

Palladium, LLC (d/b/a OAR Financial) Form CRS

Effective March 19, 2024

Item 1 Introduction: OAR Financial is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: What investment services and advice can you provide me? OAR Financial provides discretionary and non-discretionary Outsourced Chief Investment Officer (“OCIO”) services to retail investors. Our discretionary services include asset and style allocation, investment vehicle discretion and portfolio construction. A discretionary account allows us to buy and sell investments in your account without asking for your approval in advance. Our non-discretionary services include offering model portfolios to third-party firms. A non-discretionary account means that you decide what investments to buy and sell. We will monitor your investments on an ongoing basis and provide advice. We do not limit the types of investments that we recommend.

For additional information, please see our Form ADV Part 2A, Items 4, 7, and 13 at the following link: <https://adviserinfo.sec.gov/firm/summary/158989>.

Conversation Starters:

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

Item 3: What fees will I pay? We are customarily compensated based on fees calculated as a percentage of assets under management. OAR Financial reserves the right to negotiate fees. The more assets there are in your account, the more you will pay in fees, so we have an incentive to encourage you to increase the assets in your account. OAR Financial does not charge or receive performance-based fees.

For additional information regarding our fees, please see Item 5 of our Form ADV Part 2A at the following link: <https://adviserinfo.sec.gov/firm/summary/158989>

Other Fees and Costs: The fees that you pay our firm for investment advisory services are separate and distinct from other fees and expenses including custodial fees, brokerage commissions, transaction fees, internal fees and expenses charge by mutual funds and ETFs and other fees and taxes on brokerage accounts and securities transactions.

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.

For additional information, please see our Form ADV Part 2A brochure Items 5 and 6 at the following link: <https://adviserinfo.sec.gov/firm/summary/158989>

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 adviser? How else 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 interests. You should understand and ask us about these conflicts because they affect the recommendations we provide you. Here is an example to help you understand what this means:

- **Proprietary Products:** We offer proprietary OAR Financial Investment Portfolios for which we serve as investment adviser. We receive fees for these products and therefore have an incentive to recommend them to you.

For additional information, please see our Form ADV Part 2A for further information on our conflicts of interest and how we address them: <https://adviserinfo.sec.gov/firm/summary/158989>

Conversation Starter:

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

How do your financial professionals make money?

Our financial professionals are primarily compensated with a fixed annual salary. Neither OAR Financial nor any of its supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Item 4: Do your financial professionals have legal or disciplinary history?

No. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starter:

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

Item 5: Additional Information For additional information about our services, please refer to our Form ADV Part 2A brochure available at <https://adviserinfo.sec.gov/firm/summary/158989>. If you have any questions or to request a copy of Form CRS, please contact us at: via phone at 1-(888) 886-4122 or on our website at www.palladiem.com

Conversation Starter: • Who is my primary contact person?

- Is he or she a representative of an investment-adviser or broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?

Summary of Material Changes Form CRS

OAR Financial

March 19, 2024

- **Items 2 & 3**– Has been amended to take out references to Wrap Fee Programs, as this is not applicable.