

**Axiom Asset Management**  
**Form ADV 3- Client Relationship Summary**  
**January 2024**

**Item 1. Introduction**

Axiom Asset Management, LLC (“AXIOM”) is a U.S. Securities and Exchange Commission (“SEC”) registered investment advisor, formed in 2003. Brokerage and investment advisory services differ. We feel that it is important for you to understand how advisory and brokerage services and fees differ in order to determine which type of account is right for you. This document gives you a summary of the types of services we provide and how you pay. Please do not hesitate to ask us for more information. In addition to any information we provide, there are free and simple tools available to research firms and investment advisers at [Investor.gov/CRS](https://www.investor.gov/crs), a website that is maintained by the SEC and which provides educational materials about broker-dealers, investment advisers, and investing.

**Item 2. Types of Relationships and Services.**

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

When you open an advisory account, you will pay an ongoing asset-based fee for our services. We will offer you advice on a regular basis. We will discuss your investment goals, design a strategy, and regularly monitor your account.

AXIOM offers investment advisory accounts on either a discretionary or non-discretionary basis. Our management of your account is guided by your objectives (*e.g.*, maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. For our clients that provide us with discretionary authority, we buy and sell securities that we continuously monitor on your behalf. For non-discretionary clients, you make the ultimate decision regarding the purchase or sale of investments. We will exercise investment discretion or provide non-discretionary investment advice to you depending on the type of account you elect. Our investment advice will cover a limited selection of investments, *i.e.* no direct real estate. Other firms could provide advice on a wider range of choices, some of which might have lower costs.

***Conversation Starter: Below are some questions you may wish to ask a financial professional:***

- Given my financial situation, should I choose investment advisory services? Why or why not?
- How will you choose investments to recommended to me?
- What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

**Item 3: Fees, Costs, Conflicts and Standard of Conduct:**

***What fees will I pay?***

AXIOM charges its clients a fee based on assets under management and does not receive any performance-based compensation. This means that you will pay an ongoing fee, typically at the end of each calendar quarter, based on the value of the assets in your advisory account. The amount paid to our firm and your financial advisor generally does not vary based on the type of investments we select on your behalf. You will pay fees and costs whether you make or lose money on your investments. The more assets you have in your advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the value of assets in your account in order to increase our fees. You pay our fee quarterly even if you do not buy or sell any securities in your account during that period. Our fees vary and are negotiable. Please make sure you understand what fees and costs you are paying.

You may pay a nominal transaction fee to our custodian – Fidelity Investments - when we buy or sell an investment for you. More detailed information about our fees and other costs associated with investing, along with applicable conflicts of interest, can be found in our ADV Brochure.

**Conflicts of Interest: *Our Legal Obligations to You.***

**When we act as your investment adviser, we are held to a fiduciary standard that requires us to place your interests ahead of ours when providing investment advice.** This standard covers our entire investment advisory relationship with you. At the same time, the way we make money could create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide. Here is an example to help you understand what this means.

- Certain AXIOM professionals are licensed to sell insurance. You would pay a commission and your financial advisor could receive a portion of that commission.

We manage these conflicts through disclosures and employing supervisory procedures to ensure our financial advisors are acting in your best interest. Additional information on conflicts of interest can be found in our Brochure at the following url: <https://adviserinfo.sec.gov/firm/summary/145186>

**Conversation Starter: *We included the following additional question for you to ask your financial advisors:***

- How might your conflicts of interest affect me, and how will you address them?

**Item 4. Disciplinary History**

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

*We do not have any legal or disciplinary events. Some financial advisors have legal or disciplinary history. You should visit [investor.gov/CRS](http://investor.gov/CRS) for a free and simple search tool to research our firm and our financial advisors.*

**Conversation Starter: *We included the following additional question for you to ask your financial professional:***

- As a financial professional, do you have any disciplinary history? For what type of conduct?

**Item 5. Additional Information**

***Where can I find additional information?***

*For additional information on advisory services, see our Form ADV brochure on IAPD, on <https://www.investor.gov/> or on our website [www.axiomasset.com](http://www.axiomasset.com) as well as any brochure supplement your financial advisor provides. If you would like additional, up-to-date information or a copy of this disclosure, please call Albert Matt at 610-688-0050 to request up-to-date information, including a copy of Form CRS.*

To report a problem to the SEC, visit [Investor.gov](http://Investor.gov) or call the SEC's toll-free investor assistance line at (800) 732-0330. If you have a concern with your investments, account or financial advisor, email us at [amatt@axiomasset.com](mailto:amatt@axiomasset.com).