



AECH Financial
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Item 1: Firm Brochure (Form ADV Part 2A)

This brochure provides information about the qualifications and business practices of AECH Financial (CRD # 336460). If you have any questions about the contents of this brochure, please contact us at (314) 612-4525. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration (e.g. “registered investment advisor”) does not imply a certain level of skill or training.

Additional information about AECH Financial also is available on the SEC’s website by searching for the Firm’s CRD Number 336460 at www.adviserinfo.sec.gov.

Item 2: Material Changes

AECH Financial will ensure that clients receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the Firm's fiscal year end, December 31. This means that if there were any material changes over the past year, clients will receive a summary of those changes no later than April 30. At that time, AECH Financial will also offer a copy of its most current disclosure brochure and may also provide other ongoing disclosure information about material changes as necessary. If there are no material changes over the past year, no notices will be sent.

Clients and prospective clients can always receive the most current disclosure brochure for AECH Financial at any time by contacting their investment advisor representative.

Since our amendment filed on December 12, 2025, we have the following material changes to report:

- Items 4 and 5 have been updated to reflect that the Firm provides ERISA plan services as a 3(21) Adviser.

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Item 4 Advisory Business

Firm Description

AECH Financial is a Registered Investment Advisor with the State of Missouri and applying for registration in the state of Illinois. AECH Financial was founded on April 15, 2025.

The Principal Owner and Chief Compliance Officer of AECH Financial is Jay Peters.

Types of Advisory Services

Investment Management Services

AECH Financial specializes in quantitative, fundamental, technical, and economic analysis to determine what investments are in favor of AECH Financials' investment models. AECH Financial assesses clients' current holdings and ensures alignment with both short- and long-term goals. The Firm performs ongoing reviews of investment performance and portfolio exposure to market conditions. Accordingly, the Firm is authorized to perform various functions without further approval from the client, such as the determination of securities to be purchased or sold without prior permission from the client for each transaction. Any and all trades are made in the best interest of the client as part of AECH Financials' fiduciary duty. However, risk is inherent to any investing strategy and model. Therefore, AECH Financial does not guarantee any results or returns.

Prior to engaging AECH Financial to provide any investment advisory services, AECH Financial requires a written financial service agreement ("FSA") signed by the client prior to the engagement of any services. The FSA will outline services to which the client is entitled and fees the client will incur.

AECH Financial is a fee-only investment management firm. The firm does not receive commissions for purchasing or selling stocks, bonds, mutual funds, real estate investment trusts, or other commissioned products for clients. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted.

AECH Financial does not act as a custodian of client assets. The client always maintains asset control. AECH Financial places trades for clients under a limited power of attorney through qualified custodian/broker.

Altruist Model Marketplace

AECH also participates in the Model Marketplace of Altruist LLC, an SEC-registered investment adviser and affiliate of Altruist Financial LLC. AECH may assign to client accounts any of the available Altruist LLC-generated portfolios, Third-Party Portfolios, or other portfolios made available through Altruist LLC's Model Marketplace. This service is offered to Clients at no extra cost.

ERISA Plan Services

The Employee Retirement Income Security Act of 1974 ("ERISA") is the law governing the operation of employee benefit plans. AECH provides investment advisory and consulting services to Plan Sponsors of ERISA plans under Sections 3(21) of ERISA. When providing services to a Plan Sponsor, the Plan

Sponsor is the client. AECH provides ongoing investment monitoring and investment recommendation services as outlined in the written agreement between AECH and the Plan Sponsor. Under the 3(21) Service, AECH does not have investment discretion and does not have the power to manage, acquire, or dispose of any plan assets. The Plan Sponsor retains ultimate decision-making authority for the investments and may accept or reject the recommendations of AECH under this Service.

As part of this service, AECH may assist the Plan Sponsor with Plan Participant enrollment and Plan education. If the services selected by the Plan Sponsor include enrollment and investment education to Plan Participants, the services do not include any individualized investment advice within the meaning of ERISA to Plan Participants with respect to their Plan assets.

Services Tailored to Clients’ Needs

Services are provided based on a client’s specific needs within the scope of the services provided as discussed above. A review of the information provided by the client regarding the client’s current financial situation, goals, and risk tolerances will be performed and advice will be provided that is in line with available information. Clients may impose restrictions on investing in certain securities or types of securities by providing written request.

Wrap Fee Program versus Portfolio Management Program

AECH Financial does not offer a Wrap Fee Program.

Assets Under Management

As of December 31, 2025, AECH Financial has the following assets under management:

Discretionary assets: \$24,000,0000
 Non-discretionary assets: \$0

Item 5 Fees and Compensation

AECH Financial is compensated primarily through an annual asset-under-management (AUM) fee, calculated as a percentage of household assets, with tiered pricing and negotiable fees for larger accounts. Fees are generally deducted directly from client accounts by our custodian but may alternatively be invoiced. All fees are disclosed in advance, prorated for partial periods, and subject to refund if the advisory agreement is terminated mid-period.

Fees and other charges

Investment Management Fees:

Fees for individually managed accounts are tier priced as follows:

Household Assets Managed	Fee (Annual Percentage)
\$0 - \$1,000,000	1.25%
\$1,000,001 - \$5,000,000	1.00%
\$5,000,001+	Negotiable

All asset-based fees are deducted by the qualified custodian of record on a monthly basis in advance, or as otherwise indicated in the client agreement. Client statements for prior deductions will be provided on a monthly basis.

Altruist Model Marketplace

As stated in Item 4, AECH also participates in the Model Marketplace of Altruist LLC, an SEC-registered investment adviser and affiliate of Altruist Financial LLC. AECH may assign to client accounts any of the available Altruist LLC-generated portfolios, Third-Party Portfolios, or other portfolios made available through Altruist LLC's Model Marketplace. This service is offered to Clients at no extra cost.

ERISA Plan Services

Fees for retirement plan services provided to ERISA Plan Sponsors are negotiated by AECH and the Plan Sponsor and will not exceed **1.5%**. A Plan Sponsor's agreement with the recordkeeper will determine the frequency at which fees are paid. For example, fees may be calculated and billed quarterly in arrears; however, some recordkeepers may calculate and bill more frequently.

Third Party Fees

All fees paid to AECH Financial for investment advisory services are separate and distinct from the expenses charged by third-party managers and Investment Companies to their shareholders. These fees and expenses are described to the client in separate disclosures. These fees will generally include third-party management fees, an Investment Company management fee, other fund expenses, and in some situations a possible distribution fee.

AECH Financial will provide investment advisory services and portfolio management services but will not provide custodial or other administrative services. At no time will AECH Financial accept or maintain custody of a client's funds or securities except for authorized fee deduction. The Client may contact the Custodian directly for disbursements, or account record changes, and may also do so in writing to the custodian. AECH Financial may act at the client's convenience to facilitate such written communications to the Custodian, provided that such action is not construed to be custody of client assets. Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. Fees paid to the AECH Financial are separate and distinct from the custodian and execution fees.

Fee Deduction Disclosure

Where AECH Financial deducts its management fee from client accounts utilizing a qualified custodian, the Firm is required to meet the following requirements.

- a. Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian;
- b. The firm must send the qualified custodian a written invoice detailing the fee amount to be deducted from the client account; and,

- c. The firm must send the client a written invoice itemizing the fee, the invoice must detail any formulae used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based. This may be included with a quarterly performance report.

Right of Cancellation

In addition to the right to terminate an agreement pursuant to its terms, a client may cancel an agreement with AECH Financial within five (5) business days of first receiving a copy of this disclosure brochure and supplement without penalty or fee.

Advance Payment of Fees and Termination

AECH Financial's investment management fees are payable monthly in advance, based on the average daily balance. Upon termination, any fees paid in advance will be prorated to the date of termination and services rendered. Any excess will be refunded to client by check issued to the customer as soon as practicable.

Item 6 Performance-Based Fees and Side-By-Side Management

AECH Financial does not charge or accept performance-based fees.

Item 7 Types of Clients

AECH Financial provides investment advice to many different types of clients. These clients generally include individuals, trusts, estates, corporations, and other types of business entities.

Minimum Account Size

The Firm does not require a minimum account size. Third-party managed programs generally have account minimum requirements, and these minimum requirements vary from manager to manager. Account minimums are generally higher on fixed income accounts than equity-based accounts.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

A. *Methods of Analysis*

AECH Financial may use the following methods when considering investment strategies and recommendations.

Charting Review

Charting is a technical analysis that charts the patterns of stocks, bonds, and commodities to help determine buy and sell recommendations for clients. It is a way of gathering and processing price and volume information in a security by applying mathematical equations and plotting the resulting data onto graphs in order to predict future price movements. A graphical historical record assists the analyst in

spotting the effect of key events on a security's price, its performance over a period of time, and whether it is trading near its high, near its low or in between. Chartists believe that recurring patterns of trading, commonly referred to as indicators, can help them forecast future price movements.

Fundamental Review

A fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. Fundamental analysis attempts to determine the true value of a company or security by looking at all aspects of the company or security, including both tangible factors (e.g., machinery, buildings, land, etc.) and intangible factors (e.g., patents, trademarks, "brand" names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios).

The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price with the aim of determining what sort of position to take with that security (e.g., if underpriced, the security should be bought; if overpriced the security should be sold). Fundamental analysis uses real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for many types of securities.

Technical Review

Technical analysis is a method of evaluating securities that analyzes statistics generated by market activity, such as past prices and volume. Technical analysis does not attempt to measure a security's intrinsic value but instead uses past market data and statistical tools to identify patterns that can suggest future activity. Historical performance of securities and the markets can indicate future performance.

Cyclical Review

A cyclical analysis assumes the market reacts in reoccurring patterns that can be identified and leveraged to provide performance. Cyclical analysis of economic cycles is used to determine how these reoccurring patterns, or cycles, affect the returns of a given investment, asset, or company. Cyclical analysis is a time-based assessment which incorporates past and present performance to determine future value. Cyclical analyses exist because the broad economy has been shown to move in cycles, from periods of peak performance to periods of low performance. The risks of this strategy are two-fold: (1) the markets do not always repeat cyclical patterns; and (2) if too many investors begin to implement this strategy, it changes the very cycles of which they are trying to take advantage.

Economic Review

An economic analysis determines the economic environment over a certain time horizon. This involves following and updating historic economic data such as U.S. gross domestic product and consumer price index as well as monitoring key economic drivers such as employment, inflation, and money supply for the world's major economies.

B. *Investment Strategies*

When implementing investment advice to clients, the Firm may employ a variety of strategies to best pursue the objectives of clients. Depending on market trends and conditions, AECH Financial will employ any technique or strategy herein described, at the Firm's discretion and in the best interests of the client. The Firm does not recommend any particular security or type of security. Instead, the Firm makes recommendations to meet a particular client's financial objectives. There is inherent risk to any investment and clients may suffer a loss of ALL OR PART of a principal investment.

Long-Term Purchases

Long-term purchases are securities that are purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Long-term purchases may be affected by unforeseen changes in the company in which a client is invested or in the overall market. Long-term trading is designed to capture market rates of both return and risk. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Due to its nature, the long-term strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include, but are not limited to, inflation (purchasing power) risk, interest rate risk, economic risk, and political/regulatory risk.

Short-Term Purchases

Short-term purchases are securities that are purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Short-term trading generally holds greater risk. Frequent trading can affect investment performance due to increased brokerage fees and other transaction costs and taxes.

Strategic Asset Allocation

Asset allocation is a combination of several different types of investments; typically, this includes stocks, bonds, alternatives and cash equivalents among various asset classes to achieve diversification. The objective of asset allocation is to manage risk and market exposure while still positioning a portfolio to meet financial objectives.

C. *Risk of Loss*

Investing inherently involves risk up to and including loss of the principal sum. Further, past performance of any security is not necessarily indicative of future results. Therefore, future performance of any specific investment or investment strategy based on past performance should not be assumed as a guarantee. AECH Financial does not provide any representation or guarantee that the financial goals of clients will be achieved.

The potential return or gain and potential risk or loss of an investment varies, generally speaking, with the type of product invested in. Below is an overview of the types of products available on the market and the associated risks of each:

General Risks. Investing in securities always involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market

corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives can or will be met. Past performance is in no way an indication of future performance. We also cannot assure that third parties will satisfy their obligations in a timely manner or perform as expected or marketed.

General Market Risk. Investment returns will fluctuate based upon changes in the value of the portfolio securities. Certain securities held may be worth less than the price originally paid for them, or less than they were worth at an earlier time.

Common Stocks. Investments in common stocks, both directly and indirectly through investment in shares of ETFs, may fluctuate in value in response to many factors, including, but not limited to, the activities of the individual companies, general market and economic conditions, interest rates, and specific industry changes. Such price fluctuations subject certain strategies to potential losses. During temporary or extended bear markets, the value of common stocks will decline, which could also result in losses for each strategy.

Portfolio Turnover Risk. High rates of portfolio turnover could lower the performance of an investment strategy due to increased costs and may result in the realization of capital gains. If an investment strategy realizes capital gains when it sells its portfolio investments, it will increase taxable distributions to you. High rates of portfolio turnover in a given year would likely result in short-term capital gains and under current tax law you would be taxed on short-term capital gains at ordinary income tax rates, if held in a taxable account.

Non-Diversified Strategy Risk. Some investment strategies may be non-diversified (e.g., investing a greater percentage of portfolio assets in a particular issuer and owning fewer securities than a diversified strategy). Accordingly, each such strategy is subject to the risk that a large loss in an individual issuer will cause a greater loss than it would if the strategy held a larger number of securities or smaller positions sizes.

Model Risk. Financial and economic data series are subject to regime shifts, meaning past information may lack value under future market conditions. Models are based upon assumptions that may prove invalid or incorrect under many market environments. We may use certain model outputs to help identify market opportunities and/or to make certain asset allocation decisions. There is no guarantee any model will work under all market conditions. For this reason, we include model related results as part of our investment decision process, but we often weigh professional judgment more heavily in making trades or asset allocations.

ETF Risks, including Net Asset Valuations and Tracking Error. An ETF's performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depository Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by the Firm plus any advisory fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the ETF's net asset value, and therefore directly affect the ETF's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the ETF may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Cryptocurrency. Cryptocurrency is a digital currency that can be used to buy goods and services, but uses an online ledger with strong cryptography (i.e., a method of protecting information and communications with codes) to secure online transactions. Unlike conventional currencies issued by a monetary authority, cryptocurrencies are generally not controlled or regulated, and their price is determined by the supply and demand of their market. Cryptocurrency is currently considered to be a speculative investment. For clients who want exposure to cryptocurrencies, AECH will consider investment in a corresponding ETF that provides cryptocurrency exposure. Investments in cryptocurrency exchange-traded funds (ETFs) can also involve significant risks, including high volatility, regulatory uncertainty, and cybersecurity threats. While cryptocurrency ETFs provide indirect exposure to digital assets, they remain subject to the price fluctuations of the underlying cryptocurrencies, which can be extreme. Additionally, regulatory developments may impact the availability and operation of cryptocurrency ETFs, potentially affecting their liquidity and valuation. Other risks include tracking errors, custodial risks, and the potential for increased fees compared to traditional ETFs. Investors should carefully consider these risks and their risk tolerance before investing in cryptocurrency ETFs

Buffer Funds. Buffer funds seek to provide investors with the upside of an asset's returns (generally up to a capped percentage) while also providing downside protection on the first predetermined percentage of losses. Buffer funds are designed to safeguard against market downturns by employing complex options strategies. If the market performs well and exceeds the buffer, the buffer fund will not enjoy gains beyond a certain point. If the market experiences losses beyond the buffer, the buffer fund is exposed to open-ended losses. As buffer funds own options, they do not receive dividends from their equity holdings. We encourage clients to carefully read the relevant prospectus to fully understand the cost structures, risks, and features of these complex products.

Inflation, Currency, and Interest Rate Risks. Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by the Firm may be affected by the risk that currency devaluations affect Client purchasing power.

Liquidity Risk. Liquidity is the ability to readily convert an investment into cash to prevent a loss, realize an anticipated profit, or otherwise transfer funds out of the particular investment. Generally, investments are more liquid if the investment has an established market of purchasers and sellers, such as a stock or bond listed on a national securities exchange. Conversely, investments that do not have an established

market of purchasers and sellers may be considered illiquid. Your investment in illiquid investments may be for an indefinite time, because of the lack of purchasers willing to convert your investment to cash or other assets.

Legislative and Tax Risk. Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations, particularly for options, swaps, master limited partnerships, Real Estate Investment Trust, Exchange Traded Products/Funds/Securities. We do not engage in tax planning, and in certain circumstances a Client may incur taxable income on their investments without a cash distribution to pay the tax due. Clients and their personal tax advisors are responsible for how the transactions in their account are reported to the IRS or any other taxing authority.

Foreign Investing and Emerging Markets Risk. Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social, and economic developments affecting one or more foreign countries.

In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

Information Security Risk. We may be susceptible to risks to the confidentiality and security of its operations and proprietary and customer information. Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by us and other investment advisors. Data security breaches of our electronic data infrastructure could have the effect of disrupting our operations and compromising our customers' confidential and personally identifiable information. Such breaches could result in an inability of us to conduct business, potential losses, including identity theft and theft of investment funds from customers, and other adverse consequences to customers. We have taken and will continue to take steps to detect and limit the risks associated with these threats.

Tax Risks. Tax laws and regulations applicable to an account with the Firm may be subject to change and unanticipated tax liabilities may be incurred by an investor as a result of such changes. In addition, customers may experience adverse tax consequences from the early assignment of options purchased for a customer's account. Customers should consult their own tax advisors and counsel to determine the potential tax-related consequences of investing.

Advisory Risk. There is no guarantee that our judgment or investment decisions on behalf of any particular account will necessarily produce the intended results. Our judgment may prove to be incorrect, and an account might not achieve its investment objectives. In addition, it is possible that we may

experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to accounts' custodians' software.

Dependence on Key Employees. An account's success depends, in part, upon the ability of our key professionals to achieve the targeted investment goals. The loss of any of these key personnel could adversely impact the ability to achieve such investment goals and objectives of the account.

AECH Financial does not primarily recommend a particular type of security.

Item 9 Disciplinary Information

Registered investment advisors are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of the advisory business or integrity of the Firm's management.

AECH Financial has no disciplinary disclosures. Jay Peters, the owner and operator of AECH Financial, has no disciplinary disclosures.

Item 10 Other Financial Industry Activities and Affiliations

Registration as a Broker/Dealer or Broker/Dealer Representative

AECH Financial is not registered and does not have an application pending to register, as a broker dealer and its management persons are not registered as broker/dealer representative.

Registration as a Futures Commission merchant, Commodity Pool Operator

AECH Financial and its management persons are not registered and do not have application pending to register, as a futures commission merchant, commodity pool operator/advisor.

Relationships Material to this Advisory Business and Possible Conflicts of Interest

Jay Peters of AECH Financial is licensed as an independent insurance agent with various insurance agencies and can sell insurance products to clients and earn commissions. Insurance commissions earned are separate and distinct from our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of AECH Financial, who are insurance agents have an incentive to recommend insurance products to clients for the purpose of generating commissions. However, clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the firm.

When an insurance policy is purchased by the client, the investment advisor representative is paid a commission for servicing as the agent on record. The Firm always acts in the best interest of the client, including the sale of commissionable products to advisory clients.

Selection of other Advisors

AECH Financial does not recommend or select other investment advisors for its clients.

Item 11 Code of Ethics, Conflicts of Interest, and Personal Trading

A. Fiduciary Status

As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its clients. AECH Financial and its representatives have a fiduciary duty to all clients.

AECH Financial and its representatives' fiduciary duty to clients is considered the core underlying principle for AECH Financials' Code of Ethics and represents the expected basis for all representatives' dealings with clients. AECH Financial has the responsibility to ensure that the interests of clients are placed ahead of it or its representatives' own investment interest. All representatives will conduct business in an honest, ethical, and fair manner. All representatives will comply with all federal and state securities laws at all times. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to services being conducted. All representatives have a responsibility to avoid circumstances that might negatively affect or appear to affect the representatives' duty of complete loyalty to their clients.

B. Recommendations Involving Material Financial Interests

Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

C. Personal Trading Practices

AECH Financial and/or its investment advisory representatives may from time-to-time purchase or sell products or investments that they may recommend to clients. AECH Financial has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of AECH Financial.

In addition, the Code of Ethics governs personal trading by each employee of AECH Financial deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of AECH Financial are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of the Firm or its affiliates.

AECH Financial collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve potential conflicts of interest. AECH Financial's Code of Ethics is available upon request.

Item 12 Brokerage Practices

A. Selection and Recommendation

AECH Financial has a duty to select brokers, dealers and other trading venues that provide best execution for clients. The duty of best execution requires an investment adviser to seek to execute securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances, considering all relevant factors. The lowest possible commission, while very important, is not the only consideration. The brokers' dealer AECH financial currently utilizes is Altruist Financial LLC ("Altruist").

It is the policy of the Firm to seek best execution in all portfolio trading activities for all investment disciplines and products, regardless of whether commissions are charged. This applies to trading in any instrument, security, or contract including equities, bonds, and forward or derivative contracts.

The standards and procedures governing best execution are set forth in several written policies. Generally, to achieve best execution, AECH Financial considers the following factors, without limitation, in selecting brokers and intermediaries:

- Execution capability;
- Order size and market depth;
- Availability of competing markets and liquidity;
- Trading characteristics of the security;
- Availability of accurate information comparing markets;
- Quantity and quality of research received from the broker dealer;
- Financial responsibility of the broker-dealer;
- Confidentiality;
- Reputation and integrity;
- Responsiveness;
- Recordkeeping;
- Ability and willingness to commit capital;
- Available technology; and
- Ability to address current market conditions.

AECH Financial evaluates the execution, performance, and risk profile of the broker-dealers it uses at least annually.

B. Research and Other Soft Dollar Benefits

Soft dollar practices are arrangements whereby an investment advisor directs transactions to a broker-dealer in exchange for certain products and services that are allowable under SEC and State rules. Client commissions may be used to pay for brokerage and research services and products as long as they are eligible under Section 28(e) of the Exchange Act of 1934. Section 28(e) sets forth a "safe harbor," which provides that an investment advisor that has discretion over a client account is not in breach of its fiduciary duty when paying more than the lowest commission rate available if the advisor determines in good faith that the rate paid is commensurate with the value of brokerage and research services provided by the broker-dealer.

AECH Financial does not currently have any soft dollar benefit arrangements.

As stated above, AECH Financial recommends that clients establish custodial accounts with Altruist to maintain custody of clients' assets and to effect trades for their accounts. While there is no direct link between the investment advice given to clients and the recommendation to use the custodial services of Altruist, AECH Financial receives certain benefits due to this arrangement, as outlined below.

Economic Benefits

As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or another brokerage firm. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Services may include access to client account data (such as duplicate trade confirmations and account statements); the ability to have investment advisory fees deducted directly from client account; trade execution and allocate aggregated trade orders for multiple client accounts; and providing pricing and other market data. The Custodian may also provide us with services that help us manage and further develop our business enterprise. Such services generally benefit only us. Such research products and services are generally provided to all investment advisers that utilize the institutional services platforms of these custodians and are not considered to be paid for with soft dollars. However, you should be aware that the availability of products and services benefits us because we do not have to produce or purchase them. They are not contingent upon AECH Financial committing any specific amount of business to a custodian in trading commissions or assets in custody. The fact that we receive these benefits is an incentive for us to recommend the use of a particular custodian. This is a conflict of interest. We believe, however, that taken in the aggregate our recommendation of a particular custodian and broker is in the best interest of our clients. Our selection is primarily supported by the scope, quality and price of a custodian's services, and not services that benefit only us.

C. Brokerage for Client Referrals

AECH Financial does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

D. Directed Brokerage

AECH Financial does not allow client-directed brokerage.

E. Order Aggregation

AECH Financial may, at times, aggregate sale and purchase orders of securities ("block trading") for advisory accounts with similar orders in order to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the client. Clients also benefit relatively from better purchase or sale execution prices, or beneficial timing of transactions or a combination of these and other factors. Aggregate orders will be allocated to client accounts in a systematic non-preferential manner. AECH Financial may aggregate or "bunch" transactions for a client's account with those of other clients in an effort to obtain the best execution under the circumstances.

F. Trade Error Policy

AECH Financial maintains a record of any trading errors that occur in connection with investment activities of its clients. Both gains and losses that result from a trading error made by AECH Financial will be borne or realized by AECH Financial.

Item 13 Review of Accounts

A. Periodic Reviews

The CCO regularly reviews and evaluates client accounts for compliance with each client's investment objectives, policies and restrictions. The CCO analyzes rates of return and allocation of assets to determine model strategy effectiveness on at least a quarterly basis.

The CCO also conducts an annual review to confirm that investment objectives, risk tolerance, and restrictions remain appropriate for each client.

B. Intermittent Review Factors

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or changes in the client's financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Clients are advised to notify AECH Financial promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

C. Reports

Clients may receive confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information. Confirmations and statements are prepared and delivered by the custodian.

Item 14 Client Referrals and Other Compensation

AECH Financial has entered into referral agreements with Welcome to the Cause (DBA Redefine) and Estes & Associates. These entities provide prospective client introductions to the Firm in exchange for compensation. All such agreements are in writing and comply with applicable state and federal laws and regulations. If a client is introduced to AECH Financial by a solicitor, AECH Financial will typically pay that solicitor a fee. While the specific terms of each agreement may differ, generally, the compensation will be based upon the percentage of fees paid to AECH Financial by such clients. Any such fee shall be paid solely from AECH Financials' fees and will not result in any additional charge to the client. Each prospective client who is referred to AECH Financial under such an arrangement will receive a copy of the Firm's Disclosure Brochures and a separate written disclosure document disclosing the nature of the relationship between the third-party solicitor and AECH Financial and the amount of compensation that will be paid by AECH Financial to the solicitor.

Item 15 Custody

A. Custodian of Assets

Custody means holding, directly or indirectly, client funds or securities or having any authority to obtain possession of them.

AECH Financial does not have direct custody of any client funds and/or securities. AECH Financial will not maintain physical possession of client funds and securities. Instead, clients' funds and securities are held by a qualified custodian.

While AECH Financial does not have physical custody of client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds client funds pursuant to the client's account application.

In certain jurisdictions, the ability of AECH Financial to withdraw its management fees from the client's account may be deemed custody. Prior to permitting direct debit of fees, each client provides written authorization permitting fees to be paid directly from the custodian.

As part of the billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. The custodian does not calculate the amount of the fee to be deducted and does not verify the accuracy of AECH Financials' advisory calculation. Therefore, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation. Clients should contact AECH Financial directly if they believe that there may be an error in their statement.

Item 16 Investment Discretion

AECH Financial may exercise full discretionary authority to supervise and direct the investment of a client's account. This authority will be granted by clients upon completion of AECH Financials' FSA. This authority allows AECH Financial and its affiliates to implement investment decisions without prior consultation with the client. Such investment decisions are made in the client's best interest and in accordance with the client's investment objectives. Other than agreed upon management fees due to AECH Financial, this discretionary authority does not grant the Firm the authority to have custody of any assets in the client's account or to direct the delivery of any securities or the payment of any funds held in the account to AECH Financial. The discretionary authority granted by the client to the Firm does not allow AECH Financial to direct the disposition of such securities or funds to anyone except the account holder.

Item 17 Voting Client Securities

The Firm does not perform proxy voting services on the client's behalf. Clients are encouraged to read through the information provided with the proxy voting documents and to make a determination based on the information provided. Upon the client's request, Firm representatives may provide limited clarifications of the issues presented in the proxy voting materials based on his or her understanding of issues presented in the proxy voting materials. However, clients have the ultimate responsibility for making all proxy voting decisions.

Item 18 Financial Information

A. Balance Sheet Requirement

AECH Financial is not the qualified custodian for client funds or securities and does not require prepayment of fees of more than \$500 per client, six (6) months or more in advance.

B. Financial Condition

AECH Financial does not have any financial impairment that would preclude the Firm from meeting contractual commitments to clients.

C. Bankruptcy Petition

AECH Financial has not been the subject of a bankruptcy petition at any time during the last 10 years.

Item 19 Requirements for State-Registered Advisors

A. Formal Education and Business Background of Principal Officer

Jay Peters, Member

Education:

Southeast Missouri State University, Graduated 2008

Business Background:

- 04/2025 – Present Owner, Lead Advisor, and Chief Compliance Officer, AECH Financial
- 01/2016 - 06/2025 Investment Advisor Representative and Registered Representative, Cetera Financial Specialists
- 01/ 2016 - 06/2025 Paraplanner, MSMF Wealth Management
- 03/2015 - 11/2015 Financial Advisor, Edward Jones

Jay Peters is the sole Principal Executive Officer of AECH Financial. He is also the Chief Compliance Officer. His individual CRD number is 6463221.

For additional information about Jay Peters, please see Form ADV Part 2B.

B. Other Business Activities

Mr. Peters is a member of Keller Williams that receives exclusive conferences for networking and marketing. This membership is for professional development purposes and does not involve any investment-related services or compensation.

Mr. Peters is a consultant for Welcome to the Cause (DBA Redefine) and provides general strategies and best practices in exchange for client referrals. AECH Financial also has a referral arrangement in place with Welcome to the Cause (DBA Redefine). See Item 14 of our ADV Part 2A for more information.

Mr. Peters is an elected board member for Summit Ridge Estates Homeowner Association. He provides oversight, maintenance of the indentures, finances, and common group of their subdivision.

Mr. Peters is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Mr. Peters always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of AECH Financial in their capacity as a licensed insurance agent.

Mr. Peters has a fiduciary duty to always act in the best interest of the client. See Item 11 of our ADV Part 2A for more information.

C. Performance-Based Fees

Neither the Firm nor Jay Peters are compensated for Advisory Services with performance-based fees. See Item 5 (Fees and Compensation) of this brochure for further information on the Firm's advisory fees.

D. Disciplinary Information

Jay Peters has not been the subject of any legal or disciplinary actions by courts, regulatory agencies, self-regulatory organizations, or professional societies that would be relevant to a client's evaluation of his integrity or professional background.

E. Material Relationships with Issuers of Securities

Jay Peters does not maintain any relationships or arrangements with any issuer of securities.