Item 1: Cover Page

Form ADV Part 2A Investment Adviser Brochure

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This Brochure provides information about the qualifications and business practices of ACT Advisors, LLC. doing business as ACT Advisors or Act Advisors Wealth Management. If you have any questions about the contents of this Brochure, please contact us at (828) 398-2802 or through our website at http://www.act-advisors.com.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Act Advisors is also available on the SEC's website at www.adviserinfo.sec.gov. References to Act Advisors as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.

Item 2: Summary of Material Changes

Annual Update

In this Item of ACT Advisors (ACT or the Firm) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV, Part 2A since the last annual updating Amendment. ACT Advisors has made the following material changes since the annual updating amendment filed March 2025:

- Item 4 has been updated to reflect that limited financial planning and/or consultation services are included with investment management services to the extent such services are specifically requested by the Client. We further revised Item 4 to indicate that we do not sponsor any wrap fee programs. However, some of the third-party investment advisers we recommend may operate wrap fee programs. Please see Item 4 for additional information.
- Item 4 has been amended to reflect that we may recommend that a client roll over their retirement account assets into an account to be managed by us, which presents a conflict of interest. Please see Item 4 for additional information, including how we address this conflict.
- Items 4 and 5 have been amended to reflect that we may recommend a third-party investment adviser ("Independent Adviser") to manage all or a portion of the client's assets, and that any fees charged by the Independent Adviser will be in addition to our annual management fee and will be disclosed to the client by the Independent Adviser in a separate disclosure document. Please see Items 4 and 5 for additional details.
- Items 4 and 5 have been amended to reflect that we provide retirement plan consulting services on a discretionary basis, and that we receive an annual asset-based management fee for such services. Please see Items 4 and 5 for additional information.
- Item 5 has been updated to reflect fees associated with financial planning and/or consulting. We also revised the description of other fees and expenses clients may incur in connection with our advisory services.
- Item 5 has been updated to disclose the conflicts of interest associated with our receipt of an asset-based fee and our use of EncorEstate Plans with certain of our clients, as well as how we address these conflicts of interest. Please see Item 5 for additional information.
- Item 8 has been amended to reflect additional risks associated with investments we may recommend, including currency risk, purchasing power risk, political risk, risks related to investment term, business risk, default risk, reinvestment risk, and independent manager risk. Please see Item 8 for more information.
- Item 10 has been amended to reflect that we have an incentive to recommend certain Independent Advisers based on the receipt of compensation, which presents a conflict of interest. Please see Item 10 for additional information, including how we mitigate this conflict.
- Item 12 has been amended to reflect that we receive support services from Broker/Dealers in connection with client securities transactions, which presents a

conflict of interest. Please see Item 12 for additional information, including how we mitigate this conflict.

- Item 14 has been amended to indicate that our receipt of compensation from product sponsors presents a conflict of interest, as we have an incentive to recommend products offered by these sponsors based on the compensation received. Please see Item 14 for additional information, including how we mitigate this conflict.
- Item 14 has been amended to reflect that our use of promoters to provide client referrals presents a conflict of interest as the promoter has an incentive to recommend our firm in exchange for compensation. Please see Item 14 for additional information, including how this conflict is mitigated.

Since our last annual updating Amendment dated March 2026, ACT Advisors has made the following material change:

- Items 4, 5, and 7 have been amended to reflect the discontinuation of our Passive Strategy Asset Management service offering. The additional 0.20% annual advisory fee associated with that strategy has been eliminated, and clients previously participating in the strategy will continue to receive discretionary investment management services under ACT Advisors' other investment strategies, as appropriate for their investment objectives.

Full Brochure Available

ACT's Form ADV may be requested at any time, without charge, by contacting Jennifer English at 828.398.2802 or Jennifer@act-advisors.com.

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Item 4: Advisory Business

Background

ACT Advisors, LLC (ACT Advisors Wealth Management, ACT Advisors, we, our, us) is an SEC registered investment adviser. Our founding members and owners, Doug English and Roger Wesley (Wes) Johnson created the firm as a limited liability company in October of 2014 and registered it as an independent investment adviser.

We have a fiduciary duty to all ACT Advisors clients. As a fiduciary, it is always our responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients. We require all of our employees to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times.

When dealing with investment advisory clients, our Investment Advisor Representatives (IARs) have an affirmative duty of care, loyalty, honesty, and good faith to act in the best interests of their clients. IARs should fully disclose all material facts concerning any conflict that does arise with these clients and should avoid even the appearance of a conflict of interest.

We and our IARs must abide by honest and ethical business practices including, but not limited to:

- Not inducing trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account;
- Making recommendations with reasonable grounds to believe that they are appropriate based on the information furnished by the client;
- Placing discretionary orders only after obtaining client's written trading authorization contained within the advisory agreement or via separate amendment;
- Not borrowing money or securities from, or lending money or securities to a client;
- Not placing an order for the purchase or sale of a security if the security is not registered, or the security or transaction is not exempt from registration in the specific state;

Both we and our IARs will:

- Allocate securities in a manner that is fair and equitable to all clients.
- Not effect agency-cross transactions for client accounts.

Investment Management and Financial Planning and/or Consulting:

ACT Advisors provides discretionary investment advisory services on a fee basis. ACT Advisors' annual investment advisory fee shall include investment management services and limited financial planning and/or consultation services to the extent such services are specifically requested by the Client. The financial planning and consulting

services may be outsourced to another investment adviser if determined that it is in the best interest of the Client. In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of ACT Advisors), ACT Advisors may be engaged to provide financial planning and consulting services for a separate fee as described in Item 5 below, the dollar amount of which shall be set forth in the Investment Advisory & Limited Financial Planning Agreement or a separate Financial Planning Services Agreement with the client.

To commence the investment advisory process, ACT Advisors will ascertain each client's investment objective(s) and then allocate the client's assets consistent with the client's designated investment objective(s). Once allocated, ACT Advisors provides ongoing supervision of the account(s). Before engaging ACT Advisors to provide investment advisory services or investment advisory services with financial planning and consulting services, clients are required to enter into an Investment Advisory & Limited Financial Planning Agreement with ACT Advisors setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client.

We may recommend a third-party investment adviser ("Independent Adviser") to manage all or a portion of the client's assets. After gathering information about a client's financial situation and investment objectives, we will assist the client in selecting a third-party program. The Independent Adviser is then responsible for managing the client's assets, although we will monitor the account periodically.

Limitations of Financial Planning and Non-Investment Consulting/Implementation Services.

To the extent requested by the client, ACT Advisors will generally provide, or engage an independent investment adviser to provide financial planning and related consulting services regarding non-investment related matters, such as tax and estate planning, insurance, etc. ACT Advisors will generally provide such consulting services for a separate fee as set forth at Item 5 below. Please Note: ACT Advisors believes that it is important for the client to address financial planning issues on an ongoing basis. ACT Advisors' advisory fee, as set forth at Item 5 below, will remain the same regardless of whether or not the client determines to address financial planning issues with ACT Advisors. Please also note: ACT Advisors does not serve as an attorney, accountant, or insurance agent, and no portion of our services should be construed as same. Accordingly, ACT Advisors does not prepare legal documents, prepare tax returns, or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for non-investment implementation purpose (i.e., attorneys, accountants, insurance, etc.). The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from ACT Advisors and/or its representatives. If the client engages any professional (i.e., attorney, accountant, insurance agent, etc.), recommended or otherwise, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse

exclusively from the engaged professional. At all times, the engaged licensed professional[s] (i.e., attorney, accountant, insurance agent, etc.), and not ACT Advisors, shall be responsible for the quality and competency of the services provided.

Financial Planning Services

To the extent requested and engaged by the client to do so, ACT Advisors will generally provide, or engage an independent investment adviser to provide financial planning and related consulting services regarding non-investment related matters, such as tax and estate planning, insurance, etc. for a separate fee as discussed at Item 5 below, the fee for which shall be based upon the individual providing the service and the scope of the services to be provided. Prior to engaging ACT Advisors to provide planning or consulting services, clients are generally required to enter into a Financial Planning Services Agreement or an Investment Advisory & Limited Financial Planning Agreement with ACT Advisors setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client.

We may offer Estate Planning services for our clients to assist with general information as it applies to reviews of existing plans, gathering information needed to provide outside firms in the creation of documents, and updating existing plans for clients. Depending on the client's needs and desires for estate planning document review, preparation, or updates, we will engage with EncorEstate Plans, a third-party scrivener service, or estate planning attorneys. If the client's estate planning needs are determined to be more complex than can be provided by EncorEstate Plans, ACT Advisors will refer the client to estate planning attorneys. ACT Advisors solely provides coordination and educational guidance regarding estate planning matters. All legal document preparation is performed by licensed attorneys or third-party providers. ACT Advisors does not prepare legal documents or provide legal advice. Clients are encouraged to consult with their attorney regarding estate planning documents.

Employer Sponsored Plans Participant Advice

We offer advisory, consulting, and rebalancing services to the participants of employer sponsored plans (Participants). We use our research and asset allocation strategies, along with our knowledge of the participant's personal financial objectives, to develop an investment mix within the available investment options in the plan. We regularly assess the investment mix and keep it up to date with any asset allocation moves in our strategies, subject to the limitations of the options available in the plan. We do not have custody or any ability to access or withdraw the funds in the plan.

When we provide investment advice to clients regarding their retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I 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 our client's interests, so we operate under a special rule that

requires us to act in our client's best interest and not put our interest ahead of our clients. We may recommend that a client roll over their retirement account assets into an account to be managed by us. If we recommend that a client roll over their retirement assets into an account to be managed by us, such a recommendation creates a conflict of interest as we will earn a new (or increase our current) advisory fee as a result of the rollover. We address this conflict of interest by reviewing any such recommendation to ensure it is in the best interest of the client. A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). No client is under any obligation to roll over retirement assets to an account managed by us.

Retirement Plan Consulting Services

We provide fiduciary advisory services to ERISA retirement plan sponsors on a discretionary basis through our retirement plan consulting services. We may select, monitor, and (if necessary) replace investment options to be offered within the plan, consistent with the plan's investment policy statement ("IPS"). We may also assist the client in the development or review of an IPS.

Tailored Relationships

We tailor investment advisory services to the individual needs of the client. The goals and objectives for each client are explored and documented. Our clients can impose restrictions on the investments in their accounts. We may accept any reasonable limitation or restriction to our discretionary authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to us in writing.

Wrap Fee Programs

A wrap fee program is a program under which the client pays a single fee that covers both receipt of investment advisory services and the execution of securities transactions. We do not sponsor any wrap fee programs. However, some of the third-party investment advisers we recommend may operate wrap fee programs. If the investment program recommended to a client is a wrap fee program, the client will also receive the wrap fee brochure provided by the sponsor of the program.

Client Assets

We offer asset management on a discretionary basis. As of December 31, 2025, we have $498,875,199 in assets under management.

Use of Testimonials and/or Endorsements

Beginning in Q3 2021, at the conclusion of a client's annual review, ACT Advisors began asking all clients to post a review of ACT Advisors on Google. ACT Advisors does not compensate clients for these reviews, nor does ACT exercise any editorial or content control over these reviews. Further, ACT cannot remove a review that is negative or unflattering, but Google may remove a review if, in Google's view, the review violates Google's standards. Client reviews are not representative of the experience of all clients and are not a guarantee of future results

Item 5: Fees and Compensation

We charge fees established in our written agreement with the client.

Investment Advisory Services

ACT Advisors shall charge an annual investment management fee on a negotiable fee basis based upon a percentage of the market value of the assets being managed by ACT Advisors. Market value is defined as total value of assets in client's account including cash and cash equivalents plus any accrued interest. Investment management fees are paid quarterly in advance unless a specific situation calls for a calculation in arrears. Investment management fees shall be prorated and paid quarterly based upon the market value of the assets on the last business day of the previous quarter. Additions and withdrawals will be billed on a prorated basis, based on the number of days the funds spent in the account. The Firm's policy is to treat intra-account additions and withdrawals equally - unless indicated to the contrary on the Firm's Investment Advisory & Limited Financial Planning Agreement executed by the client. For those clients that engage ACT Advisors to provide investment supervisory services based upon a percentage of the market value of the assets under management, the investment management fee charged shall generally be a maximum of 2.0%.

We may recommend that all or a portion of the Assets be managed by an Independent Adviser. Fees charged by any such Independent Adviser and/or the provider of any platform through which the Independent Adviser is made available are separate and in addition to our investment management fee, and will be fully disclosed to the client on a separate disclosure document or agreement between the client and the Independent Adviser, if applicable.

Our receipt of an asset-based fee presents a conflict of interest. This is because the more assets there are in the client's account, the more the client will pay in fees. Therefore, we have an incentive to encourage clients to increase the assets in their accounts. We address this conflict of interest by ensuring that any such recommendations are in the client's best interest.

Financial Planning and Consulting Services (In addition to Investment Advisory Services or Stand Alone)

To the extent requested and engaged by the client to do so, ACT Advisors shall provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) for a separate fee. The fee for which shall be based upon the individual providing the service and the scope of the services to be provided. Prior to engaging ACT Advisors to provide planning or consulting services, clients are generally required to enter into a Financial Planning Services Agreement or an Investment Advisory & Limited Financial Planning Agreement with ACT Advisors setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client.

ACT Advisors will generally charge the Client an additional $600 monthly in advance for a minimum of 24 months. ACT Advisors' planning and consulting fees are negotiable and may vary depending upon certain criteria. The actual fee paid by the client will be detailed in the Financial Planning Services Agreement signed by the client. The client may terminate the agreement with 90 days' notice in writing, and any unearned fees will be refunded on a prorated basis. Should ACT Advisors determine that engaging an independent adviser to provide this service is in the Client's best interest, Advisor will pay independent adviser out of their own fees and such engagement will not result in an increase in fees to Client.

Clients that engage EncorEstate Plans through us will not pay any additional fee as ACT Advisors will cover the cost of Client's needs. Accordingly, ACT Advisors has an incentive to not recommend the services of EncorEstate Plans in order to not incur this additional fee, which presents a conflict of interest. We address this conflict by disclosing it here and recommending EncorEstate Plan's services to any clients who we determine are in need of such services. You are encouraged to review other options for estate planning services as this is offered merely as a convenient perk to our clients and not intended to imply suitability for our Advisory clients.

We may also refer clients to EncorEstate Plans for their estate planning needs outside the scope of our arrangement. In these instances, the client will pay a separate fee directly to EncorEstate Plans which is in addition to our fee for financial planning and consulting services. There are other similar estate planning services available, and Clients are not obligated to use any service providers recommended by us.

Employer Sponsored Plans Participant Advice

The negotiable annual fee to receive customized advice and rebalancing on employer sponsored plans is based on percentage of assets in the sponsored plan ranging up to a maximum of 2.0%. Additions and withdrawals will be billed on a prorated basis, based on the number of days the funds spent in the account.

ACT Advisors will collect these fees in one of two ways:

- Fees will be direct billed from an investment account under management by ACT Advisors.
- Fees will be directly invoiced to the Participant.

Employer sponsored plan advice fees are payable quarterly in advance unless a specific situation calls for a calculation in arrears.

Retirement Plan Consulting Services

ACT Advisors will receive an annual asset-based management fee for its retirement plan consulting services. The fee is negotiable and is billed quarterly in advance based on the value of plan assets under management.

Other Information on Compensation

Fees are typically based on the value of assets under management and will vary by engagement. Fees based on the value of assets under management are calculated based upon the market value of the applicable assets on the last business day of the previous quarter. The amount of the fee will be set forth in the written agreement executed by the client at the time the relationship is established.

ACT Advisors, in its sole discretion, may negotiate its fees for investment management and financial and/or consulting services. 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, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.), ACT Advisors may charge a lesser fee, charge a flat fee, waive its fee entirely, or charge fee on a different interval, based upon certain criteria. Additionally, certain legacy clients may receive services under different fee schedules than as set forth above. As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. ANY QUESTIONS: ACT Advisors' Chief Compliance Officer, Jennifer English, remains available to address any questions that a client or prospective client may have regarding advisory fees.

Other Fees and Expenses Incurred in Connection with Advisory Services

Unless the client directs otherwise or an individual client's circumstances require, we generally recommend that LPL Financial and/or Charles Schwab & Co., Inc. ("Schwab"), serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as LPL Financial and Schwab charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity transactions, mark-ups and mark-downs are charged for fixed income transactions,

custodial fees, deferred sales charges, and other fees or taxes on securities transactions). The amount of these commissions and/or transaction fees may vary depending upon a range of factors, which typically include the following: the broker-dealer/custodian utilized; the total value of regulatory assets under management held at the applicable custodian; the type of asset (e.g., equity, ETF, mutual fund, fixed income product). In addition, client accounts may invest in open-end mutual funds (including money market funds) and ETFs that have various internal fees and expenses (i.e., management fees, custodian fees, brokerage commissions, and legal and accounting fees), which are paid by these funds but ultimately borne by clients as a fund shareholder. These internal fees and expenses are in addition to the fees charged by Act Advisors. Please see Item 12, Brokerage Practices, for additional information.

Advisory Fee Refunds

If the written agreement between the client and Act Advisors provides for payment in advance and is terminated before the end of the billing quarter, Act Advisors will refund the prorated portion of the advanced fee paid based upon the number of days remaining in the billing quarter. If the written agreement provides for payment in arrears and is terminated before the end of the billing quarter, Act Advisors will debit the account or charge the client as applicable for the prorated portion of the unpaid fee based upon the number of days that services were provided during the billing quarter.

Item 6: Performance-Based Fees and Side-by-Side Management

We do not charge performance-based fees because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of clients

The advisory services offered by us are available for individuals, high net worth individuals, individual retirement accounts (IRAs), banks and thrift institutions, pension, and profit-sharing plans, including plans subject to Employee Retirement Income Security Act of 1974 (ERISA), trusts, estates, charitable organizations, state and municipal government entities, corporations, and other business entities.

For asset management clients, we have a minimum account size of $25,000.

Waivers or exceptions from the minimum account requirement may be granted at the exclusive discretion of ACT Advisors.

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

We purchase research from a variety of sources and rely on our research partners to guide our investment decisions. We, and our research partners, use a combination of Fundamental and Technical Analysis, as well as Modern Portfolio Theory in order to formulate investment advice when managing assets. Depending on the analysis, we will implement a long- or short-term trading strategy based on the objectives and risk tolerance of a particular client.

Fundamental Analysis concentrates on factors that affect asset class pricing relative to historical norms.

Technical Analysis involves the analysis of past market data, primarily price and volume. Technical analysis attempts to predict the direction of an asset class based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Modern Portfolio Theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets. Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile (i.e., if for that level of risk an alternative portfolio exists which has better expected returns).

Risks

Please note that investing in securities involves risk of loss that clients should be prepared to bear. There are different types of investments that involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal to any specific performance level(s). Past performance is not indicative of future results.

Our methods of analysis and investment strategies do not represent any significant or unusual risks; however, all strategies have inherent risks and performance limitations such as:

Market Risk - the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or industries.

Interest Rate Risk - the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.

Credit Risk - the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.

Currency Risk - Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk. International stocks (such as AVDE and AVEM) are affected by currencies.

Purchasing Power Risk - Purchasing power risk is the risk that an investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply. Any slow growing investment (bonds) could grow less than inflation.

Political Risk - Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world. All investments have some level of political risk.

Risks Related to Investment Term - If the client requires a liquidation of their portfolio during a period in which the price of the security is low, the client will not realize as much value as they would have had the investment had the opportunity to regain its value, as investments frequently do, or had it been able to be reinvested in another security. This applies to every investment.

Business Risk - Many investments contain interests in operating businesses. Business risks are risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like. All individual stocks are subject to business risk.

Default Risk - This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk. All bonds are subject to default risk.

Reinvestment Risk - This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities, such as bonds.

Independent Manager Risk - As stated above, the Firm selects certain Independent Advisers to manage a portion of its clients' assets. In these situations, we continue to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the Independent Advisers' ability to successfully implement their investment strategies. In addition, we do not have the ability to supervise the Independent Advisers on a day-to-day basis. Finally, in certain instances, the agreement between the Firm and Independent Advisers may limit the Independent Advisers' liability with respect to advice provided to the client's account or otherwise limit the client's rights.

Mutual Funds - Investing in mutual funds carries the risk of capital loss and thus an investor may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned below).

Equity - investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed Income - investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs) - An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a sizable portion of

aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a notable change in the attitude of speculators and investors.

Annuities & Variable Annuities- Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet retirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long term investments, to meet retirement and other long- range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Non-U.S. Securities - present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Buffer ETFs – A type of structured product investment that seeks to provide investors with the upside of the underlying index, market benchmark or assets returns (generally up to a capped percentage stated in the ETFs prospectus and prospectus supplement) while also providing downside protection on the first predetermined percentage of losses. Similar to other ETFs, a buffer ETF will be designed to track a stated index, market benchmark, or asset. However, the buffer ETF will also use a portfolio of options and derivatives in order to achieve the stated capped return ("cap") and limitation of losses ("buffer").

Most buffer ETFs have a stated outcome or holding period (typically a 3 month or 12-month period), in order to realize the benefits of the hedge or limitation on losses. These limited outcome periods or holding periods mean that only those investors who purchase at the beginning of the outcome period (e.g., on the first date of rebalancing) and hold the ETF throughout the entire outcome period will be provided with the level of return/protection stated by the prospectus. Investors who invest in these ETFs at any time after the beginning of the outcome or holding period or who liquidate their investments in these ETFs before the end of the holding or outcome period, will receive different caps and buffers on gains and losses than those stated in the ETF prospectus or prospectus supplement. Fund sponsors often post the anticipated cap on returns, buffers, and days remaining in the outcome period on the funds' websites. The updated caps, buffers, and days remaining should be considered and analyzed by an investor before investing in the buffer ETF at any time other than the beginning of the outcome period and should further be reviewed prior to liquidating any investment in such ETFs prior to the conclusion of the applicable holding or outcome period. At the end of an outcome period, the buffer ETF will roll into a new set of option contracts with the same buffer level and term length, but a new upside cap. This upside cap may be higher or lower than the preceding period and will depend on market conditions at the time. Additionally, the expenses associated with the new options contracts may impact the

expenses of the ETF, which could impact returns to investors who hold these ETFs through multiple outcome periods.
Investors should understand that buffer ETFs are complex products with complicated and layered strategies. There are unique risks and considerations that investors must understand and accept before purchasing a buffer ETF. Investors should consider the following implications before purchasing a buffer ETF:

- Exposure to the index is likely limited to price returns. Dividends and income are not included.
- Downside protection is not eliminated and is only "buffered". Accordingly, if a given buffer ETF has a stated buffer of 10% and the underlying reference index falls 25% during the outcome period, that investor will experience a roughly 15% loss. This loss will be further increased once management fees are subtracted from the portfolio.
- The buffer ETFs upside return is capped. Investors will not be compensated if the underlying reference index experiences a higher return that the stated cap. This cap is established to offset the costs of purchasing options to create the downside buffer, therefore the cap and buffer are inversely related. Thus, if investors require more downside protection, the trade-off is a lower upside cap (meaning a lower upside return). Conversely, if an investor requires a higher upside return it will result in less downside protection.
- Due to the strategies employed these funds will generally exhibit a greater potential for loss than the potential for gain. In other words, by capping the upside, investors miss out on gains that exceed the upside cap, but they still participate in all downside losses beyond the stated buffer.
- Because these buffer ETFs trade in options that are volatile in price, investors who invest in these ETFs beyond the initial holding or outcome period may experience losses due to the price fluctuations in the trading of options contracts at the start of the new holding period. It is therefore not recommended to hold these investments beyond the stated outcome or holding period.
- Investors should also be aware that in addition to these risks unique to buffer ETFs, these products also face the same general risks associated with any ETF product. Please see the ETF Risks paragraph in the section above for more information regarding risks associated with ETFs.

Inverse Exchange Traded Products (ETPs) – Inverse ETPs are exchange-traded investment products designed to provide returns that are the opposite (inverse) of the performance of a specified index, benchmark, or asset, typically on a daily basis. Investing in Inverse ETPs involves a high degree of risk and may result in significant capital loss, including the loss of a substantial portion or all of the investment in a relatively short period of time. These products are generally intended for short-term trading and may be unsuitable for long-term investors.

Areas of concern include the complexity of these products, the use of derivatives, and the effects of daily rebalancing and compounding, which can cause returns over periods longer than one trading day to differ significantly from the inverse of the underlying index's performance. Specific risks associated with Inverse ETPs include, but are not

limited to: (1) increased volatility and amplified losses during periods of market fluctuation, (2) performance decay over time due to compounding effects in volatile markets, (3) tracking error resulting from fees, transaction costs, and imperfect correlation with the underlying benchmark, (4) liquidity risk and the potential for wide bid-ask spreads during stressed market conditions, and (5) counterparty and derivatives risk arising from the use of swaps, futures, and other financial instruments. Because of these characteristics, Inverse ETPs may not perform as expected and can expose investors to rapid and unexpected losses.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of ACT Advisors or the integrity of our management. We have no legal or disciplinary events to disclose.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities – Broker-Dealers

The Firm does not have any related persons who are also registered representatives of a broker/dealer.

Financial Industry Activities – Futures and Commodities

Neither we nor any of our management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Financial Industry Affiliations – Insurance Broker or Agent

Neither we nor any of our investment advisor representatives or employees are insurance agents.

Other Investment Advisors

We may enter into agreements with various Independent Advisers. Under these agreements, we offer clients several types of programs sponsored by these advisers. All third-party investment advisers recommended to clients by our Firm will be licensed as investment advisers by their resident state and any applicable jurisdictions or registered investment advisers with the Securities and Exchange Commission.

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

We maintain a Code of Ethics (Code), which serves to establish a standard of business conduct for all IARs and employees that are based upon fundamental principles of openness, integrity, honesty, and trust. Our firm, IARs and employees must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients.

The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions and Holdings
- A prohibition on Insider Trading
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

The Code includes guidelines regarding personal securities transactions of its IARs and employees. The Code permits IARs and employees to invest for their own personal accounts in the same or different securities that an IAR or employee may purchase for clients. This presents a potential conflict of interest because trading by an IAR or employee in a personal securities account in the same or different security on or about the same time as trading in a client account could potentially disadvantage the client. We address this conflict of interest by requiring in our Code that IARs and employees report certain personal securities transactions and holdings to the Chief Compliance Officer for review. In addition, the Code requires pre-clearance of certain transactions. The Chief Compliance Officer is an interested party on all advisor accounts held away from the qualified custodian(s) and receives duplicate statements.

Upon employment and at least annually thereafter, all IARs and employees will sign an acknowledgement that they have read, understand, and agree to comply with the Code.

Clients and prospective clients can obtain a copy of our Code of Ethics by contacting Jennifer English, Chief Compliance Officer.

Other Conflicts of Interest

Directors, officers, IARs and employees always have a duty to act in the best interests of clients. As part of this duty, directors, officers, IARs and employees are prohibited from engaging in any transaction which involves an improper conflict of interest.

A "conflict of interest" exists when a person's private interests interfere in any way with the interests of ACT Advisors. A conflict situation can arise when a director, officer, IAR or employee takes actions or has interests that make it difficult to perform his or her work objectively and effectively. Conflicts of interest also arise when a director, officer, IAR or employee, or members of his or her family, receives improper personal benefits

as a result of his or her position at ACT Advisors. Loans to, or guarantees of obligations of, IAR or employees and their family members create conflicts of interest.

It is almost always a conflict of interest for an IAR or employee to work simultaneously for a competitor, customer, or supplier. IARs or employees are not allowed to work for a competitor as a consultant or board member. Our policy is to avoid any direct or indirect business connection with our customers, suppliers, or competitors, except on our behalf.

Conflicts of interest are prohibited unless they have been approved by the Firm. Wherever a conflict of interest arises, the IAR or employee involved must promptly disclose the circumstances of the conflict to the Chief Compliance Officer.

Participation or Interest in Client Transactions – Material Financial Interest

We nor our IARs recommend to clients or buy or sell for client accounts, securities in which they have a material financial interest.

Participation or Interest in Client Transactions – Principal/Agency Cross

We will not affect any principal or agency cross securities transactions for client accounts.

Participation in the No Transaction Fee ETF and Mutual Fund Program at LPL Financial

One of our recommended broker-dealers, LPL Financial, offers no transaction fee trading for some mutual fund and ETF transactions. In our managed accounts, clients do not pay brokerage commissions to IAR for transactions in the account; however, the client pays LPL a transaction charge for the purchase and sale of certain securities in the account. The transaction charges are paid directly to LPL to defray costs associated with trade execution and are not shared with IAR. We have a fiduciary responsibility to recommend investments that best suit our clients' needs. Recommended investments may not currently be a part of the no transaction fee trading program at LPL. Clients should understand that the cost to client of transaction charges may be a factor that the IAR considers when deciding which securities to select and how frequently to place transactions in their account, but it will not be the only factor.

Item 12: Brokerage Practices

Soft Dollar Benefits

We do not receive formal soft dollar benefits other than execution, research, and support services from broker/dealers in connection with client securities transactions.

Brokerage for Client Referrals

We do not receive client referrals from broker/dealers.

Client Directed Brokerage

While not routine, a client may direct us to use a broker-dealer to execute some or all transactions for the client. This brokerage direction must be requested by the client in writing. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer, and we will not seek better execution services or prices from other broker-dealers or be able to "batch" client transactions for execution through other broker-dealers with orders for other accounts managed by us. By directing brokerage, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Not all advisers require or allow their clients to direct brokerage. Subject to our duty of best execution, we may decline a client's request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

If the client requests us to arrange for the execution of securities brokerage transactions for the client's account, we shall direct such transactions through broker-dealers that we reasonably believe will provide best execution. We shall periodically and systematically review our policies and procedures regarding recommending broker-dealers to our client in light of our duty to obtain best execution.

Brokerage Selection

We generally recommend LPL Financial and/or Schwab, both members of FINRA/SIPC (Selected Broker/Dealers). Selected Broker/Dealers are widely recognized independent, and unaffiliated FINRA member broker-dealers. Selected Broker/Dealers offer independent investment advisers program services which include custody of securities, trade execution, clearance, and settlement of transactions.

The primary factors considered in our decision to recommend Selected Broker/Dealers include financial strength and the quality of the products and services offers to clients.

We believe that Selected Broker/Dealers currently offer the best overall value to us and our clients for the customer service, brokerage, research services and technology they provide. We believe these qualities make these firms superior to most non-service oriented, deep-discount and internet/web-based brokers that may otherwise be available to the public.

ACT Advisors periodically evaluates its custodial relationships to ensure that clients receive best execution. Factors considered include execution capability, commission rates, financial stability, responsiveness, and the overall value of services provided to clients.

Economic Benefits

We receive support services from Selected Broker/Dealers in connection with client securities transactions which assist us to better monitor and service program accounts maintained at Selected Broker/Dealers. It is not the result of formal soft dollar arrangements or any other express arrangements with Selected Broker/Dealers that involves the execution of client transactions as a condition to the receipt of services. These support services are provided to us based on the overall relationship between us and Selected Broker/Dealers. These support services may include the following:

- investment-related research
- pricing information and market data
- software and other technology that provide access to client account data
- compliance and/or practice management-related publications
- consulting services
- attendance at conferences, meetings, and other educational and/or social events
- marketing support
- computer hardware and/or software
- other products and services used by us in furtherance of our investment advisory business operations

We will continue to receive the services regardless of the volume of client transactions executed with Selected Broker/Dealers. Although the benefits will generally be used to service all our clients, a specific client may benefit more or less than another. As a result of receiving the services we have an incentive to continue to use or expand the use of a particular custodian. This presents a conflict of interest. We mitigate this conflict of interest through our best execution reviews. We examined this conflict of interest when we chose to enter into Selected Broker/Dealer relationships and we believe that each relationship is in the best interest of our clients and satisfies our fiduciary obligations, including our duty to seek best execution.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. A client may pay a commission that is higher than another qualified broker-dealer might charge to execute the same transaction where we determine, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. While we will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions. Some of the products and services made available by Selected Broker/Dealers may benefit us but may not benefit our client accounts. These products or services may assist us in managing and administering client accounts, including accounts not

maintained at Selected Broker/Dealers. Other services made available by Selected Broker/Dealers are intended to help us manage and further develop our business enterprise. The benefits received by us or employees are not dependent on the amount of brokerage transactions directed to Selected Broker/Dealers. As part of our fiduciary duties to clients, we always endeavor to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by us or our employees in and of itself creates a conflict of interest and may indirectly influence our choice of Selected Broker/Dealers for custody and brokerage services. We mitigate this conflict of interest through our best execution reviews.

ACT Advisors is independently owned and operated and is not affiliated with LPL or Schwab. The custodians will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use LPL or Schwab as a custodian, you will decide whether to do so and will open your account by entering into an account agreement directly with them.

Products and services available to the Firm from our custodians
LPL and Schwab provide ACT Advisors and our clients with access to institutional brokerage – trading, custody, reporting and related services. LPL and Schwab also make 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. The support services described below are generally available on an unsolicited basis (i.e., we do not have to request them) and at no charge to us. Here is a more detailed description of the support services:

Services that Benefit Clients Directly
Custodian services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. The services described in this paragraph generally benefit each client.

Services that May Not Directly Benefit Clients
Our custodians also make available to us other products and services that benefit us but may not directly benefit a specific client. These products and services assist us in managing and administering our clients' accounts. They include investment research, both their own and that of third parties. We use this research to service all or a substantial number of our clients' accounts. In addition to investment research, the custodians also make available software and other technology that:

- Provides access to client account data (such as trade confirmations and account statements);
- Facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- Provides pricing and other market data;
- Facilitates payment of our fees from our clients' accounts; and

- Assists with back-office functions, recordkeeping and client reporting.

Services that Generally Benefit Only Us
Our custodians also offer other services intended to help us manage and further develop our business enterprise. These services include (among others) the following:

- Educational conferences and events
- Technology, compliance, legal, and business consulting
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants and insurance providers

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

Our Interest in Custodian's Services
The availability of the services described above from our custodians benefits us because we do not have to produce or purchase them. They are not contingent upon ACT Advisors committing any specific amount of business to either custodian in trading commissions or assets in custody. The fact that we receive these benefits is an incentive for us to recommend the use of one custodian over another rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our recommendation of a custodian and broker is in the best interest of our clients. Our selection is primarily supported by the scope, quality and price of each custodian's services, and not the services that benefit only us.

Trade Aggregation

Trade aggregation is the act of trading a large block of a security in a single order. Shares of a purchased security are then allocated to the appropriate accounts in the appropriate proportion. The main purposes of order aggregation are (i) for ease of trading and (ii) to obtain a lower transaction cost associated with trading a larger quantity.

We usually place trades on a block trade basis and will occasionally trade portfolio securities on an individual basis based on the client's profile, needs and objectives.

In a situation where we do not aggregate trades, clients purchasing securities around the same time may receive a less favorable price than other clients. In addition, not aggregating trades may result in higher transaction costs, as a client will not benefit from lower transaction cost which might be achieved if the trade was aggregated.

Accounts for us or our employees may be included in a block trade with client accounts.

Item 13: Review of Accounts

For those clients to whom we provide asset management services, account reviews are conducted on an ongoing basis, but at least annually, by their applicable investment advisor representative. All investment advisory clients are advised that it remains their responsibility to advise us of any changes in their investment objectives and/or financial situation. All clients are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with their IAR on an annual basis.

Investment Advisor Representatives may also conduct account reviews based on the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and by client request.

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

Item 14: Client Referrals and Other Compensation

Other Compensation

We and our employees may receive additional compensation from product sponsors. However, such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than $500 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings with investment advisor representative, client workshops or events, marketing events or advertising initiatives, including services for identifying prospective clients. Product sponsors may also pay for, or reimburse us for the costs associated with, education or training events that may be attended by our employees and for our sponsored conferences and events. The receipt of this compensation presents a conflict of interest, as we have an incentive to recommend products offered by these sponsors based on the compensation received. We address this conflict of interest by disclosing it here and ensuring any such recommendations are in the client's best interest.

Other Compensation – Brokerage Arrangements

See disclosure in Item 12 regarding compensation, including economic benefits received in connection with giving advice to clients.

Compensation – Client Referrals

ACT Advisors may engage promoters to provide client referrals as defined under Rule 206(4)-1. This presents a conflict of interest as the promoter has an incentive to recommend our firm in exchange for compensation. This conflict of interest is mitigated through disclosure at the time of the referral. Promoters provide written disclosures describing their relationship with ACT Advisors, the compensation they receive and any conflicts of interest. If a client is referred to us by a promoter, this practice is disclosed to the client by the promoter and we pay the promoter out of our own funds—specifically, we generally pay the promoter a portion of the advisory fees earned for managing the capital of the client or investor that was referred. The use of promoters is strictly regulated under applicable federal and state law. Our policy is to fully comply with the requirements of all laws, rules and regulations contained within the Investment Advisers Act of 1940, as amended, and similar state rules, as applicable

We may refer clients to independent financial planners in order to provide financial planning. These independent financial planners are paid out of the fees paid by Client to Act and shall not result in a higher fee to Client of ACT Advisors. Act Advisors is not compensated for the use of independent financial planners and does not collect any referral fees.

We may also refer clients to EncorEstate Plans for their estate planning needs outside the scope of our arrangement. This service is offered for the convenience of clients, the clients will pay a separate fee directly to EncorEstate Plans, and we are not compensated for these referrals. There are other similar estate planning services available, and Clients are not obligated to use any service providers recommended by us.

Item 15: Custody

Custody – Fee Debiting

Our written agreement and/or the separate agreement with the custodian(s) may authorize us through the custodian(s) to debit the client's account for the amount of our asset management fee and to directly remit that fee to us in accordance with applicable custody rules. We have implemented procedures to comply with the safekeeping requirements of Rule 206(4)-2 for advisers with custody due to advisory fee withdrawals. The custodian(s) that we recommend have agreed to send a statement to the client, monthly, indicating all amounts disbursed from the account including the amount of fees paid directly to us.

Custody – Account Statements

As described above and in Item 13, clients receive monthly statements from the custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that we provide. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Custody – SLOAs

On February 21, 2017, the SEC issued a no-action letter ("Letter") with respect to the Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of authorization ("SLOA") is deemed to have custody. We have standing authority to make third-party transfers on behalf of our clients who have granted us this authority. As such, our firm has adopted the following safeguards in conjunction with our custodians, LPL Financial and Schwab:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

Clients engage us to provide asset management services on a discretionary basis. Before we assume discretionary authority over a client's account, the client shall be

required to execute a written agreement, naming ACT Advisors as the client's limited power of attorney and agent in fact, granting us full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account. This limited power of attorney allows us to manage the account on a discretionary basis, but it does not allow us to deposit or withdraw funds from the account. We will not have custody of these assets other than as enumerated in Item 15 above. Our discretionary authority does not extend to the selection, termination, or reallocation of assets to or from third-party managers or independent managers. Any such changes require the client's prior authorization and appropriate documentation.

Item 17: Voting Client Securities

We do not have any authority to and do not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies; clients receive proxies directly from either custodians or transfer agents.

You may contact Jennifer English, Chief Compliance Officer at (828) 398-2802 for information about proxy voting.

Item 18: Financial Information

We do not require or solicit prepayment of more than $1,200 in fees per client, six months or more in advance.

There are no financial conditions that are reasonably likely to impair the firm's ability to meet contractual commitments to clients. At no time have we been the subject of a bankruptcy petition.

Form ADV Part 2B

Investment Adviser Brochure Supplement

Supervisor: Jennifer English

Supervised Person:
Douglas B. English, CFP®,

March 2026

This brochure supplement provides information about Douglas B. English that supplements the ACT Advisors' brochure. You should have received a copy of that brochure. Please contact Jennifer English, Chief Compliance Officer if you did not receive ACT Advisors' brochure or if you have any questions about the contents of this supplement. Jennifer@act-advisors.com

Additional information about the Firm's Supervised Persons is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each Supervised Person.

521 College Street
Asheville, NC 28801
Phone (828) 398-2802
Fax (828) 398-2801
http://www.act-advisors.com

Educational Background and Business Experience

ACT Advisors (the Firm) generally requires that its Investment Advisor Representatives (IARs) have a bachelor's degree or equivalent experience and further coursework demonstrating knowledge of financial planning and tax planning. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

Douglas B. English Born 1968
CRD #2532448

Employment History:

ACT Advisors, LLC 2014 – Present
Investment Advisor Representative

LPL Financial, LLC 2006 – 2020
Registered Representative

Formal Education after High School:

Rochester Institute of Technology (RIT), MBA - Finance

Ithaca College, Bachelor of Science

Professional Designations and Licenses:

Certified Financial Planner- CFP®

Professional Certifications

Douglas B. English maintains the following professional designation, which requires the following minimum requirements:

CFP ® - Certified Financial Planner

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)

- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years

Mr. English is not currently registered with any broker-dealer and provides advisory services solely through ACT Advisors, LLC, a fee-only registered investment adviser.

Disciplinary Information

Mr. English has no material legal or disciplinary events requiring disclosure under this item.

Outside Business Activities

None

Additional Compensation

Mr. English is compensated solely through advisory fees paid by clients to ACT Advisors, LLC. He does not receive commissions, transaction-based compensation, or sales-related compensation in connection with the investment advisory services he provides.

From time to time, in the course of his professional activities, Mr. English may receive non-cash benefits from third parties, such as custodians, investment sponsors, or service providers. These benefits may include, for example, occasional meals, educational materials, training opportunities, or attendance at conferences or educational events. Any such benefits are not contingent on the recommendation of any specific investment product or service and are subject to the Firm's policies regarding gifts and entertainment. The Firm maintains policies governing gifts and entertainment designed to ensure that such benefits do not create inappropriate conflicts of interest.

Supervision

Jennifer English, Chief Compliance Officer, supervises Douglas B. English, as named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Jennifer English supervises all supervised persons by holding regular staff, investment and other ad hoc meetings. In addition, Jennifer English regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Jennifer English may be reached at 828.398.2802 or jennifer@act-advisors.com.

Form ADV Part 2B

Investment Adviser Brochure Supplement

Supervisor: Jennifer English

Supervised Person:
Roger “Wes” Johnson, CFP®

March 2026

This brochure supplement provides information about Roger “Wes” Johnson that supplements ACT Advisors’ brochure. You should have received a copy of that brochure. Please contact Jennifer English, Chief Compliance Officer if you did not receive ACT Advisors’ brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm’s Supervised Persons is also available on the SEC’s website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each Supervised Person.

521 College Street
Asheville, NC 28801
Phone (828) 398-2802
Fax (828) 398-2801
http://www.act-advisors.com

Educational Background and Business Experience

ACT Advisors (the Firm) generally requires that its Investment Advisor Representatives (IARs) have a bachelor's degree or equivalent experience and further coursework demonstrating knowledge of financial planning and tax planning. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

Roger "Wes" Johnson Born 1974
CRD #4545355

Employment History:

ACT Advisors, LLC 2014 – Present
Investment Advisor Representative

LPL Financial, LLC 2013 – 2023
Registered Representative

CUNA Brokerage Service, Inc. 2005 – 2013
Registered Representative

Formal Education after High School:

University of North Carolina at Chapel Hill; BS in Business Administration

Professional Designations and Licenses:

Certified Financial Planner- CFP®

Professional Certifications

Roger "Wes" Johnson maintains the following professional designation, which requires the following minimum requirements:

CFP ® - Certified Financial Planner

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA

- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years

Mr. Johnson is not currently registered with any broker-dealer and provides advisory services solely through ACT Advisors, LLC, a fee-only registered investment adviser.

Disciplinary Information

Mr. Johnson has no material legal or disciplinary events requiring disclosure under this item.

Outside Business Activities

None.

Additional Compensation

Mr. Johnson is compensated solely through advisory fees paid by clients to ACT Advisors, LLC. He does not receive commissions, transaction-based compensation, or sales-related compensation in connection with the investment advisory services he provides.

From time to time, in the course of his professional activities, Mr. Johnson may receive non-cash benefits from third parties, such as custodians, investment sponsors, or service providers. These benefits may include, for example, occasional meals, educational materials, training opportunities, or attendance at conferences or educational events. Any such benefits are not contingent on the recommendation of any specific investment product or service and are subject to the Firm's policies regarding gifts and entertainment. The Firm maintains policies governing gifts and entertainment designed to ensure that such benefits do not create inappropriate conflicts of interest.

Supervision

Jennifer English, Chief Compliance Officer, supervises Roger "Wes" Johnson, as named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Jennifer English supervises all supervised persons by holding regular staff, investment, and other ad hoc meetings. In addition, Jennifer English regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Jennifer English may be reached at 828.398.2802 or jennifer@act-advisors.com.

Form ADV Part 2B

Investment Adviser Brochure Supplement

Supervisor: Jennifer English

Supervised Person:
Patrick J. Latta

March 2026

This brochure supplement provides information about Patrick J. Latta that supplements ACT Advisors' brochure. You should have received a copy of that brochure. Please contact Jennifer English, Chief Compliance Officer if you did not receive ACT Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each Supervised Person.

521 College Street
Asheville, NC 28801
Phone (828) 398-2802
Fax (828) 398-2801
http://www.act-advisors.com

Educational Background and Business Experience

ACT Advisors (the Firm) generally requires that its Investment Advisor Representatives (IARs) have a bachelor's degree or equivalent experience and further coursework demonstrating knowledge of financial planning and tax planning. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

Patrick J. Latta Born 1964
CRD #4395019

Employment History:

ACT Advisors, LLC 2015 – Present
Investment Advisor Representative

LPL Financial, LLC 2015 – 2023
Registered Representative

Valic Financial Advisors, Inc. 2001 – 2015
Registered Representative and Investment Advisor Representative

Formal Education after High School:

University of North Carolina, BA Economics

Mr. Latta is not currently registered with any broker-dealer and provides advisory services solely through ACT Advisors, LLC, a fee-only registered investment adviser.

Disciplinary Information

Mr. Latta has no material legal or disciplinary events requiring disclosure under this item.

Outside Business Activities

None.

Additional Compensation

Mr. Latta is compensated solely through advisory fees paid by clients to ACT Advisors, LLC. He does not receive commissions, transaction-based compensation, or sales-related compensation in connection with the investment advisory services he provides.

From time to time, in the course of his professional activities, Mr. Latta may receive non-cash benefits from third parties, such as custodians, investment sponsors, or service providers. These benefits may include, for example, occasional meals, educational materials, training opportunities, or attendance at conferences or educational events. Any

such benefits are not contingent on the recommendation of any specific investment product or service and are subject to the Firm's policies regarding gifts and entertainment. The Firm maintains policies governing gifts and entertainment designed to ensure that such benefits do not create inappropriate conflicts of interest.

Supervision

Jennifer English, Chief Compliance Officer, supervises Patrick J. Latta, as named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Jennifer English supervises all supervised persons by holding regular staff, investment, and other ad hoc meetings. In addition, Jennifer English regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Jennifer English may be reached at 828.398.2802 or jennifer@act-advisors.com.

Form ADV Part 2B

Investment Adviser Brochure Supplement

Supervisor: Jennifer English

Supervised Person:
Martha “Ruth” Hays

March 2026

This brochure supplement provides information about Martha “Ruth” Hays that supplements ACT Advisors’ brochure. You should have received a copy of that brochure. Please contact Jennifer English, Chief Compliance Officer if you did not receive ACT Advisors’ brochure or if you have any questions about the contents of this supplement. Jennifer@act-advisors.com

Additional information about the Firm’s Supervised Persons is also available on the SEC’s website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each Supervised Person.

521 College Street
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Educational Background and Business Experience

ACT Advisors (the Firm) generally requires that its Investment Advisor Representatives (IARs) have a bachelor's degree or equivalent experience and further coursework demonstrating knowledge of financial planning and tax planning. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

Martha "Ruth" Hays — Born 1994
CRD #7442375

Employment History:

ACT Advisors, LLC — 2026 – Present
Investment Advisor Representative

Goldman Sachs — 2021 – 2026
Private Wealth - Operations

University of Georgia — 2019 – 2021
Graduate Assistant Student

Formal Education after High School:

Furman University, Bachelor of Science
University of Georga, Masters of Social Work

Professional Designations and Licenses:

Ms. Hays is not registered with any broker-dealer and provides advisory services solely through ACT Advisors, LLC, a fee-only registered investment adviser.

Disciplinary Information

Ms. Hays has no material legal or disciplinary events requiring disclosure under this item.

Outside Business Activities

None

Additional Compensation

Ms. Hays is compensated solely through advisory fees paid by clients to ACT Advisors, LLC. She does not receive commissions, transaction-based compensation, or sales-related compensation in connection with the investment advisory services she provides.

From time to time, in the course of her professional activities, Ms. Hays may receive non-cash benefits from third parties, such as custodians, investment sponsors, or service

providers. These benefits may include, for example, occasional meals, educational materials, training opportunities, or attendance at conferences or educational events. Any such benefits are not contingent on the recommendation of any specific investment product or service and are subject to the Firm's policies regarding gifts and entertainment.

Supervision

Jennifer English, Chief Compliance Officer, supervises Martha "Ruth" Hays, as named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Jennifer English supervises all supervised persons by holding regular staff, investment and other ad hoc meetings. In addition, Jennifer English regularly reviews client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports. Jennifer English may be reached at 828.398.2802 or jennifer@act-advisors.com.