

Client Relationship Summary (Form CRS)

Introduction

Twele Capital Management, Inc. is registered with the Securities and Exchange Commission as an investment advisor, and we provide investment advisory services; we do not provide brokerage services. We feel that it is important for you to understand how advisory and brokerage services and fees differ in order to determine which type of account is right for you. This document provides you with a summary of the types of services we provide and how you pay for these services. There are free and simple tools available to research firms and financial professionals at investor.gov/CRS. This site provides educational materials about investment advisers, broker-dealers and investing.

What investment service and advice can you provide me?

We offer investment advisory services to individual investors for an ongoing asset-based fee which is calculated on the value of cash and investments in the investor's account. The relationship we have with our clients is called a **discretionary account** meaning a client authorizes us to buy and sell securities within their account without needing the client's consent for each trade. You would sign an investment management agreement giving us this authority. Generally, we require a minimum of \$500,000 of assets under management to establish a relationship.

If you enter into a relationship with our firm, we will: understand your goals, prepare a written Investment Policy Statement, create an asset allocation strategy, implement the strategy, execute necessary risk management in the form of rebalancing and perform ongoing review and assessment. All of our clients receive quarterly performance reporting to track results versus their goals.

Our investment recommendations are not limited to any specific product or service, but generally we use Exchange-Traded Funds (ETFs) as the core investment building blocks for client portfolios.

Key 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?

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.

The annualized fee for our service is charged as a percentage of assets under management for your household, according to the following schedule:

- Household account balances below \$5.0M in assets are charged 0.65% annually.
- Household balances above \$5.0M in assets under management are charged 0.50% annually.

While we have established this fee schedule, we do retain the discretion to negotiate alternative fees on a client-by-client basis based on client facts and circumstances. Fees are calculated at the end of each quarter based upon the amount of your assets under management and are deducted automatically from your account a few days after each calendar quarter end.

All fees paid to us are separate and distinct from additional fees that you are subject to including the fees and expenses charged by the sponsors of the investment products we use, also known as expense ratios. Our clients have their assets safeguarded by an independent custodian, Charles Schwab & Co., Inc. The custodian also may charge fees, including, but not limited to, transaction charges when we buy or sell an investment for you.

Key Questions to Ask Us:

- *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 can affect the investment advice we provide you. Here are some examples to help you understand what this means:

- More assets in an account generates additional fees for us, which may provide an incentive to encourage you to increase your assets with our firm.
- Employees of our firm can buy or sell, for their personal accounts, securities identical to or different from those recommended to our clients. In addition, any employee can have an interest or position in a certain security which will also be recommended to a client.

Key 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 paid through a combination of salary and bonus. Some of our financial professionals are principals (owners) of the firm. Principals may earn additional compensation based on the net income of the firm. Our financial professionals receive no product sales commissions or other forms of payment.

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

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

Key Questions to Ask Us:

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

Additional Information

For additional information on our firm and advisory services, please see our Form ADV brochure on investor.gov/CRS or at <https://adviserinfo.sec.gov/firm/summary/130239>. If you would like additional information or a copy of this disclosure, please contact us at (952) 887-9253.

Key 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 my investments or how my financial professional is treating me?*