



WALSER WEALTH

A WEALTH MANAGEMENT ADVISORY

Challenging The Wisdom of Convention

Form ADV Part 2A – Disclosure Brochure

March 27, 2026

This Disclosure Brochure provides information about the qualifications and business practices of Walser Wealth Management Company, a Limited Liability Company (“Walser Wealth”, “Advisor”, “we”, “our” or “us” as the context requires.) If you have any questions about the contents of this Disclosure Brochure, please contact us at (866) 929-3258 or by email at info@walserwealth.com.

Walser Wealth is a Registered Investment Advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information to assist you in determining whether to retain Walser Wealth.

Additional information about Walser Wealth and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov.

**Walser Wealth Management Company,
A Limited Liability Company
CRD No: 206518
111 W. Oak Avenue
Suite 450
Tampa, FL 33602
Phone: (866) 929-3258 Fax: (866) 627-2508
Email: info@walserwealth.com
Website: www.walserwealth.com**

Item 2 - Material Changes

On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the "Advisers Act"). The amendments are designed to require a registered investment adviser to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor's business practices, conflicts of interest and advisory personnel. The new Form ADV 2 is divided into two parts: *Part 2A and Part 2B*.

Part 2A (this document, the "Disclosure Brochure") provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. *Part 2B* (the "Brochure Supplement") provides information about advisory personnel of Walser Wealth.

Walser Wealth believes that communication and transparency are the foundation of our relationship and continually strives to provide you with complete and accurate information at all times. We encourage all current and prospective investors to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material changes

Walser Wealth has the following material changes to report since our last annual update on August 5, 2025:

Item 4: Advisory Business:

- Added disclosure regarding engagement of Ernest J. C'DeBaca as CCO.
- Clarified disclosure regarding potential conflicts in the use of third-party sub-advisers.
- Added disclosure regarding the use of proprietary model portfolios.
- Updated information regarding our assets under management.

Item 5: Fees and Compensations:

- Added clarification regarding how our advisory fee is calculated and applied.
- Added disclosure regarding the implementation of a new fee breakpoint schedule.

Miscellaneous:

- Updated the firm's Privacy Policy.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Walser Wealth.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>.

To review the firm information for Walser Wealth:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **206518** (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (866) 929-3258 or by email at info@walserwealth.com.

Item 3 - Table of Contents

| | |
|--|----|
| Item 1 - Cover Page..... | 1 |
| Item 2 - Material Changes..... | 2 |
| Item 3 - Table of Contents..... | 3 |
| Item 4 - Advisory Services..... | 4 |
| Item 5 - Fees and Compensation..... | 6 |
| Item 6 - Performance-Based Fees and Side-By-Side Management..... | 8 |
| Item 7 - Types of Clients..... | 8 |
| Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss..... | 9 |
| Item 9 - Disciplinary Information..... | 10 |
| Item 10 - Other Financial Activities and Affiliations..... | 10 |
| Item 11 - Code of Ethics, Participation in Client Transactions and Personal Trading..... | 11 |
| Item 12 - Brokerage Practices..... | 11 |
| Item 13 - Review of Accounts..... | 13 |
| Item 14 - Client Referrals and Other Compensation..... | 13 |
| Item 15 - Custody..... | 13 |
| Item 16 - Investment Discretion..... | 13 |
| Item 17 - Voting Client Securities..... | 14 |
| Item 18 - Financial Information..... | 14 |

Item 4 - Advisory Services

A. Firm Information

Walser Wealth was founded in January 2015 and is a registered investment adviser with the SEC and is organized as a limited liability company (LLC) under the laws of the State of Delaware and registered as a foreign entity in Florida. Walser Wealth is solely owned by Rebecca Walser, Member. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Walser Wealth. In January 2026, Walser Wealth hired Ernest J. C'DeBaca as an outsourced Chief Compliance Officer.

B. Advisory Services Offered

Walser Wealth offers investment advisory services to individuals, high net worth individuals, trusts, estates, pension & profit sharing plans and corporations in Florida and other states (each referred to as a "Client").

Financial Planning and Consulting Services

Walser Wealth will typically provide a variety of financial planning services to individuals and families, pursuant to a written Financial Planning or Consulting Agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives, risk tolerance and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, tax planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed, or financial consultation rendered, to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Walser Wealth may also refer Clients to an accountant, an outside attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within three months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

Account Portfolio Management

Walser Wealth evaluates and selects mutual funds and exchange-traded funds for inclusion in Client portfolios only when they determine such inclusion is appropriate for the Client's goals, objectives, risk tolerance and financial situation. Walser Wealth employs a passive investment strategy that emphasizes diversification among many asset classes. Walser Wealth will work with the Client to determine an appropriate asset allocation. Asset allocation is a term used to refer to how an investor distributes investments among various classes of investment vehicles (e.g., stocks and bonds). This investment design should be based upon the investor's capacity for taking risk and involves taking the risk preferences, tax situations, and lifetime objectives of each client into account. Our objective is to help investors develop customized portfolio solutions aimed at managing risks and costs.

Walser Wealth Management Company

111 W. Oak Avenue, Suite 450, Tampa, FL 33602 Phone:

(866) 929-3258 Fax: (866) 627-2508

www.walserwealth.com

See Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information on the Walser Wealth investment methods.

Walser Wealth's investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client. Walser Wealth will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

Prior to rendering investment advisory services, Walser Wealth will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective[s].

Walser Wealth will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Walser Wealth accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

Use of Unaffiliated Investment Advisory Firms as Sub-Advisers/Co-Managers

Walser Wealth, at its discretion, may utilize unaffiliated investment advisory firms as sub-advisers or co-managers to assist us with the development and recommendation of appropriate investment options for your account. In such cases the Agreement will designate both Walser Wealth and the unaffiliated sub-adviser as managers of the Account and the client will receive required disclosures about both firms. Additionally, Walser Wealth has discretion to hire or remove recommended sub-advisers or co-managers at any time. The use of such unaffiliated third-party sub-advisers creates a financial incentive for Walser Wealth to recommend sub-advisers that agree to such arrangements. The Firm discloses all such arrangements in writing prior to engagement and conducts ongoing due diligence to ensure recommendations are in the client's best interest.

Managed Account Programs

Walser Wealth may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers participating in a managed accounts program at the Client's selected custodian (the "Program Sponsor"). The Client will then enter into a program and investment advisory agreement with the Program Sponsor and the participating money manager[s]. The Advisor will assist and advise the Client in establishing investment objectives for the account, the selection of the money manager[s], and defining any restrictions on the account. Walser Wealth will continue to provide oversight of the Client account and ongoing monitoring of the activities of the unaffiliated money managers.

These money managers will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the Program Sponsor will charge a program fee that includes the investment advisory fee of the money managers, the administration of the program and trading, clearance and settlement costs. The Program Sponsor will add Walser Wealth's Investment Advisory Fee (described below in Item 5) and will deduct the overall fee from the Client account, generally at the start of each calendar quarter. This asset-based program fee is tiered and varies depending on the size of the account, the asset class of the underlying securities and the sub-advisor selected.

Walser Wealth does not receive any compensation from these unaffiliated money managers or the Program Sponsor, other than Walser Wealth's Investment Advisory Fee (described in Item 5).

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor's Form ADV Part 2 (or a brochure that makes the appropriate disclosures). In addition, Walser Wealth and its Client will agree in writing that that selected Program Sponsor will manage the Client's account on a discretionary basis.

Proprietary Model Portfolio Management

Walser Wealth now offers proprietary investment models developed and managed in-house. These models are constructed using diversified asset allocation principles and may incorporate strategic and tactical allocation adjustments. Walser Wealth maintains full discretion over portfolio construction, security selection, and rebalancing decisions within these models.

The use of proprietary models creates a conflict of interest because we have an incentive to allocate client assets to strategies managed internally rather than by or through third-party managers. Walser Wealth mitigates this conflict through documented due diligence, investment committee oversight, ongoing performance monitoring, and a fiduciary obligation to act in the Client's best interest.

Business Retirement Plans

Walser Wealth will work with business Clients to develop, design and implement a retirement savings plan for its employees. Walser Wealth provides objective financial advice to plan sponsors and senior management regarding issues involving benefit plan options, wealth accumulation strategies for employees and participant education. Walser Wealth will evaluate a sponsor's current plan and recommend changes, if necessary. Walser Wealth may also provide consulting regarding new plans for companies that have not previously offered retirement plan benefits.

C. Client Account Management

Prior to engaging Walser Wealth to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement ("IPS") – Walser Wealth, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet their objectives. An IPS generally includes specific information about the Client's stated goals, time horizon for achieving the goals, investment strategies, risk tolerance and any restrictions imposed by the Client.
- Asset Allocation – Walser Wealth will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and risk tolerance for each Client.
- Portfolio Construction – Walser Wealth will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Walser Wealth will provide investment management and ongoing oversight of the Client's portfolio and overall account. In certain cases, portfolio management will be provided by a managed account program selected by Walser Wealth and the Client.

D. Wrap Fee Programs

Walser Wealth does not manage a wrap fee program.

E. Assets Under Management

As of March 27, 2026, the most recent date for which such calculations are provided pursuant to securities regulations, Walser Wealth manages the following assets:

| Assets Under Management | Assets |
|--------------------------|----------------------|
| Discretionary Assets | \$344,142,233 |
| Non-Discretionary Assets | \$0 |
| Total | \$344,142,233 |

Clients may request more current information at any time by contacting the Advisor.

Item 5 - Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of Walser Wealth and the Client.

A. Fees for Advisory Services

Account Portfolio Management

The Firm charges an annual advisory fee based on assets under management ("AUM"). The maximum advisory fee is 1.25%. Fees are generally billed monthly in arrears based on the average daily balance of the account during the prior monthly period.

Walser Wealth is deemed to have limited custody solely as a result of its authority to deduct advisory fees directly from client accounts. Clients authorize this in writing, and Walser Wealth maintains safeguards consistent with Rule 206(4)-2.

Unless otherwise provided in the applicable advisory agreement, the annual fee is calculated under the following marginal breakpoint schedule: 1.25% on the first \$2,000,000 of AUM; 1.00% on the next \$2,000,000 of AUM; 0.90% on the next \$2,000,000 of AUM; 0.80% on the next \$4,000,000; and 0.70% on AUM above \$10,000,000.

\$0 - \$1,999,999 = 1.25%

\$2,000,000 - \$3,999,999 = 1.0%

\$4,000,000 - \$5,999,999 = 0.9%

\$6,000,000 - \$9,999,999 = 0.8%

\$10,000,000+ = 0.7%

Under this structure, each rate applies only to the portion of assets within the applicable tier, not to total account assets. Accordingly, as account size increases, the client's blended effective advisory fee rate generally declines.

The Firm may, in its discretion, aggregate related accounts for breakpoint purposes, including certain household, family, or affiliated accounts, where appropriate and agreed. The Firm also may negotiate, waive, or vary fees for certain clients based on factors such as service complexity, related account relationships, anticipated additional assets, historical or legacy arrangements, institutional relationships, or other business considerations. As a result, clients may pay different advisory fees for similar services.

Investment Advisory Fees in the first month of service are prorated from the inception date of the account to the end of the first month. Fees may be negotiable at the discretion of Walser Wealth. The Client's fees will take into consideration the aggregate assets under management with Walser Wealth. All securities held in accounts managed by Walser Wealth will be independently valued by the designated Custodian. Walser Wealth will not have the authority or responsibility to value portfolio securities. The minimum fee is **\$1,000** for all accounts. For accounts with AUM less than \$80k, this minimum fee represents an annual fee higher than our maximum fee of 1.25%.

When using the services of other investment advisory firms as sub-advisers/co-managers, the sub-adviser/co-manager's fees will be included in Walser Wealth's fee schedule above and acknowledged in the sub-adviser's or co-adviser's investment management agreement.

Managed Accounts Programs

Fees for Clients participating in managed accounts programs will include Walser Wealth's Investment Advisory Fee above, plus the Program Sponsors Fee.

Financial Planning and Consulting Services

Walser Wealth offers financial planning or consulting services on a fixed fee and hourly fee basis. The hourly rate is \$250 per hour, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship. A fixed fee may also be offered for certain planning or consulting projects. The fixed fee ranges between \$1,500 and \$5,000 and varies based on the size and complexity of the Client's assets.

Walser Wealth Management Company
111 W. Oak Avenue, Suite 450, Tampa, FL 33602
Phone: (866) 929-3258 Fax: (866) 627-2508
www.walserwealth.com

The Advisor's fee is exclusive of, and in addition to, brokerage commissions, custody and transaction fees, fund expense ratios and other related third-party costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of those other fees and costs. The Advisor's hourly fees are determined after considering many factors, such as the level and scope of the services.

B. Fee Billing

Account Portfolio Management

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. Walser Wealth shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective month end date. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the average daily value of the assets under management with Walser Wealth during that month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Walser Wealth or the sub-advisor to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

Financial Planning and Consulting Services

As noted above, financial planning and consulting fee are invoiced by the Advisor and are due upon receipt.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third-parties, other than Walser Wealth, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the Custodian and executing broker-dealer. The Investment Advisory Fee charged by Walser Wealth is separate and distinct from these custodian and execution fees.

In addition, all fees paid to Walser Wealth for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Walser Wealth, but would not receive the services provided by Walser Wealth which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Walser Wealth to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Advance Fees

Walser Wealth Clients do not pay any fees in advance.

Termination

Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party within five (5) days of signing the Advisor's financial planning or consulting agreement. The Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro-rata basis.

E. Compensation for Sales of Securities

Other than the Investment Advisory Fees noted above, Walser Wealth does not buy or sell securities and does not receive any compensation for securities transactions in any Client account.

Retirement Rollover Conflicts of Interest

When recommending a rollover from an employer-sponsored retirement plan, the Firm has a financial incentive because it will receive advisory compensation. Clients should consider investment options, fees, services, and protections available under the existing plan before proceeding. We attempt to mitigate the conflict of interest by acting in your best interest and applying an impartial conduct standard to all rollovers. Please note that you are not under any obligation to roll over a retirement account to an account managed by us.

Item 6 - Performance-Based Fees

Walser Wealth does not charge performance-based fees for its investment advisory services. **The fees charged by Walser Wealth are as described in Item 5 - Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.**

Item 7 - Types of Clients

Walser Wealth provides investment advisory services to the following types of Clients:

- Individuals, High Net Worth Individuals, Personal Trusts and Estates - private investors, investing their personal assets

The relative percentage of each type of Client is available on Walser Wealth's Form ADV Part 1. These percentages will change over time. Walser Wealth imposes a minimum account size of approximately \$250,000 for establishing a relationship. This minimum may be waived at the sole discretion of Walser Wealth.

Walser Wealth does not manage any proprietary investment funds or limited partnerships.

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

A. Methods of Analysis

Walser Wealth primarily utilizes diversified asset allocation strategies implemented through mutual funds, exchange-traded funds ("ETFs"), and, where appropriate, proprietary model portfolios. The Firm may incorporate tactical asset allocation adjustments based on market conditions.

Mutual Funds and ETFs - Walser Wealth generally invests its Clients' assets with mutual funds and ETFs that pursue investment approaches that are diversified among multiple strategies, asset classes, regions, industry sectors and securities. Mutual funds and ETFs are selected primarily for their ability to replicate a given index or sector. The research of economists and academics will be used to evaluate an index or sector, and an appropriate fund selected to meet that research. Walser Wealth typically seeks passive investment options that provide low cost, tax efficient exposure to an asset class.

Bond Fund Due Diligence - Walser Wealth may invest Client assets with bond fund managers that may or may not pursue a passive investment strategy. In selecting a bond fund and allocating assets to that fund, Walser Wealth considers both quantitative and qualitative factors including:

- Relative performance during various time periods and market cycles
- Industry reputation
- Experience and training of staff investment professionals
- The clarity of, and adherence to, a viable investment philosophy

- Risk management process
- Portfolio management capabilities
- Fee structure
- Any other factor deemed appropriate by Walser Wealth

Walser Wealth may use various databases and other sources of information in order to facilitate the discovery process on each investment manager, strategy or product utilized by Walser Wealth .

B. Investment Strategies

Walser Wealth's analysis is based on research from leading economists and academics. This research suggests that investment returns are determined principally by asset allocation, not market timing or stock selection. Walser Wealth adheres to the following principles:

- Markets are efficient and, for investing purposes, assets are fairly priced.
- Price risk factors determine the expected rate of return.
- Diversification reduces the risk of uncertainty and asset allocation in numerous sectors of the market principally determines results in the portfolio.

Walser Wealth's primarily uses tactical asset allocation as their investment strategy. Tactical asset allocation is an active management portfolio strategy that rebalances the percentage of assets held in various categories in order to take advantage of market pricing anomalies or strong market sectors and movements. This strategy is designed to allow portfolio managers to create extra value by taking advantage of certain situations in the marketplace. It is a moderately active strategy because portfolio managers return to the portfolio's original strategic asset mix when desired short-term profits are achieved. The risk associated with tactical asset allocation is that each asset class has different levels of risk and return, so each will behave differently overtime. There is no guarantee that moving additional assets into an asset class will be beneficial to a portfolio.

C. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Walser Wealth will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

Walser Wealth primarily employs investment strategies that seek to limit risk to the risk inherent in domestic equity and international market risks. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (866) 929-3258 or via email at info@walserwealth.com.

Item 9 - Disciplinary Information

There are no legal, regulatory or disciplinary events that are material to a Client's or prospective client's evaluation of Walser Wealth's business or the integrity of our management. Walser Wealth and its management have not been involved in any administrative enforcement proceedings. Walser Wealth and its management have not been involved in any Self-Regulatory Organization enforcement proceedings related to past or present investment clients. Walser Wealth and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider you engage. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **206518** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Rebecca Walser by selecting the Investment Adviser Representative and entering Rebecca Walser's Individual CRD# **2602608** in the field labeled "Individual CRD Number".

Item 10 - Other Financial Activities and Affiliations

Our owner and representatives may be licensed insurance agents. They may recommend the purchase of insurance products to you. This other business activity pays them commissions that are separate from the fees described in Item 5 above. This is a conflict of interest because the commissions give them a financial incentive to recommend and sell you insurance products. However, we attempt to mitigate any conflicts of interest to the best of our ability by placing your interests ahead of our own and by implementing policies and procedures that address this conflict. Additionally, they will inform you that you have the right to choose whether to act on the recommendation and that you have the right to purchase recommended insurance through any licensed insurance agent or agency.

The main business of Walser Wealth and Rebecca Walser is to provide investment advisory services to its Clients. Rebecca is a licensed tax attorney and licensed insurance agent and provides legal and insurance services to Clients where warranted. Rebecca spends 25% of her time providing legal services, 25% of her time providing insurance advisory services and 50% of her time providing investment advisory services. The commissions from insurance sales and fees as a tax attorney give Ms. Walser a financial incentive to recommend these services. Ms. Walser will attempt to mitigate any conflicts of interest to the best of her ability by placing your interests ahead of her own and through the implementation of policies and procedures that address this conflict. Additionally, Clients always retain the right to choose whether to act on any of the recommendations given and are under no obligation to use or purchase these services through Walser Wealth and are free to use any licensed insurance agent or tax attorney.

Recommendation or Selection of Other Investment Advisors

Walser Wealth, in providing the services agreed upon with the client, may allocate client assets to third-party sub-advisers to manage all or a portion of the managed assets in the client's account (hereafter, the "Sub-Adviser.") If this occurs, Walser Wealth will be responsible for the continuing supervision of the Client's account, and the actions of the Sub-Adviser in connection with the Client's account and the managed assets. Walser Wealth also will be responsible for the payment of any advisory fee or other charges of the Sub-Adviser with respect to the managed assets unless or except as specifically authorized in advance by the Client. Walser Wealth agrees that upon proper notice by the client, it will refrain from the appointment of, or terminate, as permitted under applicable contracts, any Sub-Adviser appointed pursuant to this authority.

We have a conflict of interest when we utilize third-party Sub-Advisers that have agreed to share a portion of their advisory fee with us and have met the conditions of our due diligence review. There may be other third-party Sub-Advisers that may be suitable for you and that may be more or less costly. No guarantees can be made that your financial goals or objectives will be achieved. Further, no guarantees of performance can be offered. This conflict of interest is primarily mitigated through written disclosures to Clients, by our ongoing comparative due diligence and ongoing monitoring of our third-party Sub-Advisers and our limits on advisory compensation set forth in *Item 5 - Fees and Compensation*.

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

A. Code of Ethics

Walser Wealth has adopted and implemented a Code of Ethics consistent with Section 204A of the Investment Advisers Act of 1940, that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Walser Wealth. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Walser Wealth and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Walser Wealth's associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that include; general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, insider trading (material non-public information controls), initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. Walser Wealth has designed its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (866) 929-3258 or via email at info@walserwealth.com.

B. Personal Trading and Conflicts of Interest

Walser Wealth allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through application of our policies and procedures.

Walser Wealth has designed its policies and procedures to always place the interests of Clients ahead of our own. We strive to ensure that any personal securities transactions by any associated person of Walser Wealth are transacted in a manner consistent with this principle.

Item 12 - Brokerage Practices

A. Recommendation of Custodian[s]

Walser Wealth does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "Custodian") to hold and safeguard Client assets and will authorize Walser Wealth to direct trades to this Custodian as agreed in the Investment Advisory Agreement. Further, Walser Wealth does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Walser Wealth typically recommends to Clients that they establish their brokerage account[s] at Charles Schwab & Co., Inc. ("Schwab") or Fidelity Investments ("Fidelity"). Schwab and Fidelity are independent and unaffiliated SEC-registered broker-dealers and FINRA members. Walser Wealth considers a number of factors in selecting and/or recommending brokers and custodians for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided, reasonableness of commissions charged to the Client, services made available to the Client, and location of the Custodian's offices. Walser Wealth does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers. Walser Wealth is not affiliated with, or related to, Schwab or Fidelity. Clients are not obligated to use the recommended Custodians but certain services may not be available to Clients choosing a different Custodian.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Walser Wealth does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

Walser Wealth Management Company
111 W. Oak Avenue, Suite 450, Tampa, FL 33602
Phone: (866) 929-3258 Fax: (866) 627-2508
www.walserwealth.com

2. **Brokerage Referrals** - Walser Wealth does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

3. **Directed Brokerage** - All Clients are serviced on a “directed brokerage basis”, where Walser Wealth will place trades within the established account[s] at the custodian designated by Walser Wealth. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). In selecting the custodian, Walser Wealth will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results considering such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Walser Wealth will execute its transactions through an unaffiliated broker-dealer selected by the Client. Walser Wealth may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 - Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by the investment adviser representative assigned to the account. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A, each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account. The Client is encouraged to notify Walser Wealth if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events. A Client’s risk tolerance may be re-evaluated if economic conditions cause portfolio performance that is outside their comfort level.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Walser Wealth

Walser Wealth is a fee-only advisor for all managed money client accounts where the practice is compensated solely by the Client. Walser Wealth may, under appropriate circumstances, advise on the acquisition of certain products

for which the Client will not pay an ongoing management fee. In those cases, Walser Wealth will be compensated directly by an unrelated third-party issuing the product. Walser Wealth may refer Clients to various third-parties to provide certain services, as necessary and likewise, Walser Wealth may receive referrals of new Clients from various third-parties.

B. Client Referrals from Solicitors

Walser Wealth does not engage paid solicitors for Client referrals.

Item 15 - Custody

Walser Wealth does not accept or maintain custody of any Client accounts. All Clients must place their assets in a qualified unaffiliated third-party Custodian. Clients may select their own Custodian to retain their funds and securities and direct Walser Wealth to utilize that Custodian for the Client's security transactions. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

Item 16 - Investment Discretion

Walser Wealth generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Walser Wealth. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Walser Wealth will be in accordance with each Client's documented investment objectives and goals.

Walser Wealth also offers non-discretionary asset management services. A non-discretionary investment account requires us to receive permission from the client prior to buying and/or selling securities in the client's account. The client retains full discretion to supervise, manage, and direct the assets of the account. The client maintains full power and authority to purchase, sell, invest, reinvest, exchange, convert, and trade assets in the account in any manner deemed appropriate and to place all orders for the purchase and sale of account assets with or through broker, dealers, or issuers selected by the client. The client is free to manage the account with or without our recommendation and all with or without their prior consultation.

Item 17 - Voting Client Securities

Walser Wealth will not vote proxies on behalf of Clients. All proxy materials are mailed or emailed directly to the client from the Custodian. Any proxy materials received by Walser Wealth will be forwarded to the Client for response and voting. In the event the Client has a question about a proxy solicitation, they should feel free to contact the us.

Item 18 - Financial Information

Neither Walser Wealth nor its management has any adverse financial situations that would reasonably impair the ability of Walser Wealth to meet all obligations to its Clients. Walser Wealth has not been subject of any bankruptcy proceeding or material financial compromise. Walser Wealth is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

WALSER WEALTH MANAGEMENT

PRIVACY AND INFORMATION PROTECTION POLICY

Effective Date: April 1, 2026

Background

Regulation S-P (“Reg S-P”), issued pursuant to the Graham-Leach-Bliley Act, requires registered investment advisors to adopt and implement policies and procedures that are reasonably designed to protect the confidentiality of nonpublic personal records. Reg S-P applies to “consumer records”, meaning records regarding any individuals, families, or households obtaining financial products or services primarily for personal, family, or household purposes (“Consumers”). Reg S-P does not explicitly apply to the records of companies, investors in private funds (“Investors”), or individual agents or employees of the Company acting in a business capacity (“Supervised Persons”), but corresponding Federal Trade Commission rules may impose similar disclosure and safeguarding obligations.

Walser Wealth Management Company, LLC (the “Company”) is committed to protecting the confidentiality of all of the nonpublic personal information of Consumers who have or will have an ongoing relationship with the Company (“Customers”) as well as Investors, prospective Investors, and Supervised Persons (such information, “Personal Information”).

Reg S-P requires the Company to provide its Customers with notices describing the Company’s privacy policies and procedures. These privacy notices must be delivered to all new Customers upon inception of an arrangement, and at least annually thereafter. Reg S-P does not require distribution of privacy notices to companies, to Investors, or to Supervised Persons, but the Company provides initial and annual privacy notices to all Investors as a best practice.

Additional disclosures required pursuant to Reg S-P may be found in the Privacy Notice in the attached **Appendix A**.

Guiding Principles

The Company will seek to limit the collection of all Personal Information to that which is reasonably necessary for legitimate business purposes. The Company will not disclose Personal Information except in accordance with these policies and procedures, as permitted or required by law, or as authorized in writing by the Customer. The Company will never sell any Personal Information.

With respect to all Personal Information, the Company will strive to: (a) ensure the security and confidentiality of the information; (b) protect against anticipated threats and hazards to the security and integrity of the information; and (c) protect against unauthorized access to, or improper use of, the information.

Risk Considerations

In developing these policies and procedures, the Company considered the material risks associated with privacy protection. This analysis included risks such as:

- Company trade secrets and Personal Information may not be protected from unauthorized access by Supervised Persons or third-party service providers;
- Personal Information may not be recorded accurately or protected from inadvertent alteration or destruction;
- Personal Information might be accessed, copied, or destroyed by physical or electronic intrusions;
- False or misleading disclosures may be made to Customers about the use or protection of Personal Information;
- Third-party service providers may have not adopted or implemented adequate policies and procedures to protect Personal Information;
- Company may use information obtained from affiliates for marketing purposes without ensuring that affected individuals have been given adequate notice and an opportunity to opt out; and
- Company may fail to comply with applicable state or other applicable privacy laws.

The Company has established the following guidelines to mitigate these risks.

Policies and Procedures

What this Policy Covers

This Policy covers the Company's use and treatment of Personal Information (which includes personal data, and may also be referred to as personally identifiable information (PII)):

- that the Company may collect when a Customer, or prospective Customer (each, a "Covered Person") accesses the Company's website in any manner or engages the Company's investment advisory services (collectively, the "Services");
- provided to the Company as described below; and
- unless a Covered Person is notified that another policy applies.

By accessing or engaging the Company's Services, each Covered Person acknowledges and agrees that they consent to the practices and policies outlined in this Policy.

This Policy also explains a Covered Person's choices about how the Company uses information about the Covered Person. A Covered Person's choices include how they can object to certain uses of information about the Covered Person and how they can access and update certain information about the Covered Person.

The Company does not knowingly collect or solicit Personal Information from any individual under the age of 18 or knowingly allow such individuals to engage the Company's Services. Neither this Policy nor the Company's website or Services are directed to such individuals.

What Information is Collected about Customers

a. What is Personal Information:

The term "Personal Information" as used in this policy means any information that identifies a Covered Person as an individual or relates to an identifiable person, including Personal Information. The kinds of Personal Information that the Company may collect depends on the nature of the relationship between the Company and the Covered Person. This information may include a Covered Person's name, job title, and contact details, such as the Covered Person's address, email address and telephone number. In addition to the information stated above, the Company may collect certain information about a Covered Person's use of the Company's online services, for example, the Company may capture a Covered Person's IP address, operating system, or browser.

b. Information provided to the Company:

The Company receives and stores any information a Covered Person knowingly provides, as well as additional information collected through a Covered Person's use of the Company's website. A Covered Person can choose not to provide the Company with certain information, but then a Covered Person may not be able to engage the Company's Services, take advantage of some of the Company's online features, or receive reports or other communications from the Company. Unless another policy applies, the Company may also collect and use information submitted through any support or customer portal related to the Services.

If a Covered Person has provided the Company with a means of contacting the Covered Person for particular purposes, the Company may use such means to communicate with the Covered Person for that purpose. If a Covered Person previously provided the Company with their contact information but no longer wishes to receive such communications, a Covered Person can indicate their preference by sending an email to info@walserwealth.com.

c. Personal Information the Company receives from other sources:

The Company may receive Personal Information about a Covered Person from:

- other persons engaging the Services of the Company (e.g., if a Customer's name, phone number and/or email address is mentioned by another Covered Person or provided as a reference); and
- third-party service providers (e.g., if a broker or other investment adviser used by a Covered Person engages the Company's Services for the Covered Person's account, the Company will receive a Covered Person's information in order to onboard the Covered Person's account). The information the Company receives depends on the policies and procedures of that third-party service provider. A Covered Person is responsible for checking the privacy policies and notices of these third-party service providers to understand what data may be disclosed.

How the Company Uses the Personal Information it Collects

The purposes for which the Company uses the Personal Information of a Covered Person depend in part on the Services provided to the Covered Person, how the Covered Person engages with the Company, and any preferences the Covered Person has communicated to the Company.

The Company may use Personal Information of a Covered Person:

- to provide the Services requested;
- to communicate with a Covered Person (e.g., to deliver any reports or communications, information on new or additional Services or offerings, market updates, etc.);
- for security (e.g., to authenticate the identity and authority of a Covered Person, verify accounts and activity, monitor suspicious or fraudulent activity, etc.);
- to provide ancillary services and support relating to the Company's Services to the Covered Person, as applicable;
- to operate and maintain the Services being provided;
- to process any requests by a Covered Person;
- to protect the Company's legitimate business interests and legal rights; and
- with a Covered Person's consent (i.e., for any purpose not listed above, the Company may use the Personal Information of a Covered Person where the Covered Person has given the Company consent to do so).

Protecting Confidential Information

Supervised Persons will maintain the confidentiality of the Personal Information acquired in connection with their employment, with particular care being taken regarding Personal Information. Improper use of the Company's proprietary information, including Personal Information of any Covered Person, is cause for disciplinary action, up to and including termination of employment for cause and referral to the appropriate civil and criminal legal authorities. Consequently, all Supervised Persons are required to sign and adhere to a confidentiality agreement covering these and other matters.

Personal Information will be restricted to the Supervised Persons who have a need to know such information.

All requests by third parties to review this Privacy Policy, the Company's Compliance Manual, compliance testing results, correspondence between Company and regulators and other compliance related documents should be forwarded to the Chief Compliance Officer ("CCO"). Supervised persons are not authorized to respond to such requests without prior approval of the CCO.

Disclosure of Personal Information

Personal Information of a Covered Person may only be provided to third parties under the following circumstances:

- To broker-dealers opening brokerage accounts;
- To accountants, lawyers, and other professional advisers as directed in writing by the Covered Person;
- To specific family members as directed in writing by the Covered Person, or as authorized by law;
- To third-party service providers, as necessary, to service the Covered Person's account(s); and
- To governmental or regulatory authorities and any other persons as required by law.

Supervised Persons should take responsible precautions to confirm the identity of any persons requesting Personal Information of a Covered Person. Supervised Persons must be careful to avoid disclosures to identity thieves, who may use certain Personal Information of a Covered Person, such as social security number, to convince a Supervised Person to divulge additional Personal Information. Any contacts with suspected identity thieves must be reported promptly to the CCO.

To the extent practicable, Supervised Persons will seek to remove nonessential Personal Information of a Covered Person from the information disclosed to third parties.

Personal Information of Covered Persons may be accessed by the Company's outside service providers, such as accountants, lawyers, consultants, and administrators. The Company may review such service providers' privacy policies to ensure that Personal Information is not used or distributed inappropriately.

Regulation S-AM: Under Regulation S-AM, we are prohibited from using eligibility information that we receive from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously, and concisely disclosed to the Covered Person; (2) the Covered Person has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the Covered Person has not opted out.

We may also disclose the following information to companies that perform marketing services on our behalf or to other financial institutions with which we have joint marketing agreements:

- Information we receive from Covered Persons on applications or other forms, such as the Covered Person's name, address, social security number, assets, and income;
- Information about a Covered Person's transactions with us, our affiliates, or others, such as the Covered Person's account balance, payment history, parties to transactions, and credit card usage; and

- Information we receive from a consumer reporting agency, such as a Covered Person's creditworthiness and credit history.

Regulation S-ID: Regulation S-ID requires the Company to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to Covered Persons or to the safety and soundness of the Company from identity theft. The Company has developed an ITPP designed to adequately identify and detect potential red flags to prevent and mitigate identity theft.

Access to the Company's Premises

The Company's premises will be locked outside of normal business hours. Meetings with Covered Persons should be held in conference rooms or other locations where Personal Information is not available or audible to others.

Visitors to the Company's offices will not be left unattended in a manner that will permit unauthorized access to proprietary information of the Company or Personal Information.

On an annual basis, the CCO assesses whether information security risks associated with the Company's physical office have changed in material ways. The Chief Operating Officer and/or Chief Financial Officer and the CCO will work together to address any newly identified vulnerabilities.

Information Stored in Hard Copy Formats

The Company has implemented the following procedures to protect Personal Information of Covered Persons stored in hard copy formats:

- To the extent practicable, Personal Information will be kept in lockable filing cabinets;
- All Personal Information, as well as the Company's proprietary information, should be locked up at the end of each workday;
- Documents containing Personal Information must never be left unattended in public spaces, such as lobbies or conference rooms;
- Documents being printed, copied, or faxed must not be left unattended;
- Supervised Persons will exercise due caution when emailing, mailing, or faxing, documents containing Personal Information to ensure that the documents are sent to intended recipients; and
- Supervised Persons may only remove documents containing Personal Information from the Company's premises for legitimate business purposes. Any documents taken off premises must be handled with appropriate care and returned as soon as practicable.

Responding to Privacy Breaches

If any Supervised Person becomes aware of an actual or suspected privacy breach, including any improper disclosure of Personal Information, that Supervised Person must promptly notify the CCO. Upon becoming aware of an actual or suspected privacy breach, the CCO will investigate the situation and take the following actions, as appropriate:

- To the extent possible, identify the Personal Information that was disclosed and the improper recipients;
- Notify any appropriate members of senior management;
- Take any action necessary to prevent further improper disclosures;
- Take any action necessary to reduce the potential harm from improper disclosures that have already occurred;
- As applicable, discuss the issue with legal counsel, and consider discussing the issues with the regulatory authorities and/or law enforcement officials;
- Assess notification requirements imposed by applicable state and national regulatory authorities and/or law enforcement officials;
- Evaluate the need to notify affected Covered Persons, and make any such notifications;
- Collect, prepare, and retain documentation associated with the inadvertent disclosure and Company response(s); and
- Evaluate the need for changes to the Company privacy protection policies and procedures in light of the breach.

Privacy and Protection Training

The CCO or his/her delegate will ensure that all new Supervised Persons have received, reviewed, and understand their obligations to protect Personal Information of Covered Persons. The CCO will remind all Supervised Persons of their privacy protection obligations as part of the Company's annual compliance training. If the Program appears to be functioning well and has not undergone material changes, then this reminder might appropriately take the form of broadly-distributed annual email. The CCO may provide training more frequently and/or in person to individuals or groups if:

- Company's policies and procedures, or the threats to Personal Information, change in a material way;
- Company experiences a privacy breach; and/or
- One or more Supervised Persons do not appear to understand their obligations regarding privacy protection.

Closed or Inactive Accounts

If you decide to close your account(s) or become an inactive Covered Person, our Privacy Policy will continue to apply to you.

Changes to this Policy

The Company is committed to complying with data privacy laws in every jurisdiction it does business. As such, the Company may amend this Policy from time to time. Use of Personal Information of any Covered Person the Company collects now is subject to the Policy in effect at the time such information is used. If the Company makes changes in the way it uses Personal Information, the Company shall notify its Customers.

Appendix A

Effective Date: April 1, 2026

| FACTS | WHAT DOES WALSER WEALTH MANAGEMENT COMPANY, LLC (“WWM”) DO WITH YOUR PERSONAL INFORMATION? | |
|-------------------|---|-----------------|
| WHY? | Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. | |
| WHAT? | <p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social security number ▪ Income ▪ Assets ▪ Risk tolerance ▪ Wire/bank transfer instructions ▪ Transaction history <p>When you are no longer our customer, we continue to share information about you as described in this notice.</p> | |
| HOW? | All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons WWM chooses to share; and whether you can limit this sharing. | |
| | Reasons we can share your personal information | Does WWM Share? |
| | For our everyday business purposes - such as to process your transactions, maintain your account(s) or respond to court orders and legal investigations. | Yes |
| | For our marketing purposes - to offer our products and services to you. | Yes |
| | For our affiliates' everyday business purposes - information about your transactions and experiences. | Yes |
| | For our affiliates' everyday business purposes - information about your creditworthiness. | No |
| | For our affiliates to market to you | Yes |
| | For nonaffiliates to market to you | Yes |
| Questions? | Please call us at: 866-929-3258 or visit our website: www.walserwealth.com | |

Who we are

Who is providing this notice? Walser Wealth Management Company, LLC

What we do

How does WWM protect my personal information? To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does WWM collect my personal information? We collect your personal information, for example, when you

- Enter into an investment advisory contract;
- Seek financial advice;
- Make deposits or withdrawals from your account;
- Tell us about your investment or retirement portfolio; or
- Give us your employment history.

We also collect your personal information from other companies.

Why can't I limit all sharing? Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include companies with a common corporate ownership, including the following: Walser Capital Group, LLC; and Trust Law, PLLC.*

Nonaffiliates Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *WWM does not share with nonaffiliates so they can market to you.*

Other important information

A copy of this privacy notice is available upon request by contacting: 866-929-3258 info@walserwealth.com.