

## Item 1 Cover Page



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### **FORM ADV PART 2A BROCHURE**

March 25, 2025

This brochure provides information about the qualifications and business practices of Sustainable Advisors Alliance, LLC (SAA). If you have any questions about the contents of this brochure, contact us at (918) 408-7981. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Sustainable Advisors Alliance, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) CRD number 312061.

Sustainable Advisors Alliance, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since the last filing of this brochure on March 25, 2024, the following material changes have been made:

- Item 1: Cover Page - Adviser updated its business address.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 312061.

You may request a copy of this Disclosure Brochure at any time, by contacting us at (918) 408-7981.

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## Item 4 Advisory Business

### Description of Firm

Sustainable Advisors Alliance, LLC (SAA) is a registered investment adviser with its home office in Tulsa, OK. We are organized as a limited liability corporation under the laws of the State of OK. We have been providing investment advisory services since January 5, 2021. SAA is equally owned by Janet E. Bryan, Laura W. Isanuk, Harold J. Moran, Julie Lynn Skye, Pamela Stamper-Brandt and Krista Strohoffer.

As a fiduciary, we are required to put your interests first. We exercise the highest ethical standards, maintain a high level of knowledge and professional competence, and hold ourselves accountable for our investment advice and decisions.

SAA specializes in sustainable, responsible, and impact investing (SRI) using environmental, social, and governance (ESG) criteria. SAA designs portfolios that prudently integrate our clients' preferences and priorities, including any that relate to environmental, social or governance issues.

The following paragraphs describe our services and fees. Refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs.

### Portfolio Management Services

Sustainable Advisors Alliance, LLC provides discretionary and non-discretionary investment management and related advisory services to its Clients. Sustainable Advisors Alliance, LLC primarily employs an investment strategy which reflects Client goals, risk tolerance, and time horizon. The process begins with building a profile of where the Client is today and where they want to be in the future. Their goals, in combination with their risk tolerance, will determine the appropriate asset allocation. As the market dictates, SAA will rebalance when necessary. A client may have multiple goals and each goal may have its own asset allocation if appropriate. For example, a retirement account will likely have a different allocation compared to saving for a down payment on a house.

If you participate in SAA's discretionary portfolio management services, you will be granting our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the dollar amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms.

You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

We also offer non-discretionary portfolio management services for specialized off-list holdings. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis. Since each IAR manages portfolios differently, please refer to our ADV Part 2B's for more detail.

## **Use of Sub-Advisors**

We offer the use of Sub-Advisors for portfolio management services and advise regarding appropriate strategy and then assist with implementation and ongoing monitoring. Our review process and analysis of Sub-Advisors is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the Client on a periodic basis to discuss changing economic and market conditions as well as changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

## **Advising on Held-Away Accounts**

In addition to managing investment portfolios directly, we will also provide advice on held-away accounts that the client chooses to have us monitor and provide recommendations for but cannot be transferred under our management. These might include employee retirement accounts or other held-away investment accounts. Fees for advising on the held-away accounts may be paid from the managed account or other assets.

## **Financial Planning**

This service involves working one-on-one with a planner over a period of time. Clients get to work with a planner to develop and implement their plan. SAA provides a flexible fee structure that consists of the following options which may require a deposit or down payment in advance:

- Flat fee
- Hourly fee
- Ongoing retainer paid (monthly, quarterly, bi-annual, or annual)

When developing a financial plan, SAA will work with clients to identify and clarify their goals and their values around money. Steps in our planning process could include but are not limited to the following:

- Gather Client data and goals;
- Analyze strengths and vulnerabilities;
- Identify shortcomings if any and develop alternatives;
- Review the plan with the Client;
- Guide the Client with plan implementation; and
- Provide monitoring if desired.

To facilitate the planning process, Clients will be asked to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefits, retirement planning, insurance, investments, college planning, and estate planning.

Clients subscribing to this service may receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

## **Annuity Management Services**

We offer fee-based, low-expense no-load annuities that are free of sales charges or commissions to help clients meet their income, preservation, and liquidity needs. Fee-only annuities may be a part of our analysis when developing comprehensive financial plans and building long-term investment strategies. SAA may assist clients in the selection of appropriate annuity carriers, and the completion of new account documents. Fees for this service are outlined in Item 5 of this Form ADV Part 2A.

## **Employee Benefit Plan Services**

Our firm may provide employee benefit plan services to employer plan sponsors on an ongoing basis. Generally, such services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include investment options, plan structure, and participant education.

The plan administrator will provide services regarding the following items: employer securities, real estate, participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs.

## **Wrap Fee Programs**

We do not sponsor or manage a wrap fee program.

## **Types of Investments**

We may advise you on various types of investments based on your stated goals and objectives. We offer advice on a wide variety of investments including but not limited to the following: Stocks, Bonds, Mutual Funds, Exchange Traded Funds or ETFs, Annuities, Real Estate Investment Trusts or REITS, Private Equity, Community Investments and Limited Partnerships. Please refer to the *Methods of Analysis, Investment Strategies and Risk of Loss* below for additional disclosures on this topic.

## **Assets Under Management**

As of December 31, 2024, SAA manages \$200,078,505 on a discretionary basis and \$6,894,697 on a non-discretionary basis.

## **Item 5 Fees and Compensation**

### **Portfolio Management Services**

The portfolio management service fee is based on a percentage of the assets under management. The fee is billed and payable monthly or quarterly in advance or arrears, based on the balance at the end of the billing period or on an average daily balance. At the Advisor's sole discretion depending on individual Client circumstances, management fees are negotiable.

Assets in each of your account(s) are included in the fee assessment unless specifically identified in writing for exclusion. Management fees are applied pro rata based on the days in the billing period for which you are a client. They are deducted directly from your account through the qualified custodian holding your funds and securities.

The fee cannot be increased without the client signing a new agreement or amendment.

You may terminate the portfolio management agreement upon a 10-business day written notice. You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur management fees only in proportion to the number of days in the billing period for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

**Use of Sustainable Advisors Alliance for Portfolio Management Services**

The fee schedule directly below represents the maximum annual fees we might charge. Your actual management fees may be lower.

Tier Level	Dollar Value of Portfolio	Maximum Fee
On the first	\$200,000	1.65%
On the next	\$300,000	1.50%
On the next	\$500,000	1.45%
On the next	\$1,000,000	1.35%
On the next	\$1,000,000	1.30%
On the next	\$2,000,000	1.10%
On the next	\$5,000,000	0.70%
On the next	\$10,000,000	0.65%
Above	\$20,000,000	Negotiated

**Use of Sub-Advisors for Portfolio Management Services**

The fee schedule directly below represents the maximum annual fees we might charge. Your actual management fees may be lower.

Dollar Value of Portfolio	Maximum Fee
On all asset levels	1.95%

Please note, the above fee schedule includes the Sub-Advisor’s fee.

## **Annuity Management Services**

The below fee schedule represents the maximum annual fees we may charge for annuity management services. Your actual management fees may be lower.

Dollar Value of Portfolio	Maximum Fee
On all asset levels	1.50%

## **Employee Benefit Plan Services**

Sustainable Advisors Alliance, LLC will be compensated for Employee Benefit Plan services according to the value of plan assets not to exceed 1.00% of total plan assets.

Fees for this service are either paid directly by the plan sponsor or deducted directly from the plan assets by the custodian on a monthly or quarterly basis. The fee above does not include fees to other parties, such as recordkeepers, custodians, or third-party administrators.

## **Financial Planning**

The fee structure for financial planning consists of the following options depending upon the agreed upon scope of services:

- Hourly financial planning engagements are offered at an hourly rate between \$125 and \$500 per hour depending on complexity.
- Flat fee financial planning engagements are offered at a range between \$500 and \$7,500 depending on complexity.
- Ongoing planning engagements paid through a retainer arrangement can be paid monthly, quarterly, semi-annually, or annually. The maximum annual fee for the Client is \$7,500.

At Advisor's sole discretion, depending on individual client circumstances, SAA's planning fees are negotiable. The fees are due upon completion and a down payment may be requested at the start of the engagement. Fees for this service may be paid by electronic funds transfer, credit card or check.

This service may be terminated with a 10-business day's written notice. Upon termination of any agreement, the fee will be prorated, and any unearned fee will be refunded to the Client. In the event of early termination by the Client, any fees for advisor time spent and services provided will still be due.

## **Additional Fees and Expenses**

The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. Mutual Fund and ETF fees will generally include a fund management fee and other fund expenses.

You may also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your



account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian.

To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure.

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

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of a capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the Fees and Compensation section above and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

## **Item 7 Types of Clients**

We offer investment advisory services to individuals (other than high net worth individuals), high net worth individuals, pension and profit-sharing plans, retirement plans, corporations, non-profits and charities.

SAA does not typically require a minimum dollar amount to open and maintain an advisory account. Specific arrangements may vary based on Client circumstances and are at the SAA Advisor's discretion.

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

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

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

### **Recommendation of Particular Types of Securities**

#### **SRI/ESG & Impact Investing**

SAA may employ and has considerable expertise in Sustainable Responsible and Impact (SRI) investing which uses ESG (environmental, social and governance criteria) to identify better managed and more forward-thinking companies. Many years of research suggest that the use of ESG investment criteria results in equal to and in some circumstances better long-term risk adjusted returns.

This same ESG investment criteria used in a Sustainable Responsible Impact (SRI) Investing portfolio result in a more peaceful, just, equitable and prosperous society which is a "values-add" for generations to come.

SAA believes that most corporations deliver benefits to society, through their products and services, creation of jobs, payment of taxes, and the sum of their behaviors. As a responsible investor, SAA seeks to invest in companies and other issuers that provide positive leadership in the areas of their business operations and overall activities that are material to improving long-term shareholder value and societal outcomes. SAA seeks to invest in companies and other issuers that balance the needs of financial and nonfinancial stakeholders and demonstrate a commitment to the global commons as well as to the rights of individuals and communities. SAA seeks to identify companies and other issuers that operate in a manner that is consistent with or promote:

- Environmental sustainability and resources efficiency;
- Equitable Societies and respect for human rights; and
- Accountable Governance and transparent operations.

Active or passive management may be used separately or in combination. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by reduced tracking error, low portfolio expenses (i.e., the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Active managers may also employ strategies to reduce the expected volatility of a portfolio vis a vis its benchmark.

### **Direct Indexing**

Direct Indexing is an approach that blends certain aspects of active and passive investment management. It can be used to build personalized portfolios comprised of individual stocks, and bond mutual funds and ETFs, but with a structure that still leans toward broad-based, diversified index investing. There are currently four major types of direct indexing – tax-focused, personalized investor preferences, rules-based, and customized portfolios. This strategy can be a useful approach to overweight or underweight certain stocks based on Environmental, Social & Governance (ESG) criteria, or to exclude or include specific companies or sectors. With the help of institutional level portfolio optimization tools, we strive to create prudently diversified portfolios that are aligned with current market and economic conditions and our clients' specific ESG preferences and priorities in a Socially Responsible Investment (SRI) framework.

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The

risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Technical analysis** involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

**Cyclical analysis** is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Charting analysis** involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**Modern Portfolio Theory (MPT):** The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated for by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

**Use of Sub-Advisors:** We may refer Clients to third-party investment advisers Sub-Advisors. Our analysis of Sub-Advisors involves the examination of the experience, expertise, investment philosophies, and past performance of the Sub-Advisors in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. Additionally, as part of our due diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he or she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a Sub-Advisors portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Each IAR may take a different approach to the implementation of the investment strategies, and the use of Sub-Advisors, please refer to ADV Part 2B's.

### **Material Risks Involved**

All investing strategies involve risk and may result in a loss of your original investment which you should be prepared to bear. All types of investments (i.e., stocks, bonds, commodities, non-traded investments and other securities) involve risk. Material risks associated with our investment strategies are listed below.

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

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

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

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

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

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

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices

generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

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

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

### **Risks Associated with Securities**

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

**Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

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

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

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs

are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

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

## **Item 9 Disciplinary Information**

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management.

We do not have any required disclosures under this item.

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

No Sustainable Advisors Alliance, LLC employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No Sustainable Advisors Alliance, LLC employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Sustainable Advisors Alliance, LLC does not have any related parties.

Sustainable Advisors Alliance, LLC only receives compensation directly from Clients. We do not receive compensation from any outside source.

We do not have any conflicts of interest with any outside party.

Some Advisors of SAA are currently licensed insurance agents; however, they no longer receive compensation from any commission-based insurance products. SAA Advisors may continue to consult with clients or prospective clients on insurance matters.

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

### **Description of Our Code of Ethics**

Our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting Julie Lynn Skye at (918) 408-7981.

### **Participation or Interest in Client Transactions**

Neither our firm nor any persons associated with our firm have any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

### **Personal Trading Practices**

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to Clients or securities in which Clients are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

### **Investment Advice Relating to Retirement Accounts**

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

In addition, and as required by this rule, we provide information regarding the services that we provide to you, and any material conflicts of interest, in this brochure and in our DOL disclosure documents.

### **Item 12 Brokerage Practices**

At this time, we recommend the brokerage and custodial services of Charles Schwab, Goldman Sachs, AssetMark Trust Company, Apex Clearing, and Pershing Advisor Solutions. Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services. We consider various factors, including:

- Capability to buy and sell securities for your account itself or to facilitate such services;
- The likelihood that your trades will be executed;
- Availability of investment research and tools;
- Overall quality of services;
- Competitiveness of price;
- Reputation, financial strength, and stability; and
- Existing relationship with our firm and our other clients.

### **Research and Other Soft Dollar Benefits**

Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services.

SAA does not participate in a soft dollar program.

### **Brokerage for Client Referrals**

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

### **Directed Brokerage**

Clients may direct SAA to execute transactions through broker dealers/custodians of their preference. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

### **Block Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order and 3) difficulty of execution. SAA will execute its transactions through the Custodian as authorized by the Client. SAA will aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day.

## **Item 13 Review of Accounts**



Each IAR will conduct account reviews at least annually, to ensure the advisory services provided to you are consistent with your investment needs and objectives.

Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's accounts. The Client is encouraged to notify SAA if changes occur in the Client's personal financial situation that might affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

The Client will receive brokerage statements no less than quarterly from the custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's accounts.

The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

We do not receive any compensation from any third party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

#### **Item 15 Custody**

As a paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. Without written authorization from the Client, SAA is not permitted to be paid from Client accounts held by the custodian.

You are provided statements reflecting the amount of the advisory fee deducted from your account(s). You should compare our statements with the statements from your account custodian to reconcile the information reflected on each statement. If you have a question regarding your account statement, or if you did not receive a statement from your custodian, contact us immediately at (918) 408-7981.

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

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement and the appropriate trading authorization forms.

You may grant our firm discretion over the selection and dollar amount of securities to be purchased or sold for your account(s). Doing so allows SAA to place transactions without obtaining your consent or approval prior to each transaction.

You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

### **Item 17 Voting Client Securities**

SAA votes Proxies.

If directed by the Client, we, or a designated third party, will vote the proxies for advisory accounts under the management of SAA. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights.

### **Item 18 Financial Information**

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and we do not require the prepayment of more than \$1200 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

We have not filed a bankruptcy petition at any time in the past ten years.