

STEWARDSHIP CONCEPTS FINANCIAL SERVICES, LLC

7307 N Division St., Suite 205

Spokane, WA 99208

509-443-0845

www.scfinancials.com

Adviser CRD #330611

Firm Brochure

Part 2A of Form ADV

This brochure provides information about the qualifications and business practices of Stewardship Concepts Financial Services, LLC, a Washington limited liability company. If you have any questions about the contents of this brochure, please contact us at: 509-443-0845, or by email at: amy@scfinancials.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 Stewardship Concepts Financial Services, LLC, is available on the SEC's website at www.adviserinfo.sec.gov

August 14, 2025

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

We registered with the Securities and Exchange Commission (SEC) in August 2025, and the State of Washington is no longer our primary regulator. We have made updates throughout our brochure to align with SEC requirements and removed state-required references, including removing Item 19 of this brochure, which is for state registrants only. We encourage you to read this brochure in its entirety and contact us if you have any questions.

Item 5: We have updated our fee schedule and explain that your fee schedule is negotiated with your Investment Advisor Representative. We have also updated how we calculate client assets for fee billing purposes. We previously calculated this as of each quarter-end, but we now calculate assets based on average daily balance in the quarter.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 509-443-0845 or by email at: amy@scfinancials.com.

Item 3: Table of Contents

Item 2: Material Changes	i
Annual Update	i
Material Changes since the Last Update	i
Full Brochure Available	i
Item 4: Advisory Business	1
Firm Description	1
Principal Owners	2
Types of Advisory Services	2
Tailored Relationships	4
Important Information for Retirement Investors	4
Managed Assets	5
Item 5: Fees and Compensation	5
Description	5
Fee Billing	6
Other Fees	7
Past Due Accounts and Termination of Agreement	7
Compensation for Sales of Insurance Products	7
Item 6: Performance-Based Fees	8
Sharing of Capital Gains	8
Item 7: Types of Clients	8
Description	8
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	8
Methods of Analysis	8
Investment Strategies	9
Risk of Loss	9
Item 9: Disciplinary Information	10
Legal and Disciplinary	10
Item 10: Other Financial Industry Activities and Affiliations	10
Financial Industry Activities	10
Affiliations	10

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	11
Code of Ethics.....	11
Participation or Interest in Client Transactions.....	11
Item 12: Brokerage Practices	11
Selecting Brokerage Firms.....	11
Soft Dollars	12
Order Aggregation	13
Item 13: Review of Accounts.....	13
Periodic Reviews	13
Review Triggers.....	13
Regular Reports.....	13
Item 14: Client Referrals and Other Compensation.....	13
Incoming Referrals.....	13
Referrals Out	14
Item 15: Custody	14
Account Statements.....	14
Statements Provided by Stewardship Concepts Financial Services, LLC.....	14
Direct Fee Deduction	14
3 rd Party SLOA's	14
Item 16: Investment Discretion	15
Discretionary Authority for Trading.....	15
Item 17: Voting Client Securities.....	15
Proxy Votes	15
Item 18: Financial Information	15
Financial Condition	15
Supplement Information: Business Continuity Plan.....	16
General	16
Disasters	16
Alternate Offices	16
Loss of Key Personnel	16

Supplemental Information: Information Security Program	16
Information Security	16
Privacy Notice	16

Item 4: Advisory Business

Firm Description

Stewardship Concepts Financial Services LLC (“we,” “our,” “us,” “Stewardship Concepts Financial Services”), originally began an advisory business in 1998 as a sole proprietorship, Edwin R Hill. Stewardship Concepts Financial Services’ principal owner is SCFS LLC which in turn is owned by Noah Schwab and Amy Drury.

Stewardship Concepts Financial Services provides personal financial planning and investment management services to individuals, families and their related entities, trusts and estates, family businesses, corporations and other business entities, and charitable organizations. Stewardship Concepts Financial Services works with clients to define financial objectives and to develop strategies for reaching those objectives, some of which may include: identification of financial problems, cash flow and budget management, tax planning, risk exposure review and management, investment management, education funding, retirement planning, estate planning, charitable goals, special needs planning, family business succession issues, fringe benefits, and/or other issues specific to the client.

The firm’s compensation is solely from fees paid directly by clients. The firm and its employees are no longer insurance licensed and, therefore, do not receive any commission from client’s purchase of any form of insurance, including life insurance and long-term care insurance. No other commissions in any form are received or accepted. No referral fees are paid or accepted. No benefits are received from custodians/broker-dealers based on client securities transactions (also known as “soft dollar benefits”). The firm is purely fee-only.

Assets under the direct management of Stewardship Concepts Financial Services are held by independent custodians (ie: Charles Schwab & Co., Inc.) in the client’s name. Stewardship Concepts Financial Services does not act as a custodian of client assets.

Stewardship Concepts Financial Services may recommend other professionals (e.g., lawyers, accountants, insurance agents, real estate agents, etc.) at the request of the client. Other professionals are engaged directly by the client on an as-needed basis even when recommended by the Advisor. Stewardship Concepts Financial Services receives no compensation, direct or indirect, for any referral. Conflicts of interest, if any, will be disclosed to the client and managed in the best interest of the client.

The initial meeting, which may be by telephone or Web conference, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

Principal Owners

Stewardship Concepts Financial Services is owned 90% by SCFS LLC which in turn is owned 65% by Noah Schwab and 35% by Amy Drury. The other 10% of Stewardship Concepts Financial Services is owned 6.5% by Noah Schwab and 3.5% by Amy Drury.

Types of Advisory Services

Stewardship Concepts Financial Services, LLC, provides comprehensive financial and estate planning services, investment advisory and management services, and charitable planned gift consultation to its clients. In all services, we operate in a fiduciary capacity, placing client needs above its own.

In performing its services, Stewardship Concepts Financial Services, is not required to verify any information received from the client or from the client's other professionals. Each client is advised that it remains his/her responsibility to promptly notify Stewardship Concepts Financial Services when there is any material or significant change in his/her financial situation and/or financial objectives for the purpose of reviewing, evaluating, or revising previous recommendations and/or services.

The following are typical financial planning services we offer to clients:

Financial Planning

We provide comprehensive financial planning services and condensed financial reviews, depending upon the needs of the client. Financial planning services may include, but are not limited to:

- **Cash Management and Budgeting:** Includes a review of Client's income and expenses to provide advice and guidance on a variety of cash management issues, as applicable, including how to prioritize any surplus and/or reduce expenses, debt pay-off options, existing cash reserves and strategies for saving.
- **Insurance Review:** Includes a review of existing policies for proper coverage of life, health disability, long-term care, liability, home and/or automobile.
- **College Savings:** Includes projecting the amount needed for college or other post-secondary education funding goals, savings options, eligibility for financial aid, and options for contributions to education funding for grandchildren or others.
- **Retirement Planning:** Typically includes discussion of financial goals with financial independence often seen as a primary objective; includes options for working towards reaching those goals; recommendations will be made based on review and discussions with Client. If retired or near retirement, includes discussion of distribution strategies, if applicable.

- **Investment Analysis:** Includes recommendations of a suitable asset allocation strategy, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker-dealer or custodian.
- **Tax Planning:** Recommendations for overall tax efficiency with consideration of existing and possible changes to federal, state and local tax laws and rates that may impact Client; recommended questions and options to discuss with Client's tax professional; may include participation in meetings with Client's accountant, attorney, or other professionals.

A written evaluation of the client's current situation and their goals is provided to the client. The engagement also includes implementation of recommendations accepted by client, telephone support, meetings as required, on-going financial planning services, and reminders of the specific courses of action that need to be taken. The actual scope of planning services is dependent solely upon the needs and circumstances of each client, and therefore differs which each client.

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed. The client may choose to enter into an investment management agreement upon the completion of the financial plan. The initial financial planning fee will be offset if the client implements a financial plan under an investment management contract for the managed accounts assets and no additional financial planning fee will be charged for further incidental investment planning or consulting account assets. Our financial planning fee is negotiable.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; death planning and a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided typically as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

Investment Management Services

We provide complete investment management and advisory services. Most financial planning clients choose to have Stewardship Concepts Financial Services manage their assets in order to obtain ongoing in-depth advice which is specific to the client's needs. Stewardship Concepts Financial

Services will not enter into an investment management relationship until they have a thorough understanding of a client's financial situation, needs and objectives.

A diversified investment portfolio is constructed for the client based upon specific risk and return goals, and other client-specific factors. Depending upon the total size of the portfolio, the portfolio may include but may not be limited to any of the following securities: equities (stocks – both US and foreign), government bonds (both US and foreign), corporate bonds (both US and foreign), mutual fund shares, exchange-traded funds (ETFs), certificates of deposit, municipal securities, U. S. government securities, real estate investment trusts (REITs), options contracts, futures contracts, and interests in master limited partnerships. The material risks involved with our investments and recommendations are as follows: interest-rate risk, market risk, inflation risk, currency risk, reinvestment risk, business risk, liquidity risk, and financial risk. These are detailed below in risk of loss section.

Special Projects

Projects may be undertaken that are not described in the above agreements, including periodic investment portfolio review, assistance with tax planning, or other services specifically described in an engagement letter.

Tailored Relationships

We tailor planning and advisory services to the individual needs of clients. Client goals and objectives are clarified in meetings and via correspondence and are used to determine the course of action for each individual client. The goals and objectives for each client are documented in our client relationship management system and in client files, either in hard copy or in electronic files.

Clients may impose restrictions on investing in certain securities or types of securities. These restrictions will be outlined in writing in an Investment Policy Statement to be signed by the client and Stewardship Concepts Financial Services.

Important Information for Retirement Investors

When we recommend that a client rollover retirement assets, or transfer existing retirement assets (such as a 401(k) or an IRA), to our management, we have a conflict of interest. This is because we will generally earn additional revenue when we manage more assets. In making the recommendation, however, we do so only after determining that the recommendation is in the client's best interest. Further, in making any recommendation to transfer or rollover retirement assets, we do so as a "fiduciary," as that term is defined in ERISA or the Internal Revenue Code, or

both. We also acknowledge we are a fiduciary under ERISA or the Internal Revenue Code with respect to our ongoing investment advisory recommendations and discretionary asset management services, as described in the advisory agreement we execute with you. To the extent we provide non-fiduciary services to you, those will be described in the advisory agreement.

Managed Assets

As of July 2025, we managed approximately \$104,790,442 in assets on a discretionary basis and \$1,593,392 on a non-discretionary basis.

Item 5: Fees and Compensation

Description

Stewardship Concepts Financial Services charges fees on a fixed basis or an hourly basis for consultations in financial planning and charitable gift planning. For our clients who do not need or desire comprehensive financial planning but seek planning counsel on a specific topic (e.g. education funding, home purchase, risk management, investments review, etc.), we charge an hourly fee of \$250.00 per hour. Total hourly charges for “specific topic” planning will vary, being dependent upon the planning topic and the complexity of the case. For clients that request and require comprehensive financial planning services, a flat fee of \$2,500 is charged, reflecting ten hours of our time. Financial planning fees are paid after the consultation and upon completion of work.

We also charge fees for investment management services. Fees are charged as an annual percentage of assets under management. We use a tiered fee schedule, which means when we manage more of your assets, we charge a lower annual percentage rate on those assets. Annual fees for the management of client assets in a diversified portfolio including stocks and bonds are subject to the following maximum fee schedule:

Assets Under Management	Annual Fee
\$0–\$2M:	1.0%
\$2M–\$4M:	0.8%
\$4M–\$6M:	0.6%
\$6M+:	0.5%

Your fees are negotiable and will be determined by your Investment Advisor Representative, subject to this maximum fee schedule. Your management agreement with Stewardship Concepts Financial Services will specify your exact fee schedule.

This management fee is in addition to all other customary fees and expenses (e.g., brokerage commissions, mutual fund expenses and fees) inherent in the overall management of an investment portfolio. No brokerage commissions in any form will be paid to or received by Stewardship Concepts Financial Services. Investment management fees are negotiable. We discount management fees for certain types of clients as follows: a 25% discount off the base fee for family members and friends, and for non-profit organizations. Stewardship Concepts Financial Services reserves the right to waive fees at its sole discretion.

In no event shall a management fee be based on the performance of the Client's Portfolio; neither shall it depend on the investment return of the assets or any share of capital gains or appreciation thereof.

In the event of termination of our services by either party, the annual management fee will be calculated based on the average daily balance of the client's portfolio for the number of days the agreement remained in effect during the terminated quarter.

Fee Billing

For all client engagements in which fees are being billed on an hourly basis or flat fee financial plan, fees will be billed to the client as the work is completed. Forms of payment accepted for flat fee or hourly financial plans are check, credit card, and ACH from bank. ACH and credit card payments are processed through Square. Square is a third-party payment processor in which the client can securely input their banking information and the advisory fees are paid through "one-time payment" requests for each billing period.

For investment management engagements for which fees are being billed as an annual percentage of assets under management, the management fee will be charged on a cumulative household account basis and will take into consideration the total market value of all assets under management for the client. Some exceptions apply and will be outlined in the investment advisory agreement. The management fee will be paid quarterly and will be paid in arrears based on the average daily balance of the client's total portfolio for the number of days in the calendar quarter. The first quarterly fee will commence on the last day of the calendar quarter in which this agreement was executed.

If the client consents in advance to direct debiting of their investment management fees from the brokerage accounts at a qualified custodian, then the quarterly fee will be automatically deducted from the client's investment accounts held by the custodian. We strongly encourage our clients to compare the information on any statement we provide with the fees listed on the account statements issued by the custodian.

If the client does not agree to direct debiting of fees from their brokerage accounts, then the client will receive an invoice, payable upon receipt, for the amount of the fees following the end of the quarter. The following are the forms of payment we accept for investment management: check, credit card,

and ACH from bank account. ACH and credit card payments are processed through Square. Square is a third-party payment processor in which the client can securely input their banking information and the advisory fees are paid through “one-time payment” requests for each billing period.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds, stocks, bonds, exchange-traded funds, options, and other marketable securities. These transaction charges are usually relatively small and are incidental to the purchase or sale of a security. In limited cases, custodians also charge monthly, quarterly or annual custody fees. Fees for custody are disclosed to clients when this type of arrangement is recommended.

Mutual funds and exchange traded funds generally charge a management fee for their services as investment managers. The management fee is included in the expense ratio. Mutual fund fees also include transaction charges for the purchase or sale of securities within the fund and may charge other fees as disclosed in the fund prospectus. These fees are in addition to the fees paid by the client to Stewardship Concepts Financial Services, LLC.

Please see the section entitled “Brokerage Practices” for more information.

Past Due Accounts and Termination of Agreement

Stewardship Concepts Financial Services reserves the right to stop work on any account that is more than 60 days overdue. In addition, we reserve the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate to providing proper financial advice, per our judgment. Clients may terminate their agreement at any time by providing written notice. Adviser will deliver completed portions of the plan to the client.

Terminated clients being billed at an hourly rate will receive an itemized bill based on hourly rates for work completed to the date of termination. In the unlikely case of fees being collected in advance, any unused portion of fees will be refunded within 30 days. In the event of termination of an investment advisory agreement where the fees are being billed as an annual percentage of assets under management, the annual management fee will be calculated using the average daily balance of the assets in the client’s portfolio based upon the number of days the agreement was in effect during the quarter in which the termination occurs.

Compensation for Sales of Insurance Products

Neither Stewardship Concept Financial Services nor its IARs receive insurance sale compensation. When providing comprehensive financial planning services, we may make general recommendations concerning

property/casualty insurance, life insurance, annuities, and/or long-term care insurance. However, if the client elects to pursue and possibly purchase any insurance products, those will always be done with a licensed insurance producer, not through us. We may recommend clients to insurance producers and will never receive compensation for such referrals.

Other Investment Compensation

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

Item 6: Performance-Based Fees

Sharing of Capital Gains

Performance-based compensation creates an incentive for us to recommend investments that carries a higher degree of risk to the client. Stewardship Concepts Financial Services does not use a performance-based fee structure because of this potential conflict of interest. In other words, in no event shall a management fee be based on the performance of the client's portfolio; neither shall it depend on the investment return on the assets or any share of capital gains or appreciation thereof. However, the nature of asset-based fees allows us to participate in the growth of the client's wealth. This also means that our fees can decline when the client's portfolio declines in value.

Item 7: Types of Clients

Description

Stewardship Concepts Financial Services provides personal financial planning and investment management to individuals, families and their related entities, trusts and estates, family businesses, corporations and other business entities, and charitable organizations. Client relationships vary in scope and length of service.

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

Methods of Analysis

Our investment analysis methods include fundamental analysis and technical analysis. We analyze and recommend a variety of individual securities, mutual funds, and money management services to clients. In analyzing investment options, sources of information may include financial newspapers

and magazines, investment advisory newsletters, economic newsletters, economic and financial books, corporate rating services like Value Line, Morningstar, S&P Global, Argus and Thomson Reuters, annual reports, prospectuses, filings with the Securities and Exchange Commission, current financial news, and company press releases. Stewardship Concepts Financial Services employees also attend financial industry conferences on a regular basis and utilize conference calls with various economists, mutual fund managers, and other asset managers. The material risks involved in our method(s) of analysis are risk of incomplete analysis and inaccurate given data.

Investment Strategies

The primary investment strategy we use for client accounts is broad portfolio diversification incorporating strategic asset allocation. Portfolios are globally diversified to help control risk and also to better reflect the global nature of current economies and financial markets. We also utilize tactical allocation changes which means overweighting or underweighting exposure to various investment classes at various times as deemed appropriate to enhance return or to reduce risk. The material risks involved with our investments and recommendations are as follows: interest-rate risk, market risk, inflation risk, currency risk, reinvestment risk, business risk, liquidity risk, and financial risk. These are detailed below in risk of loss section.

The investment strategy for a specific client is primarily centered on the client's overall risk tolerance and risk capacity. The strategy is further tailored based upon the planning objectives, income and cash flow needs, and tax situation stated by the client during consultations. It is understood that the client may change these objectives at any time and that both risk tolerance and risk capacity will change over time. Each client executes an Investment Policy Statement (IPS) that documents their risk, their overall objectives and the resulting appropriate investment strategy. The IPS provides an important platform to build mutual understanding of the client's investment needs and objectives, and to provide open dialogue.

We may employ other strategies to enhance returns or hedge risk including long-term purchases, short-term purchases, and option strategies (restricted to covered options writing and the purchase of protective Put options).

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach keeps the risk of loss as a primary focus. However, as with all investments, clients face investment risks which can lead to a temporary decline in or permanent loss to the value of an investment portfolio. These investment risks include, but are not limited to, the following:

- Market Risk, or systematic risk, is the risk associated with the overall decline in value of all securities in a specific investment market.

- Interest-rate Risk is the possibility that a debt security (i.e., bond) will decline in value as a result of a rise in interest rates.
- Inflation Risk is the risk of a decline (or erosion) of the purchasing power of both the value of an investment asset and the fixed income generated by it over time due to inflation.
- Currency Risk effects foreign investments and is the potential for a decline in the value of a foreign security due to changes in the price of one currency relative to another.
- Re-investment Risk, which is the risk of reinvesting the principal and interest from one investment at a lower rate due to declining interest rates, leading to an overall decline in cash flow.
- Business Risk is the risk that the specific issuer of a security (i.e., stock or bond) may become financially insolvent, thereby losing the ability to pay principal and interest on its bonds and causing its stock to become worthless.
- Liquidity Risk is the risk that a specific investment cannot be readily bought or sold due to a limited market for the investment.

Item 9: Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities

Stewardship Concepts Financial Services does not participate in any other industry business activities outside of its investment advisory business.

Affiliations

We do not have any arrangements that are material to its advisory business or its clients with any related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

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

Code of Ethics

We have committed to adhering to the Code of Ethics and Professional Responsibility as developed by the Certified Financial Planner Board of Standards. This Code of Ethics is centered on the following seven principles: Integrity, Objectivity, Competence, Fairness, Confidentiality, Professionalism, and Diligence. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

Stewardship Concepts Financial Services, its employees, and owners may not hold a material financial interest in securities in which a client is recommended or buys and sells in client accounts. Employees and owners may buy or sell securities that are held by clients. Employees and owners may not trade their own securities ahead of client trades. Employees and owners must comply with the provisions of the Stewardship Concepts Financial Services *Code of Ethics, Prevention of Insider Trading, and other policies*.

Our Chief Compliance Officer, Amy Drury, reviews all employee trades. The personal trading reviews ensure that the personal trading of employees do not conflict with or receive preferential treatment over client trades. Our employees' trades are generally not of a sufficient size or value to affect the securities markets.

Item 12: Brokerage Practices

Selecting Brokerage Firms

Stewardship Concepts Financial Services does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. We recommend custodians based on the proven integrity and financial responsibility of the custodial firm, the best execution of orders at reasonable commission rates, the level of other transactional costs, the access to a broad array of investment options for the benefit of clients, and the quality of customer service. We do not permit the client to direct brokerage because they may not be able to achieve the most favorable execution of client transactions and may lead to higher transactional costs.

We do not receive fees or commissions from any custodial platform, although we benefit from electronic delivery of client information, electronic trading platforms, and other services provided by the custodial platform for the benefit of clients. We may also benefit from other services provided by the custodian,

such as research, continuing education, and practice management advice. These benefits are standard for an investment advisor using an institutional custodial platform and are not in return for client recommendations or transactions.

We review the execution of trades at each custodian annually. Trading fees charged by the custodians are also reviewed on an ongoing basis. We do not receive any portion of the trading fees.

Soft Dollars

Stewardship Concepts Financial Services does not have any soft dollar arrangements. However, we do participate in the institutional advisor program (the "Program") offered by Schwab. Schwab offers services to independent investment advisors which include custody of securities, trade execution, clearance and settlement of transactions. We receive benefits through product and services from Schwab through our participation in the Program. Some of these products and services benefit Stewardship Concepts Financial Services, but do not benefit Clients accounts directly, although these benefits often assist us in managing and administering Client accounts. We consider the value of various services, including research or additional brokerage products a broker-dealer has provided or may be willing to provide to us. Because many of the services or products are considered a benefit to us, we have a conflict of interest in allocating client brokerage business: we receive valuable benefits when clients choose to custody their assets and execute client transactions at Schwab. Schwab's fees might not be the lowest we might otherwise be able to negotiate. There is no direct link between our participation in the Program and the investment advice we give our Clients, although the economic benefits we receive through our participation in the Program are not typically available to retail investors who use those same custodians. Benefits we receive from Schwab include: • receipt of duplicate Client statements and confirmations; • research-related products and tools; • consulting services; • access to a trading desk serving Program participants; • access to block trading and other trading tools; • direct debit of advisory fees from client accounts; • access to an electronic communications network for client order entry and account information; and • discounts on third-party vendor compliance, marketing, research, technology, and practice management products or services. Services made available through the Program are intended to help Stewardship Concepts Financial Services manage and further develop our business enterprise. The benefits that we receive through participation in the Program do not depend on the number of brokerage transactions directed to any one particular custodian. Clients should be aware, however, that the receipt of economic benefits by Stewardship Concepts Financial Services or our supervised persons in and of itself creates a potential conflict of interest and may indirectly influence our recommendation to you for custody and

brokerage services. As part of our fiduciary duty to clients, we endeavor at all times to put the interests of our clients first.

Order Aggregation

Where possible, we enter stock and bond block trades so that all clients receive the same price execution for the trade. Once executed, the trade is then allocated to the individual client accounts for which the trade applied.

Item 13: Review of Accounts

Periodic Reviews

Account reviews for investment management clients are performed by the advisory staff at Stewardship Concepts Financial Services. The frequency of reviews is individually negotiated with each client, but occurs no less than annually. An annual financial review is frequent and sufficient to review any material changes in a client's goals and objectives in their financial situation. Account reviews are performed more frequently when market conditions dictate it.

Financial planning clients are given the option to return annually at their expense for an update of their financial plan.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, changes in a client's own situation, or a review or update at the client's request.

Regular Reports

Written reports are sent to investment management clients on a quarterly basis. The reports may consist of a market commentary summarizing the results of the review and our general thoughts on the economy, a statement of holdings from our portfolio accounting software, asset allocation analysis, tax-related information, updates to financial plan reports, portfolio graphs, or other reports as needed. Portfolio rates of return shown in these reports are calculated using third party software that is believed to be accurate and reliable.

Item 14: Client Referrals and Other Compensation

Incoming Referrals

We have been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants,

employees, personal friends of employees and other similar sources. The firm does not compensate the parties listed above for referrals.

Stewardship Concepts Financial Services receives client referrals from SmartAsset, a third-party vendor that identifies prospective clients who may be interested in our advisory services. We pay a fee for each client referred to us through SmartAsset; the fee is not based on whether the client chooses to work with us or on the client's assets under our management. The leads are sent out to three different investment advisors and the client chooses the investment advisor that they wish to work with.

Referrals Out

Stewardship Concepts Financial Services does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, who provide account statements directly to clients at least quarterly. Clients are encouraged to carefully review the statements provided by their custodians.

Statements Provided by Stewardship Concepts Financial Services, LLC

At times we provide portfolio statements generated from our portfolio accounting and financial planning software. Clients are urged to compare any statements they receive from us to those they receive from their qualified custodians.

Direct Fee Deduction

Stewardship Concepts Financial Services is deemed to have custody when we have written authorization from the client to deduct our management fees directly from the client's account(s) through instructions delivered to the custodian. We urge clients to review their custodian account statements, which will reflect all activity during the statement time period, including fee deductions, and to let us know if there is a discrepancy.

3rd Party SLOA's

Clients at times provide us with signed standing letters of authorization (SLOAs) to send money to third parties. These are written and signed directives from the client authorizing us to initiate payments from their custodial accounts to specified third parties. This authority is considered "custody" under current regulations and requires us to report that we have custody over these account assets on our Form ADV, Part 1A. To the extent

the SLOAs comply with certain conditions, however, including that clients have the right to terminate the SLOA, and that the qualified custodian will confirm the status of the SLOA annually directly with the client, we are not subject to the surprise custody audit of those assets.

Item 16: Investment Discretion

Discretionary Authority for Trading

Stewardship Concepts Financial Services accepts discretionary authority to manage securities accounts on behalf of clients. Clients must sign a limited power of attorney before we are given discretionary authority. The limited power of attorney is included in the account application of our qualified custodians. Discretionary authority means Stewardship Concepts Financial Services has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, if discretionary authority or a limited power of attorney has not been given, we would need to consult with the client prior to each trade to obtain concurrence. Discretionary trading authority facilitates placing trades in clients' accounts on their behalf so that we may promptly implement the investment policy that they have approved. In most cases, clients are provided with an opportunity for review and discussion prior to implementation of recommendations.

Item 17: Voting Client Securities

Proxy Votes

Stewardship Concepts Financial Services does not vote proxies on securities. Clients are expected to vote their own proxies and will receive proxies directly.

When assistance on voting proxies is requested, we will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Item 18: Financial Information

Financial Condition

Stewardship Concepts Financial Services does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because we do not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Supplemental Information: Business Continuity Plan

General

Stewardship Concepts Financial Services has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, flooding, and pandemics. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived both onsite and offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

In the event of Amy Drury's serious disability or death, Noah Schwab of Stewardship Concepts Financial Services is licensed and capable of continuing to serve clients and maintain full operations. In the event of Noah Schwab's serious disability or death, Amy Drury of Stewardship Concepts Financial Services is licensed and capable of continuing to serve clients and maintain full operations.

Supplemental Information: Information Security Program

Information Security

We maintain an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

We are committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer

reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques, where necessary, and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client of Stewardship Concepts Financial Services and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you if our privacy policies change.