

# Form ADV Part 3 – Client Relationship Summary

## Introduction (Item 1)

WELLINGTON CONSULTING SERVICES, INC. (“WCS”) is an investment adviser registered with the Securities and Exchange Commission (“SEC”) offering investment advisory accounts and services. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. This document gives you a summary of the types of services we offer and fees that we charge. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

## Relationships and Services (Item 2)

*Questions to ask us: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

### What investment services and advice can you provide me?

Our firm primarily offers discretionary managed model investment portfolios for both retirement and individual accounts. We assist clients select a model portfolio based on their risk profile and investment time horizon. We also offer general financial consulting regarding asset allocation and tax planning. Model portfolios are reviewed at least quarterly for both cost efficiency and asset allocation alignment based on current macroeconomic conditions and our outlook for the financial markets. Our firm also offers non-discretionary services for both retirement and individual accounts whereby the investor makes the ultimate decision regarding the purchase or sale of investments. We limit the types of investments that are recommended since not every type of investment vehicle is needed to create an appropriate portfolio.

Our firm has discretionary management without any material limitations for client accounts, but also offers non-discretionary services for retirement plans where the investor makes the ultimate decision regarding the purchase or sale of investments. Our minimum account size is generally \$25,000, although we can accept smaller accounts at our discretion. Please also see our Form ADV Part 2A (“[Brochure](#)”), specifically Items 4 & 7.

## Fees, Costs, Conflicts, and Standards of Conduct (Item 3)

*Questions to ask us: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? How might your conflicts of interest affect me, and how will you address them?*

### What fees will I pay?

You will pay fees and costs whether you make or lose money on your investments which lower the returns on your investments over time. Our fees may vary depending on the services you receive. Unless your advisory services are based on a flat fee, the amount of assets in your account affects our advisory fee; the more assets you have in your advisory account, the lower our fees generally are as a

## Form ADV Part 3 – Client Relationship Summary

percentage of your investment, but the higher the dollar amount of our total fees you will pay. We therefore have an incentive to increase those assets in order to increase our fee. Typically, portfolio management fees are charged quarterly in arrears or as an average daily account balance and are automatically taken from assets in your account. You pay our fees even if you do not have any transactions, and the advisory fee paid to us generally does not vary based on the type of investments selected. Please make sure you understand what fees and costs you are paying. Please also see our Form ADV Part 2A ([“Brochure”](#)) for additional details.

### **What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

Examples of our conflict of interests would be our preference to utilize mutual funds which have additional costs built into them which increases the overall costs that you pay (although we do not receive and retain any part of these costs). Similarly, in order to manage your money, we may utilize third-party providers who likewise have additional custodian, transaction or other applicable fees.

### **How do your financial professionals make money?**

Primarily, we and our financial professionals benefit from the advisory services we provide to you because of the advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. Please also see Item 5 of our [Brochure](#) for additional details.

## **Disciplinary History (Item 4)**

*Questions to ask us: As a financial professional, do you have any disciplinary history? For what type of conduct?*

### **Do you or your financial professionals have legal or disciplinary history?**

We do not have any legal and disciplinary events. Please visit [Investor.gov](http://Investor.gov) for a free, simple search tool to research us and our financial professionals.

## **Additional Information (Item 5)**

*Questions to ask us: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*

For additional information on our advisory services, see our Brochure available at: <https://adviserinfo.sec.gov/firm/summary/105837> and any individual brochure supplement your representative provides. If you have any questions or want another copy of this Client Relationship Summary, please contact your Wellington representative.

# Wellington Consulting Services, Inc.

## Form ADV Part 2A Brochure

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**Wellington Consulting Services, Inc.**

14325 Willard Road, Suite 104

Chantilly, VA 20151

Website: [www.wellington401k.com](http://www.wellington401k.com)

Date of this Brochure: March 31, 2026 (for Compliance Year 2025)

Prior Year Annual Updating Amendment: March 31, 2025 (for Compliance Year 2024)

**Form ADV Part 2A Brochure**

This Form ADV Part 2A brochure provides information about the qualifications and business practices of Wellington Consulting Services, Inc.

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 Wellington Consulting Services, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Wellington Consulting Services, Inc. is a Registered Investment Adviser.

Registration as an investment adviser does not imply any certain level of skill or training.

**Wellington Privacy Statement is included as an addition to this "Brochure."**

## **Material Changes (Item 2)**

*This section of the brochure helps you quickly identify material changes from the last annual update.*

Wellington Consulting Services, Inc. filed an annual updating amendment on March 31, 2026 for the 2025 compliance year. Since that annual update we have the following material changes to report in this current update:

*None*

Pursuant to SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may provide further ongoing disclosure information about material changes as necessary. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Peter Jones, Chief Compliance Officer, at (877) 836-1993 ext. 3333.

Additional information about Wellington Consulting Services, Inc. is available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with Wellington Consulting Services, Inc. who are registered, or are required to be registered, as investment adviser representatives of our firm.

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## **Advisory Business (Item 4)**

*This section of the brochure tells you about our business, including ownership, and a description of the services we offer.*

### **Firm Description**

Wellington Consulting Services, Inc. (“WCS”), a privately held Subchapter S Corporation, is an investment adviser with primary offices in Virginia and was incorporated on April 8<sup>th</sup>, 1992. WCS is registered with the Securities and Exchange Commission (“SEC”). Our firm provides discretionary and non-discretionary money management services to individuals for their personal investment accounts as well as for their company-sponsored retirement plan accounts.

### **Principal Owners**

The principal owners of Wellington Consulting Services, Inc. are Stephen Dix, Peter Jones, and Stephen Lynch.

### **Types of Advisory Services**

#### **Investment Advice and Consulting**

Our firm provides discretionary money management services to individuals for their personal investment accounts as well as for their company-sponsored retirement plan accounts. In providing our advisory services we utilize no-load mutual funds or electronically traded funds (“ETF’s”) which fit well with our conservative long-term approach to investing. Our primary focus is the management of IRA’s, 401(k)’s and other retirement-related accounts for individuals. We also offer non-discretionary advice to individuals and retirement plan participants.

#### **ERISA Clients**

WCS offers fiduciary services to company retirement plan sponsors. WCS acknowledges that we are a fiduciary, and we discharge our duties for the exclusive benefit of plan participants. WCS discloses information about the services we provide and the compensation we receive for such services in this ADV Part 2A. Notably, in conjunction with its advisory services for company-sponsored retirement plans, WCS is typically acting in the capacity of an ERISA Section 3(38) “manager” (fiduciary).

#### **Investment Management**

Our firm provides discretionary money management services to individuals for their personal investment accounts as well as for their company-sponsored retirement plan accounts. In providing our advisory services, we utilize no-load mutual funds and/or ETF’s. One of our goals is to minimize expenses, so consequently we often build portfolios with a concentration in index funds. All accounts have the goal of maximizing risk-adjusted returns.

Our primary focus is the management of plan participant accounts within company-sponsored 401(k) plans. In doing so we utilize pooled mutual fund portfolios as well as managed or participant directed separate accounts. We also offer non-discretionary advice to individuals and retirement plan participants. Our discretionary advisory services are matched to specific individuals' needs by assisting them to determine which of our managed model portfolios best aligns with their desired risk profile and timeframe to retirement (or expected drawdown of the managed assets). This "Risk" vs. "Timeframe" matrix may be represented as follows:

**Model 3 – Conservative**

1	2	<b>3</b>	Risk (Increasing) ↓
4	5	6	
7	8	9	

Time Horizon  
(increasing) →

**Model 6 – Moderate**

1	2	3	Risk (Increasing) ↓
4	5	<b>6</b>	
7	8	9	

Time Horizon  
(increasing) →

**Model 9 - Aggressive**

1	2	3	Risk (Increasing) ↓
4	5	6	
7	8	<b>9</b>	

Time Horizon  
(increasing) →

Alternatively, the "Risk" vs. "Timeframe" matrix may be represented as follows:

<b>Conservative</b>	<b>Moderate</b>	<b>Aggressive</b>	<b>Aggressive – Ultra Long-Term</b>
Less than Five Years	Five to Ten Years	Ten to Twenty Years	More than Twenty Years

We work closely with two affiliated Third Party Administrators ("TPAs"), Everington Consulting, Inc. ("ECI") and Wellington Retirement Solutions, Inc. ("WRS") that provide retirement plan recordkeeping services. It should be noted that the allocation of our managed model portfolios may differ between each of the recordkeeping platforms based upon the differences in funds that are available, due to the software requirements of the TPA, or for other reasons. Such variation in managed portfolio composition also applies to individual accounts where the allocations and fund choices of our managed model portfolios may differ substantially.

WCS strives to keep clients apprised of its strategy and current market outlook. The firm fosters a culture that focuses on maintaining transparency and openness for successful relationships and stresses this approach as both a core company value and an expectation of all employees in their dealings with clients and each other.

## IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I 6 of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

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

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

## Assets Under Management

WCS manages client assets on a discretionary and non-discretionary basis. As of December 31, 2024, WCS managed assets in the following categories:

Type Advisory Service	Private Client	Retirement Plans	Total
Discretionary	\$370,576,579	\$1,195,125,716	\$1,565,702,295
Non-Discretionary	\$0	\$123,614,831	\$123,614,831
<b>Total</b>	<b>\$370,576,579</b>	<b>\$1,318,740,547</b>	<b>\$1,689,317,126</b>

## **Fees and Compensation (Item 5)**

*This section of the brochure describes how we are compensated for the services we offer.*

WCS offers its services on a fee basis, which may include fixed fees, as well as fees based upon assets under management.

### **How Clients Pay Advisory Fees**

The specific manner in which fees are charged by WCS is established in a client's written agreement with us. We bill clients on a quarterly basis in arrears or as an average daily balance, and our advisory fees are deducted directly from client account assets unless specific instructions are given by a client who would prefer to make payment via invoice. In the case of fees for accounts of company-sponsored retirement plan participants, the plan sponsor may elect to pay some or all of their participant fees directly to us. Our management fees are determined based upon client account balances at the end of each calendar quarter, as an average daily balance during the quarter, or as a flat advisory fee collected quarterly. Please see each program descriptions below for fee billing arrangements.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based upon either the percentage of the quarter that assets were under management or upon an accounts average daily balance during that quarter. Either WCS or our clients may terminate an advisory contract upon ten days written notice.

WCS fees are exclusive of brokerage commissions, transaction fees, mutual fund short-term redemption charges and other related costs and expenses, if any, which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, check and distribution fees and other fees and taxes on brokerage accounts and securities transactions as may be applicable. Mutual funds and ETFs also charge internal management fees (see Investment Company Fees), which are disclosed via prospectus.

Such charges, fees and commissions are exclusive of and in addition to our advisory fee. WCS does not receive any portion of these commissions, fees, and costs. It should be noted that clients have the option to purchase investment products we recommend through other broker/dealers or agents that are not affiliated with our firm.

WCS in its sole discretion, may negotiate to charge a lessor advisory, money management, or consulting fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, pro bono activities, etc.).

## Investment Company Fees

Investment company funds (e.g., mutual funds or ETFs) that are held by you will bear their own internal transaction and execution costs, as well as directly compensate their investment managers along with internal administrative services. These fees reduce the net asset value of the fund shares and are indirectly borne by fund shareholders. If you transfer assets to our management, we will evaluate whether to hold or sell those assets. We typically liquidate high-expense funds, including those that pay a 12b-1 fee or similar trailing commissions. If we believe that the client will incur significant tax liability or excessive redemption fees, or that the sale is otherwise not in the client's best interest, we may elect to continue to hold the security. In no case, however, does WCS select mutual funds for inclusion in our managed model portfolios or as recommended Designated Investment Alternatives ("DIAs") which contain internal fund "revenue-sharing" payments.

## Commission Based Compensation

Neither the firm nor its advisory representatives receive any commissions or transaction-based compensation.

Item 12 further describes the factors that our firm considers in selecting or recommending broker/dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

## Services Offered

**Retirement Plan Consulting Services** - In conjunction with its other advisory services, WCS may provide retirement plan sponsors with ERISA Section 3(21) and/or ERISA Section 3(38) fiduciary services, as well as non-fiduciary services to include the following:

### **ERISA Section 3(38) Fiduciary Services:**

Discretionary Management of Retirement Plan Assets  
Discretionary Selection of Plan Designated Investment Alternatives

### **ERISA Section 3(21) Fiduciary Services:**

Development of Investment Policy Statement:  
Recommendations for Selecting & Monitoring the Plan's Investments  
Investment Performance Measurement & Analysis  
Recommendations for Selecting & Monitoring Qualified Default Investment Alternatives  
Recommendations for Allocating & Rebalancing Model Asset Allocation Portfolios  
Individualized Investment Advice to Plan Participants

### **Non-Fiduciary Services**

Employee Investment Education & Communication

WCS willingly accepts the designation as a “Co-Fiduciary” under ERISA 3(21)(A) or ERISA 3(38) as part of its normal course of business.

## **Investment Management Fees**

**LAMP-PLUS** – This service provides discretionary money management services to individuals for their personal retirement (IRA, SEPP, etc.) and investment accounts. In providing this service, we recommend a client model portfolio and utilize no-load mutual funds and/or RTFs with an emphasis on index funds. Client accounts may also include a non-discretionary “side account” which may hold non-mutual fund assets within the same brokerage account. Those non-discretionary assets are positions the client has requested to hold in the account that are not part of the assets we manage but do charge an advisory fee on.

The annual fee schedule for “LAMP-Plus” is typically 2.00% on assets from \$25,000 to \$100,000 plus 1.75% on the next \$100,001 and higher. For any non-discretionary assets within the account, fees are charged at a 1.00% flat fee. A flat advisory fee may also be applicable for assets managed on a discretionary basis. LAMP-Plus accounts below \$25,000 in discretionary assets are accepted at the option of our firm.

Fees are billed on a quarterly basis in arrears. Fees are based upon client account balances at the end of each calendar quarter or alternatively are charged as a flat fee on the client account. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based upon the percentage of the quarter in which the assets were invested.

**LAMP-PLUS, ETF’s** – This service provides a discretionary ETF allocation program driven by (Charles) Schwab Institutional Intelligent Portfolios which uses an algorithm to assign clients to a corresponding model portfolio based upon tolerance for risk and other factors. WCS is then able to adjust the assignment of the model ETF portfolio manually if so desired.

The annual fee schedule for “LAMP-Plus, ETFs” is typically a 1.00% flat fee. LAMP-Plus, EFT accounts below \$15,000 in discretionary assets are accepted at the option of our firm.

Fees are billed on a quarterly basis in arrears. Fees are based upon client account balances at the end of each calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based upon the percentage of the quarter in which the assets were invested.

**BUSINESS SOLUTIONS 401(k)** - Our “Business Solutions” advisory services, available to company-sponsored 401(k) retirement plans, allows each participant on a fully automated web-based process to select one of three levels of advisory services for their 401(k) account.

1. Wellington Lifestyle Portfolio: Retirement plan participants electing to have our firm manage their retirement account on a discretionary basis via one of our nine no-load mutual fund and/or ETF portfolios. Participants use a wizard based approach to determine their risk and retirement time horizon and are then guided towards a model fund selection which we rebalance and manage continuously.

2. **Participant Customized:** Plan participants select their own mutual fund or ETF allocations, but have our firm execute the mutual fund / ETF orders to allocate the initial account balance and any subsequent account contributions.
3. **Participant Self-Manage:** Plan participants who desire only non-discretionary investment advice and guidance from our firm but who elect to execute their own mutual fund / ETF and other securities orders.

Advisory and related fees range up to 1.25% for our fully discretionary service but are based upon which level of advisory service is being selected by each individual plan participant as well as the level of total plan assets. Plan participants pay only for the level of advisory and related services selected by themselves personally. Fees for all three levels of service are negotiable.

Fees are billed on a quarterly basis in arrears. Fees are based upon client account balances at the end of each calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based upon the percentage of the quarter in which the assets were invested.

This product dovetails with Wellington Retirement Solutions, Inc., an associated company. Wellington Retirement Solutions, Inc. acts as the retirement plan recordkeeper for the Business Solutions 401(k) Product.

**Perfect401(k)<sup>®</sup>** - WCS's Perfect401(k)<sup>®</sup> plan is a product for company-sponsored 401(k) plans and is similar to our Business Solutions retirement plan product except that assets are primarily custodied by Charles Schwab Trust Bank rather than Charles Schwab & Co., Inc. ETF's may be used along with individual mutual funds for the plan participant DIAs and managed model portfolios. Once again, participants are able to select from one of three levels of advisory services.

Advisory and related fees range up to 1.25% for our fully-discretionary service but are based upon which level of advisory service is being selected by each individual plan participant as well as the level of total plan assets. Plan participants pay only for the level of advisory and related services selected by themselves personally. Fees for all three levels of service are negotiable.

Advisory services in the form of ERISA Section 3(21) "Good Governance" or ERISA Section 3(38) Investment Manager and fiduciary roles may also be applicable. Additionally, fees for services by WCS-associated companies may be applicable. Charles Schwab Trust Bank charges a fee for plan custody services and (if applicable) trading support for ETFs which is disclosed in the 408(b)(2) fee disclosure statement provided to the client directly by Charles Schwab Trust Bank.

Everington Consulting, Inc. ("ECI"), a company associated with WCS, collects and remits (on a quarterly basis) an amount to Charles Schwab Trust Bank as determined by Charles Schwab

Trust Bank's schedule of such custodian and ETF trading support fees. Charles Schwab Trust Bank's applicable minimum annual Plan Custodian Fee is \$400. ECI pays any or all of this \$400 minimum fee charged by Charles Schwab Trust Bank whether or not it has collected sufficient fees to cover this amount.

Additionally, and in conjunction with its collection of custody and trading support fees for Charles Schwab Trust Bank, ECI may charge and collect an administrative support fee which it retains. ECI's administrative support fee, if any, is 0.055% or less annually, and is negotiable. This fee may be based upon assets held at Charles Schwab Trust Bank and/or assets in "brokerage-window" accounts held within the plan that are custodied at Charles Schwab & Co., Inc. according to the terms of the client's service agreement with ECI.

Fees are billed on a quarterly basis in arrears. Fees are consistently based upon average daily balance during the quarter, or upon the asset balances at quarter-end. Accounts initiated or terminated during a calendar quarter will be charged based on average daily balance or upon their balance at quarter-end.

This product dovetails with Everington Consulting, Inc., an associated company. Everington Consulting, Inc. acts as the plan recordkeeper for the Perfect401(k)<sup>®</sup> Product.

**Atlas-401(k)<sup>™</sup>** - WCS partners with and supports third-party RIAs through the ATLAS-401(k)<sup>™</sup> solution, allowing third-party RIAs to deliver their money management services to the plan participants, while WCS provides other fiduciary or non-fiduciary support. WCS typically charges 0.10% to 1.00% for its ERISA Section 3(38) Services for ATLAS-401(k)<sup>™</sup> plans.

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

*This section of the brochure explains any performance-based fees we may charge you for and how they may be different from other clients' charges.*

WCS does not charge fees that are based upon a share of capital gains or capital appreciation of client assets (performance-based fees).

We provide investment advisory services to other clients in addition to you. Not all clients receive the same investment advice, nor do they pay the same fee. We strive to act in the best interests of each of our clients at all times.

## **Types of Clients (Item 7)**

*This section of the brochure describes those to whom we generally provide our services.*

We provide advisory services to a variety of types of clients including individuals, trusts, individual's pension plan accounts, ERISA clients, and retirement plan trustees.

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

*This section of the brochure explains how we formulate our investment advice and manage client assets.*

### **General Investment Strategies**

WCS generally uses diversification as a way to optimize the risk and potential investment return of a portfolio. We often use multiple asset classes, capitalizations, sectors, and investment styles to provide needed diversification. However, it should be noted that diversification alone does not guarantee future profits.

Our basic investment strategy is to seek a return commensurate with the level of risk the client decides to take. We work directly with, or indirectly assist, each client in developing an investment strategy, which is done by reviewing the client's general financial situation, investment objectives, liquidity needs, time horizon, return objective, and risk tolerance, as well as any special considerations and/or restrictions the client chooses to place on the management of the client accounts. Based on this information, we make, or provide guidance regarding, an investment strategy intended to be consistent with the client's investment plan and situation.

WCS offers several different investment strategies or model portfolios for managing accounts. Based on the client's personal financial situation, we provide guidance or recommend managing the clients' accounts in accordance with one or multiple asset allocation strategies. Client portfolios with similar investment objectives and asset allocation goals may own the same or different securities. Income tax factors also influence our investment decisions. Clients who buy or sell securities, mostly regarding ETF portfolios, on the same day may receive different prices based on the timing of the transactions during open market hours.

Each portfolio is set with target asset allocation percentages. We may utilize rebalancing software to review client portfolios regularly to evaluate how closely the actual allocation is to the target allocation. Our software can also automatically reallocate a portfolio toward its target allocation percentages by buying the asset most out of balance with new contributions to consistently bring the portfolio back towards balance. When we consider a portfolio to be too out of balance, we will take steps (by buying or selling funds) to bring the actual allocation back to an acceptable range of the target allocation. We refer to this process as "rebalancing." The process of rebalancing offers a systematic process to buy or sell securities when investment categories (asset classes) vary sufficiently from their target allocation.

The investment allocation of WCS's managed portfolios may be changed by WCS at any time without notice and, in the case of managed portfolios for company-sponsored retirement plans, may contain mutual funds or other securities that are not included as a Designated Investment Alternative for the retirement plan of a given plan sponsor. Portfolios managed by WCS or other associated advisers available to individuals or company-sponsors retirement plan participants, may utilize mutual funds, including "inverse" funds, ETFs, and other equity and debt securities.

## Methods of Analysis for Selecting Securities

In analyzing mutual funds and Exchange Traded Funds, WCS may use various sources of information, including data provided by internal research, Morningstar, Inc., Charles Schwab & Company, Inc., fund company website's, and other online and subscription resources as needed. We cannot guarantee that any strategy or analysis employed will prove profitable or successful.

## General Risks of Owning Securities

Prior to entering into an agreement with WCS, each client should carefully consider and understand that:

- Investing involves risk of loss, which clients should be prepared to bear;
- Securities markets experience varying degrees of volatility;
- Over time, client's assets may fluctuate and at any time be worth more or less than the amount invested; and
- That clients should only commit assets that are long-term in nature.

We do not guarantee that any investment strategy will meet its investment objectives nor that an account will not suffer losses. Mutual funds and investment securities are not FDIC-Insured and may lose value.

The prices of securities held in client accounts and the income they generate may decline in response to certain events taking place around the world. These include events directly involving the issuers of securities held as underlying assets of mutual funds and ETFs in a client's account, conditions affecting the general economy, and overall market changes. Other contributing factors include local, regional, or global political, social, or economic instability and governmental or governmental agency responses to economic conditions. Finally, currency, interest rate, commodity price fluctuations, or other factors may also affect security prices and income. For additional risk information please see appropriate mutual fund and ETF prospectuses.

## Risks of Securities

When investing in mutual funds and ETFs, buyers have a large number of choices. More importantly, mutual funds and ETFs fall into one among three fundamental categories: money market funds, bond funds (also referred to as "fixed income" funds), and stock funds (also known as "equity" funds). Each kind of fund has different risk and reward features.

**Exchange-Traded Funds ("ETFs")** - An ETF is a type of investment company (usually, an open-end fund or unit investment trust) containing a basket of stocks or bonds that usually tracks a specific index or sector. An ETF is similar to an index fund in that it will primarily invest in securities of companies that are included in a selected market index or that fall into a particular sector. Unlike traditional mutual funds, which can only be redeemed at the end of a trading day, ETFs trade throughout the day on an exchange. Like stock and bond mutual funds, the prices of the underlying securities and the overall market may affect ETF prices. Similarly, factors affecting a particular industry segment may affect ETF prices that track specific sectors. An investment in an ETF could lose money over short or even long periods of time. You should

expect the ETFs share price and total return to fluctuate within a wide range, like the fluctuations of the overall stock market.

**Mutual Funds (Open-End Investment Companies)** - A mutual fund is a company that pools money from many investors and invests the money in stocks, bonds, short-term money-market instruments, other securities or assets, or some combination of these investments. The portfolio of the fund consists of the combined holdings it owns. Each share represents an investor's proportionate ownership of the fund's holdings and the income those holdings generate. The price that investors pay for mutual fund shares is the funds per share net asset value (NAV) plus any shareholder fees that the fund imposes. An investment in a mutual fund could lose money over short or even long periods of time. You should expect the fund's share price and total return to fluctuate within a wide range, like the fluctuations of the overall stock market.

**Bond Mutual Funds and Individual Bonds** - A laddered individual bond portfolio is comprised of individual bonds where each bond or series of bonds features strategically staggered maturity dates at regular intervals. As each bond or series of bonds matures, proceeds are used to purchase new bonds to continue the bond ladder, or they are used as income.

Both laddered individual bonds held in a laddered bond portfolio and bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher returns. Unlike money market funds, the SEC's rules do not restrict bond funds and laddered individual bonds to high-quality or short-term investments. Because there are many different types of bonds, bond funds and laddered individual bonds, they can vary dramatically in their risks and returns. Some of the risks associated with bond funds and laddered individual bonds include:

**Interest Rate Risk** - Interest rate risk refers to the risk that the market value of bonds will go down when interest rates go up. Because of this risk, investors can lose money in any bond fund or laddered individual bond portfolio, if a bond were sold before its maturity date. Interest rate risk applies to investments in insured bonds and U.S. Treasury Bonds. Longer-term bonds and bond funds tend to have higher interest rate risks.

**Credit Risk** - Credit risk refers to the risk that companies or other issuers may fail to pay their debts (including the debt owed to holders of their bonds). Consequently, this affects individual bond ladders, mutual funds and ETFs that hold these bonds. Credit risk is less of a factor in investments including insured bonds or U.S. Treasury Bonds. By contrast, those funds that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.

**Prepayment Risk** - Issuers may choose to pay off debt earlier than the stated maturity date on a bond. For example, if interest rates fall, a bond issuer may decide to "retire" its debt and issue new bonds that pay a lower rate. When this happens, proceeds from the sale of individual bonds or a bond fund may not be able to be reinvested in an investment with as high a return or yield.

**Stock Mutual Funds** - A stock fund's value can rise and fall quickly (and dramatically) over short or even long periods of time. You should expect a fund's share price and total return to fluctuate within a wide range. Overall stock market risk poses the greatest potential danger for investors in stock funds. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices. Stock prices can fluctuate for a broad range of reasons such as the overall state of the economy or demand for particular products or services. Some other risks associated with various types of stock funds include:

**Small Cap Funds** - Funds that invest in stocks of small companies involve additional risks. Smaller companies typically have higher risk of failure and are not as established as larger companies. Historically, smaller company stocks have experienced a greater degree of market volatility than the overall market average.

**International Funds** - Funds that invest in foreign securities involve special additional risks. International investments are subject to stock market risk as well as additional risks, including currency fluctuation, political instability, country/regional risk, and potential illiquid markets.

**Emerging Market Funds** - Emerging market investments involve stock market risk and the same risks as international investments. Investing in emerging markets may accentuate those additional risks.

**Real Estate Investment Trusts (REITs)** REIT Funds include REITs within the underlying fund holdings. REITs primarily invest in real estate or real estate-related loans. Equity REITs own real estate properties, while mortgage REITs hold construction, development, and/or long-term mortgage loans. REIT investments include illiquidity and interest rate risk.

**Cybersecurity Risk** - WCS and its service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes and practices designed to protect networks, systems, computers, programs and data from both intentional cyber-attacks and hacking by other computer users as well as unintentional damage or interruption that, in either case, can result in damage or interruption from computer viruses, network failures, computer and telecommunications failures, infiltration by unauthorized persons and security breaches, usage errors by their respective professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. A cybersecurity breach could expose both WCS and its client accounts to substantial costs (including, without limitation, those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, adverse investor reaction, the dissemination of confidential and proprietary information and reputational damage), civil liability as well as regulatory inquiry and/or action.

While WCS has established a business continuity plan and risk management strategies, systems, policies and procedures to seek to prevent cybersecurity breaches, there are inherent limitations in such plans, strategies, systems, policies and procedures including the possibility

that certain risks have not been identified. Furthermore, WCS cannot control the cybersecurity plans, strategies, systems, policies and procedures put in place by other service providers and/or the issuers in which the clients invest.

**Business Continuity Risk** - WCS has established a business continuity plan and risk management strategies, systems, policies and procedures to mitigate disruptions in its operations. These include disruptions which may be present during times of pandemic, natural disaster and other circumstances beyond the control of WCS. Our plans include preparations to have our personnel operate remotely for extended periods of time, remote storage and backup for all key operating systems and data, review and monitoring of the continuity strategies and procedures of key vendors, and plans for communicating with clients, employees and key vendors during times of crisis. Plans also include reviewing and considering the impacts of these disruptions on its ability to operate financially in a sound manner, manage portfolios, serve clients, and support the health and welfare of its employees.

While WCS has established plans to seek to prevent business disruptions, there are inherent limitations in such plans, strategies, systems, policies and procedures including the possibility that certain risks have not been identified. Furthermore, WCS cannot control the business continuity plans or strategies of its strategic investment partners upon whom it relies.

## **Disciplinary Information (Item 9)**

*This section of the brochure lists legal and disciplinary information for Wellington Consulting Services, its owners, and management team.*

Investment advisers are required to disclose certain regulatory and legal events. Neither Wellington Consulting Services, Inc. nor any of our owners or management team members has anything to disclose in response to this item.

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

*This section of the brochure describes other financial services industry affiliations we may have that could present a conflict of interest with you.*

As disclosed in Item 5, above, WCS provides the majority of its investment advisory business to 401(k) retirement plans. The owners of WCS are also owners of separate third party administrators that provide retirement plan recordkeeping, tax preparation and retirement plan compliance. Wellington Retirement Solutions, Inc., a recordkeeper and Third Party Administrator (“TPA”) is majority owned by Stephen Dix and Stephen Lynch. Everington Consulting Inc., a recordkeeper and Third Party Administrator (“TPA”), is owned by Peter Jones.

## **Code of Ethics (Item 11)**

*This section of the brochure describes our code of ethics, adopted pursuant to SEC rule 204A-1, and how we deal with client and related person trading.*

We have adopted a code of ethics designed to prevent and detect violations of securities rules by our employees and affiliated persons. Our controls in this area focus upon securities transactions made by our employees that have access to material information about the trading of WCS. We will provide a copy of our code of ethics to clients or prospective clients upon request.

## **Material Financial Interest and Personal Trading**

From time to time the interests of the principals and employees of WCS may coincide with yours and other clients. Individual securities may be bought, held, or sold by a principal or employee of WCS that is also recommended to, or held by, you or another client. If potential insider information is inadvertently provided or learned by a principal or employee, it is our policy to strictly prohibit its use.

It is the policy of WCS to permit the firm, its employees, and investment adviser representatives (“IARs”) to buy, sell, and hold the same securities that the IARs also recommend to clients. It is acknowledged and understood that we perform investment services for different types of clients with varying investment goals, risk profiles, and time horizons. As such, the investment advice offered to you may differ from other clients and investments made by our IARs. We have no obligation to recommend for purchase or sale a security that WCS, its principals, affiliates, employees, or IARs may purchase, sell, or hold. When a decision is made to liquidate a security from all applicable accounts, priority will always be given to client orders before those of a related or associated person to WCS. In some cases, the trades of the clients and advisory personnel will be combined in a single block trade, and all trades will receive the average price. We have internal procedures for dealing with insider trading, employee-related accounts, “front running” and other issues that may present a potential conflict when buy/sell recommendations are made. These procedures include reviewing employee security transactions and holdings to eliminate, to the extent possible, the adverse effects of potential conflicts of interest on clients.

## Brokerage Practices (Item 12)

*This section of the brochure describes how we recommend broker-dealers for client transactions.*

### The Custodian and Brokers We Use

WCS does not maintain custody of client assets, although we may be deemed to have custody of client assets if you (our client) have given us authority to withdraw assets from your account. Your assets must be maintained in an account at a “qualified custodian,” generally a broker/dealer or bank.

We require that our clients use Charles Schwab & Co., Inc., a registered broker-dealer, member SIPC, as the qualified custodian, or an affiliated entity, Charles Schwab Trust Bank (jointly “Schwab”). WCS is independently owned and operated and is not affiliated with Schwab. Schwab will hold your assets in a brokerage or bank account and buy and sell securities when so instructed. While we may require that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see “Your Brokerage and Custody Costs”) although we generally do not. Not all advisers require that clients direct brokerage transactions through a specified broker-dealer and consequently we may be unable to achieve the most favorable execution of client transactions resulting in additional costs to you.

### How We Select Brokers/Custodians

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

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

- Combination of transaction execution services and asset custody services.
- Capability to execute, clear, and settle trades (buy and sell securities for your account).
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- The availability of a large number of mutual funds and ETF’s that are both no-load and that have no transaction charges.
- Availability of investment research and tools that assist us in making investment decisions.
- Quality of services.
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices.
- Reputation, financial strength, and stability.
- Prior service to us and our other clients.

- Availability of other products and services that benefit us, as discussed below (see “Products and Services Available to Us from Schwab”).

## **Your Brokerage and Custody Costs**

Schwab generally does not charge individual clients separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab is also compensated by earning interest on the uninvested cash in Schwab’s Cash Features Program or on any margin balance maintained in Schwab accounts, and from other ancillary services. When Charles Schwab Trust Bank is acting as the custodian for company sponsored retirement plans they generally charge an asset-based fee for those services.

Most trades no longer incur commissions or transaction fees, although there are exceptions. Schwab discloses its fees and costs to clients, and we take those costs into account when executing transactions on your behalf. Although Schwab can execute trades via other broker/dealers that are settled at Schwab (“trade away”) we have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How We Select Brokers/Custodians”).

Certain mutual funds and ETFs are made available for no transaction fee and as a result the confirmation may show “no commission” for a particular transaction. Typically, the custodian (but not WCS) earns additional remuneration from such services as recordkeeping, administration, and platform fees, for the funds and ETFs on their no-transaction fee lists. This additional revenue to the custodian will tend to increase the internal expenses of the fund or ETF. We select investments based on our assessment of a number of factors, including liquidity, asset exposure, reasonable fees, effective management, and low execution cost. Where we choose a no-transaction fee fund or ETF, it is because it has met our criteria in all applicable categories.

## **Products and Services Available to Us from Schwab**

Charles Schwab & Co., Inc., Charles Schwab Retirement Plan Services, Charles Schwab Trust Bank and Schwab Retirement Technologies, Inc.<sup>®</sup> are separate but affiliated companies and subsidiaries of The Charles Schwab Corporation. Brokerage products and services are offered by Charles Schwab & Co., Inc. Trust and custody services are provided by Charles Schwab Trust Bank. Schwab Retirement Technologies, Inc.<sup>®</sup> is engaged in developing and licensing proprietary retirement plan recordkeeping systems to independent record-keepers.

The Schwab entities above provide services to investment advisory firms such as WCS. They provide us and our clients with access to its institutional brokerage, trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services generally are available on an unsolicited basis (we do not have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our clients collectively have less than

\$10 million in assets at Schwab, Schwab may charge us quarterly service fees of \$1,200. Following is a more detailed description of Schwab's support services:

### **Services That Benefit You**

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account. Such "soft dollar" benefits are used to service all client accounts and there is no effort to differentiate client accounts based upon such soft dollar benefits received.

### **Services That May Not Directly Benefit You**

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements);
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- Provide pricing and other market data;
- Facilitate payment of our fees from our clients' accounts;
- Assist with back-office functions, recordkeeping, and client reporting.

### **Services That Generally Benefit Only Us**

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

- Educational conferences and events;
- Consulting on technology, compliance, legal and business needs;
- Publications and conferences on practice management and business succession;
- Access to employee benefits providers, human capital consultants and insurance providers.

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

## **Our Interest in Schwab's Services**

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to require that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality and price of Schwab's services (see "How We Select Brokers/Custodians") and in particular the availability of thousands of no-load, no-transaction charge mutual funds, which is our investment vehicle of choice.

## **Aggregated Orders**

When we decide to purchase or sell a specific ETF for multiple clients at the same time, we will consider aggregating or combining the orders. This procedure will result in a single average price for all client transactions in the aggregated order. The account custodian charges for each transaction as if it were placed individually.

## **Review of Accounts (Item 13)**

*This section of the brochure describes how often client accounts are reviewed and by whom.*

We review client accounts and positions on a continuous basis. We assign a financial adviser to each client who will review a client's specific investment goals and objectives on a periodic basis and work with a client to align them with the client's investment strategy. We also offer account reviews directly with a client on an as-requested basis.

Clients may choose to receive reviews in person (local in our office), by videoconference, by telephone, or by email. During reviews, we focus on changes to a client's investment plan which can include, but is not limited to, a change in the client's investment objectives, general financial situation, tax considerations and significant cash deposits or withdrawals in client accounts.

## **Account Reporting**

Our individual clients receive monthly account statements directly from Charles Schwab & Co., Inc. only if there has been activity in their account during the prior month, however they receive statements at least quarterly regardless of account activity. Company-sponsored retirement plan accounts receive statements directly from Charles Schwab Trust Bank quarterly. WCS personnel provide oral or written reviews of client accounts and objectives upon demand. Our clients who oversee company sponsored retirement plans also receive quarterly trustee reports regarding plan specifics and participant holdings, while the plan participants themselves receive additional account and retirement-related information

quarterly as well as all information required under ERISA 404(a)(5) quarterly or annually as required.

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

*This section of the brochure discloses our arrangements with people who are compensated for referring us business.*

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

WCS may pay a portion of advisory fees for the referral or solicitation of clients to an individual and/or their supervisor. Individual “solicitors” receiving such compensation must hold the same securities licenses required of our supervised persons although such solicitors do not provide investment advisory services to clients on our behalf. All such compensation to solicitors is disclosed to each client and is generally made in accordance with the following schedule: Investment Adviser Representative acting as a solicitor: 75.0% Wellington Consulting Services, Inc. 25.0%, however WCS in its sole discretion, may negotiate to pay a different fee schedule to outside referring advisers based upon certain criteria (i.e., anticipated future referrals etc.).

## **Custody (Item 15)**

*This section of the brochure encourages you to check the statements sent to you by your account custodian to ensure the accuracy of the fee calculation.*

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person’s account. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. These statements will be sent to the email or postal mailing address you provided to Schwab as well as being posted and stored electronically. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab’s account statements to the periodic account and vesting statements and reports you receive from us. (Our statements may vary from custodial statements based on accounting procedures, reporting dates or valuation methodologies of certain securities.)

## **Investment Discretion (Item 16)**

*This section of the brochure discloses the power we have to make trades in your account.*

WCS usually receives discretionary authority from the client at the outset of an advisory

relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions provided by the clients to whom we provide such services. Such investment guidelines and restrictions must be provided to WCS in writing.

## **Voting Client Securities (Item 17)**

*This section of the brochure explains our proxy voting policy and your ability to get proxy voting information from us.*

As a matter of firm policy and practice, WCS does not have any authority to, and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. WCS may provide advice to clients regarding the clients' voting of proxies.

## **Financial Information (Item 18)**

*This section of the brochure is where investment advisers that collect more than \$1,200 in fees per client and six months or more in advance would include a balance sheet.*

Wellington Consulting Services, Inc. is not aware of any circumstance that is reasonably likely to impair our ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

We do not require pre-payment of investment advisory fees of greater than \$1200 and more than six months in advance.

## **Requirements for State-Registered Advisers (Item 19)**

*This section of the brochure is for non-federally registered investment advisers.*

We are a federally registered investment adviser and are not required to respond to this item.

**END OF FORM ADV PART 2A**

## Wellington's Privacy Pledge

*At Wellington Consulting Services, Inc., your privacy is our top priority and is held in the strictest confidence. We collect personal information to open your account(s), to process your transactions and to help us provide a better level of service.*

*We do not sell your personal information to anyone. We protect the security and confidentiality of the personal information we collect. Our relationship with you is our most important asset. We understand that you have entrusted us with your private financial information, and we do everything we can to maintain that trust.*

*Details of our approach to privacy and how your personal information is collected and used are described below. If you have any questions regarding Wellington policies please do not hesitate to contact your Wellington representative.*

## Privacy Statement

*Wellington Consulting Services, Inc., like other professionals who advise on personal financial matters, are required by federal law to inform our clients of their policies regarding the privacy of client information.*

In the course of providing our clients with certain advice, we may receive nonpublic personal financial information such as financial statements, account statements, and tax returns from our clients, their accountants and other representatives. All nonpublic personal information that we receive regarding our clients or former clients is held in strict confidence in accordance with our professional obligations and is not released to people outside Wellington Consulting Services, Inc. except with your consent, as required by law or to explain our actions to professional organizations that we are members of. We may share certain information with third parties who assist us in providing our services to you (such as administrative and client service functions) or marketing services, as permitted by law, subject to the obligation of these third parties not to use or disclose such information for any other purpose.

We retain records relating to professional services that we provide so that we are better able to assist you with your professional needs and, in some cases, to comply with professional guidelines. In order to guard your nonpublic personal information from unauthorized disclosure, we maintain physical, electronic, and procedural safeguards.

### **Wellington Consulting Services, Inc.**

**Notes: A current version of Wellington Consulting Services, Inc.'s Form Part 2A, 2B, & 2C, which is updated and filed with the SEC annually, is available upon request without charge.**

**PLEASE INFORM US PROMPTLY IF YOUR FINANCIAL SITUATION OR OBJECTIVES CHANGE.**