

ITEM 1: COVER PAGE

CONTINUUM ADVISORY, LLC FIRM BROCHURE Part 2A of Form ADV

March 30, 2026

Part 2A of Form ADV (the “Brochure”) provides information about the qualifications and business practices of Continuum Advisory, LLC. If you have any questions about the contents of this Brochure, please contact us at (208) 481-4170 and/or at our website at www.continuumadvisory.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Continuum Advisory, LLC is registered as an Investment Adviser with the SEC; however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.

Additional information about Continuum Advisory and its investment adviser representatives is also available on the SEC’s website at www.adviserinfo.sec.gov.

Continuum Advisory, LLC
CRD # 283155
Principal Office Location
873 E. State Street | Eagle, ID 83616
(208) 481-4170 | www.continuumadvisory.com

ITEM 2: MATERIAL CHANGES

In this Item, Continuum Advisory is required to discuss any material changes that have been made to the Brochure since the last annual amendment. This Brochure dated March 30, 2026, updates and replaces the Brochure dated March 30, 2025. The following material changes were made:

- **ITEM 4: Advisory Business** (Third-Party Asset Managers (“TPAMs”))
The addition of column (iv) clarifies that Advisor Directed Investments and other options may also be accessed through a distinct Third-Party Platform of Investment Options, expanding the table to capture this separate distribution pathway.
- **ITEM 5: Fees and Compensation**
Discretionary Tiers - Investment Advisor Representatives generally have discretion to determine the advisory fees they charge, provided that the total fee does not exceed 2.95% and remains aligned with the Firm’s current tiered fee structure. While the Firm expects Advisors to follow the established tiers as the standard framework for pricing, in rare and exceptional circumstances an Advisors may request Firm approval to depart from the tier structure when warranted by unique client needs or special situations. Any such exception must be reviewed and approved by the Firm in advance.
- **ITEM 17: VOTING CLIENT SECURITIES** (*Voting Proxy*)
Continuum clarified that it does not vote proxies, receive proxy materials, or ensure their delivery; clients remain fully responsible for voting their own securities. The Firm may provide limited guidance upon written request, but all voting decisions rest with clients. Third party money managers or programs may have their own policies that are independent of Continuum’s policy. The Firm also added that it does not take action or provide advice regarding class-action lawsuits or other legal proceedings, which clients must handle independently.

Continuum made additional non-material updates to other sections in this Brochure. Each client is encouraged to review the complete Brochure carefully and to call us with any questions.

Pursuant to SEC Rules, Continuum Advisory will ensure that clients receive a summary of any material changes to this Brochure within 120 days of the close of Continuum Advisory's fiscal year, along with a copy of this Brochure or an offer to provide the Brochure. Additionally, as Continuum Advisory experiences material changes in the future, we will send our clients a summary of our “Material Changes” under separate cover. For more information about our firm, please contact our Chief Compliance Officer at (208) 425-6566, or by visiting our website at www.continuumadvisory.com. Additional information about Continuum Advisory and its Investment Advisor Representatives is available on the SEC’s website at www.adviserinfo.sec.gov.

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ITEM 4: ADVISORY BUSINESS

About Us

Continuum Advisory, LLC (“Continuum/our/us/we/Firm”) is an SEC Registered Investment Adviser. Our business model consists of a network of Investment Advisor Representatives (“Advisors”) doing business under separate “doing business as” (“DBA”) entities across the United States. Currently, we have Advisors in Arizona, Arkansas, California, Florida, Hawaii, Idaho, Maryland, Montana, Missouri, New York, Pennsylvania, and Vermont.

We offer a variety of advisory services and programs, which include financial planning, consulting, and investment management services. Before Continuum and/or our Advisors provide any of the advisory services mentioned, clients must first sign one or more written agreements with us. These agreements outline the specific terms and conditions of the advisory relationship (“Advisory Agreement”).

Continuum was formed in February 2016 and is principally owned by Timothy S. Kerrigan, Brian J. Damiani, and Michael A. Kelly (hereafter, “Owners”).

While this brochure generally describes the business of Continuum, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm’s Advisors, officers, owners, directors (or other persons occupying a similar status or performing similar functions), employees, or any other person who provides investment advice on our behalf and is subject to the Firm’s supervision and control.

Financial Planning and Consulting Services

We offer clients a broad range of financial planning and consulting services, which can include any or all the following functions:

- Business Planning
- Cash Flow Forecasting
- Trust and Estate Planning
- Financial Reporting
- Investment Consulting
- Insurance Planning
- Retirement Planning
- Risk Management
- Charitable Giving
- Retirement Plan Consulting
- Tax Planning
- Due Diligence

In performing these services, we are not required to verify any information received from clients or from other professionals the client has hired (e.g., attorneys, accountants, etc.,) and are expressly authorized to rely on such information. We can recommend clients engage us for additional related services from its Supervised Persons in their individual capacities as insurance agents, registered representatives of a broker/dealer, CPAs or tax preparers, attorneys (JD) and/or other professionals to implement recommendations. Clients are advised that a conflict of interest exists if clients engage us or our affiliates to provide additional services for compensation. Clients retain absolute discretion over all decisions regarding implementation of any recommendations and are under no obligation to act upon any of the recommendations made by us under a financial planning or consulting engagement. It is the client's responsibility to promptly notify us of any change in their financial situation or investment objectives to review, evaluate, or revise our recommendations and/or services.

Investment Management Services

Continuum manages client investment portfolios on a discretionary basis. We will provide these services on a non-discretionary basis, if the client requests and upon our agreement. We primarily allocate client assets in accordance with their stated investment objectives among various exchange-traded products (“ETPs”), mutual funds, individual debt, and equity securities. When appropriate, client assets may be managed on a discretionary basis by one or more unaffiliated Third-Party Asset Managers (“TPAMs”) in accordance with the client’s stated investment objectives.

Where appropriate, we can also provide advice about any type of legacy position or other investments held in a client portfolio. Clients can engage us to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as but not limited to variable life insurance, variable annuity contracts (e.g., fee-based variable annuities), and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, we direct or recommend the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company, or the custodian designated by the investment product’s provider. Please refer to Item 8 below for further information on the types of investments used by us, along with the associated risks.

Continuum tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. We consult with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints, and other related factors relevant to the management of their portfolios. Clients must promptly notify us if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients can impose reasonable restrictions or mandates on the management of their accounts if we determine, in our sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to our management efforts.

Amplify Platform

We utilize the technology and the Sub-Advisory services of Amplify’s proprietary, automated, and computer algorithms (“Platform”) to provide certain administrative, technological, and back-office operational support services. Such services include, among other things, account reconciliation, fee calculation, billing and processing, client reporting, performance reporting, administration, and trading. In addition, our advisors can access Separately Managed Accounts (“SMAs”) and select one or more as a discretionary investment sub-adviser through the Platform. By doing so, your Advisor can allocate all or a portion of your underlying assets among the different approved SMA Managers available through the Platform.

Continuum Advisory clients authorize us to engage Amplify for its platform and Sub-Advisory Services as described above. SMA Managers available through Amplify will perform discretionary investment management services and shall manage, invest, and reinvest client assets designated by our Advisors. As such, a selected SMA Manager(s) shall be authorized, without prior consultation with the Firm or the underlying client, to buy, sell, trade, or allocate the designated client’s assets in accordance with the stated investment objectives as communicated by our Advisors.

Under this arrangement, our Advisors will retain responsibility for the underlying client relationship, including the initial and ongoing suitability determination and the designation of assets to be managed by an SMA Manager. Our Advisors also have full discretion to select or replace any SMA Manager and furnish information about the selection of SMA Manager to the client. They will also inform the SMA Manager(s) of any underlying client account guidelines and reasonable account restrictions.

Continuum utilizes the Amplify platform for billing, reporting, and trading purposes. Additional fees apply for choosing an SMA Manager(s) and these fees vary depending on the SMA manager(s) selected.

Refer to Item 5 for important information related to costs associated with the Amplify platform.

Third-Party Asset Programs

When appropriate, and based on the client’s investment objectives, guidelines, and restrictions, we may delegate or recommend that a Third-Party Program actively manage all or part of the client’s assets in their managed accounts.

Access to a Third-Party Program can be structured in three ways:

1. **Co-Advisory Capacity:** The Advisor acts as a co-fiduciary alongside a TPAM.
2. **Referral Basis:** The TPAM is the primary fiduciary.
3. **Advisor Directed Investment** – Advisor has discretion to manage the limited set of investment options offered by the third-party program or platform.

We evaluate Third Party Programs based on a range of information, including their public disclosure documents, materials they provide, and third-party analyses, when readily available.

Key factors in this evaluation include:

- The investment options available in the program.
- Investment strategies, past performance, and risk results.
- Leadership and management style, reputation, compliance standards, financial strength, reporting, pricing, and research capabilities.

Discretionary Authority and Asset Management

TPAMs can have discretionary authority over assets allocated to them. This means they are authorized to make investment decisions, including but not limited to buying, selling, and trading securities, in line with the client's investment objectives. Discretionary authority will be described in the TPAM’s disclosure documents, when applicable.

Summary of Programs Available Through Continuum’s Advisors

Amplify Platform Unified Managed Account (“UMA”)		Third-Party Asset Programs		
(i)		(ii)	(iii)	(iv)
Advisor Directed Investments	Separately Managed Accounts (“SMA”)	Co-Fiduciary Advice and Service	Referral Fee Solicitors Agreement	Advisor Directed Investments
Advisor Managed Portfolios	Continuum & Third-Party Managed Strategies	Third-Party Managed strategies	Third-Party Managed Strategies	Third-Party Platform of Investment Options

Retirement Plan Consulting Services

We provide a broad range of consulting services to qualified employee benefit plans and their fiduciaries. This suite of institutional services is designed to assist plan sponsors in structuring, managing, and optimizing their corporate retirement plans.

Each engagement is individually negotiated and customized, and may include any of the following services:

- Plan Design and Strategy
- Plan Review and Evaluation
- Executive Planning & Benefits
- Investment Selection & monitoring
- Plan Fee and Cost Analysis
- Plan Committee Consultation
- Fiduciary and Compliance
- Participant Education

As outlined in the Advisory Agreement, some of these services are provided in a fiduciary capacity under ERISA. In compliance with ERISA Section 408(b)(2), each plan sponsor receives a written explanation of our fiduciary role, the services to be provided, and all expected direct and indirect compensation for the engagement.

Fiduciary Role Under ERISA (3(21) and/or 3(38) Services)

Depending on the scope of services selected by the plan sponsor, we may act as an ERISA 3(21) fiduciary advisor, an ERISA 3(38) investment manager, or both:

- **As an ERISA 3(21) fiduciary**, we provide *investment recommendations* to the plan sponsor or plan committee, who retains final decision-making authority.
- **As an ERISA 3(38) fiduciary**, we accept *full discretionary authority* to select, monitor, and replace investment options on behalf of the plan, thereby reducing the plan sponsor's fiduciary burden with respect to investment selection and monitoring.

The specific fiduciary capacity under which we serve is fully described in the Advisory Agreement and related disclosures.

Fiduciary Standard for Retirement Accounts

When providing investment advice related to retirement plan accounts or individual retirement accounts, we act as a fiduciary under Title I of ERISA and/or the applicable sections of the Internal Revenue Code. Although our revenue model may present certain conflicts of interest, we are required to follow fiduciary standards intended to ensure we act in your best interest.

Under ERISA, we must:

- Meet a professional standard of care when making investment recommendations (provide prudent advice)
- Never place our financial interests ahead of yours (provide loyal advice)
- Avoid misleading statements about conflicts, fees, or investments
- Maintain policies and procedures designed to ensure advice is in your best interest
- Charge no more than reasonable compensation
- Provide clear disclosure regarding conflicts of interest

Disclosure of Conflict of Interest

As a fiduciary Advisor serving both the retirement plan and individual plan participants, it is important to disclose potential conflicts of interest to ensure full transparency. This dual role may create situations where our fiduciary duty to the plan as a whole does not fully align with the unique needs of certain individual participants.

For example, a decision that benefits the plan broadly may not always reflect the optimal outcome for every participant's personal circumstances. We are committed to managing and disclosing these conflicts and providing advice that adheres to the fiduciary standards outlined above.

Assets Under Management

As of December 31, 2025, the Firm managed \$1,893,270,619 in discretionary assets and \$14,669,722 in non-discretionary assets for total assets under management of \$1,907,940,341.

ITEM 5: FEES AND COMPENSATION

We provide services for a fee, which may consist of fixed fees or fees calculated as a percentage of assets under management. Additionally, we have certain Advisors in their individual capacities that can offer securities brokerage services and/or insurance products under a separate commission-based arrangement.

Financial Planning and Consulting Fees

We offer a variety of planning fees that may include an up-front initial planning fee, an ongoing periodic fee, or a combination of both. These fees are negotiable and vary based on the scope and complexity of the engagement and the Advisor delivering the services. The initial planning fee generally covers the upfront work of developing the financial plan, while ongoing fees cover continued access, periodic updates, and ongoing advisory support. If clients also engage our Advisors for additional investment advisory services, we may reduce or waive some or all of those advisory fees based on the amount paid for financial planning and/or consulting services.

The terms and conditions of each financial planning and/or consulting engagement are detailed in the Financial Planning / Consulting Agreement(s). Depending on the Advisor delivering the services, we *may* request a portion of the initial planning fee in advance, with any remaining balance generally due upon delivery of the financial plan or completion of the agreed-upon services. Ongoing fees begin once ongoing services commence and are billed monthly, quarterly, or annually based on the arrangement selected. These fees continue until terminated in writing. Consistent with regulatory requirements, we do not accept \$1,200 or more in prepaid fees for services scheduled more than six months in advance. Our Advisors may also provide ongoing financial planning services under an annual service model billed periodically (monthly, quarterly, or annually), which continues until terminated in writing.

Total Management Fees

We offer investment management services for an annual fee based on the total assets under the Firm's management, including cash and cash equivalents. The Total Management Fee is structured in tiers, ranging from 0 to 295 basis points (0.00% to 2.95%) annually. This fee is fully negotiable and may vary at the discretion of the Advisor and Firm, based on factors such as the nature of the Advisor's relationship with the client, the size and composition of the client's portfolio, the type of services provided, and any other relevant considerations.

Advisors generally have discretion to determine the advisory fees they charge, provided that the Total Management Fee does not exceed 295 basis points (2.95%) and remains aligned with the Firm's current tiered fee structure. While the Firm expects Advisors to follow the established tiers as the standard framework for pricing, in rare and exceptional circumstances an Advisors may request Firm approval to depart from the tier structure when warranted by unique client needs or special situations. Any such exception must be reviewed and approved by the Firm in advance.

Continuum's Total Management Fee for the Amplify Platform is prorated and charged quarterly, in advance, based upon the market value of the assets (including cash, cash equivalents) being managed by us on the last day of the previous billing period. If assets are deposited into or withdrawn from an account during any month following a billing quarter, we will prorate the fee after the end of the quarter and either bill for the additional amount or issue a credit, as applicable. For the initial period of engagement, the fee is calculated on a *pro rata* basis. In the event the Advisory Agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding or unearned portion of the fee is charged or refunded to the client as appropriate.

Additionally, for investment management services the Firm provides with respect to certain client holdings (e.g., held-away assets, courtesy accounts, fee-based variable annuities, alternative investments, etc.), Continuum has in the past, and can in the future negotiate a fee rate that differs from the range set forth above. In addition, for a fee-based variable annuity, the fee is usually calculated by the insurance company issuing the policy and paid in advance or arrears as applicable.

The Owners at Continuum have an incentive to recommend investments that enable the firm to retain a larger portion of the Total Management Fee. Such recommendations present a conflict of interest in that the owners have a financial incentive to recommend Continuum Capital Management (CCM) models where they will receive additional compensation. To mitigate this conflict, we disclose its existence to clients at the time of solicitation through the delivery of this brochure. Continuum clients are under no obligation to utilize CCM proprietary models.

Refer to the TPAM's ADV and applicable new account opening document(s) for specifics regarding their billing practices.

Amplify Separately Managed Account Manager Fees and Sub-Advisory Service Fees

As discussed above, our Advisors are required to use the Amplify platform to perform certain back-office services. When a Continuum client account utilizes an Amplify Separately Managed Account ("SMA") Manager, the account will incur two types of fees:

1. **The Advisor Fee**, and
2. **The SMA Manager Fee**

Together, these make up the **Total Management Fee**.

SMA Manager Fee

If an account is managed by an SMA Manager through the Amplify platform, the SMA Manager Fee generally ranges from 0.20% to 1.50% annually. This fee is billed quarterly in advance, based on the market value of the account as of the last business day of the prior quarter.

Continuum Advisory's Retained Portion

Continuum Advisory provides administrative and supervisory services to Advisors and retains a portion of both:

- the Advisor Fee, and
- the SMA Manager Fee

The amount retained varies by Advisor and by SMA Manager or Strategy but maybe up to 0.15% (15 basis points) of each fee type.

Fee Illustration

For example: assume Total Management Fee: 1.35%

- Account Value (prior quarter-end): \$500,000
- Advisor Fee: 1.00%
- SMA Manager Fee: 0.35%

Therefore, the fees would be:

- Annual Fee: $1.35\% \times \$500,000 = \$6,750$
- Quarterly Fee: $\$6,750 \div 4 = \$1,687.50$

If Continuum retains 0.15% of assets for the SMA Manager Fee portion, we would retain:

- Annual: $0.15\% \times \$500,000 = \750
- Quarterly: \$187.50

Fee Limitations

In general, the Total Management Fee should not exceed 2.95% annually in the aggregate. Clients should review and understand how fees impact investment returns, and Advisors are available to discuss all applicable fees in detail.

Customized CCM Models

Continuum may also create customized CCM Models for client accounts. These customized portfolios are typically not available on the Amplify platform and cannot generally be blended with Amplify SMA Managers.

Fees for customized CCM Models are negotiable and bundled, and—similar to SMA fees—are in addition to the Advisor Fee when calculating the Total Management Fee.

Account Additions and Withdrawals

Clients have the flexibility to make additions and withdrawals from their managed account at any time, although Continuum Advisory retains the right to terminate an account. Additions may involve cash or securities, but the Firm reserves the right to liquidate any transferred securities or decline to accept certain securities into a client's account. Clients can withdraw account assets on notice to Continuum Advisory, subject to the usual and customary securities settlement procedures. However, we generally design our portfolios as long-term investments, and the withdrawal of assets can impair the achievement of a client's investment objectives. We can consult with our clients about the options and implications of transferring securities. Clients are advised that when securities are liquidated, they can be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charges) and/or tax ramifications.

Fees and Separate Agreements

If assets are allocated to a TPAM, fees may vary, and the client will need to sign a separate advisory agreement with the TPAM, in addition to their existing agreements with us. In some cases, Continuum and specific Advisors may receive a referral fee when they refer a client to a TPAM.

Channel-Specific Pricing:

Since TPAMs can offer their strategies through multiple channels, such as clearing firms or Turnkey Asset Management Programs ("TAMPs"), pricing and features may differ depending on the channel used. Similar strategies may be available at lower costs through another firm.

Materially Similar or Identical Investment Strategies and Pricing Differences:

Similar investment strategies may be offered through different programs within Continuum, and pricing can vary depending on the program. For example, some TPAMs are available through both Amplify and Schwab's Marketplace. While the investment strategies are essentially the same, different features of each program may explain the price differences.

Billing Procedures

As a general practice, Continuum does not aggregate external assets for the purpose of computing fee discounts. Each third-party program typically has its own fee aggregation policy that applies to its assets. However, when Continuum is responsible for billing on specific third-party program assets, we may combine those assets with Amplify platform assets for the purpose of calculating the overall billing fee. This approach allows for more efficient billing and may benefit clients by enabling them to reach breakpoints on a combined asset basis, potentially lowering their fees. Refer to Item 14 for further details.

Margin Accounts

While we do not encourage clients to borrow money for the purpose of building an investment portfolio, there may be times when a client sets up their managed account as a margin account for borrowing purposes. Clients should be aware that borrowing on margin subject clients to additional costs and risks that should be carefully considered before opening a margin account.

Some TPAM relationships may use margin as a requirement for one or more of their strategies. See the TPAM's disclosure documents to fully understand their use of margin and potential risks prior to investing.

Using a margin account is not suitable for all investors; the use of margin increases leverage in a client's account and therefore increases overall risk. For further information on risks pertaining to margin accounts, please refer to Item 8 below and the Investor Bulletin issued by the SEC at https://www.sec.gov/oiea/investor-alerts-and-bulletins/ib_margin_account.

Retirement Plan Consulting Fees

We charge a fixed consulting fee, not to exceed \$40,000, or an ongoing asset-based fee that ranges from 0.15% to 1.00%, to provide clients with retirement plan consulting services. Each plan is individually negotiated and tailored to accommodate the needs of the individual plan sponsor, as memorialized in the Consulting Agreement. Fees vary based on the nature and scope of the services rendered, the complexity of the engagement, the expertise of the Advisor providing the services, and the size of the retirement plan.

Mutual Fund and ETP Fees

We invest in ETPs as well as mutual funds, both open-ended and closed-ended interval funds, in client portfolios. Each mutual fund charges fees to shareholders, which are described in their respective prospectuses and usually include a management fee, administrative and operations fees, and certain other fees (e.g., 12b-1 fees) and/or redemption fees. These fees are referred to as a fund's "expense ratio" and the fees are deducted at the fund level when calculating the fund's net asset value ("NAV") and have a direct bearing on the fund's performance. Certain mutual funds also charge an up-front or back-end sales charge. In addition, some open-end mutual funds offer different share classes of the same fund, and one share-class can have a higher expense ratio than another share class.

The most economical share class will depend on certain factors, including the amount of time the shares are held by a client, applicable transaction fees, and the dollar amount a client will be investing. Closed-ended interval funds usually don't have 12b-1 fees, but they can charge redemption fees. Mutual fund expense ratios vary by mutual fund, so it is important to read the mutual fund prospectus to fully understand all the fees charged. The fees charged by mutual funds are in addition to the Firm's and other Independent Manager fees. Continuum Advisory will strive to purchase the lowest cost mutual fund share class for clients when available. There are occasions when we do not have access to lower cost share classes. This typically happens when the client's custodian doesn't offer a lower-cost share class for certain or all of the mutual funds in their accounts, or when the investment amount falls below the minimum requirement for a specific share class. Transaction fees are also a factor in mutual fund investing. Some custodians offer certain higher-cost mutual fund share classes without transaction fees. Therefore, we'll opt for a more expensive share class if, based on the situation, it proves to be the most cost-effective for a client. Additionally, we'll transfer a client to a lower-cost share class later, if we find it beneficial for them.

Fee-Based Variable Annuities

Clients investing in Fee-Based Variable Annuities will be charged fees by our Advisors and the Product Company. While the Product Company fees are outlined in an annuity's prospectus, they can include, but are not limited to administrative fees, surrender charges, mortality expenses, transfer fees, distribution fees, contract fees, underwriting fees and fees associated with the underlining portfolio investments, such as mutual fund fees. Some of these additional fees are included in the expense ratio and reflected in the per share value of the annuity, while other fees are deducted from the client's assets invested in the annuity.

Effect of Fees on Managed Assets

Clients should review all applicable direct and indirect fees charged, including but not limited to custodian fees, transaction fees, fees associated with all investments (e.g., mutual funds and ETPs, insurance products), and advisory fees to fully understand the total amount of fees to be paid by them and to thereby evaluate the advisory services being provided. It is important that clients understand how all these fees can affect investment returns over time. For further information, please refer to the SEC's Investor Bulletin at <https://www.investor.gov/introduction-investing/general-resources/news-alerts/alerts-bulletins/investor-bulletins/updated>.

Investors can avoid certain fees by making their own decisions regarding the investments made in their accounts. However, in doing that, investors would not have the benefit of receiving experienced investment advice provided by us and our Advisors.

Advisor Fee Discretion

We can, in our sole discretion, negotiate to charge a lesser fee and/or waive the fee based upon certain criteria, such as anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention, and pro bono activities.

Transaction Charge Considerations

Clients should understand that the cost to the Advisor of transaction charges can be a factor that the Advisor considers when deciding which securities to select and how frequently to place transactions in these accounts.

In particular, our Advisor has a financial incentive, resulting in a conflict of interest, to select No Transaction Fee (“NTF”) funds to avoid paying or to lower the transaction charges. Clients should consider such conflict with monitoring the purchase of NTF funds in recognition of the overall fee and other arrangements with the Advisor for management of the account. All such conflicts can have an impact on the investment performance of the client’s account.

If the Advisor has agreed to pay transaction costs or asset-based fees on behalf of the client, the cost may be a factor that the Advisor considers when deciding which securities, mutual funds or ETPs to select and whether or not to place transactions in the account. The transaction charges borne by the Advisor vary based on the type of transaction (e.g., mutual fund, ETP, equity or fixed income security). The Advisor has a financial incentive to recommend transactions in certain securities that carry lower fees (e.g., transactions involving equity securities may be recommended over transaction fee mutual fund securities because of the lower transaction charge) or to limit the overall number of transactions it recommends to clients. In particular, the Advisor has a financial incentive to select NTF Funds or ETPs to avoid paying or to lower the transaction charges over others that may be more suitable for the client. Clients should consider such conflict when monitoring the purchase of NTF Funds or ETPs.

Continuum does not waive transaction charges, instead we participate in a reimbursement arrangement with Schwab for asset-based fees. We do allow advisors to reimburse clients for ancillary fees charged by the custodian.

Additional Fees and Expenses

In addition to the advisory fees paid to us, clients can also incur certain charges imposed by other third parties, such as broker/dealers, custodians, TPAMs, mutual funds, trust companies, banks, and other financial institutions (collectively “Financial Institutions”). The additional charges include, but are not limited to, transaction fees, custodial fees, margin interest, fees attributable to alternative assets (including insurance products), fees charged by third party programs, margin costs, charges imposed directly by a mutual fund or ETP in a client’s account, as disclosed in the fund’s prospectus (e.g., fund management fees and other fund expenses), odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Client assets invested with TPAMs recommended and/or utilized by us will be subject to management fees charged by those TPAMs, as described in each manager’s disclosure brochure (Form ADV Part 2A). These management fees are charged separately by the TPAM and are in addition to our Advisory Fee.

Our brokerage practices are described at length in Item 12 below.

Direct Fee Debit

Clients provide us and/or certain third-party programs with the authority to directly debit their accounts for payment of the investment advisory fees, via written client agreements. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to our clients not less than quarterly detailing all account transactions, including any amounts paid to us. We send invoices directly to qualified custodians for debiting and payment of advisory fees.

Commissions and Sales Charges for Recommendations of Securities

Some Advisors with Continuum are also registered representatives of Osaic Wealth, Inc. (“Osaic Wealth”), a broker/dealer registered with FINRA. Refer to Item 10 for additional information regarding the type of other compensation received.

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

Continuum Advisory does not offer services for a performance-based fee, meaning we do not charge fees based on a percentage of capital gains or asset appreciation for our clients.

ITEM 7: TYPES OF CLIENTS

We offer services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and business entities.

We do not impose a stated minimum fee or minimum portfolio value for starting and maintaining an investment management relationship. Certain Third-Party Programs, TPAMs and SMA Managers do, however, impose investment minimums.

If a client’s account is a pension or other employee benefit plan governed by ERISA, we may be a fiduciary to the plan. In providing our investment management services, we are obligated to adhere to a standard of care that requires us to act with the same level of care, skill, prudence, and diligence that a prudent individual, knowledgeable in such matters, would exercise under similar circumstances in managing a similar enterprise with similar objectives. We will provide certain required disclosures to the “responsible plan fiduciary” (as such term is defined in ERISA) in accordance with Section 408(b)(2), regarding the services we provide, and the direct and indirect compensation received from such clients. These disclosures are normally contained in this Form ADV Part 2A, the Advisory Agreement and/or in separate ERISA disclosure documents and are designed to enable the ERISA plan’s fiduciary to: (1) determine the reasonableness of all compensation received by us; (2) identify any potential conflicts of interests; and (3) satisfy reporting and disclosure requirements to plan participants.

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

Methods of Analysis

Often times we utilize a blend of fundamental and technical analysis methods to manage client assets.

Fundamental analysis involves an evaluation of the fundamental financial condition and competitive position of a particular fund or issuer. For us, this process typically involves an analysis of an issuer’s management team (experience, firm size, corporate structure, compliance history), investment strategies, style drift, past performance, reputation, and financial strength in relation to the asset class concentrations and risk exposures of the Firm’s model asset allocations. Relying on fundamental analysis carries a significant risk. Despite a company’s overall health and position appearing positive, changes in market conditions can still adversely affect its security.

Technical analysis involves analyzing past market data rather than specific issuer information when making recommendations to clients. Technical analysis may utilize mathematical indicators and charts, like moving averages and price correlations, to identify market patterns and trends influenced by investor sentiment rather than company fundamentals. However, there's a significant risk associated with relying solely on technical analysis: historical trends may not accurately predict future trends. Even if a trend recurs eventually, there's no guarantee of accurately predicting its recurrence.

Investment Strategies

As discussed above, we primarily manage client investment portfolios on a discretionary basis. With the Firm's supervision, Advisors make recommendations and/or allocations that they feel are in the client's best interest. Client assets are invested in accordance with their stated investment objectives and allocated among various ETPs, mutual funds, individual debt and equity securities as well as placing some or all of their assets in Continuum model portfolios or with Independent Managers. Additional investments available for use include but are not necessarily limited to Real Estate Investment Trusts ("REITs"), Business Development Companies ("BDCs"), and fee-based annuities.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

Prior to entering into an Advisory Agreement with us, a client should carefully consider:

- (1) that volatility from investing in the stock market can occur; and
- (2) that over time the client's assets will fluctuate and at any time be worth more or less than the amount invested.

Below is a summary of some of the main risks involved with the types of investments recommended/utilized by us. However, this is not an all-inclusive list, so it is important that clients take time to learn about all the risks involved in their investments, by reading disclosure documents, offering documents, and discussing them with your advisor.

Market Risks

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The results of our recommendations and/or investment decisions can depend greatly on correctly assessing the future course of price movements of stocks, bonds, and other asset classes. There can be no assurance that we will be able to predict those price movements accurately or capitalize on any such assumptions.

Mutual Funds and ETPs

Investing in mutual funds or ETPs involves risk, including the loss of principal. Mutual fund and ETP shareholders are subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. For taxable accounts, shareholders are also responsible for paying taxes on any capital gains or income distributed by the mutual fund or ETP. Mutual funds and ETPs are legally mandated to distribute capital gains if they sell securities at a profit that cannot be offset by corresponding losses.

Shares of open-ended mutual funds are often distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (*e.g.*, sales loads, purchase fees, redemption fees). The per share NAV of an open-ended mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings.

The trading prices of an open-ended mutual fund's shares can differ significantly from the NAV during periods of market volatility, which can, among other factors, lead to the mutual fund's shares trading at a premium or discount to the actual NAV.

Closed-ended interval funds can expose investors to liquidity risk. While interval funds periodically offer to repurchase some outstanding shares, clients should view interval fund shares as illiquid investments because they are not publicly traded and have a unique redemption structure. Furthermore, the level of illiquidity in interval funds can vary depending on the liquidity of their underlying investments. Interval funds are not required to provide daily liquidity and only offer to repurchase a certain percentage of outstanding shares at set time periods throughout the calendar year. Shareholders can only redeem at the fund's designated intervals, which are outlined in the fund's prospectus. Importantly, while interval funds make periodic redemption offers, there is no guarantee that all shareholders will be able to sell the number of shares they want, when they want.

Shares of ETPs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Depending on market demand and supply, ETPs' shares can trade at a premium or discount to their NAV. Also, there is no guarantee that an active secondary market for such shares will develop or continue to exist. Therefore, if a liquid secondary market ceases to exist for shares of a particular ETP, a shareholder may have to dispose of such shares at a significant discount.

Use of Margin Accounts

Clients with margin accounts should be aware that there are additional risks that need to be considered. The risks associated with having a margin account include, but are not limited to, the following:

- Clients can lose more assets than deposited in the margin account. A decline in the value of securities that are purchased on margin can require the client to provide additional funds to the brokerage firm that has made the loan to avoid the forced sale of securities in the account.
- The lending brokerage firm can force the sale of securities in a client's account. If the equity in a client's account falls below the maintenance margin requirements under the law—or the lending brokerage firm's higher "house" requirements—the brokerage firm can sell the securities in a client's account to cover the margin deficiency. The client will also be responsible for any short fall in their account after such a sale.

It is important that clients take time to learn about the risks involved in having a margin account and should consult with their Advisor regarding any concerns they have with their margin accounts.

Use of TPAMs

As stated above, Continuum Advisory makes available certain TPAMs to manage a portion of our clients' assets. Once an initial detailed analysis of a TPAM has been completed, we conduct ongoing due diligence, but such recommendations rely to a great extent on the TPAMs' ability to successfully implement their investment strategies. In addition, we may not have the ability to supervise the TPAMs on a day-to-day basis.

Real Estate Investment Trusts (REITs)

Our Advisors can suggest investing in or allocating assets among different REITs, which are represented by publicly traded securities. REITs are collective investment vehicles that pool funds into portfolios comprised primarily of real estate and mortgage related holdings. Many REITs primarily invest heavily in commercial and/or residential developments, exposing REIT investors to risks associated with downturns in the real estate market.

Investments in regions with higher volatility in local real estate markets can lead to significant fluctuations in the value of the vehicle's shares. Additionally, mortgage-related holdings raise concerns related to interest rates, inflation, liquidity, and counterparty risk.

Use of Business Development Companies (BDCs)

Our Advisors can recommend an investment in, or allocate assets among, various BDCs.

Some risks of investing in BDCs include:

- limited liquidity and a redemption plan that is subject to suspension, modification and/or termination at any time;
- liquidations at less than the original amount invested;
- distributions that are not guaranteed in frequency or amount and can be paid from other sources than earnings;
- limited operating history and reliance on the advisor to the BDC, conflicts of interest, and payment of substantial fees to the advisor, the BDC, and its affiliates. The prospectus for the BDC will outline its specific risks.

Use of Interval Funds

An interval fund is a type of continuously offered, closed-ended registered investment company that seeks to provide liquidity through periodic repurchase offers (typically quarterly, monthly, or semi-annually) at a set percentage of the fund's net asset value (NAV), rather than through daily trading on an exchange like an open-ended mutual fund. Interval funds commonly invest in less liquid or alternative assets (such as private credit, private equity, real estate, or structured loans), seeking to provide investors with access to alternative strategies while retaining some liquidity via the periodic repurchase feature.

Interval funds are subject to several inherent limitations and risks that investors should understand:

- **Limited liquidity and repurchase constraints:** Liquidity is provided only through periodic repurchase offers, and the fund may limit the amount it repurchases in any period (often 5% of shares outstanding), meaning investors may not be able to redeem their entire position at the time of request or may receive only partial repurchase at NAV.
- **Valuation risk and pricing uncertainty:** Because interval funds often hold illiquid or private-market assets, NAV is based on estimates and models rather than readily observable market prices, which increases the risk that the NAV may not accurately reflect the fund's true value at any given time.
- **Market and credit risk:** The underlying portfolio typically includes investments in private or thinly traded securities, which may experience wide price fluctuations, difficulty in exiting positions, and higher credit and default risk than more liquid, broadly traded investments.
- **Concentration and leverage risk:** Interval funds may be concentrated in specific sectors, asset classes, or strategies, and may use leverage or complex structures to amplify returns, which can increase volatility and the potential for larger losses.
- **Fee and expense risk:** Interval funds may carry higher management fees and expenses than traditional mutual funds, particularly given the specialized nature of the underlying assets and operational complexity, which can reduce net returns to investors.
- **Regulatory and structural risk:** As a closed-ended structure, the fund's shares may trade at a discount or premium to NAV if traded on a secondary market, and changes in regulatory treatment, interest rates, or market demand for interval fund structures can affect liquidity and performance.

Because of these characteristics, interval funds are generally appropriate only for investors who can tolerate reduced liquidity, higher volatility, and more complex structures, and who have a long-term time horizon consistent with the fund's underlying investment strategy.

Investment in Fee-Based Variable Annuities

Fee-Based Variable Annuities are subject to the risks related to the operations of the issuing life insurance company, including insurance pricing, asset liability management, interest rate risk, and other operational risks. Additionally, they are exposed to risks associated with the investments in the annuity's underlying portfolio (referred to as a "sub-account"). For example, an annuity's sub-accounts are subject to the risks associated with its underlying mutual fund investments.

In addition, for some annuities, the allowable investments in a sub-account may be limited and, in some cases, certain riders can cause additional restrictions.

Risks and restrictions are outlined in each respective annuity's prospectus and statement of additional information should be read carefully. Also refer to the SEC's Investor Bulletin at https://www.sec.gov/oiea/investor-alerts-and-bulletins/ib_variableannuities#Annuity_Fees.

ITEM 9: DISCIPLINARY INFORMATION

We have not been involved in any legal or disciplinary events that could impact a client's assessment of our advisory business or the integrity of our management.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Registered Representatives and Investment Adviser Representatives with Another Firm

Certain Continuum Advisors are registered representatives of Osaic Wealth and can provide clients with securities brokerage services under a separate, commission-based arrangement, as described herein and below.

COMMISSIONS OR SALES CHARGES FOR RECOMMENDATIONS OF SECURITIES

Certain Continuum Advisors in their respective individual capacities are registered representatives of Osaic Wealth. These Advisors are subject to FINRA Rule 3040 which restricts registered representatives from conducting securities transactions away from their broker/dealer unless Osaic Wealth provides written consent. Therefore, clients are advised that certain Advisors can be restricted to conducting securities transactions through Osaic Wealth if they have not secured written consent from Osaic Wealth to execute securities transactions through a different broker/dealer. Absent such written consent or separation from Osaic Wealth, these Advisors are prohibited from executing securities transactions through any broker/dealer other than Osaic Wealth under its internal supervisory policies. We are cognizant of our duty to obtain best execution and have implemented policies and procedures designed in such pursuit.

In their separate capacity as registered representatives of Osaic Wealth, some of our Advisors can sell, for commissions and other compensation, investment products such as stocks, bonds, mutual funds, ETPs, alternative investments, and variable annuity and variable life products to clients. These Advisors can suggest that their clients open brokerage accounts with Osaic Wealth. If a client does so and carries out the recommended transactions, our Supervised Person will earn commissions and potentially other compensation, depending on the investment product. While opening a brokerage account and paying commissions may initially result in higher compensation for the Advisor, over time these fees typically become lower compared to those associated with an advisory account. Advisory accounts involve ongoing advice and thus incur recurring fees. This difference in compensation structures can create a conflict of interest.

Clients are not obligated to open brokerage accounts with Osaic Wealth or follow the recommended transactions. They are free to choose brokers, advisors, or representatives who are not affiliated with us. Commissions charged by Osaic Wealth can be higher or lower than at other broker/dealers. There is a conflict of interest in having advisory clients purchase securities products through Osaic Wealth in that the higher the registered representative's production is with Osaic Wealth, the greater potential the representative has for obtaining a higher pay-out on commissions earned. It's important to note that both Continuum Advisory and our Supervised Persons are fiduciaries, meaning we are legally obligated to make recommendations that we believe are in the best interest of the client.

We address the conflict of interest by requiring our Advisors to always act in the best interest of their clients, including when acting as a registered representative, investment adviser representative, and/or an insurance agent. We periodically review recommendations made to our clients by our Advisors to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. In addition, we disclose, mainly via our Form ADV Part 1, Part 2A, Part 2Bs and Form CRS, how we and our Advisors are compensated, along with the conflicts of interest involving any advice or service provided.

LICENSED INSURANCE AGENTS

Several of our Advisors are licensed insurance agents and can offer certain insurance products on a fully disclosed commissionable basis. A conflict of interest exists to the extent that we recommend the purchase of insurance products where our Advisors can be entitled to insurance commissions or other additional compensation. We have procedures in place whereby it seeks to ensure that all recommendations are made in its clients' best interest regardless of any such affiliations.

TAX PREPARATION WORK

One of our Advisors, Mark Allen, is an Enrolled Agent who is an active tax preparer with a tax planning firm by the name of Allen Tax Planning. Mark spends a considerable amount of time during the week on tax preparation work in addition to providing investment advice to clients.

LEGAL SERVICES FOR ESTATE PLANNING AND TRUST SERVICES

One of our Advisors, Joanna Amberger, is an attorney engaged in an outside business activity unrelated to the investment advisory services provided by the Firm. Specifically, trust services (e.g., creating and amending trust documents) in connection with revocable and irrevocable trusts, special needs trusts, or similar structures, serving solely in a noncustodial, noninvestment management capacity.

These trust-related activities are conducted independently of the RIA and are separate from the investment advisory services contemplated in this brochure.

Clients who wish to understand the nature of any Advisor's outside business activities, including their role in trust-related matters, may request additional information from Continuum or review the Advisor's personal disclosure supplement.

ITEM 11: CODE OF ETHICS

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Continuum has adopted a code of ethics in compliance with applicable securities laws (“Code of Ethics”) that sets forth the standards of conduct expected of its Supervised Person. Our Code of Ethics contains written policies designed to prevent certain unlawful practices such as the use of material non-public information by us or any of our Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires all Supervised Persons to report their personal securities holdings and transactions and obtain pre-approval of certain investments (*e.g.*, initial public offerings, limited offerings). However, our Supervised Persons can buy or sell securities it also recommends to clients if done fairly and consistent with our policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions can be made to the policies stated below.

When we are engaging in or considering a transaction in any security on behalf of a client, no Supervised Person who has access to this information can knowingly effect for themselves or for their immediate family (i.e., spouse, minor children and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to:

- (i) direct obligations of the Government of the United States;
- (ii) money market instruments, bankers’ acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements;
- (iii) shares issued by mutual funds or money market funds; and
- (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Clients and prospective clients can contact us to request a copy of our Code of Ethics.

ITEM 12: BROKERAGE PRACTICES

THE CUSTODIAN AND BROKERS WE USE

While we do not maintain custody of your assets that we manage, we may be deemed to have custody of client assets because you give us authority to withdraw assets from your account (*see Item 15 Custody, below*). We recommend that our clients use Charles Schwab & Co., Inc. (“Schwab”), a FINRA-registered broker/dealer, member SIPC, as the qualified custodian for investment management accounts. Client assets must be maintained in an account at a “qualified custodian,” generally a broker/dealer or bank. We are independently owned and operated and not affiliated with Schwab. This is not applicable to our TPAM relationships as they can use a different custodian. The Custodian will hold our clients’ assets in a brokerage account and buy and sell securities when we instruct it to. While we recommend that clients use Schwab as custodian/broker, clients will

decide whether to do so when they open an account with Schwab by entering into an account agreement directly with them. Schwab offers independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from Schwab through our participation in the program.

HOW WE SELECT CUSTODIANS/BROKERS

We seek to select and recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services.

We consider a wide range of factors, including, among others, these:

- 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 your account);
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- breadth of investment products made available (stocks, bonds, mutual funds, ETPs, etc.);
- availability of investment research and tools that assist us in making investment decisions;
- quality of services;
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them, including many mutual funds without transaction charges and other securities at nominal transaction charges (the commissions and/or transaction fees charged by the Custodians can be higher or lower than those charged by other Financial Institutions);
- reputation, financial strength and stability of the custodian/broker;
- the custodian/broker's prior service to us and our other clients;
- and availability of other products and services that benefit us, as discussed below (*see "Products and Services Available to Us from Schwab"*).

CUSTODY AND BROKERAGE COSTS

The Custodian generally does not charge our client accounts separately for custody services but is compensated by charging clients commissions or other fees on trades that it executes or that settle into your account. For Continuum investment management accounts, the Custodian has the ability to charge clients a percentage of the dollar amount of assets in the account in lieu of commissions.

The Custodians' asset-based fees applicable to our client accounts were negotiated based on our commitment to maintain Continuum client assets in accounts at Schwab. This commitment benefits our clients because the overall asset-based fees they pay are lower than they would be if we had not made the commitment. In addition to asset-based fees, Schwab charges a flat dollar amount as a "trade away" fee for each trade that we execute by a different broker/dealer but where the securities bought or the funds from the securities sold are deposited (settled) into a Schwab account. These fees are in addition to the commissions or other compensation clients pay the executing broker/dealer. Because of this, in order to minimize trading costs, we exclusively use Schwab to execute trades for our clients' Schwab accounts.

PRODUCTS AND SERVICES AVAILABLE TO US FROM SCHWAB

Schwab Advisor Services is Schwab's business serving independent investment advisory firms like Continuum. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. In most cases, Schwab's support services are available on

an unsolicited basis (*i.e.*, we do not have to request them), and at no charge, as long as we keep a total of at least \$10 million of our clients' assets in accounts at Schwab. Below is a detailed description of Schwab's support services:

Schwab Services that Benefit You.

Schwab's institutional 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 include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit our clients and their accounts.

Schwab Services that May Not Directly Benefit You.

Schwab also makes available to us other products and services that benefit us but may not directly benefit our clients or their accounts. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all, some or a substantial number of our clients' accounts.

In addition to investment research, Schwab also makes 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 our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.

Schwab Services that Generally Benefit Only Us.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events;
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also may discount or waive its fees for some of these services or pay all or a part of a third party's fees. In addition, Schwab may provide us with other benefits such as occasional business entertainment for our Supervised Persons.

The fees paid by our clients to the Custodians comply with the Firm's duty to obtain "best execution." Clients can pay fees that are higher than another qualified Financial Institution might charge to affect the same transaction where we determine that the fees are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, and responsiveness. We seek competitive rates but may not necessarily obtain the lowest possible fees for our clients.

Transactions can be cleared through other broker/dealers with whom the Firm and its custodian(s) have entered into agreements for prime brokerage clearing services. Should an account make use of prime brokerage, our clients can be required to sign additional agreements, and additional fees are likely to be charged.

Consistent with obtaining best execution, brokerage transactions can be directed to certain broker/dealers in return for investment research products and/or services which assist Continuum Advisory in its investment decision-making process. Such research will be used to service the Firm's clients, but brokerage fees paid by one client can be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because Continuum Advisory does not have to produce or pay for the products or services. Continuum Advisory periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions to fulfill its duty to obtain best execution.

CONTINUUM'S BENEFICIAL INTEREST IN SCHWAB'S SERVICES

We can avoid certain fees if we maintain a combined total of \$10 million or more in client assets with Schwab. This requirement might lead us to recommend Schwab to clients not solely for their benefit, but because it benefits our business. This situation raises concerns about potential conflicts of interest.

However, we firmly believe that selecting Schwab as a custodian/broker is in the best interests of our clients. Our decision is primarily based on the breadth, quality, and cost-effectiveness of Schwab's services, rather than just our own gains. With approximately \$1.3 billion in client assets under management, we view maintaining at least \$10 million at Schwab to avoid service fees as a minimal conflict of interest.

SOFTWARE AND SUPPORT PROVIDED BY FINANCIAL INSTITUTIONS

Continuum can receive, without cost from the Custodians, computer software and related systems support, which allows us to better monitor client accounts maintained at the Custodians. We can take advantage of the Custodian's platform and related support without cost because the Firm renders investment management services to clients that maintain assets at the Custodians. The platform and support are not provided in connection with securities transactions of clients (i.e., not "soft dollars"), but can be based on the assets being managed by Continuum at the specific Custodian. The platform and related systems support can benefit us, but not our clients directly. In fulfilling our duties to our clients, prioritize the interests of our clients first. Clients should be aware, however, that our receipt of economic benefits from a custodian creates a conflict of interest since these benefits can influence the Firm's choice of one custodian over another that does not furnish similar software, systems support or services.

Specifically, Continuum Advisory can receive the following benefits from the Custodians:

- Credits to be used toward qualifying third-party service providers used in connection with the initial setting up of our research, technology and software platforms;
- Receipt of duplicate client confirmations and bundled duplicate statements;
- Access to a trading desk that exclusively services its institutional traders;
- Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and
- Access to an electronic communication network for client order entry and account information.

BROKERAGE FOR CLIENT REFERRALS

Continuum does not consider in selecting or recommending custodians, whether the Firm receives client referrals from the Financial Institutions or other third party.

DIRECTED BROKERAGE

A client can direct Continuum, in writing, to use a particular Financial Institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that Financial Institution, and we will not seek better execution services or prices from other Financial Institutions or be able to “batch” client transactions for execution through other Financial Institutions with orders for other accounts managed by us (as described above). As a result, the client can pay higher commissions or other transaction costs, greater spreads or can receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, we can decline a client’s request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in additional operational difficulties or violate restrictions imposed by other broker/dealers (as further discussed below).

TRADE AGGREGATION

Transactions for each client will be affected independently unless Continuum decides to purchase or sell the same securities for several clients at approximately the same time. Continuum can (but is not obligated to) combine or “batch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our client's differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and allocated among our client's pro rata to the purchase and sale orders placed for each client on any given day. To the extent that we determine to aggregate client orders for the purchase or sale of securities, including securities in which Continuum Advisory’s Supervised Persons can invest, we generally do so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the SEC. We do not receive any additional compensation or remuneration as a result of the aggregation.

In the event that the Firm determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which can include:

- when only a small percentage of the order is executed, shares can be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates;
- allocations can be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts;
- if an account reaches an investment guideline limit and cannot participate in an allocation, shares can be reallocated to other accounts (this may be due to unforeseen changes in an account’s assets after an order is placed);
- with respect to sale allocations, allocations can be given to accounts low in cash;
- in cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, the Firm can exclude the account(s) from the allocation; the transactions can be executed on a pro rata basis among the remaining accounts; or
- in cases where a small proportion of an order is executed in all accounts, shares can be allocated to one or more accounts on a random basis.

Continuum trades client accounts in a specific order, based on technological capabilities of our trading platforms. This approach allows us to manage transactions efficiently while adhering to the technical and operational requirements of each platform. By organizing trades in this manner, we aim to provide the best possible execution for our clients, optimize performance across platforms, and maintain consistency in our trading processes. This sequencing method helps us deliver a streamlined trading experience while prioritizing accuracy and reliability.

ITEM 13: REVIEW OF ACCOUNTS

ACCOUNT REVIEWS

We monitor client portfolios on a continuous and ongoing basis while conducting regular account reviews at least annually. These reviews are carried out by our Advisors. We urge all clients to engage in discussions with us regarding their needs, goals, and objectives, and to keep us informed of any changes. Our Advisors reach out to clients at least annually to review past services and recommendations and to address any impacts stemming from changes in their financial situation or investment objectives.

Account Statements and Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time to time or as otherwise requested, clients can also receive written or electronic reports from us and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should compare the account statements they receive from their custodian with any documents or reports they receive from us or an outside service provider.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

Continuum Advisory has entered into referral arrangements with certain non-affiliated TPAMs. Under the arrangements, the TPAM pays us and/or certain advisory personnel a referral fee when our client that is referred to the TPAM by Continuum Advisory, opens an account with the TPAM. Continuum and its Advisors only refer clients to TPAMs when we believe that the advisory services to be provided by the TPAM are consistent with each referred client's investment objectives and financial circumstances and believed to be in the best interest of the referred clients. The referral fee is a percentage of the total annual investment advisory fee paid by each client to the TPAM.

Continuum Advisory can enter into solicitation agreements to which it compensates third-party intermediaries for client referrals that result in the provision of investment services by an Advisor with Continuum Advisory. We will disclose these solicitation arrangements to affected investors, and any cash solicitation agreements will comply with Rule 206(4)-3 under the Advisers Act. Solicitors introducing clients to Continuum Advisory Advisors can receive compensation such as a retainer, a flat fee per referral and/or a percentage of introduced capital. Such compensation will be paid pursuant to a written agreement with the solicitor and may be terminated by either party from time to time. The cost of any such fees will be borne entirely by the Advisor and not by any affected client.

Certain Continuum Advisors also are registered representatives with Osaic Wealth. Some Advisors are also independent insurance agents. As such, they receive certain additional compensation.

Please refer to Items 5 and 10 for further details.

Continuum receives an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisers that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (*see Item 12 – Brokerage Practices*). The availability to Continuum of Schwab’s products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Some service providers or TPAMs sponsor Continuum’s education and training meetings for our Advisors. A service provider or TPAM may reimburse Continuum for up to 100% of the cost of these meetings. These contributions and reimbursements create a conflict of interest because participating sponsors have more opportunities to provide Advisors with education on their products, services, and investment programs.

ITEM 15: CUSTODY

The Advisory Agreement and/or the separate agreement with any Financial Institution generally authorizes Continuum and/or the Independent Managers to debit client accounts for payment of the Firm’s fees and to directly remit those funds to the Firm in accordance with applicable custody rules. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to us.

Pursuant to federal regulations, Continuum is deemed to have custody of client assets if clients authorize us to instruct the Custodians to deduct our advisory fees directly from their account. The Custodians maintain actual custody of client assets. Clients will receive quarterly account statements directly from the Custodians sent to the email or postal address provided. Clients are expected to promptly review these statements upon receipt. In addition, as discussed in Item 13, Continuum can also send periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the Financial Institutions and compare them to those received from us.

Additionally, Continuum is deemed to have custody of the assets in any account for which clients have signed a third-party standing letter of authorization (“SLOA”) for the purpose of allowing the Firm to direct specific distributions or receipts of cash to or from your account(s) with the Firm. A SLOA is a standing letter of instruction or other similar asset transfer authorization arrangement established by a client with a qualified custodian. The client instructs the qualified custodian that maintains the client’s account to transfer assets, either on a specified schedule or from time to time, to a designated third party upon the future request of the client’s authorized adviser in accordance with the limited authority the client grants to the adviser. Such disbursements can be made by any method, such as wires, checks, or electronic funds transfers (ACH).

ITEM 16: INVESTMENT DISCRETION

Continuum can be given the authority to exercise discretion on behalf of clients. When we have the authority to make transactions that can affect or direct the account without seeking their prior consent, we exercise investment discretion over a client’s account. Continuum is given this authority through a limited power-of-attorney included in the Advisory Agreement between us and the client. Clients can request a limitation on this authority (such as certain securities not to be bought or sold).

Continuum takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold;
- When transactions are made; and
- The Independent Managers to be hired or fired.

ITEM 17: VOTING CLIENT SECURITIES (PROXY VOTING)

Continuum does **not vote proxies** on behalf of clients. Clients retain the authority and responsibility for voting their own securities. Continuum may provide clients with advice regarding proxy votes if requested, but the Firm does not take any action to vote proxies, receive proxy materials, or ensure that such materials are received by clients.

Clients will receive their proxy materials directly from the custodian or transfer agent and should follow the instructions included with those materials to cast their votes.

Upon written request, Continuum may provide limited guidance regarding a specific proxy question if it relates directly to a client's investment strategy or financial plan. However, clients remain solely responsible for all proxy voting decisions.

Class Actions and Legal Proceedings

Continuum does not take any action or provide advice regarding legal proceedings, including the filing or monitoring of class-action lawsuits or other securities litigation involving securities held, formerly held, or to be held in client accounts. Clients are responsible for taking any such actions on their own behalf.

ITEM 18: ADVISOR TERMINATION

Handling OR Reassignment of Accounts of Terminated Investment Advisor Representatives

In the event that an Advisor is terminated or otherwise leaves the Firm, Continuum has established procedures to ensure the appropriate handling of client accounts under their management. These procedures are designed to maintain the continuity of service and protect the interests of our clients.

Upon termination of an Investment Advisory Representative, the Firm will assess the status of all accounts managed by that representative and will take the following actions:

1. **Reassignment of Accounts:** Accounts previously managed by the terminated Investment Advisor Representative may be reassigned to another qualified Investment Advisor Representative within the Firm. The client will be notified of this reassignment, and the new representative will review the account to ensure alignment with the client's investment objectives.
2. **Client Communication:** Clients will be informed promptly of the transition, including details about the new Advisor and how their account will be managed moving forward. We will also provide clients with an opportunity to select a new representative or make other changes as desired.
3. **Continuity of Services:** While the change in representation may occur, the Firm ensures that the client's investment strategy, objectives, and portfolio management services will continue seamlessly, without disruption.

4. **Transfer of Account Information:** The Firm will ensure the transfer of all necessary account information to the new Advisor. Any outstanding matters related to the terminated representative's management of the account will be addressed by the Firm's compliance and operations team.
5. **Client Choice:** Clients always retain the right to move their accounts to another firm or representative, regardless of any internal transitions within the Firm. If a client chooses to leave, they will be provided with all necessary paperwork to facilitate the transfer.

These procedures are part of our commitment to providing high-quality service and ensuring that client accounts are handled with the utmost care and professionalism, even in the event of changes to the advisory team.

ITEM 19: FINANCIAL INFORMATION

Continuum Advisory is not required to disclose any financial information due to the following:

- The Firm does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of services rendered;
- The Firm does not have a financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients; and
- The Firm has not been the subject of a bankruptcy petition at any time during the past ten years.