ThePARTNERS Wealth Management

SEC File Number: 801-122637

Wrap Fee Program Brochure

Effective: March 23, 2026

This **Wrap Fee Program Brochure** provides information about the business practices and fees for ThePARTNERS Wealth Management (**ThePARTNERS**) when client (hereinafter referred to as **"you", "your"** or the **"Client"**) transaction costs are included with investment advisory fees as a single bundled fee (a "Wrap Fee Program").

ThePARTNERS sponsors this Wrap Fee Program and provides this Wrap Fee Program Brochure as a supplement to the ThePARTNERS ADV Part 2A Disclosure Brochure, which provides complete details on the business practices of ThePARTNERS. If you did not receive the complete ThePARTNERS' ADV Part 2A Disclosure Brochure or you have any questions about the contents of this Wrap Fee Program Brochure or the ThePARTNERS Disclosure Brochure, please contact Jeffrey Smith at compliance@thepartnerswm.com or by phone at (800) 324-3010.

ThePARTNERS is an investment adviser registered with the U.S. Securities and Exchange Commission (the **SEC**). The information in this Wrap Fee Program Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment adviser does not imply any specific level of skill or training. This Wrap Fee Program Brochure provides information about ThePARTNERS to assist you in determining whether to engage it as your investment adviser.

Additional information about ThePARTNERS and its advisory persons (Investment Adviser Representatives) is available on the SEC's website at www.adviserinfo.sec.gov by searching for our firm name or by using our CRD# 314816.

ThePARTNERS Wealth Management
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Item 2 Summary of Material Changes

Form ADV Part 2A provides information about a variety of topics relating to ThePARTNERS' business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses the fee billing practices of the firm as a supplement to the Form ADV Part 2A Disclosure Brochure.

Material Changes
There are no material changes to report.

Future Changes
From time to time, we may amend this Wrap Fee Program Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Wrap Fee Program Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of ThePARTNERS.

At any time, you may request a current copy of the Wrap Fee Program Brochure by contacting our Chief Compliance Officer, Jeffrey Smith at compliance@thepartnerswm.com or by phone at (800) 324-3010.

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Item 4 Services, Fees, and Compensation

Services

ThePARTNERS Wealth Management ("ThePARTNERS" or the “firm”) provides customized investment management and related advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the ThePARTNERS Disclosure Brochure (Form ADV 2A). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting ThePARTNERS as your investment adviser.

As part of the investment advisory fee noted in Item 5 of the Part 2A Disclosure Brochure, ThePARTNERS includes normal securities transaction fees and a platform fee. Securities regulations often refer to this combined fee structure as a "Wrap Fee Program".

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosures relating to the combination of securities transaction fees and a platform fee into the single "bundled" investment advisory fee. Please see Item 4 – Advisory Services of the Part 2A Disclosure Brochure for details on ThePARTNERS' investment philosophy and related services.

For information regarding this ADV Part 2A Disclosure Brochure, please contact Jeffrey Smith, Chief Compliance Officer at compliance@thepartnerswm.com.

Program Costs

Advisory services provided by ThePARTNERS may be offered as a Wrap Fee Program whereby normal securities transaction costs are included in the overall investment advisory fee paid to ThePARTNERS. As the level of trading in a Client's account may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the transaction costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on the services to be provided to each Client, however, the Client is not charged more if there is higher trading activity in the Client's account.

This wrap fee structure has a potential conflict of interest as we may have an incentive to limit the number of trades placed in Clients’ accounts to reduce our costs (a practice known as “reverse churning”). To address this conflict, we have adopted policies and procedures to ensure the wrap fee arrangement remains in your best interest. Our Investment Adviser Representatives (IARs) and our Chief Compliance Officer periodically review wrap fee accounts to assess trading activity. Specifically, accounts with minimal or no trading activity over an extended period (typically a calendar year) are flagged for a formal suitability review. This review is designed to determine if the level of portfolio management and trading activity justifies the wrap fee. If we determine the program may no longer be suitable, we will discuss with you whether a non-wrap advisory account or other arrangement would be more appropriate and cost-effective.

Please note that for accounts with low trading activity, a wrap fee may cost more than paying for advisory services and transaction costs separately. Certain broker-dealers have lower transaction fees than other broker-dealers and as a result overall separate fees may be lower now than in the past in relation to these particular broker-dealers and custodians. Please see Item 5 - Fees and Compensation of the Part 2A Disclosure Brochure for complete details on fees.

Additionally, the practice of billing fees on the total market value, including assets purchased with margin, creates a conflict of interest. ThePARTNERS and its IARs have a financial incentive to recommend the use of margin, as borrowing to invest increases the total assets on which the advisory fee is based, thereby increasing the firm's compensation. To address this conflict, margin will only be recommended after a thorough suitability review with you to ensure it aligns with your stated investment objectives, financial situation, and risk tolerance. Our IARs will also clearly explain the risks associated with margin, including the potential for amplified losses, before it is used in your account.

You may pay custodial fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, margin interest, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included in the wrap-fee you are charged by our firm.

Fees

Investment Advisory Services
Your designated IAR will discuss the investment advisory fees when your account is established, and these fees will be outlined in the advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior billing period and are billed at an annual rate of up to 2.99%, depending on factors such as the level of assets being managed, the complexity of the services to be provided and/or the overall relationship with the Client. For purposes of calculating the advisory fee, the "market value of assets under management" includes the total value of assets in the account, including any assets purchased with margin (i.e., borrowed funds). Further, as a component of the bundled wrap fee, a platform fee may be charged for securities transaction fees, reporting and related services, structured as follows:

- ThePARTNERS as Portfolio Manager – If we directly manage and trade your portfolio, the platform fee is 0.09% per year, billed quarterly (0.0225% per quarter).
- Unified Managed Account (UMA) – If we engage or use third party managers to manage some or all of your portfolio, the platform fee is 0.12% per year, billed quarterly (0.03% per quarter).

Fees are paid quarterly, in advance of each calendar quarter (the billing period), pursuant to the terms of the investment advisory agreement. Fees for the first partial billing period of service are prorated from the inception date of the account[s] to the end of the first billing period. Fees may be negotiable at the sole discretion of the Adviser. Certain Clients may have a fixed annual fee or fixed rate fee or a fee schedule that differs from above. The Client's fees will take into consideration the aggregate assets under management with Adviser. All securities held in accounts managed by ThePARTNERS will be independently valued by the custodian. ThePARTNERS will not have the authority or responsibility to value portfolio securities. Clients should review their advisory agreement for additional information relative to fees and fee billing.

The Client may make additions or withdrawals from the account[s] at any time, subject to the ThePARTNERS' right to terminate an account or the overall relationship. Additions may be in cash or securities provided that the ThePARTNERS reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets on notice to ThePARTNERS, subject to the usual and customary securities settlement procedures. However, ThePARTNERS typically designs its investment portfolios as long-term investments, and the withdrawal of assets may impair the achievement of a Client's investment objectives. ThePARTNERS may consult the Client about the implications of such transactions. Clients are advised that when such securities are liquidated, they may be subject to securities transaction fees, short-term redemption fees, and/or tax ramifications. If assets in excess of $25,000 are deposited into or withdrawn from the Client's account[s], an adjustment will be made in the next billing period to reflect the fee difference. ThePARTNERS may negotiate a fee that differs from the schedule above for certain account[s] or holdings.

As noted above, the Wrap Fee Program includes normal securities trading costs incurred in connection with the discretionary investment management services provided by ThePARTNERS. Securities transaction fees for Client-directed trades may be charged separately to the Client.

Compensation

ThePARTNERS receives an investment advisory fee paid by Clients for investment advisory services covered under this Wrap Fee Program. The investment advisory fees as described in detail in Item 5 – Fees and Compensation of the Part 2A of Disclosure Brochure.

Fees and Costs Not Included

Our wrap fee covers our advisory services and the brokerage services provided by Schwab, including custody of assets, equity trades, ETFs, and agency transactions in fixed income securities. As a result, we have an incentive to execute transactions for your account at Schwab.

Our wrap fee does not cover all fees and costs. The fees not included in the wrap fee include charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions, and commissions or transaction fees for trades executed away from Schwab. In limited circumstances, our firm may direct a trade to a broker-dealer other than Schwab. This is done only when we believe in good faith that another broker or dealer will provide better "best execution" (for example, a more favorable net price, considering all factors) than is available through Schwab. In such instances, you will be responsible for paying the commission or markup charged by the other broker-dealer. This cost is separate from and in addition to your wrap fee. You will see this separate transaction cost itemized on the official trade confirmation sent by the executing broker-dealer and reflected on your custodial account statement.

Clients are likewise responsible for paying all margin interest, which is a separate finance charge imposed by the custodian for any funds borrowed on margin. The wrap fee does not cover this margin interest. ThePARTNERS does not receive any portion of the margin interest revenue paid to the custodian.

This would be similar if assets were held at other custodians.

Item 5 Account Requirements and Types of Clients

ThePARTNERS offers investment advisory services to individuals, families, trusts, estates, and businesses, with a focus on those Clients with a high net worth. The relative percentage of each type of Client is available on ThePARTNERS' Form ADV Part 1. These percentages will change over time. ThePARTNERS do not impose a size for establishing a relationship, but as noted does tailor its services to high-net-worth Clients.

Item 6 Portfolio Manager Selection and Evaluation

This item describes how ThePARTNERS, as the sole sponsor and portfolio manager for this Wrap Fee Program, manages your account. Our firm, ThePARTNERS, acts as the portfolio manager for this program, with services provided directly by our supervised persons, particularly our IARs acting on behalf of the firm, through our "Internal Investment Management" services. As required, we are providing the following information from our Part 2A Disclosure Brochure:

A) Advisory Business

ThePARTNERS is an investment adviser registered with the SEC. It is organized as a limited liability company under the laws of the State of Delaware. ThePARTNERS was founded in March 2021 and is primarily owned by Gregory Rutherford through various entities and trust vehicles. These entities are owned in whole or part by individuals who are affiliated with ThePARTNERS, and certain of these entities also own ELITE TAMP and Adaptive which are affiliates of ThePARTNERS. Please refer to Item 4 – Advisory Business of the Part 2A Disclosure Brochure for details on the advisory services provided by ThePARTNERS, and to the Brochure Supplement for the background of the IARs of ThePARTNERS.

B) Performance-Based Fees

As a general rule, ThePARTNERS charges advisory fees based on a percentage of assets under management, as described in Item 5 – Fees and Compensation of the Part 2A of Disclosure Brochure.

However, in limited circumstances for certain qualified client accounts, we may negotiate a performance-based fee (e.g., a fee based on a share of capital gains). All such fee arrangements are exceptional and require the prior review and approval of our Chief Compliance Officer.

ThePARTNERS does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund). However, as described above and in Item 10 of the Part 2A Disclosure Brochure, our affiliate, Adaptive, manages proprietary mutual funds and ETFs. This creates a financial incentive for our firm and IARs to recommend these products to Clients. Depending upon client suitability and investment profile, an investment may be made in mutual funds or ETFs managed by Adaptive.

C) Methods of Analysis

Please see Item 8 of the Part 2A Disclosure Brochure for details on the research and analysis methods employed by ThePARTNERS.

D) Risk of Loss

Investing in securities involves certain investment risks. Securities will fluctuate in value and may lose value. Clients should be prepared to bear the risk of loss, which will vary based upon market conditions and length of investment. ThePARTNERS and its IARs assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that Clients will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the firm in evaluating potential investments, it does not guarantee that the investments will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis will fluctuate in value and may lose value and may have negative investment performance. ThePARTNERS monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. Please refer to Item 13 – Review of Accounts of the Part 2A Disclosure Brochure for more details on the review process.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The IAR shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform ThePARTNERS of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The IAR will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the IAR. Please see Item 8.B. – Risk of Loss of the Part 2A Disclosure Brochure for details on investment risks.

E) Voting Client Securities

ThePARTNERS does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the custodian. The IAR will assist in answering questions relating to proxies; however, the Client retains the sole responsibility for proxy decisions and voting.

Item 7 Client Information Provided to Portfolio Managers

As ThePARTNERS is the sponsor and primary portfolio manager for this Wrap Fee Program, we generally manage client accounts directly. However, in certain cases, we can utilize third-party or affiliated portfolio managers, including manager strategists available through the Amplify platform or independent managers not affiliated with the Amplify platform. In such cases, client information will be shared as necessary to provide advisory services.

Your IAR, acting on behalf of ThePARTNERS, serves as your portfolio manager. Your IAR gathers information directly from you regarding your financial situation, investment objectives, risk tolerance, and any reasonable restrictions you wish to place on your account. We use this information to construct and manage your portfolio.

We update this information during our regular Client reviews or as needed when you inform us of any material changes to your financial situation or goals.

Item 8 Client Contact with Portfolio Managers

There are no restrictions on your ability to contact and consult with your portfolio manager. As ThePARTNERS is the sole portfolio manager for this program, you will have direct access to your IAR, who is responsible for managing your account.

Item 9 Additional Information

Disciplinary Information and Other Financial Industry Activities and Affiliations Disciplinary Information

ThePARTNERS values the trust you place in us. As part of our commitment to transparency, we encourage all Clients to conduct their own due diligence when selecting an investment adviser or related service provider. Information regarding the background of ThePARTNERS and our IARs is publicly available on the Investment Adviser Public Disclosure ("IAPD") website at www.adviserinfo.sec.gov by searching our firm name or CRD# 3184816.

For additional information regarding disciplinary history, please refer to Item 9 – Disciplinary Information of the Part 2A Disclosure Brochure and Item 3 – Disciplinary Information of the Brochure Supplement of each IAR documents describe how to review the regulatory background of both the Firm and its representatives.

Other Financial Activities and Affiliations

Additional information regarding ThePARTNERS' affiliations, business activities, and potential conflicts of interest can be found in Items 10 and 14 of the Part 2A Disclosure Brochure, and in Items 4 and 5 of each IAR's Brochure Supplement.

Code of Ethics, Review of Accounts, Client Referrals, and Financial Information

ThePARTNERS maintains a comprehensive Code of Ethics designed to uphold our fiduciary obligations and to promote the highest standards of professional conduct. This Code of Ethics applies to all individuals subject to ThePARTNERS' compliance program (collectively, our "Supervised Persons"). Complete details regarding the ThePARTNERS' Code of Ethics are provided under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading of the Part 2A Disclosure Brochure.

Review of Accounts

Client accounts are reviewed on a regular basis by the Client's designated IAR and periodically by our Chief Compliance Officer. For additional information, please refer to Item 13 – Review of Accounts of the Part 2A Disclosure Brochure.

Other Compensation

Participation in Institutional Adviser Platform

As part of our institutional relationships with custodians such as Fidelity and Schwab, we receive an array of products, services, and support that benefit our firm and, in some cases, our Clients. These benefits are not considered "soft dollars" under the safe harbor of Section 28(e) of the Investment Advisers Act of 1940, as they are not received in exchange for directing client brokerage transactions and are not used exclusively for brokerage and research services.

Instead, these benefits are received as part of an overall institutional platform offering. We disclose them here as a potential conflict of interest. The availability of these services and benefits creates an incentive for us to recommend custodians that provide them over those that do not.

Where ThePARTNERS does not exercise discretion over the selection of the custodian, we may recommend the custodian[s] to Clients for custody and execution services. Nonetheless, Clients are not obligated to use the custodian recommended by ThePARTNERS. As earlier stated, we recommend that Clients establish their account[s] with Fidelity Clearing & Custody Solutions, a related entity of Fidelity Investments, Inc. (collectively "Fidelity"), or with Charles Schwab & Co, Inc. ("Schwab") where the firm maintains institutional relationships. We periodically monitor and review the services, costs, and benefits provided by our recommended custodians to ensure our recommendation continues to be in the best interest of our Clients.

Fidelity

ThePARTNERS has established an institutional relationship with Fidelity to be the preferred custodian for Client accounts. This relationship assists us in managing Client accounts through aggregation of the accounts and use of a single operating system. Based upon this relationship, we have received access to software and related support. The software and related systems support provide direct benefit to the ThePARTNERS and may provide indirect benefits to the Clients through increased efficiencies. In fulfilling our duties to our Clients, we endeavor at all times to put the interests of our Clients first. To reiterate, Clients should be aware, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the firm's recommendation of the custodian over one that does not furnish similar software, systems support, or services.

Additionally, ThePARTNERS has received financial and other support from Fidelity to assist in the launch and maintain its advisory firm. These benefits from Fidelity include reimbursement to Clients for costs charged by a previous custodian for transfer of the assets or account to Fidelity, financing services, receipt of duplicate Client confirmations and bundled duplicate statements at no cost, access to a trading desk that exclusively services its institutional participants, access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts, and access to an electronic communication network for Client order entry and account information.

Schwab

ThePARTNERS may likewise recommend that Clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc., to maintain custody of Client's assets and to effect trades for their accounts. Schwab provides us and our Clients with access to its institutional trading and services, which are not typically available to Schwab retail customers. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. These services generally benefit our Clients.

Services that May Not Directly Benefit Clients

Schwab also makes available to ThePARTNERS other products and services that benefit us but may not directly benefit our Clients or their account(s). These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third party which we may use to service all or some substantial number of our Clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- o provides access to Client account data (such as duplicate trade confirmations and account statements);
- o facilitates trade execution and allocate aggregated trade orders for multiple Client accounts;
- o provides pricing and other market data;
- o facilitates payment of our fees from our Clients' accounts; and
- o assists with back-office functions, recordkeeping and Client reporting.

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

- o educational conferences and events
- o technology, compliance, legal, and business consulting;
- o publications and conferences on practice management and business succession; and

o access to employee benefits providers, human capital consultants and insurance providers.

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

Irrespective of direct or indirect benefits to our Client through Schwab, we strive to enhance the Client's experience, help reach their goals and put their interests before that of our firm or its associated persons.

Schwab has eliminated commissions for online trades of equities, ETFs and options (subject to $0.65 per contract fee). This means that, in most cases, when we buy and sell these types of securities, we will not have to pay any commissions to Schwab. We encourage you to review Schwab's pricing to compare the total costs of entering into a wrap fee arrangement versus a non-wrap fee arrangement. If you choose to enter into a wrap fee arrangement, your total cost to invest could exceed the cost of paying for brokerage and advisory services separately. To see what you would pay for transactions in a non-wrap account please refer to Schwab's most recent pricing schedules available at schwab.com/as pricing guide.

Please see Item 14 – Other Compensation of the Part 2A Disclosure Brochure for details on additional compensation that may be received by ThePARTNERS. The Brochure Supplements for each IAR also provide details on their outside business activities and associated compensation.

Financial Information

Neither ThePARTNERS, nor its management has any adverse financial situations that would reasonably impair our ability of to meet all our obligations to our Clients. Neither ThePARTNERS, nor any of our IARs, has been subject to a bankruptcy or financial compromise.

ThePARTNERS is not required to deliver a balance sheet along with its Disclosure Brochure, as the firm does not collect advance fees of $1,200 or more for services to be performed six months or more in advance.