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Part 2A Appendix 1 of Form ADV

Wrap Fee Program Brochure

November 2022

This wrap fee brochure provides information about the qualifications and business practices of Compass Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 203-453-7000. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities industry.

Compass Wealth Management LLC is a Registered Investment Adviser. "Registration of" and "Investment Adviser" does not imply any level of skill or training. The oral and written communications of an Adviser provide you with the information about which you determine to hire or retain an Adviser.

Additional information about Compass Wealth Management., LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

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3. Material Changes

Pursuant to SEC Rules, 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. We may further provide other ongoing disclosure information about material changes as necessary. Since out last update we have the following changes to report:

- Item 1, cover page has been amended to reflect the new business name.

We will further provide you with a new Brochure as necessary based on changes or new information at any time without charge. Currently, our Brochure may be requested by contacting our office at 203-453-7000. Additional information about Compass Wealth Management, LLC is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Compass Wealth Management, LLC who are registered, or are required to be registered, as Investment Advisers of Compass Wealth Management, LLC.

4. Services, Fees and Compensation

Services

We are both the sponsor and investment manager of the Compass Wrap Fee Program (the Program). A "wrap-fee" program is one that provides the client with advisory and brokerage execution services for an all-inclusive fee. The client is not charged separate fees by Compass for the respective components of the total service.

Compass Wealth Management (Compass, we, our, us) offers asset management services based on the individual needs of the client. This Brochure provides a description of the advisory services offered under the Compass Wrap program. For more information about Advisor's other investment advisory services, please contact us for a copy of a similar brochure that describes such services or go to www.adviserinfo.sec.gov.

In the Compass Wrap program, we provide ongoing investment advice and management on assets in the client's account. We provide advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds ("ETFs"), variable annuity subaccounts, equities, fixed income securities. We provide advice that is tailored to the individual needs of the client based on the investment objective chosen by the client. Clients may request restrictions on investing in certain securities or groups of securities. Compass will make a reasonable effort to honor those restrictions and if we are unable to, we will notify the client before taking action.

We provide management services on a discretionary basis. The client authorizes Compass to have discretion by signing a Discretionary Asset Management Agreement.

Assets for program accounts are often held in a custodial account at Pershing Advisory Solutions (PAS) or another third-party custodian. PAS acts as the executing broker/dealer for transactions placed in PAS custodial accounts, and provides other administrative services as described throughout this Brochure.

Fees

In the Compass Wrap Program, clients pay us a single annual advisory fee for advisory services and execution of transactions. Clients do not pay brokerage commissions, markups or transaction charges for execution of transactions in addition to the advisory fee. The advisory fee is negotiable between the client and the Advisor and is set out in the advisory agreement. The advisory fee is a percentage based on the value of all assets in the account, including cash holdings. The maximum advisory fee is 1.0 %. The advisory fee may be higher than the fee charged by other investment advisors for similar services. The advisory fee is paid to Compass and is shared between Compass and its associated persons. We do not accept performance-based fees for program accounts.

The advisory fee is deducted from the account by the custodian of the assets based on a written authorization from the client or by a bill sent directly to the client. The quarterly advisory fee is calculated by Compass and transmitted to the custodian. If the advisory agreement is terminated before the end of the quarterly period, client is entitled to a pro-rated refund of any pre-paid quarterly advisory fee based on the number of days remaining in the quarter after the termination date.

Although clients do not pay a transaction charge for transactions in a program account, clients should be aware that Compass pays the custodian transaction charges for the transactions. The transaction charges paid by us vary based on the type of transaction (e.g., mutual fund, equity or fixed income security) and range from $0 to $25. Because we pay the transaction charges in program accounts, there is a conflict of interest. Clients should understand that the cost to us for transaction charges may be a factor that we consider when deciding which securities to select and how frequently to place transactions in a program account.

Other Types of Fees and Charges

Program accounts will incur additional fees and charges from parties other than us as noted below. These fees and charges are in addition to the advisory fee paid to us. We do not share in any portion of these third-party fees. For example, PAS may serve as the custodian and the broker-dealer providing brokerage and execution services on program accounts and consequently impose certain fees and charges. Clients are notified of such charges at account opening and a list of these fees and charges are generally posted on the custodian's website. The custodian will commonly deduct these fees and charges directly from the client's program account.

There are other fees and charges that are imposed by other third parties that apply to investments in program accounts. Some of these fees and charges are described below.

- If a client's assets are invested in mutual funds or other pooled investment products, clients should be aware that there will be two layers of advisory fees and expenses for those assets. Client will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. This is known as the Expense Ratio. Client will also pay us the advisory fee with respect to those assets. Some of the mutual funds available in the program may be purchased directly. Therefore, clients could generally avoid the second layer of fees by not using our management services and by making their own investment decisions. We consider the impact of fees when making investment allocations and seek to keep fees at a minimum.

- Certain mutual funds impose fees and charges such as contingent deferred sales charges, early redemption fees and charges for frequent trading. These charges may apply if client transfers into or purchases such a fund with the applicable charges in a program account.

- Although only no-load and load-waived mutual funds can be purchased in a program account, client should understand that some mutual funds pay asset based sales charges or service fees (e.g., 12b-1 fees) to the custodian with respect to account holdings.

Further information regarding fees assessed by a mutual fund, ETF or other investment vehicle is available in the appropriate prospectus, which is available upon request from us or from the product sponsor directly.

Other Important Considerations

- The advisory fee is an ongoing wrap fee for investment advisory services, the execution of transactions and other administrative and custodial services. The advisory fee may cost the client more than purchasing the program services separately, for example, paying an advisory fee plus commissions for each transaction in the account. Factors that bear upon the cost of the account in relation to the cost of the same services purchased separately include the type and size of the account, historical and or expected size or number of trades for the account, and number and range of supplementary advisory and client-related services provided to the client.

- The advisory fee also may cost the client more than if assets were held in a traditional brokerage account. In a brokerage account, a client is charged a commission for each transaction, and the representative has no duty to provide ongoing advice with respect to the account. If the client plans to follow a buy and hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the client should consider opening a brokerage account rather than a program account.

- We recommend the program to the client, and Compass receives compensation as a result of the client's participation in the program. This compensation includes the advisory fee and also may include other compensation, such as bonuses, awards or other things of value offered by the custodian to us or our associated persons. The amount of this compensation may be more or less than what Compass would receive if the client participated in other wrap fee programs, programs of other investment advisors or paid separately for investment advice, brokerage and other client services. Therefore, we may have a financial incentive to recommend a particular program account over other programs and services.

- The investment products available to be purchased in the program can be purchased by clients outside of a program account, through broker-dealers or other investment firms not affiliated with Compass

5. Account Requirements and Types of Clients

Compass Wealth Management LLC generally requires total assets of at least $50,000 to open a managed account.

Waivers or exceptions to the minimum account requirement may be granted at the discretion of Compass.

6. Portfolio Management Selection and Evaluation

In the Compass Wrap program, we do not select, review or recommend other investment advisors or portfolio managers. Through our associated persons, we are responsible for the investment advice and management offered to clients. We generally require that individuals involved in determining or giving investment advice have several years of experience dealing with individuals and small business.

In our Wrap program, we provide ongoing investment advice and management on assets in the client's account. We provide advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds ("ETFs"), equities, fixed income securities. We provide advice that is tailored to the individual needs of the client based on the investment objective chosen by the client. Clients may request restrictions on investing in certain securities or groups of securities by indicating in the written advisory agreement with us.

Methods of Analysis

We purchase research from a variety of sources and rely on our research partners to guide our investment decisions. We and our research partners use a combination of Fundamental and Technical Analysis, as well as Modern Portfolio Theory in order to formulate investment advice when managing assets. Depending on the analysis, we will implement a long or short term trading strategy based on the particular objectives and risk tolerance of a particular client.

Fundamental Analysis concentrates on factors that affect asset class pricing relative to historical norms.

Technical Analysis involves the analysis of past market data; primarily price and volume. Technical analysis attempts to predict the direction of an asset class based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Modern Portfolio Theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets. Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile (i.e., if for that level of risk an alternative portfolio exists which has better expected returns).

Risks

Please note, investing in securities involves risk of loss that clients should be prepared to bear. There are different types of investments that involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Past performance is not indicative of future results.

Our methods of analysis and investment strategies do not represent any significant or unusual risks, however all strategies have inherent risks and performance limitations such as:

- **Market Risk** - the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.
- **Interest Rate Risk** - the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Credit Risk -** the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Mutual Funds -** Investing in mutual funds carries the risk of capital loss and thus an investor may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned below).
- **Equity -** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.
- **Fixed Income -** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.
- **Exchange Traded Funds (ETFs) -** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Non-U.S. Securities - present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Voting Client Securities

We do not have any authority to and do not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies; clients receive proxies directly from either custodians or transfer agents.

7. Client Information Provided to Portfolio Managers

In the Compass Wrap program, we are responsible for account management; there is no separate portfolio manager involved. We obtain the necessary financial data from the client and assist the client in setting an appropriate investment objective for the account. We obtain this information by having the client complete an advisory agreement and other documentation. Clients are encouraged to contact us if there have been any changes in the client's financial situation or investment objectives or if they wish to impose any reasonable restrictions on the management of the account or reasonably modify existing restrictions. Client should be aware that the investment objective selected for the program is an overall objective for the entire account and may be inconsistent with a particular holding and the account's performance at any time. Client should further be aware that achievement of the stated investment objective is a long-term goal for the account.

The Firm policy requires an annual client meeting (one review every 12 months) to determine if there have been any changes in the client's financial situation, investment objectives, or restrictions. In addition, the meeting should incorporate the account performance, appropriateness of the account, and any other information determined pertinent to the client situation. The annual meeting may occur by phone, in person, via e-mail, or via video conference and documentation will be maintained to evidence that at a minimum the following topics were reviewed:

- The client's financial status
- Risk Tolerance
- Time Horizon
- Investment Objective and Goals
- Asset Allocation and/or Account Holdings

Additionally, on a quarterly basis, IARs should review the performance of the client's advisory account and investment objectives.

8. Client Contact with Portfolio Managers

There are no restrictions on a client's ability to contact and consult with us. We encourage clients to contact us with any questions they may have regarding the management of their account.

9. Additional Information

A. Disciplinary Information:

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Compass Wealth Management, LLC. Compass Wealth Management LLC has no legal or disciplinary events

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each person providing investment advice. There are none.

B. Other Financial Industry Activities and Affiliations

Compass Wealth Management LLC is a fully independent investment adviser operated by Jason Bear.

C. Code of Ethics

Compass Wealth Management, LLC has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, rumor mongering, restrictions of acceptance of significant gifts, and personal trading procedures, among other things.

Compass Wealth Management LLC maintains a written “Code of Ethics” and will provide copies upon request.

D. Review of Accounts

All accounts are reviewed by Compass Wealth Management, LLC at least quarterly. This review includes, but is not limited to performance relative to an appropriate index, risk exposure relative to the client’s stated risk tolerance and investment objectives, and asset allocation relative to the client’s stated investment objectives.

Most clients will receive monthly account statements of their positions and account balances. If there is no account activity in a given month, at minimum, clients will receive quarterly statements. Statements are prepared by an independent custodian; Pershing Adviser Services/Pershing LLC. Most clients receive quarterly, and on demand, performance reports which include: inception to date, quarterly and initiation to date performance relative to an appropriate index. Clients on flat fee agreement receive performance reports upon request and not included in Compass’s performance reporting.

Compass Wealth Management LLC provides quarterly reports which are prepared by its staff using third party software. Generally, the reports are not audited by a third party and are intended as an informational supplement to the client’s monthly, independently prepared account statement from the custodian. Compass will arrange for a third party audit of the performance reports and separately bill the client at cost for this service. Compass will also provide the raw data necessary for the client’s agent to perform an independent audit at no charge to the client. All clients are encouraged to personally contact their advisor as often as they would like to.

Other reports are available from software resources which may be helpful to the client and the advisor in understanding the client’s asset positioning. The scope of additional reporting will vary depending on the client’s requests, complexity of the account and any restrictions placed on the account.

E. Client Referrals and Other Compensation

Compass Wealth Management LLC does not directly or indirectly compensate any person for client referrals.