

Axiom Asset Management Form ADV 3- Client Relationship Summary February 2025

Item 1. Introduction

AXIOM Asset Management, LLC (“AXIOM”) is a U.S. Securities and Exchange Commission (“SEC”) registered investment advisor formed in 2003. AXIOM Asset Management operates as a Registered Investment Advisor. 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, free and simple tools are available to research firms and investment advisers at [Investor.gov/CRS](https://www.investor.gov/crs), a website maintained by the SEC that 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 regularly, discuss your investment goals, design a strategy, and monitor your account regularly.

AXIOM offers investment advisory accounts on either a discretionary or non-discretionary basis. Our management and financial planning of your account is guided by your objectives (e.g., maximum capital appreciation, growth, income, or growth and income) and tax considerations (www.axiomasset.com). For our clients who provide us with discretionary authority, we buy and sell securities and continuously monitor them on your behalf. For non-discretionary clients, you make the ultimate decision regarding the purchase or sale of investments. Our investment advice will cover a limited selection of investments, i.e. no direct real estate. Other firms could advise on a broader range of choices, some of which might have lower costs.

AXIOM offers ongoing portfolio monitoring as part of our investment advisory services. We regularly review your account(s) to assess performance, risk exposure, and alignment with your stated investment objectives. Our monitoring includes:

- Frequency of Reviews: We monitor your portfolio on an [ongoing/quarterly/semi-annual/annual] basis and adjust as needed.
- Adjustments & Recommendations: If we determine that market conditions, economic trends, or changes in your financial situation require modifications, we will take action on discretionary accounts or provide recommendations for non-discretionary accounts.
- Scope of Monitoring: Our monitoring applies to the assets and accounts under our management. We do not actively monitor accounts held outside our firm unless expressly agreed upon.

You remain responsible for informing us of any changes in your financial situation or investment objectives that may impact how we manage your portfolio.

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 the investments you recommend 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 and whether we make no trades or lots of trades. The more assets you have in your advisory account, including cash, the more you will pay us. Therefore, we have an incentive to increase the value of assets in your account to increase our fees. You may pay a nominal transaction fee to our custodian – Fidelity Investments - when we buy or sell an investment for you. For example, sell orders for all equities are charged an SEC activity and assessment fee, and options have a per-contract fee. Separately, Mutual Funds, ETFs, and Insurance related products have their own associated fees in the form of expense ratios, insurance charges, and rider, and administrative fees. Some mutual funds may charge a fee for funds held less than 30, 60, or 90 days. Some mutual funds on Fidelity’s platform are non-networked and may charge a sales fee. If you have a margin account, the outstanding balance has interest rate charges. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.** Our fees vary and are negotiable. More detailed information about our fees and other costs

associated with investing, along with applicable conflicts of interest, can be found in our Form ADV Brochure Part 2A brochure and in your management agreement.

Conversation Starter - Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

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

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

- Certain AXIOM professionals are licensed to sell insurance. You would pay a fee to AXIOM Asset Management.
- Our employees may buy or sell the same securities that we recommend that our clients invest in or that we purchase or sell at the request of our clients. This presents a conflict of interest between our employees' own financial interests and the best interests of our clients. We have addressed this conflict of interest by imposing trading restrictions under the AXIOM's Code of Ethics which include restrictions on our employees' personal trading based upon investment activity occurring in, or being contemplated for, our clients' accounts under which our employees are generally obligated to buy or sell securities in their personal accounts simultaneously with, or after completion of, purchase or sale of the same security in our clients' accounts subject to certain exceptions. Many of the trades are implemented as a block which average the price paid across all allocations.

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>

Our Form ADV Brochure Part 2A brochure provides more detailed information about our fees and other costs associated with investing, as well as applicable conflicts of interest.

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

How do your financial professionals make money? All of our professionals are compensated on a salary plus a discretionary bonus. None are paid on commission. The ownership partners distribute a portion of the net income based on a percentage of ownership.

Item 4. Disciplinary History

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

AXIOM does not have any legal or disciplinary events. You should visit investor.gov/CRS for a free and simple search tool to research our firm and our financial advisors.

Conversation Starter:

- 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 as well as any brochure supplements your financial advisor provides. If you have a concern with your investments, accounts or financial advisor, please contact us in writing at 550 E. Swedesford Road, Suite 110 Wayne, PA 19087 or email at dwebster@axiomasset.com

To report a problem to the SEC, visit Investor.gov or call the SEC's toll-free investor number at (800) 732-0330 AXIOM

Conversation Starters: Ask your professional: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker dealer? Who can I talk to if I have concerns about how this person is treating me?