in many cases traded independently of one another.

Resolving Trade Errors

From time to time, trade errors occur in client accounts where Moneta has either discretionary or non-discretionary authority. To resolve a trade error, Moneta will direct the account custodian to cancel and/or correct the trade to reflect the desired parameters, such as quantity, dollar value, symbol, or applicable account. Trade errors typically result in either a gain or loss from correcting the transaction. If the trade error occurs in a client account at Schwab, Schwab will maintain the loss or gain if it is under \$100 to minimize and offset its administrative time and expense. If a loss occurs greater than \$100, Moneta will pay for the loss. If an investment gain results from the correcting trade, these gains can accrue in a trade error account and offset the

expense to Moneta for errors incurred that generated a loss exceeding \$100. Moneta can benefit from the netting of trade error gain/loss, if said gain offsets a trade error loss that Moneta would otherwise be required to pay. Any gains from trade errors that are not netted against losses will be donated to charity by either Schwab or Moneta.

Client-Directed Brokerage

As stated herein, client securities transactions generally will be affected through each client's custodian/broker or other broker selected by our advisory personnel pursuant to the discretionary brokerage authority given to us by our clients. However, clients retain ultimate authority to direct us to purchase or sell securities through a particular brokerage firm even though a more favorable net price and/or execution could be available through a different broker-dealer. Where the directed executing broker is not the client's custodian, the custodian will from time to time require the client to establish a prime brokerage account before such client-directed brokerage transactions can be executed.

Brokerage for Client Referrals

Moneta does not enter into client referral agreements in exchange for trading commissions.

Item 13: Review of Accounts

Frequency and Nature of Periodic Reviews

All client accounts under Moneta's management are subject to regular monitoring; each portfolio of accounts and financial plan (as applicable) are reviewed periodically, but no less than annually. These reviews are conducted by advisors on the client's Team. Additional client account reviews will occur upon client request, changes in market conditions, new information about an investment, changes in tax laws, or other pertinent events.

Content and Frequency of Reports Provided to Clients

In general, clients will receive written reports from Moneta at least annually that discuss the performance of the client's account(s), the Team's recommendations for the client, and certain other information. Clients will also receive quarterly or monthly reports from their custodian that include the value of securities held in the client's account, as well as confirmation of all securities transactions in the account during the period. Such reports are generally made available to Moneta through the client's custodian. Moneta reviews such reports periodically but is not responsible for the accuracy or for maintaining copies of such statements for or on behalf of the client.

Additionally, any reports generated by Moneta include data that we believe to be accurate, and use sources deemed to be reliable. In some instances, manual data entry might be required to assist in reporting all of a client's assets or liabilities that are maintained at institutions or custodians that do not directly feed data to Moneta reporting systems. We strive to provide clients with accurate data but are not responsible for independently verifying the valuations, whether they were provided by the Client or a third-party institution. The data is provided as a best-efforts and we encourage clients to always refer to the statements sent directly from the institution or custodian that holds the asset(s) or liability.

Securities Litigation and Class Action Securities Claims

Moneta offers its clients access to a class action monitoring service provided by a third-party service provider for accounts in the custody of the qualified custodian(s) recommended by Moneta (Fidelity and Schwab). Accounts held away from Moneta or managed by third party investment managers (Ex. Argent or Parametric) are not eligible for this service. Moneta currently engages the services of Chicago Clearing Corporation (CCC) for this service. The service is designed to assist clients in identifying and pursuing potential claims in securities class action settlements. They collect the applicable documentation, interpret the terms of each settlement, file the appropriate claim, interact with the administrators, and distribute the award to the individual claimant. CCC charges a contingency fee of 18.5% of the claim which is subtracted from the award at the time of payment. Moneta does not receive any portion of the contingency fee. Participation in this class action monitoring service is subject to CCC's terms and conditions and usually requires Moneta to provide CCC with client's holdings and transaction data for the applicable accounts, as well as additional information to facilitate any payments made by CCC to the client.

Clients have the ability to opt out of this service. If a client opts out, neither CCC nor Moneta will monitor or process any class action suits from which the Client could be entitled to participate. Clients should carefully review CCC's disclosures and consider whether participation is appropriate for their individual circumstances. Clients are eligible to discontinue participation at any time by notifying Moneta directly.

Item 14: Client Referrals and Other Compensation

Referrals to Affiliates or Related Parties

Moneta and our advisory personnel refer Moneta clients to a variety of affiliated and non-affiliated service providers. Generally, neither Moneta nor its personnel receive payments for referrals; any compensation received from such entities is derived from Moneta's or a Partner's ownership interest in such entity as explained in greater detail in Item 10. One exception is, when new advisory personnel join Moneta, those new personnel can refer certain of their existing clients (such as those who might not be a good fit for Moneta) to an advisor that is not affiliated with Moneta and can receive compensation for these referrals. See also Item 5 regarding referrals relative to the cessation of insurance commissions.

Other Referral Arrangements

Moneta does not engage third parties to solicit referral business and does not receive compensation for providing referrals to third-parties. Certain Moneta advisors receive additional compensation from Moneta for developing new business.

Benefits from Client Custodians

Moneta receives economic benefits from certain client custodians, typically in the form of support products and services the custodian makes available to us and other independent investment advisers whose clients maintain their accounts at the custodian. In addition, Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Schwab reaches a certain size. Clients do not pay more for assets maintained at Schwab as a result of these arrangements. However, Moneta benefits from the arrangement because the cost of these services would otherwise be borne directly by us. Clients should consider these conflicts of interest when selecting a custodian. These products and services, how they benefit us, and the related conflicts of interest are described herein in Item 12. The availability to us of client custodian products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Online Matching Program

Certain Moneta Teams pay a periodic lead generating expense to participate in an online matching program that seeks to match prospective advisory clients with investment advisers. The lead generating program collects information from prospective advisory clients and uses it to provide information about multiple advisory firms to persons who have expressed an interest in utilizing the program's services. The program also provides the name and contact information of such persons to the multiple firms that match the criteria expressed by the persons utilizing the lead generating program's services. The lead generating expense we pay for being provided with potential leads varies based on certain factors, including the size of the person's portfolio, and the fee is payable regardless of whether any prospect becomes our advisory client.

Item 15: Custody

Moneta does not maintain custody of client assets. All client assets (including cash and securities) are held by the client's qualified custodian. However, under the Custody Rule, Moneta is generally deemed to have custody of certain client assets held by the qualified custodian as a result of, among other reasons, the access granted to Moneta by the client, and in certain other instances where Moneta has the ability to transfer funds out of its clients' accounts without a client's authorization to make the transfer.

A client's qualified custodian (e.g., Schwab, Fidelity) will provide the client with account statements at least quarterly. The account statements will be sent to the email or postal mailing address the client provide to the custodian. Clients are encouraged to carefully review the statements provided by their custodians and to compare them to any statements provided by Moneta.

To mitigate the risk related to custody of client funds or securities, Moneta undergoes an annual surprise custody audit performed by an unaffiliated Public Companies Accounting Oversight Board (PCAOB)-registered accounting firm to verify the client funds and securities of which Moneta has custody.

Item 16: Investment Discretion

As set forth in Item 4 herein, some clients grant Moneta discretionary authority to determine the securities to be bought or sold for the client's account(s), and other actions to be taken. This discretionary authority, if selected by the client, is set forth in the client's Agreement with Moneta. Moneta can require the client to execute a limited power of attorney granting Moneta authority over their account(s) for trading purposes if required by the client's qualified custodian. Clients have the right to place limitations on Moneta's discretionary authority in the written advisory agreement or other written agreements with Moneta.

Item 17: Voting Client Securities

Non-Discretionary Accounts

Moneta generally does not have the authority to vote proxies relating to securities held in non-discretionary client accounts, which includes most 3(21) retirement plan accounts. Rather, non-discretionary clients (or the plan fiduciaries, in the case of certain retirement accounts) retain the authority for voting all proxies related to securities held in their accounts. A client's custodian or the security's transfer agent is responsible for providing all proxy notices and proxy-related materials directly to the client. Clients are encouraged to call or email their Team if they have any questions regarding the process for voting proxies.

Discretionary Accounts

Moneta typically has the authority and responsibility to vote proxies on behalf of accounts to which it provides discretionary management services, which includes certain retirement plan accounts. Consistent with its commitment to clients, Moneta has adopted written policies and procedures that require it to evaluate and vote proxies in the best interests of its clients.

Moneta has engaged Institutional Shareholder Services ("ISS") as its independent proxy voting service to provide proxy voting recommendations and to handle the administrative mechanics of proxy voting. Moneta has determined that ISS's Proxy Voting Guidelines are designed to further the interests of clients, and has therefore adopted ISS's Proxy Voting Guidelines and directed ISS to vote clients' proxies in accordance with the Guidelines (unless otherwise directed). Moneta monitors and oversees ISS and reviews ISS's Proxy Voting Guidelines periodically to ensure that this policy aligns with the best interests of clients.

With respect to those clients who do not receive proxy voting services from ISS, Moneta votes proxies in accordance with its proxy voting policies. Moneta's goal when voting is to maximize the economic value of client holdings. For these clients, the following voting guidelines apply: (i) for management proposals on routine matters, Moneta will typically vote in accordance with the issuer's management, unless Moneta believes that such recommendation is not in the best interests of the client; (ii) for non-routine matters proposed by management, Moneta will typically vote on a case-by-case basis, in each case voting in a manner that Moneta believes is in the best interest of the client; and (iii) for shareholder proposals, Moneta will typically vote in accordance with the issuer's management, unless Moneta believes that such recommendation is not in the best interest of the client. As part of Moneta's policy, Moneta has the right to abstain from voting a proxy when it determines the cost of voting the proxy exceeds the expected benefit to the client.

Discretionary clients have the right to direct that their proxies be voted in a specific manner by providing a written request to their Team. If timely received and to the extent practicable, Moneta will vote a client's proxies in accordance with the client's written request; even if the vote would be inconsistent with Moneta's proxy voting policies or the votes Moneta casts on behalf of other clients.

Due to the nature of Moneta's business and its ownership, Moneta believes that it is unlikely that conflicts of interest will arise in voting client proxies. Any conflict of interest identified by Moneta with respect to a proxy vote will be referred to Moneta's Compliance Department. Clients can request a free copy of Moneta's proxy-voting policies and procedures.

Item 18: Financial Information

Moneta does not accept client fees exceeding \$1,200 more than six months in advance.

As of the date of this Brochure, Moneta is not aware of any financial condition that is reasonably likely to impair its ability to continue to meet all contractual commitments to clients, and Moneta has never been the subject of a bankruptcy petition.