

Part 2A of Form ADV: Firm Brochure

Axio Consulting Group

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February 28, 2026

This brochure provides information about the qualifications and business practices of Axio Wealth Management, Inc. d/b/a Axio Consulting Group ("Axio Consulting Group" or "Axio"). If you have any questions about the contents of this brochure, please contact us at 803-851-1935 or joe.giltner@AxioConsultingGroup.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.

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Additional information about Axio also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 306982.

Item 2 Material Changes

- Since the last update to our brochure on March 5, 2025, we have updated Item 11- Code of Ethics and Participation or Interest in Client Transactions and Personal Trading and Item 12- Brokerage Practices to further describe our practices in these areas. Otherwise, there have been no material changes.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

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Item 4 Advisory Business

Axio Consulting Group is a registered investment adviser with its principal place of business located in SC. Axio is registered in SC and other states requiring such registration and began conducting business in 2020.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Yvonne Vanderhoff Kepler, Vice President, Director
- Susan Diane Diehl, Vice President, Director

Axio provides investment advice to retirement as well as pension and profit sharing plans. Clients may engage Axio to provide any of the services below.

DISCRETIONARY PORTFOLIO MANAGEMENT

Axio will manage investments in self-directed plans on a discretionary basis as follows:

Axio Fiduciary Services Plus

Axio will be responsible for the selection, monitoring, and replacement of fund options for retirement plans. The Plan Sponsor will be removed entirely from the selection, monitoring, and replacement process. The Plan Sponsor's sole responsibility in the investment process will be monitoring Axio and the effective administration of Axio's recommendations by the third party record-keeper. Axio will provide the following services:

- Work with plan sponsor to develop a suitable Investment Policy Statement for the plan that addresses the plan's specific goals;
- Examine funds available through the record-keeper's platform and, using its discretionary authority, select a customized "menu" of options designed to meet the goals established within the Investment Policy Statement;
- Continuously monitor the investments options in the plan's account and, when we determine that a particular investment is no longer appropriate for the plan, instruct the record-keeper to remove and, as needed, replace that investment in the client's account;
- Provide Quarterly Variance Report;
- Communicate directly with record-keeper when changes are to be made within investment options; and
- Provide ERISA 3(38) Investment Fiduciary Services to corporate retirement plans.

As a fiduciary under the plan Axio's primary responsibilities are as follows:

- Assist the Plan Sponsor in the development of the Investment Policy Statement;
- Prudently diversify the plan's assets to achieve the risk/return profile outlined in the Investment Policy Statement;
- Prudently select investment options using a consistent and repeatable process outlined in the Investment Policy Statement;
- Avoid prohibited transactions and conflicts of interest.

As a discretionary manager, Axio shall only be responsible for the investment alternatives it selects and shall not have any responsibilities or potential liabilities in connection with other investments (e.g., employer securities, unallocated accounts, mutual fund windows, self-directed brokerage accounts, guaranteed investment contracts, target date funds, etc.) offered by the Plan. Plan Sponsors may offer a window for self-directed brokerage accounts for Plan Participants. Axio will not manage assets held in such Brokerage Windows. Axio will not advise Plan Participants on whether they should or should not open or close a self-directed brokerage account, nor do we provide advice on purchasing, holding or selling any securities through the brokerage window.

Axio Risk-Based Mutual Fund Portfolios

- Design and manage one or all of five diversified actively managed mutual fund portfolios. Each portfolio (Aggressive, Moderately Aggressive, Balanced, Moderately Conservative, Conservative) is benchmarked against an appropriate Morningstar Benchmarks;
- Select funds for each plan's account from the mutual funds available through the client's record-keeper's platform;
- Continuously monitor the investments in the plan's account and, when we determine that a particular investment is no longer appropriate for the plan, instruct the record-keeper to remove and, as needed, replace that investment in the client's account;
- Axio receives no compensation from the underlying portfolio investment components, eliminating this potential conflict of interest and bias in the construction of portfolios;
- Plans can impose reasonable restrictions on the investments to be held in managed portfolios.

ADVICE THROUGH CONSULTATIONS

Axio will provide non-discretionary consulting services to clients are follows:

Axio Fiduciary Service

- Provide Plan Sponsor with a sample Investment Policy Statement for review and consideration;
- Establish Necessary Investment Categories in major asset classes for the plans investment line up designed to ensure the Plan offers a "broad range of investment alternatives" as well as other optional investment categories;
- Provide and maintain a list of approved investment alternatives available on the plan's record-keeper's platform. The approved list is designed to be used by the Plan Sponsor to select the designated investment alternatives. No client is obligated to accept any recommendation;
- Continuously monitor approved investment alternative list adding and removing investments when necessary;
- Recommend a replacement investment alternative from the approved list when a designated investment alternative is removed from the approved list. It is up to the plan to instruct the record-keeper when to add or remove an investment; and.
- Identifying investment alternatives on the approved list that may serve as the plan's qualified default investment alternative, if applicable;
- Provide ERISA 3(21) Investment Fiduciary Services to corporate retirement plans

RETIREMENT PLAN SERVICES

Axio offers consulting and advisory services for employer-sponsored retirement plans ("Plans") that are designed to assist Plan sponsors ("Sponsors") as described above. Axio may also assist Sponsors with enrollment and/or providing investment education to Plan participants and beneficiaries. Axio

provides these retirement plan services (“Retirement Plan Services”) through IARs and may charge a fee for the Retirement Plan Services, as described in this Brochure and the Axio Fiduciary Plus or Fiduciary Agreement (“Agreement”). Retirement Plan Services include services that would be considered fiduciary services or non-fiduciary services under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”), or comparable state laws, rules and regulations.

When delivering fiduciary services to a Plan, Axio will act in good faith and with the degree of diligence, care and skill that a prudent person rendering similar services would exercise under similar circumstances. Sponsor may engage Axio to perform Retirement Plan Services by providing information about the Plan, including the Plan design, Plan objectives, investment objectives, investment risk tolerance, demographics about Plan participants, and third-party service providers, and by executing an Agreement (or amending an existing agreement). Axio will provide Sponsor a copy of this Brochure or a comparable brochure and the Agreement for review. The Agreement describes the terms of the arrangement between Axio and Sponsor, including a description of the Retirement Plan Services and the fees to be charged by Axio. By signing the Agreement, Sponsor represents that Sponsor has received sufficient information and determined that the Retirement Plan Services selected are: (i) necessary for the operation of the Plan and (ii) reasonable and appropriate based upon the compensation to be paid for the Retirement Plan Services. A description of the Retirement Plan Services is as follows.

Enhanced Education and Enrollment Support

Three Additional group Education and Enrollment meetings, Advanced Group Investing Education, access to various tools and materials to assist participants when making investment decisions.

Guided Online Enrollment

Guided online enrollment through the TPA/Recordkeeper’s website, Access to a library of online videos covering various investing and retirement topics, online risk tolerance assessment, sample asset allocation based on participant risk tolerance.

Sponsor Fiduciary Training

A multi-module course designed to educate Retirement Plan Sponsors, Investment Committees, and board members as to who and what a fiduciary is, what a sponsor’s responsibility is as a fiduciary, and ways to mitigate their fiduciary risk.

GENERAL INFORMATION ON ADVISORY SERVICES

Plan Sponsor is responsible for determining the proper share class to utilize in the plan. Mutual Funds may offer more than one “class” of shares. Each class represents the same interest in the mutual fund’s portfolio; however, a plan advisor or consultant may be compensated differently depending on what classes of shares are chosen. Axio does not make recommendations on and shall have no responsibility for the class of shares utilized. Axio shall utilize, in its fund recommendations, the share classes in the Program that have been provided by the plan Sponsor. Absent specific instruction from the plan Axio will use the lowest-cost share class.

Plan sponsors are encouraged to carefully review share class selection to understand the extent to which broker-dealers and/or record-keepers selected by the plan (including a record-keeper affiliated with Axio) may receive 12b-1 or other compensation from mutual funds and whether and to what extent any such compensation may be used to offset other fees charged to the plan.

In performing the fund selection or recommendation services, Axio is limited to the investment options available through the plan record-keeper’s platform and does not have authority or obligation to select any investment options that are not available through the plan record-keeper’s platform. The Plan Sponsor is responsible for the selection of the record-keeper and custodian, not Axio.

Services are provided on the plan level only and do not include participant education or any participant-level services.

A client may terminate an agreement with Axio, without penalty, within five business days of signing an agreement if a client has not been provided with a copy of the brochure documents (Form ADV Parts 2A and 2B) at least 48 hours prior to signing an agreement.

As of December 31, 2025, Axio had \$79,558,619 of client assets under discretionary management and \$1,234,502 of client assets under non-discretionary management.

Additionally, as of December 31, 2025, Axio had assets under advisement (“AUA”) of \$390,374,882. AUA includes assets for which Axio provides consulting services. These assets are not included in Axio’s calculation of our regulatory assets under management in Part 1A, Item 5.F of the Form ADV.

Item 5 Fees and Compensation

Fees will be charged according to the following schedule:

Investment Management Services		
Axio Fiduciary Services Plus	20 Bps to \$10,000,000	Anything over \$10,000,000 negotiable
Axio Fiduciary Service	20 Bps to \$10,000,000	Anything over \$10,000,000 negotiable
Axio Risk-Based Mutual Fund Portfolios	25 Bps	\$200,000 Minimum
Retirement Plan Services		
Enhanced Education and Enrollment Support	40 Bps	
Guided Online Enrollment	\$400/year	
Sponsor Fiduciary Training	\$2,000/year	

Fees may be negotiable based on the size and complexity of the plan and the potential for future business with the plan. Additionally, certain legacy clients are subject to different fee rates for Axio Fiduciary Service and Axio Fiduciary Services Plus. Such rates are specified in those clients' agreements with Axio.

Fees are billed in arrears and are based on the value of the plan's account(s) on the last day of each calendar quarter. Fees for the plan's initial quarter will be pro-rated based on the number of days remaining in the quarter. Fees will be charged as of the day the plan enters into a contract with Axio.

Services may be terminated by either party upon 30 days written notice. Upon termination, all earned, unpaid fees will be due and payable. Clients may elect to have their fees directly debited from the plan's account(s) or to receive an invoice from Axio.

Other Fees or Expenses

All fees paid to us for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a fund directly, without our services. In that case, the client would not receive the services provided by us which are designed, among other things, to assist the client in determining which fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by us to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians, broker dealers, third party record-keepers, and other service providers.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

All fees and account minimums may be negotiable at Axio's discretion.

Item 6 Performance-Based Fees and Side-By-Side Management

Axio does not charge performance-based fees.

Item 7 Types of Clients

Axio only provides advisory services to pension and profit sharing plans and other retirement plans. We do not provide participant-level advice.

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

Methods of Analysis

Fundamental analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indication it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical analysis. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Mutual fund and/or ETF analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the client's portfolio.

Asset Allocation: in constructing mutual fund portfolios and in recommending funds for plans, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Investment Strategies

Long-term purchases: We purchase securities with the idea of holding them in the client's account for a year or longer. We may do this because we believe the securities to be currently undervalued. We may

do this because we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that, by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

General Information on Risk

Securities investments are not guaranteed, and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

Massachusetts law requires disclosure that information on disciplinary history and the registration of Axio and its associated persons may be obtained by contacting the SEC's Office of Investor Education and Advocacy at (800) 732-0330 or by completing the SEC's online [complaint form](#) or [question form](#). Disciplinary history may also be obtained from the Massachusetts Securities Division at (617) 727-3548, and if asked, Axio and its associated persons must also disclose the history.

Item 10 Other Financial Industry Activities and Affiliations

Two of our executive officers and shareholders are also the owners and operators of PenServ Plan Services, Inc. ("PenServ"), which provides third-party administration and record-keeping services to pension & profit sharing plans as well as to other types of retirement plans.

It is anticipated PenServ will suggest the use of Axio to its clients in need of investment advisory services, and Axio may suggest the use of PenServ to its clients in need of third party administration and record-keeping services. There is no compensation paid between Axio and PenServ for these referrals. No client of Axio is obligated to use PenServ and vice versa. Advisory fees charged by Axio are entirely separate and distinct from the fees PenServ charges to its clients.

Axio clients may work with any third party service provider they choose.

Otherwise, our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Axio and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Axio's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to joe.giltner@AxioConsultingGroup.com, or by calling us at 803-851-1935.

Axio and individuals associated with our firm are prohibited from engaging in principal transactions.

Axio and individuals associated with our firm are prohibited from engaging in agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

Axio's investment recommendations are generally limited to mutual funds transacted at net asset value (NAV), stable value funds, and broadly traded exchange-traded funds (ETFs). The nature of these instruments substantially reduces the risk of employees benefiting from advance knowledge of client transactions. Notwithstanding this reduced risk, when fund changes are recommended for client accounts, supervised persons involved in the implementation of those changes are restricted from executing personal transactions in the same until client transactions have been completed. The Chief Compliance Officer is responsible for monitoring personal trading activity and reviewing transaction reports to identify and address any potential conflicts of interest.

Item 12 Brokerage Practices

Axio Consulting Group does not place or direct trades for individual plan participants. Our role is limited to directing the investment vehicles available to participants within their retirement plans.

For discretionary accounts (ERISA Section 3(38)), we communicate fund changes to the client's third-party record-keeper, who is responsible for placing trades with the qualified custodian or broker-dealer

selected by the plan. For non-discretionary accounts (ERISA Section 3(21)), we provide investment recommendations to the plan fiduciary, who retains decision-making authority. Axio does not evaluate, monitor, or control the ability of any third-party record-keeper or qualified custodian to execute trades, nor does Axio have any control over which broker-dealer the qualified custodian uses.

When fund changes are communicated to plan providers, multiple factors may affect trade timing, including provider processing schedules, plan-specific disclosure requirements (such as 30-day blackout notices required for ERISA plans), the nature of the fiduciary authority, the number of assets held in existing funds, and qualified custodian relationships.

Axio generally utilizes open-ended mutual funds, exchange-traded funds (ETFs), and stable value funds. As these investments typically trade at Net Asset Value (NAV), all trades placed on a given day should receive the identical price. Axio communicates investment change decisions to all applicable third-party record-keepers on the same day when possible.

Due to the nature of our advisory services, Axio does not: aggregate or allocate trades; address trading errors directly (these are the responsibility of the record-keeper and/or qualified custodian); engage in agency cross or principal transactions; receive soft dollar benefits; or participate in IPOs or new issues.

Axio does not have access to audit individual participant transactions. Our access is limited to overall plan balances in each fund.

Discretionary clients must inform Axio of any restrictions they wish to place on our ability to direct a third-party record-keeper to make fund changes for the plan. If Axio believes such restrictions will prevent effective management of the account, Axio may decline to provide discretionary services to the client.

Item 13 Review of Accounts

REVIEWS: Investments held in Axio Fiduciary Services Plus and Axio Risk-Based Mutual Fund Portfolios accounts are reviewed continuously. Client accounts will be reviewed not less than quarterly.

Investments on the Approved List provided to Axio Fiduciary Service clients will be reviewed continuously. Clients will be notified when an investment is removed from the Approved List.

REPORTS: Axio Fiduciary Services Plus clients will receive Quarterly Variance Reports. Axio Fiduciary Services clients will receive quarterly updates of the approved list. Otherwise, all client accounts will receive reports as contracted for at the inception of the advisory relationship.

Item 14 Client Referrals and Other Compensation

It is Axio's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

It is Axio's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Item 15 Custody

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our clients may elect to have advisory fees debited from their accounts. While Axio will not have access to directly debit such fees from the client's accounts, clients may authorize and direct their Third-Party Administrator/Record-keeper to remit fees directly to Axio from plan assets. In such cases, Axio will send an invoice with its fee calculation to the TPA/Recordkeeper who will initiate the payment out of the plan assets. The custodian and TPA will send quarterly statements showing the disbursements to the client.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

AXIO does not intend to, nor currently offers custody services for plan assets. Through AXIO's related persons, AXIO shares common ownership with PenServ Plan Services, Inc. ("PENSERV"). The nature of PENSERV's business includes Record-Keeping and Third-Party Administration services. Through these administrative services, custody is provided to Plan assets. Due to common ownership and the way our businesses are organized, AXIO is not considered "operationally independent" of PENSERV under the rules of the Investment Advisers Act of 1940 (the "Advisers Act") and therefore is considered to have "custody" of plan assets, as that term is defined in the Advisers Act and its rules. This is clearly disclosed in AXIO's Brochure ADV and AXIO abides by all custody rules set forth by the Advisers Act.

AXIO does not require any client to utilize services provided by PENSERV, nor does PENSERV require any client to utilize the services provided by AXIO. There is no fee sharing arrangement or solicitation agreement between AXIO and PENSERV minimizing any potential conflicts of interest.

The Plan Sponsor will be solely responsible for paying all fees or charges of the Record-keeper. AXIO does not make any recommendations with respect to the custody of assets, Record-keepers or other Plan service providers, unless specifically indicated herein. AXIO shall not have any liability with respect to custodial arrangements or the acts, conduct, or omissions of the custodian. Sponsor authorizes the Record-keeper to provide AXIO with copies of all periodic statements and other reports that the Record-keeper sends to Sponsor.

Item 16 Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we instruct the plan's third party record-keeper, without obtaining the client's specific permission for each trade, to place trades in a client's account.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

Item 17 Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

Item 18 Financial Information

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. We have no such financial circumstances to report.

Axio has not been the subject of a bankruptcy petition at any time during the past ten years.

Item 19 Requirements for State-Registered Advisers

Axio's principal executive officers are:

Joe Harvey Giltner II

Education:

- Master of Business Administration; Business Analytics major; 2019
- Bachelor of Science; Business Administration major; 2011

Professional Designations:

- Chartered Financial Analyst (CFA®)
- Accredited Investment Fiduciary (AIF®)
- Accredited Investment Fiduciary Analyst (AIFA)

Business Background:

- Axio Consulting Group, President, 12/2019 to Present
- CCM Investment Advisers, LLC, Vice President 09/2016 - 11/2019; Asst. Vice President 12/2011 - 8/2016; Intern 6/2011 - 12/2011

Susan Diane Diehl

Education:

- Bachelor of Science; Mathematics; 1975

Business Background:

- Axio Consulting Group, Vice President and Director, 12/2019 to Present
- PenServ Plan Services, President, 8/1988 to Present

Yvonne Vanderhoff Kepler

Education:

- Graduated State University of New York; 1964

Business Background:

- Axio Consulting Group, Vice President and Director, 12/2019 to Present
- PenServ Plan Services, President, 1986 to Present

Axio is not engaged in any business activity other than giving investment advice.

Neither Axio nor any of its supervised persons are compensated by performance-based fees.

Ms. Diehl and Ms. Kepler spend the majority of their time with PenServ Plan Services, a firm providing third party administration and recordkeeping services to pension plans.

None of these individuals have any reportable disciplinary history or have filed a petition for bankruptcy.

Neither Axio nor any of its management persons have a relationship or arrangement with any issuer of securities.