

# Farther Finance Advisors, LLC



## Form ADV Part 2 Brochure

**August 23, 2021**

[www.fartherfinance.com](http://www.fartherfinance.com)

415-827-7371

**This brochure provides information about the qualifications and business practices of Farther Finance Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (415) 827-7371 or [compliance@farther.com](mailto:compliance@farther.com). 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 Farther Finance Advisors, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**References herein to Farther Finance Advisors, LLC as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.**

**Item 2           Material Changes**

Although there have been no material or substantial changes to our services, fees or conflicts of interest, since our last Annual Amendment filing, made on March 30, 2020, we have significantly revised our Brochure and Wrap Fee Brochure to more clearly discuss our services and our inherent conflicts of interest.

**Registrant’s Chief Compliance Officer, Christopher Powers, remains available to address any questions that an existing or prospective client may have regarding this Brochure.**

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#### **Item 4            Advisory Business**

A. Farther Finance Advisors, LLC (“Farther”) is a limited liability company formed in the state of Delaware. Farther became registered as an Investment Adviser Firm in July 2019. Farther is solely owned by Farther Finance, Inc., and Mr. Matthews and Mr. Genser are Farther’s Principal owners through their indirect ownership.

B.

##### **INVESTMENT ADVISORY SERVICES**

Farther offers a website and mobile application portal (“Platform”) designed to help clients accomplish both near-term and long-term personal finance goals, where both preservation of capital and capital growth are important considerations. Through this Platform, Registrant offers an online discretionary investment management service, on a wrap fee basis, designed expressly for investors who want investment advice for a reasonable price and without a significant time commitment.

Specifically, Registrant offers clients investment advice on allocations of exchange-traded funds (ETFs) based on personalized information that each client provides via the firm’s Platform. Registrant’s investment strategy is based on Modern Portfolio Theory which strives to maximize return relative to risk.

Registrant uses a proprietary algorithm to implement model portfolios designed by investment experts with target asset allocations of equity and fixed-income ETFs based on the client’s financial situation, risk tolerance, and time horizon (“Objective”).

When a client deposits money, Registrant allocates that money to model portfolios based on the client’s goals, which may include saving for emergencies, retirement, large purchases, or general long-term savings. In doing so, Registrant constructs a combination of securities purchases to align the client’s account with the corresponding target asset allocation. Upon a client’s request to withdraw money, a combination of securities sales is initiated while continuing to pursue the corresponding target asset allocation.

Clients may manually select one of the target asset allocations other than the one recommended or currently in effect. As clients deposit or withdraw money the corresponding transactions will rebalance to pursue the modified target asset allocation. If the holdings of the account significantly deviate from the newly selected target asset allocation, then Registrant will initiate a rebalancing to bring the holdings within an acceptable range of the target asset allocation.

Registrant’s algorithm is designed to keep the holdings within each client’s portfolio within a specified range of the target asset allocation, even when the market prices of the ETFs fluctuate. Client holdings are rebalanced and dividends are reinvested automatically. In general, Registrant rebalances whenever the percentage holding of one or more ETFs fluctuates 5% above or below its target allocation.

The rebalancing process is automated and not limited to number or frequency of rebalances. As a result, there is a possibility that Registrant may sell overrepresented ETFs and use the proceeds to buy underrepresented ETFs to bring portfolios towards its target

allocation without taking into account individual tax consequences or market circumstances.

### **FARTHER FINANCE ADVISORS WRAP PROGRAM**

Farther sponsors the Farther Finance Advisors Wrap Program (the “Program”) through which it offers all of its discretionary investment management services. The services offered under, and the corresponding terms and conditions pertaining to, the Program are discussed in the Wrap Fee Program Brochure, a copy of which is presented to all prospective Wrap Program participants.

Under the Program, Farther is able to offer participants discretionary investment advisor services, for a single specified annual Program fee, inclusive of trade execution, custody, reporting, account maintenance, investment management fees.

The current annual Program fee generally ranges from 0.35% to 0.80%, depending upon the complexity of the account, the amount of the client assets in the Program and the independent/separately managed accounts utilized by the client’s investment portfolio.

The terms and conditions for client participation in the Program are set forth in detail in the Wrap Fee Program Brochure, which is presented to all prospective Program participants in accordance with disclosure requirements. All prospective Program participants should read both the Brochure and the Wrap Fee Program Brochure, and ask any corresponding questions that they may have, prior to participation in the Program.

As indicated in the Wrap Fee Program Brochure, participation in the Program may cost more or less than purchasing such services separately. When managing a client’s account on a wrap fee basis, Farther shall receive as payment for its asset management services, the balance of the wrap fee after all other non-excluded costs incorporated into the wrap fee have been deducted. As also indicated in the Wrap Fee Program Brochure, the Program fee charged by Farther for participation in the Program may be higher or lower than those charged by other sponsors of comparable wrap fee programs.

**Wrap Program-Conflict of Interest.** Under Farther’s wrap program, the client generally receives investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified fee. When managing a client’s account on a wrap fee basis, Farther shall receive as payment for its investment advisory services, the balance of the wrap fee after all other costs incorporated into the wrap fee have been deducted.

Because wrap program transaction fees and/or commissions are being paid by Farther to the account custodian/broker-dealer, Farther has an economic incentive to maximize its compensation by seeking to minimize the number of trades in the client's account.

### **MISCELLANEOUS**

**Limitations of Financial Planning and Non-Investment Consulting/Implementation Services.** To the extent requested by a client, Registrant may provide financial planning and related consulting services. Neither Farther nor its investment adviser representatives assist clients with the implementation of any financial plan, unless they have agreed to do so in writing. Farther does not monitor a client’s financial plan, and it is the client’s responsibility to revisit the financial plan with Farther, if desired.

Furthermore, although Farther may provide recommendations regarding non-investment related matters, such as estate planning, tax planning and insurance, Farther does not serve as a law firm or accounting firm and no portion of Registrant's services should be construed as legal or accounting services. Accordingly, Farther does not prepare estate planning documents or tax returns.

To the extent requested by a client, Registrant may recommend the services of other professionals for certain non-investment implementation purpose (i.e. attorneys, accountants, insurance agents, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Registrant and/or its representatives.

If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional[s] (i.e. attorney, accountant, insurance agent, etc.), and not Farther, shall be responsible for the quality and competency of the services provided.

**Cash Positions.** At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), Farther maintains cash positions for defensive purposes. All cash positions (money markets, etc.) shall be included as part of assets under management for purposes of calculating Farther's advisory fee.

When the account is holding cash positions, those cash positions will be subject to the same fee schedule as set forth below.

**Use of Exchange Traded Funds:** Farther may recommend that clients allocate investment assets to publicly available ETFs that the client could obtain without engaging Registrant as an investment adviser. However, if a client or prospective client determines to allocate investment assets to publicly available ETFs without engaging Registrant as an investment adviser, the client or prospective client would not receive the benefit of Registrant's initial and ongoing investment advisory services.

**Portfolio Activity.** Registrant has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Registrant will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Registrant determines that changes to a client's portfolio are neither necessary nor prudent. Clients nonetheless remain subject to the fees described in Item 5 below during periods of account inactivity.

**Client Obligations.** In performing its services, Registrant shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify Farther if there is ever any change in their financial

situation or investment objectives for the purpose of reviewing, evaluating or revising Registrant's previous recommendations and/or services.

**Disclosure Statement.** A copy of Farther's written Brochure as set forth on Part 2 of Form ADV and Client Relationship Summary as set forth in Form CRS shall be provided to each client prior to, or contemporaneously with, the execution of the Investment Advisory Agreement.

- C. Farther shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, Farther shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on Farther's services.
- D. As discussed above, Farther only provides its investment management services on a wrap fee basis. If a client determines to engage Farther, the client will pay a single fee for bundled services (i.e. investment advisory, brokerage, custody) (*See* Item 4.B). The services included in a wrap fee agreement will depend upon each client's particular need.

When managing a client's account on a wrap fee basis, Farther shall receive as payment for its investment advisory services, the balance of the wrap fee after all other costs incorporated into the wrap fee have been deducted.

- E. As of February 26, 2021, Farther had \$19,523,989 in assets under management on a discretionary basis.

## **Item 5 Fees and Compensation**

A.

### **INVESTMENT ADVISORY SERVICES**

Under the Program, Farther is able to offer participants discretionary investment management services, for a single specified annual Program fee, inclusive of trade execution, custody, reporting, account maintenance, investment management fees, and in some instances, fees charged by independent managers and/or separately managed accounts.

The current annual Program fee ranges from 0.35% up to 0.80%, depending upon the complexity of the account, the amount of the client assets in the Program and the independent/separately managed accounts utilized by the client's investment portfolio.

Clients may be responsible for, but not limited to, fees for trades executed away from the account's custodian, trustee fees, mutual fund internal expenses, ETF internal expenses, mark-ups, mark-downs, transfer taxes, fees charged by independent managers and/or separately managed accounts (when such managers require the client to enter into a dual contract relationship) odd lot differentials, exchange fees, interest charges, American Depository Receipt agency processing fees, and any charges, taxes or other fees mandated by any federal, state or other applicable law or otherwise agreed to with regard to client accounts (Such fees are in addition to any fees paid by the client to Farther and are between the client and the account custodian). These fees are in addition to Farther's Program fee.

- B. Clients may elect to have Farther’s advisory fees deducted from their custodial account. Both Registrant's Investment Advisory Agreement and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of Farther's investment advisory fee and to directly remit that management fee to Farther in compliance with regulatory procedures. In the limited event that Farther bills the client directly, payment is due upon receipt of Farther’s invoice.
- C. As discussed below, unless the client directs otherwise or an individual client’s circumstances require, Farther generally recommends that Apex Clearing Corporation, (“Apex”), serves as the broker-dealer/custodian for client investment management assets. Broker-dealers such as Apex charge brokerage commissions and/or transaction fees for effecting certain securities transactions. However, under Farther’s Program, Farther shall generally be responsible for these fees.
- D. Registrant's annual investment advisory fee shall be prorated and paid monthly, in advance, based upon the market value of the assets, on the last business day of the previous month.

The Investment Advisory Agreement between Farther and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the Investment Advisory Agreement. Upon termination, Farther shall refund the pro-rated portion of the advanced advisory fee paid based upon the number of days remaining in the billing quarter.

- E. Neither Farther, nor its representatives accept compensation from the sale of securities or other investment products.

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

Neither Farther nor any supervised person of Farther accepts performance-based fees.

## **Item 7 Types of Clients**

Farther’s clients shall generally include individuals, trusts and estates.

Farther generally requires an asset level \$100,000 per each client household.

Farther, in its sole discretion, may waive its account minimum and/or charge a lesser investment management fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, householdings of related accounts, account composition, negotiations with client, etc.).

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

- A. Farther may utilize the following methods of security analysis:
  - Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)

- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
- Cyclical – (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

Farther may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)

**Investment Risk**. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Farther) will be profitable or equal any specific performance level(s). Investing in securities involves risk of loss that clients should be prepared to bear.

Investors generally face the following types investment risks:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk may be caused by external factors independent of the fund's specific investments as well as due to the fund's specific investments. Additionally, each security's price will fluctuate based on market movement and emotion, which may, or may not be due to the security's operations or changes in its true value. For example, political, economic and social conditions may trigger market events which are temporarily negative, or temporarily positive.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

B. Farther's method of analysis and investment strategy does not present any significant or unusual risks.



However, every method of analysis has its own inherent risks. To perform an accurate market analysis Farther must have access to current/new market information. Farther has no control over the dissemination rate of market information; therefore, unbeknownst to Farther, certain analyses may be compiled with outdated market information, severely limiting the value of Farther's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Farther's primary investment strategies - Long Term Purchases and Short Term Purchases - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy.

- C. Currently, Farther primarily allocates client investment assets among various exchange traded funds on a discretionary basis in accordance with the client's designated investment objective(s).

Farther may also allocate investment management assets of its client accounts, on a discretionary basis, among one or more of its asset allocation models described below. Registrant's asset allocation model administration has been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940. Rule 3a-4 provides similarly managed investment programs with a non-exclusive safe harbor from the definition of an investment company. In accordance with Rule 3a-4, the following disclosure is applicable to Registrant's management of client assets asset allocation models:

1. Initial Interview – at the opening of the account, Farther, through its designated representatives, shall obtain from the client information sufficient to determine the client's financial situation and investment objectives;
2. Individual Treatment - the account is managed on the basis of the client's financial situation and investment objectives;
3. Quarterly Notice – at least quarterly Farther shall notify the client to advise Farther whether the client's financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of the account;
4. Annual Contact – at least annually, Farther shall contact the client to determine whether the client's financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of the account;
5. Consultation Available – Farther shall be reasonably available to consult with the client relative to the status of the account;
6. Quarterly Report – the client shall be provided with a quarterly report for the account for the preceding period;
7. Ability to Impose Restrictions – the client shall have the ability to impose reasonable restrictions on the management of the account, including the ability to instruct Farther not to purchase certain securities;

8. No Pooling – the client’s beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the account;
9. Separate Account - a separate account is maintained for the client with the Custodian;
10. Ownership – each client retains indicia of ownership of the account (e.g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

Farther believes that its annual investment management fee is reasonable in relation to: (1) the advisory services provided under the Investment Advisory Agreement; and (2) the fees charged by other investment advisers offering similar services/programs. However, Registrant’s annual investment advisory fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to Registrant’s annual investment management fee, the client will also incur charges imposed directly at the mutual and exchange traded fund level (e.g., management fees and other fund expenses).

Registrant’s investment programs may involve above-average portfolio turnover which could negatively impact upon the net after-tax gain experienced by an individual client in a taxable account.

## **Item 9            Disciplinary Information**

Farther has not been the subject of any disciplinary actions.

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

- A. Neither Farther, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither Farther, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing
- C. Neither Farther, nor its representatives have any material relationships which would require disclosure.
- D. Farther does not recommend or select other investment advisers for its clients for which it receives a fee.

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

- A. Farther maintains an investment policy relative to personal securities transactions. This investment policy is part of Registrant’s overall Code of Ethics, which serves to establish a standard of business conduct for all of Registrant’s Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, Farther also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Farther or any person associated with Farther.

- B. Neither Farther nor any related person of Registrant recommends, buys, or sells for client accounts, securities in which Farther or any related person of Registrant has a material financial interest.
- C. Farther and/or representatives of Farther may buy or sell securities that are also recommended to clients. This practice may create a situation where Farther and/or representatives of Farther are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. Practices such as “scalping” (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if Farther did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, “front-running” (i.e., personal trades executed prior to those of Farther’s clients) and other potentially abusive practices.

Farther has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of Farther’s “Access Persons.” Farther’s securities transaction policy requires that Access Person of Farther must provide the Chief Compliance Officer or his/her designee with online access to their holdings and securities transactions for monitoring and verification purposes.

- D. Farther and/or representatives of Farther *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where Farther and/or representatives of Farther are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. As indicated above in Item 11C, Farther has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Registrant’s Access Persons.

## **Item 12      Brokerage Practices**

- A. In the event that the client requests that Farther recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct Farther to use a specific broker-dealer/custodian), Registrant generally recommends that investment management accounts be maintained at Apex. Prior to engaging Registrant to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with Registrant setting forth the terms and conditions under which Registrant shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/ custodian.

Factors that Farther considers in recommending Apex (or any other broker-dealer/custodian to clients) include historical relationship with Farther, financial strength, reputation, execution capabilities, pricing, research, and service.

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 broker-dealer services, including the value of research provided, execution

capability, commission rates, and responsiveness. Accordingly, although Registrant will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. Farther's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

1. Research and Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Registrant may receive from Apex (or another broker-dealer/custodian, investment platform, unaffiliated investment manager, vendor, unaffiliated product/fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist Farther to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by Farther may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Registrant in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received may assist Farther in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Farther to manage and further develop its business enterprise.

There is no corresponding commitment made by Farther to Apex or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

**Farther's Chief Compliance Officer, Christopher Powers, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding conflict of interest.**

2. Farther does not receive referrals from broker-dealers.
3. Farther does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Registrant will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Registrant. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

In the event that the client directs Registrant to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be

available through Registrant. Higher transaction costs adversely impact account performance.

Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

- B. To the extent that Farther provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless Farther decides to purchase or sell the same securities for several clients at approximately the same time. Farther may (but is not obligated to) combine or “bunch” such orders to seek best execution, to negotiate more favorable commission rates or to allocate equitably among Farther’s clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. Farther shall not receive any additional compensation or remuneration as a result of such aggregation.

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

- A. For those clients to whom Registrant provides investment supervisory services, account reviews are conducted on a periodic basis by Farther's representatives, at least annually. All investment supervisory clients are advised that it remains their responsibility to advise Farther of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with Farther on an annual basis.
- B. Farther may conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.
- C. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. Farther may also provide a written periodic report summarizing account activity and performance.

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

- A. As referenced in Item 12.A.1 above, Farther may receive an economic benefit from Apex. Farther, without cost (and/or at a discount), receives support services and/or products from Apex.

There is no corresponding commitment made by Farther to Apex or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

**Farther's Chief Compliance Officer, Christopher Powers, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding conflict of interest.**

- B. Farther engages independent solicitors to provide client referrals. If a client is referred to Farther by a solicitor, this practice is disclosed to the client in writing by the solicitor and Farther pays the solicitor out of its own funds—specifically, Farther generally pays the solicitor a portion of the advisory fees earned for managing the capital of the client or investor that was referred. The use of solicitors is strictly regulated under applicable federal and state law. Farther's policy is to fully comply with the requirements of Rule 206(4)-3, under the Investment Advisers Act of 1940, as amended, and similar state rules, as applicable.

Farther may receive client referrals from Zoe Financial, Inc through its participation in Zoe Advisor Network (ZAN). Zoe Financial, Inc is independent of and unaffiliated with Farther and there is no employee relationship between them. Zoe Financial established the Zoe Advisor Network as a means of referring individuals and other investors seeking fiduciary personal investment management services or financial planning services to independent investment advisors. Zoe Financial does not supervise Farther and has no responsibility for Farther's management of client portfolios or Farther's other advice or services. Farther pays Zoe Financial an on-going fee for each successful client referral. This fee is usually a percentage of the advisory fee that the client pays to Farther ("Solicitation Fee"). Farther will not charge clients referred through Zoe Advisor Network any fees or costs higher than its standard fee schedule offered to its clients. For information regarding additional or other fees paid directly or indirectly to Zoe Financial Inc, please refer to the Zoe Financial Disclosure and Acknowledgement Form.

## **Item 15      Custody**

Farther shall have the ability to have its advisory fee for each client debited by the custodian on a monthly basis. Clients are provided, at least monthly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. Farther may also provide a written periodic report summarizing account activity and performance.

To the extent that Farther provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Farther with the account statements received from the account custodian.

The account custodian does not verify the accuracy of Farther's advisory fee calculation.

## **Item 16      Investment Discretion**

The client can determine to engage Farther to provide investment advisory services on a discretionary basis. Prior to Farther assuming discretionary authority over a client's account, client shall be required to execute an Investment Advisory Agreement, naming Farther as client's attorney and agent in fact, granting Farther full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage Farther on a discretionary basis may, at any time, impose restrictions, in writing, on Farther's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe Farther's use of margin, etc.).

**Item 17      Voting Client Securities**

- A. Farther does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.
- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact Farther to discuss any questions they may have with a particular solicitation.

**Item 18      Financial Information**

- A. Farther does not solicit fees of more than \$1,200, per client, six months or more in advance.
- B. Farther is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. Farther has not been the subject of a bankruptcy petition.

**Farther's Chief Compliance Officer, Christopher Powers, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.**

# Farther Finance Advisors, LLC



## **ADV Part 2A, Appendix 1 Wrap Fee Program Brochure**

**August 23, 2021**

[www.fartherfinance.com](http://www.fartherfinance.com)

415-827-7371

**This Brochure provides information about the qualifications and business practices of Farther Finance Advisors, LLC (the “Farther”). If you have any questions about the contents of this Brochure, please contact us at (415) 827-7371 or [compliance@farther.com](mailto:compliance@farther.com). 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 Farther Finance Advisors, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

**References herein to Farther Finance Advisors, LLC as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.**



**Item 2           Material Changes**

Although there have been no material or substantial changes to our services, fees or conflicts of interest, since our last Annual Amendment filing, made on March 30, 2020, we have significantly revised our Brochure and Wrap Fee Brochure to more clearly discuss our services and our inherent conflicts of interest.

**Farther’s Chief Compliance Officer, Christopher Powers, remains available to address any questions that an existing or prospective client may have regarding this Brochure.**

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## **Item 4 Services, Fees and Compensation**

A.

### **INVESTMENT ADVISORY SERVICES**

Farther offers a website and mobile application portal (“Platform”) designed to help clients accomplish both near-term and long-term personal finance goals, where both preservation of capital and capital growth are important considerations. Through this Platform, Farther offers an online discretionary investment management service, on a wrap fee basis, designed expressly for investors who want investment advice for a reasonable price and without a significant time commitment.

Specifically, Farther offers clients investment advice on allocations of exchange-traded funds (ETFs) based on personalized information that each client provides via the firm’s Platform. Farther’s investment strategy is based on Modern Portfolio Theory which strives to maximize return relative to risk.

Farther uses a proprietary algorithm to implement model portfolios designed by investment experts with target asset allocations of equity and fixed-income ETFs based on the client’s financial situation, risk tolerance, and time horizon (“Objective”).

When a client deposits money, Farther allocates that money to model portfolios based on the client’s goals, which may include saving for emergencies, retirement, large purchases, or general long-term savings. In doing so, Farther constructs a combination of securities purchases to align the client’s account with the corresponding target asset allocation. Upon a client’s request to withdraw money, a combination of securities sales is initiated while continuing to pursue the corresponding target asset allocation.

Clients may manually select one of the target asset allocations other than the one recommended or currently in effect. As clients deposit or withdraw money the corresponding transactions will rebalance to pursue the modified target asset allocation. If the holdings of the account significantly deviate from the newly selected target asset allocation, then Farther will initiate a rebalancing to bring the holdings within an acceptable range of the target asset allocation.

Farther’s algorithm is designed to keep the holdings within each client’s portfolio within a specified range of the target asset allocation, even when the market prices of the ETFs fluctuate. Client holdings are rebalanced and dividends are reinvested automatically. In general, Farther rebalances whenever the percentage holding of one or more ETFs fluctuates 5% above or below its target allocation.

The rebalancing process is automated and not limited to number or frequency of rebalances. As a result, there is a possibility that Farther may sell overrepresented ETFs and use the proceeds to buy underrepresented ETFs to bring portfolios towards its target allocation without taking into account individual tax consequences or market circumstances.

## FARTHER FINANCE ADVISORS WRAP PROGRAM

Farther sponsors the Farther Finance Advisors Wrap Program (the “Program”) through which it offers all of its discretionary investment management services. The services offered under, and the corresponding terms and conditions pertaining to, the Program are discussed in the Wrap Fee Program Brochure, a copy of which is presented to all prospective Wrap Program participants.

Under the Program, Farther is able to offer participants discretionary investment advisor services, for a single specified annual Program fee, inclusive of trade execution, custody, reporting, account maintenance, investment management fees.

The current annual Program fee generally ranges from 0.35% to 0.80%, depending upon the complexity of the account, the amount of the client assets in the Program and the independent/separately managed accounts utilized by the client’s investment portfolio.

The terms and conditions for client participation in the Program are set forth in detail in the Wrap Fee Program Brochure, which is presented to all prospective Program participants in accordance with disclosure requirements. All prospective Program participants should read both the Brochure and the Wrap Fee Program Brochure, and ask any corresponding questions that they may have, prior to participation in the Program.

As indicated in the Wrap Fee Program Brochure, participation in the Program may cost more or less than purchasing such services separately. When managing a client’s account on a wrap fee basis, Farther shall receive as payment for its asset management services, the balance of the wrap fee after all other non-excluded costs incorporated into the wrap fee have been deducted. As also indicated in the Wrap Fee Program Brochure, the Program fee charged by Farther for participation in the Program may be higher or lower than those charged by other sponsors of comparable wrap fee programs.

**Wrap Program-Conflict of Interest.** Under Farther’s wrap program, the client generally receives investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified fee. When managing a client’s account on a wrap fee basis, Farther shall receive as payment for its investment advisory services, the balance of the wrap fee after all other costs incorporated into the wrap fee have been deducted.

Because wrap program transaction fees and/or commissions are being paid by Farther to the account custodian/broker-dealer, Farther has an economic incentive to maximize its compensation by seeking to minimize the number of trades in the client's account.

Under the Program, Farther shall be provided with written authority to determine which securities and the amounts of securities that are bought or sold. Any limitations on this authority shall be included in the written agreement between each client and Farther. Clients may change/amend these limitations, in writing, at any time. The client shall have reasonable access to one of Farther’s investment professionals to discuss their account.

Apex Clearing Corporation (“Apex”), generally serves as the custodian for Program accounts.

**Fee Payment:** Clients will be charged in advance at the beginning of each calendar month based upon the value (market value or fair market value in the absence of market value, plus any credit balance or minus any debit balance), of the client's account at the end of the previous quarter.

Clients authorize Farther to directly debit its advisory fee by executing an Investment Management Agreement. Farther shall send to the client's Custodian written notice of the amount of Farther's advisory fee to be deducted, on a monthly basis, from the client's account.

**Termination of Advisory Relationship:** A client agreement may be canceled at any time, by either party, for any reason upon receipt of prior written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

**Investment Performance:** As a condition to participating in the Program, the participant must accept that past performance may not be indicative of future results, and understand that the future performance of any specific investment or investment strategy (including the investments and/or investment strategies purchased and/or undertaken by Farther) may not: (1) achieve their intended objective; (2) be profitable; or, (3) equal historical performance level(s) or any other performance level(s).

**Client Responsibilities:** In performing any of its services, Farther shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Furthermore, unless the client indicates to the contrary, Farther shall assume that there are no restrictions on its services, other than to manage the account in accordance with the client's designated investment objective. Moreover, it remains each client's responsibility to promptly notify Farther if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Farther's previous recommendations and/or services.

- B. Participation in the Program may cost more or less than purchasing such services separately. Also the Program fee charged by Farther for participation in the Program may be higher or lower than those charged by other sponsors of comparable wrap fee programs.

Depending upon the percentage wrap-fee charged by Farther, the amount of portfolio activity in the client's account, and the value of custodial and other services provided, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately.

- C. The Program's wrap fee does not include certain charges and administrative fees, including, but not limited to, transaction charges (including mark-ups and mark-downs) resulting from trades executed away from the account's custodian, transfer taxes, odd lot differentials, exchange fees, interest charges, American Depository Receipt agency processing fees, and any charges, taxes or other fees mandated by any federal, state or other applicable law or otherwise agreed to with regard to client accounts. Such fees and expenses are in addition to the Program's wrap fee. Clients who maintain a retirement account with their custodian are generally charged an annual maintenance fee.
- D. Farther's related persons who recommend the Program to clients do not receive additional compensation as a result of a client's participation in the wrap fee program.

## **Item 5 Account Requirements and Types of Clients**

Farther's clients shall generally include individuals, trusts and estates.

Farther generally requires an asset level of \$100,000 per each client household.

Farther, in its sole discretion, may waive its account minimum and/or charge a lesser investment management fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

## **Item 6 Portfolio Manager Selection and Evaluation**

- A. Farther, as an investment advisor, selects ETFs or securities in accordance with the description of services provided in this brochure. As such, Farther does not select portfolio managers.
- B. Farther acts as the portfolio manager for the Program. Inasmuch as the execution costs for transactions effected in the client account will be paid by Farther, a conflict of interest arises in that Farther may have a disincentive to trade securities in the client account. In addition, the amount of compensation received by Farther as a result of the client's participation in the Program may be more than what Farther would receive if the client paid separately for investment advice, brokerage and other services.

### **MISCELLANEOUS ADVISORY SERVICES DISCLOSURE**

**Limitations of Financial Planning and Non-Investment Consulting/Implementation Services.** To the extent requested by a client, Farther may provide financial planning and related consulting services. Neither Farther nor its investment adviser representatives assist clients with the implementation of any financial plan, unless they have agreed to do so in writing. Farther does not monitor a client's financial plan, and it is the client's responsibility to revisit the financial plan with Farther, if desired.

Furthermore, although Farther may provide recommendations regarding non-investment related matters, such as estate planning, tax planning and insurance, Farther does not serve as a law firm or accounting firm and no portion of Farther's services should be construed as legal or accounting services. Accordingly, Farther does not prepare estate planning documents or tax returns.

To the extent requested by a client, Farther may recommend the services of other professionals for certain non-investment implementation purpose (i.e. attorneys, accountants, insurance agents, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Farther and/or its representatives.

If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional[s]

(i.e. attorney, accountant, insurance agent, etc.), and not Farther, shall be responsible for the quality and competency of the services provided.

**Cash Positions.** At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), Farther maintains cash positions for defensive purposes. All cash positions (money markets, etc) shall be included as part of assets under management for purposes of calculating Farther's advisory fee.

When the account is holding cash positions, those cash positions will be subject to the same fee schedule as set forth below.

**Use of Exchange Traded Funds:** Farther may recommend that clients allocate investment assets to publicly available ETFs that the client could obtain without engaging Farther as an investment adviser. However, if a client or prospective client determines to allocate investment assets to publicly available ETFs without engaging Farther as an investment adviser, the client or prospective client would not receive the benefit of Farther's initial and ongoing investment advisory services.

**Portfolio Activity.** Farther has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Farther will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Farther determines that changes to a client's portfolio are neither necessary nor prudent. Clients nonetheless remain subject to the fees described in Item 5 below during periods of account inactivity.

**Client Obligations.** In performing its services, Farther shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify Farther if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Farther's previous recommendations and/or services.

**Disclosure Statement.** A copy of Farther's written Brochure as set forth on Part 2 of Form ADV and Client Relationship Summary as set forth in Form CRS shall be provided to each client prior to, or contemporaneously with, the execution of the Investment Advisory Agreement.

Farther shall provide investment advisory services specific to needs of each client. Prior to providing investment advisory services, an investment adviser representative will discuss with each client, their particular investment objective(s). Farther shall allocate each client's investment assets consistent with their designated investment objective(s). Clients may, at any time, impose restrictions, in writing, on Farther's services.

Farther only provides its investment management services on a wrap fee basis. If a client determines to engage Farther, the client will pay a single fee for bundled services (i.e. investment advisory, brokerage, custody) (*See* Item 4.A). The services included in a wrap fee agreement will depend upon each client's particular need.

When managing a client's account on a wrap fee basis, Farther shall receive as payment for its investment advisory services, the balance of the wrap fee after all other costs incorporated into the wrap fee have been deducted.

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

Neither Farther nor any supervised person of Farther accepts performance-based fees.

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

- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
- Cyclical – (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

Farther may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)

**Investment Risk.** Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Farther) will be profitable or equal any specific performance level(s). Investing in securities involves risk of loss that clients should be prepared to bear.

Investors generally face the following types investment risks:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk may be caused by external factors independent of the fund's specific investments as well as due to the fund's specific investments. Additionally, each security's price will fluctuate based on market movement and emotion, which may, or may not be due to the security's operations or changes in its true value. For example, political, economic and social conditions may trigger market events which are temporarily negative, or temporarily positive.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

B. Farther's method of analysis and investment strategy does not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis Farther must have access to current/new market information. Farther has no control over the dissemination rate of market information; therefore, unbeknownst to Farther, certain analyses may be compiled with outdated market information, severely limiting the value of Farther's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Farther's primary investment strategies - Long Term Purchases and Short Term Purchases - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy.

Currently, Farther primarily allocates client investment assets among various exchange traded funds on a discretionary basis in accordance with the client's designated investment objective(s).

Farther may also allocate investment management assets of its client accounts, on a discretionary basis, among one or more of its asset allocation models described below. Farther's asset allocation model administration has been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940. Rule 3a-4 provides similarly managed investment programs with a non-exclusive safe harbor from the definition of an investment company. In accordance with Rule 3a-4, the following disclosure is applicable to Farther's management of client assets asset allocation models:

1. Initial Interview – at the opening of the account, Farther, through its designated representatives, shall obtain from the client information sufficient to determine the client's financial situation and investment objectives;
2. Individual Treatment - the account is managed on the basis of the client's financial situation and investment objectives;
3. Quarterly Notice – at least quarterly Farther shall notify the client to advise Farther whether the client's financial situation or investment objectives have changed, or if the



client wants to impose and/or modify any reasonable restrictions on the management of the account;

4. Annual Contact – at least annually, Farther shall contact the client to determine whether the client’s financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of the account;

5. Consultation Available – Farther shall be reasonably available to consult with the client relative to the status of the account;

6. Quarterly Report – the client shall be provided with a quarterly report for the account for the preceding period;

7. Ability to Impose Restrictions – the client shall have the ability to impose reasonable restrictions on the management of the account, including the ability to instruct Farther not to purchase certain securities;

8. No Pooling – the client’s beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the account;

9. Separate Account - a separate account is maintained for the client with the Custodian;

10. Ownership – each client retains indicia of ownership of the account (e.g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

Farther believes that its annual investment management fee is reasonable in relation to: (1) the advisory services provided under the Investment Advisory Agreement; and (2) the fees charged by other investment advisers offering similar services/programs. However, Farther’s annual investment advisory fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to Farther’s annual investment management fee, the client will also incur charges imposed directly at the mutual and exchange traded fund level (e.g., management fees and other fund expenses).

Farther’s investment programs may involve above-average portfolio turnover which could negatively impact upon the net after-tax gain experienced by an individual client in a taxable account.

### **Voting Client Securities**

Farther does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client’s investment assets.

Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact Farther to discuss any questions they may have with a particular solicitation.

## **Item 7 Client Information Provided to Portfolio Managers**

Farther shall be the Program’s portfolio manager. Farther shall provide investment advisory services specific to needs of each client. Prior to providing investment advisory services, an investment adviser representative will discuss with each client, their particular

investment objective(s). Farther shall allocate each client's investment assets consistent with their designated investment objective(s). Clients may, at any time, impose restrictions, in writing, on Farther's services.

As indicated above, each client is advised that it remains their responsibility to promptly notify Farther if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Farther's previous recommendations and/or services.

## **Item 8 Client Contact with Portfolio Managers**

The client shall have, without restriction, reasonable access to the Program's portfolio manager.

## **Item 9 Additional Information**

- A. Farther has not been the subject of any disciplinary actions.

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

Neither Farther, nor its representatives have any material relationships which would require disclosure.

- B. **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Farther maintains an investment policy relative to personal securities transactions. This investment policy is part of Farther's overall Code of Ethics, which serves to establish a standard of business conduct for all of Farther's Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, Farther also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Farther or any person associated with Farther

Neither Farther nor any related person of Farther recommends, buys, or sells for client accounts, securities in which Farther or any related person of Farther has a material financial interest.

Farther and/or representatives of Farther *may* buy or sell securities that are also recommended to clients. This practice may create a situation where Farther and/or representatives of Farther are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if Farther did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of Farther's clients) and other potentially abusive practices.

Farther has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of Farther's "Access Persons." Farther's securities transaction policy requires that Access Person of Farther must provide the Chief Compliance Officer or his/her designee with online access to their holdings and securities transactions for monitoring and verification purposes.

Farther and/or representatives of Farther *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where Farther and/or representatives of Farther are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a conflict of interest. As indicated above, Farther has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Farther's Access Persons.

### **Review of Accounts**

For those clients to whom Farther provides investment supervisory services, account reviews are conducted on a periodic basis by Farther's representatives, at least annually. All investment supervisory clients are advised that it remains their responsibility to advise Farther of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with Farther on an annual basis.

Farther may conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. Farther may also provide a written periodic report summarizing account activity and performance.

### **Client Referrals and Other Compensation**

Farther receives economic benefits from Apex. Farther, without cost (and/or at a discount), receives support services and/or products from Apex. For more information regarding economic benefits and support services received and the related conflicts of interest, please see Item 12 of Farther's ADV Part 2A.

There is no corresponding commitment made by Farther to Apex or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

**Farther's Chief Compliance Officer, Christopher Powers, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding conflict of interest.**

Farther engages independent solicitors to provide client referrals. If a client is referred to Farther by a solicitor, this practice is disclosed to the client in writing by the solicitor and Farther pays the solicitor out of its own funds—specifically, Farther generally pays the

solicitor a portion of the advisory fees earned for managing the capital of the client or investor that was referred. The use of solicitors is strictly regulated under applicable federal and state law. Farther's policy is to fully comply with the requirements of Rule 206(4)-3, under the Investment Advisers Act of 1940, as amended, and similar state rules, as applicable.

Farther may receive client referrals from Zoe Financial, Inc through its participation in Zoe Advisor Network (ZAN). Zoe Financial, Inc is independent of and unaffiliated with Farther and there is no employee relationship between them. Zoe Financial established the Zoe Advisor Network as a means of referring individuals and other investors seeking fiduciary personal investment management services or financial planning services to independent investment advisors. Zoe Financial does not supervise Farther and has no responsibility for Farther's management of client portfolios or Farther's other advice or services. Farther pays Zoe Financial an on-going fee for each successful client referral. This fee is usually a percentage of the advisory fee that the client pays to Farther ("Solicitation Fee"). Farther will not charge clients referred through Zoe Advisor Network any fees or costs higher than its standard fee schedule offered to its clients. For information regarding additional or other fees paid directly or indirectly to Zoe Financial Inc, please refer to the Zoe Financial Disclosure and Acknowledgement Form.

### **Financial Information**

Farther does not solicit fees of more than \$1,200, per client, six months or more in advance.

Farther is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

Farther has not been the subject of a bankruptcy petition.

**Farther's Chief Compliance Officer, Christopher Powers, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.**