

Guideline, Inc.
Client Relationship Summary
October 2, 2023

Introduction

Guideline, Inc. is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”). Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. There are free and simple tools available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about investment advisers, broker-dealers, and investing.

What investment services and advice can you provide me?

We offer our investment advisory services to retail investors. Where selected, we provide investment management services to Individual Retirement Accounts (IRAs), Simplified Employee Pension (SEP) IRAs, and 401(k) plans, including selecting, monitoring, and managing the investment menu and portfolios for your account. We also recommend managed portfolios composed of mutual funds via our proprietary software. We review our investment menu on a routine basis in accordance with our Investment Policy Statement. We also act as the sponsor of IRAs, SEP IRA clients, and 401(k) plans, providing account set-up, administration, recordkeeping, certain tax reporting, and maintenance.

You can choose to invest in one of our managed portfolios comprised of mutual funds and recommended by our proprietary software based on your reported risk tolerance and estimated time of retirement (“discretionary account”), or you may choose to create a custom portfolio from our menu of mutual funds (“non-discretionary account”). The type of account is determined and authorized by you in your account contract, which will remain in place until you make applicable investment changes, or we terminate the relationship.

Additional information about our advisory services is located in Item 4 of our Brochure which is available online at www.adviserinfo.sec.gov by searching CRD #281515.

Questions to ask us

- 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 those qualifications mean?

What fees will I pay?

For IRA accounts, you will be charged a recurring monthly base fee based upon the average daily balance of your account assets. The monthly base fee is \$2 a month for accounts with \$10,000 or less in assets or \$4 a month for accounts with more than \$10,000 in assets. For SEP IRA accounts, you will be charged a recurring monthly base fee of \$8. We charge IRA and SEP IRA clients an annual account fee of 0.08% on assets under management based on their account balance on the last day of the month. Fees are non-negotiable.

For 401(k) accounts, we charge a plan administration and service fee directly to the 401(k) plan sponsor, which includes a monthly participant fee of \$4-\$8 per active employee and a monthly base fee which ranges from \$39-\$149. We charge 401(k) plan participants an annual account fee ranging from 0.15%-0.35% (depending on the pricing plan chosen by the 401(k) plan sponsor) on assets under management based on their account balance on the last day of the month. Contact Sales at hello@guideline.com to learn more about exclusive pricing options available in Enterprise tier. 401(k) plan participants who have terminated employment with the plan sponsor are charged an additional

monthly base fee of \$4 per month after an initial 90-day grace period following termination of employment, or after the end of the blackout period if the retirement plan was recently transferred to Guideline from another 401(k) provider. 401(k) plan participants may have a third-party advisor's fee deducted from their account if the 401(k) plan sponsor engages a third-party advisor to assist with administering the plan.

Guideline provides a detailed schedule of fees at the time of enrollment. Fees are subject to change at any time with thirty (30) day notice. Lastly, the mutual funds within your portfolio charge fees to you which will reduce the value of your investments over time. Information on these fees can be found in each fund's prospectus, made available upon request.

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.

Additional information about our fees is located in Item 5 of our Brochure, which is available online at www.adviserinfo.sec.gov by searching CRD #281515, and on our website at <https://www.guideline.com>.

Questions to ask us:

- Help me understand how these fees and costs will 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 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 interests 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 investment advice we provide you.

Here is an example to help you understand what this means. We charge an annual account fee that is based on the amount of assets we manage for you. The fee that you will pay will be computed based on the fee schedule set forth in the "What fees will I pay" section above as well as in our ADV Brochure. Therefore, the more assets in the accounts we manage for you, the more you will pay in fees, and we have an incentive to encourage you to increase the amount of assets in your accounts. However, our employees are not paid based on the amount of assets that are in your account and we always strive to put the interest of our clients first as part of our fiduciary duty as a registered investment adviser.

Additional information about our conflicts of interest can be found in our Brochure under Items 10, 11, and 14 which is available online at www.adviserinfo.sec.gov by searching CRD #281515.

Questions to ask us:

- 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 employees of the firm and are paid a fixed monthly salary. They do not receive or accept compensation for the sale of securities or other investment products. Employees also receive compensation in the form of equity grant options in Guideline, Inc. Certain team members receive incentive compensation based on factors including but not limited to, the number of participants in a plan and/or the number of plans brought to Guideline.

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

No, our firm and/or financial professionals do not have any legal and disciplinary history. Visit www.investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Questions to ask us:

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

Additional Information

You can find additional information about our firm’s investment advisory services on the SEC’s website at www.adviserinfo.sec.gov by searching CRD# 281515. You may also contact our firm at (888) 228-3491 and talk to any one of our investment professionals or support staff.

Questions to ask us

- 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?

Exhibit A – Summary of Material Changes

This Exhibit discusses material changes to our Client Relationship Summary since our update dated July 31, 2023. The following material changes were included in the update filed on October 2, 2023.

- Updated language in the what fees will I pay section as we updated the range of the monthly base fee that 401(k) plan sponsors pay from \$49-\$129 to \$39-\$149 and updated the range of the annual account fee 401(k) plan participants will pay from 0.08%-0.35% to 0.15%-0.35% .