Sankala Group

Firm Brochure

Customer Relationship Summary *(Form CRS)*
How We Protect Your Privacy *(Privacy Policy)*
Business Practices & Disclosures *(Form ADV Part II)*

This brochure provides information about the business practices of Sankala Group LLC. 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. It is required that each investment advisory Client receive this document at, or prior to, the execution of any investment advisory agreement. The term "registered investment adviser" communicates that Sankala Group LLC is a regulated investment advisory business. Registration does not imply a certain level of skill or training. Additional information about Sankala Group LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

If you have any questions about the contents of this brochure, or the regulatory organizations with which we are registered, please contact us:

Sankala Group LLC
www.sankalagroup.com
info@sankalagroup.com

T: (720) 310-0605
P.O. Box 2649
Lyons, CO, 80540-2649

Form CRS - Client Relationship Summary

Sankala Group LLC (CRD# 154806)

Introduction

Sankala Group LLC ("Adviser") is registered with the U.S. Securities and Exchange Commission ("SEC") as an investment adviser. Brokerage and investment advisory 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 investment advisory services to retail investors for an ongoing asset-based fee calculated on the market value of the assets we manage for clients. Those assets may include stocks, bonds, real estate investment trusts, mutual funds, exchange traded funds, closed-end funds, money market funds, certificates of deposit, and cash. If you open an account with us, we'll meet with you to understand your current financial situation, goals, and risk tolerance. We'll recommend a portfolio of investments to be monitored, adjusted, and maintained on a continuous basis, then conduct an internal review of your accounts on at least a quarterly basis and, if necessary, rebalance the portfolio and its risk to meet your changing needs. Our client accounts are managed on a discretionary basis, which means we don't need to call you when buying or selling investments in your account. Our minimum relationship size is $500,000, unless waived by us.

We also provide consulting services on investment related, financial, and other business matters, billed hourly. When working on a consultative basis, we do not have investment discretion, and your authorization and/or execution of any investment decisions will be required.

To learn more, please see Item 4 of our Firm Brochure (*ADV Part II*) which is provided to all clients and is online at https://adviserinfo.sec.gov/.

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 these qualifications mean?*

What fees will I pay?

Fees and costs affect the value of your accounts over time. We charge an asset-based fee ranging between 0.25% and 1.5% annually, billed on a quarterly basis. The fee is determined by the amount of assets we manage, the strategies you choose, and how many accounts those strategies must be applied to. Business treasury accounts pay our lowest fees. Fees are charged directly to your accounts, based on your instructions for tax optimization.

Our incentive is to increase the value of your accounts over time. Our fees will increase if the value of the assets in your account increase, and they will decrease if the value of your assets decreases. However, under certain circumstances, when new asset breakpoint levels are met, we will decrease the overall percentage fee rate your accounts pay.

The custodian or broker-dealer that holds your assets may also charge your accounts fees as well. These fees may

include transaction fees when we buy or sell investments, although for most investments we will not pay commissions, and we seek to minimize other such fees. They may also charge wire fees, check writing fees, and administrative charges which are detailed on statements. These fees are in addition to our advisory fee. We do not receive nor share in any portion of those custodial or transaction fees. You will pay fees and costs whether you make or lose money on your investments. Fees and costs reduce any amount of money you make on your investments over time. Some mutual funds and exchange traded funds also charge fees. We seek to control those fees to best grow your accounts in value. Please make sure you understand what fees and costs you are paying, we are delighted to discuss them in detail with you and estimate them.

To learn more, please see Item 5 of our Firm Brochure (*ADV Part II*) which is provided to all clients and is online at https://adviserinfo.sec.gov/.

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 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. For example, we may recommend that you open your account with a specific broker/custodian. This broker/custodian may provide us software, services and administrative support which is free of charge to our firm. While this is not a payment, it does represent an economic benefit.

To learn more, please see Item 11 of our Firm Brochure (*ADV Part II*) which is provided to all clients and is online at https://adviserinfo.sec.gov/.

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 partners/professionals are paid a variable quarterly amount which is derived from the aggregate fees charged to the accounts they oversee. Their pay increases when your accounts grow, and their pay decreases when your accounts decline in value. We seek to align our professionals pay with the results they generate for clients. We do not use independent contractors to conduct client work.

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

No, our firm and our professionals do not have any legal and disciplinary history.

Visit https://www.investor.gov/CRS for a free and simple search tool to research our firm and our 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 investment advisory services on the SEC's website at https://adviserinfo.sec.gov by searching for Sankala Group LLC - **CRD #154806**. You may also contact us at **(720) 310-0605**, and talk to any one of our investment professionals/partners.

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?*

Privacy Policy

Sankala Group LLC

Sankala Group LLC ("we") is required by law to inform our clients ("you") and prospective clients how we manage and safeguard their personal information. Confidentiality and discretion is one of our core commitments to clients, and as a result we endeavor to keep our *Privacy Policy* simple and clear.

We may receive information from you on contracts, statements, applications, through our website, through our vendors and in other forms, such as, but not limited to, your name, address, email, assets, income, account balances, and investing history. We do not disclose any of this personal information to non-affiliated third parties, with three exceptions**:**

1.] We may disclose personal information in unusual and limited circumstances where clearly required under law, for example, to cooperate with regulators or law enforcement authorities.

2.] Personal information may also be required by third-parties who *directly* provide services to your investment accounts. This includes, but is not limited to, your independent custodian, brokers/dealers and related analytics providers, including our software vendor Blueleaf Wealth Inc.

3.] We also may disclose account and trading information to Chicago Clearing Corporation, a securities class-action service provider that monitors court filings to assure securities owned by clients participate in shareholder class action lawsuits and settlements which they may be eligible for.

Information received by these parties will be governed by those firm's own privacy policies and is beyond our control. We do, however, endeavor to select business partners that share our commitment to stringent information security and privacy controls, and we attempt to minimize the amount of personal identifying information delivered to these parties to what is expressly required for those services. As we work to protect the security of your personal information, we will attempt to proactively manage your information with the same consideration we apply to our own personal information. We also restrict access to your personal information to our employees, for business purposes only, and then only to those who need it to conduct their normal duties.

If personal information is required by third-parties who *indirectly* service your accounts (such as tax professionals, accountants, auditors, etc.) your authorization will be expressly required.

We also continuously evaluate our efforts to protect personal information and make every effort to keep your information accurate and up-to-date. If you identify any inaccuracy in your personal information, please contact us so that we can promptly update our records.

Important Note - Married Clients

In instances where we have married clients signed onto a single contract, our approach to inter-party privacy is to assume mutual transparency unless specifically instructed otherwise in writing. We reserve the right to decline or terminate contracts where requests for non-transparency create unusual administrative complexity.

Form ADV Part II (A)

Investment Advisory Disclosure Brochure

This brochure provides information about the business practices of Sankala Group LLC. 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. It is required that each investment advisory Client receive this document at, or prior to, the execution of any investment advisory agreement. The term "registered investment adviser" communicates that Sankala Group LLC is a regulated investment advisory business. Registration does not imply a certain level of skill or training. Additional information about Sankala Group LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

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2. Material Changes

This version of Sankala Group LLC's *Form ADV Part II* has the following material changes from the prior version:

Item 4: Update to *Advisory Business – AUM Figures*

3. Table of Contents

Item 1: Cover Page
Item 2: Material Changes
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Item 6: Performance Based Fees & Side-by-Side Management
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4. Advisory Business

Sankala Group LLC ("the Company,") est. 2010, provides portfolio management services and investment advisory to individual and institutional investors ("Clients.") The firm's focus is on global equity portfolios with a value-biased strategy. Sankala Group LLC is an independent fee-only firm founded by Managing Partner Harold A. Hallstein IV, and is wholly owned by its advisory partners.

Both Mr. Hallstein and Mr. Denkenwolf are principal owners each controlling more than 25% of the Company.

Sankala Group LLC delivers investment services in two formats – discretionary *asset management* services, and non-discretionary *investment advisory* services.

Asset Management:

Sankala Group LLC's asset management services focus on diversified global equity portfolios. The investment approach is customized to investor needs utilizing separately managed accounts. The Company has a fiduciary commitment to Clients and provides private account management as a fee-only service, utilizing independent third-party custodians. Client assets are held in the Client's name with full transparency and control.

The Company's strategy begins with analysis of macroeconomic trends, and related global capital flows. These themes are supplemented with fundamental value-biased analysis of various equity markets, sectors and issuers. Finally,

technical analysis is used to facilitate risk management and opportunistic investment positioning.

Sankala Group LLC utilizes a range of investment vehicles in Client portfolios including, but not limited to:

- ETFs (Exchange Traded Funds)
- Closed-End Funds
- Mutual Funds
- REITS (Real Estate Investment Trusts)
- Common & Preferred Stock
- Options
- Corporate, Municipal & Government Bonds, Notes or Bills

Client portfolios will generally not be concentrated in any one issuer greater than 15%, barring legacy investments or other investments with unique tax ramifications. Under certain circumstances more concentrated investments will be made in Client portfolios using other investment companies such as exchange-traded funds, closed-end funds, and mutual funds. The selection of these investment companies will be limited to those not having greater than 20% invested in any single issuer. As a result of these strategies, the Company's portfolios may have less diversification and may be more exposed to certain investment risks than other portfolios.

The Company may also employ a range of options strategies including the writing of call option contracts against portfolio holdings to generate income, and the purchase of put options for risk management purposes. The utilization of call and put options to generate income and protect securities from declines may temper total account returns (due to the premiums paid or received to purchase or write call and put options), but may also provide some downside protection against declines in the underlying securities. There are certain risks associated with the options strategies employed by the Company:

I. In a rising market, a call option written to protect the portfolio, or an individual stock position within the portfolio, may reduce upside potential of the underlying investment;

II. As options expire or experience increased market volatility, it may be more difficult to manage the covered call positions for maximum economic advantage;

III. Market volatility may drop around the time of option expiration and result in lower premium income attainable in rolling over an options position; and

IV. Option commissions have a much greater impact on smaller accounts than they do on larger accounts.

All Client accounts engaging in options transactions will receive a copy of the brochure *Characteristics and Risks of Standardized Options* (and any supplements) from the Client's Broker/Dealer at or prior to opening an options

enabled account. The Company will require representation that these documents have been received and read.

For Clients with the appropriate risk tolerances and financial background, the Company may also employ short selling strategies for both risk management and investment purposes. These short selling strategies may be utilized in any of the same securities the Company makes long investment purchases. Short selling strategies have inherent risk due to the fact that the account owner could potentially lose more than their original investment. Please read additional and related margin borrowing disclosures below.

Margin borrowing strategies may be used to fund short selling strategies as needed, or to make additional leveraged investments beyond the account's net equity, as governed by the Federal Reserve's Regulation T and the account Broker/Dealer's house margin requirements. Margin borrowing has inherent risk due to the fact that it can magnify both the potential profits and losses in Client accounts, and could potentially result in losses greater than the initial investment. Clients who open a margin account will be provided with a *Margin Disclosure Document* (and any supplements) by the Broker/Dealer at or prior to opening a margin account. The Company will require representation that these documents have been received and read. Margin Clients should be aware of the following:

I. Clients may lose more funds than are deposited in the margin account;

II. The Broker/Dealer can force the sale of securities or other assets in a Client's account(s);

III. The Broker/Dealer can sell securities or other assets without contacting the Client;

IV. Neither Clients nor the Company are entitled to choose which securities or other assets in their account(s) the Broker/Dealer may liquidated or sell to meet a margin call;

V. The Broker/Dealer can increase its "house" maintenance margin requirements at any time and is not required to provide advanced written notice to Clients.

Investment Advisory:

Sankala Group LLC's investment advisory services address the unique consultative needs of Clients. Suited to independent investors seeking a trusted consultant to support their own investment process, the Company's advisory relationships can be structured to meet a range of goals. Ultimately, the Company seeks to help Clients to invest more confidently and efficiently across a range of global markets. Services offered include, but are not limited to:

- Portfolio & Performance Reviews
- Fee & Cost Analysis

• Asset Allocation Strategies
• 401k, ROTH & Traditional IRA Guidance
• Private Investment Analysis & Review
• Third-Party Money Manager Analysis and Review

Investment advisory Clients may utilize any of the same strategies offered to asset management Clients. Each of the risks in the preceding asset management disclosures also apply to investment advisory Clients. They should be read and reviewed thoroughly.

As of 02/10/2026:

Sankala Group LLC has regulatory assets under management **(RAUM)** of **$159,130,515 USD**, of which **84**% is managed on a discretionary basis. RAUM consists of securities trading accounts we provide continuous management and supervisory services over.

Sankala Group LLC has total assets under advisement **(AUA)** of **~$410,368,000 USD.** AUA includes RAUM plus all other assets and investments, valued net of financing, that clients have requested consulting on by the Company, and it includes private non-traded assets and investments the Company does not have direct authority over.

5. Fees & Compensation

The Company's discretionary asset management services are fee-only services, billed directly to the Client on a quarterly basis in arrears, either through direct deduction by the Custodian, or on net 30-day terms, as applicable. The assets billed will be calculated on the average daily balance during the quarter, or if such information is not available then on the average of the opening and closing quarterly account balances, as valued by the Independent Custodian.

In all cases both the Client and the Custodian will receive an invoice from the Company for fees billed clearly detailing the billing details. The Custodian will also send monthly statements to the Client showing all disbursements from the account, including the amount of the advisory fees. The Client provides written authorization for the Custodian to pay the Company as detailed in the Client invoice.

The Company's discretionary advisory agreements are at-will and can be terminated by the Client or the Company at any time by providing written notice. Any accrued advisory fees will be pro-rated based on the number of days the Company managed the account up to the day of termination. No fees are payable in advance. Discretionary advisory fees are not negotiable but may be adjusted based on mandate complexity and Client circumstance.

The Company's non-discretionary investment advisory services are billed hourly, directly to the Client, in arrears, on a quarterly or biannual basis with net 30-day terms. The Company's non-discretionary advisory agreements are at-will and can be terminated by the Client or the Company at any time by providing

written notice. Non-discretionary advisory fees are not negotiable but may be adjusted based on project complexity and Client circumstance.

Clients may terminate both discretionary and non-discretionary advisory agreements within 5 business days of initiation without cost.

The Company does not receive compensation or commissions of any type in connection with the particular investment products it recommends. Some of the investment products, brokerages and custodians that the Company recommends do, however, charge their own management fees, commissions, and account maintenance fees, which are paid directly to those companies. Sankala Group LLC does not participate in or receive any of these fees. The Company may also negotiate with these entities for better terms on behalf of its Clients. Please see *Section 12 – "Brokerage Practices"* – for additional details.

Non-discretionary investment advisory Clients may choose to implement the Company's investment advice through Broker/Dealers and Custodians of their choice. Asset management Clients will be required to use Brokers/Dealers and Independent Custodians approved by Sankala Group LLC.

The Company's fee structure is as follows: Discretionary asset management services, 0.25% to 1.5% of assets under management per annum, depending on mandate type, complexity and size.

Non-discretionary investment advisory services – $150-$350 per hour, depending on mandate type, complexity and size.

6. Performance-Based Fees

Sankala Group LLC does not charge performance-based fees. The nature of the basic asset-based, fee-only approach provides significant financial incentive to grow Client accounts.

7. Types of Clients

Sankala Group LLC works with both individual and institutional investors, including but not limited to: individuals, high-net-worth individuals, estates, trusts, charitable organizations, and corporations.

Due to the transactional costs associated with the Company's investment strategies as well as the need for certain thresholds of investment diversity in Client accounts, the Company has established a Client aggregate account minimum for discretionary asset management services. The minimum initial account size is **$500,000 USD**, unless waived by the Company.

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

The Company uses three primary forms of investment analysis – macroeconomic analysis, fundamental analysis and technical analysis.

Macroeconomic analysis looks at the relationships between various assets classes around the world such as equities, fixed-income, commodities, currencies and volatility. From these relationships and market history it seeks to discover longer-term trends in the global economic environment. Macroeconomic analysis carries the risk that trends can and do change quickly

and that markets are prone to policy changes, public and private manipulation, and periods of extreme optimism and pessimism.

Fundamental analysis explores the valuation of securities as measured by various income, balance sheet, and cash flow factors relative to market history. While fundamental analysis offers insight into the possible intrinsic value of securities, it carries the risk that markets often trade at valuations far away from market averages and history for extended periods of time.

Technical analysis evaluates the price history and statistical characteristics of price history to make decisions about future price movement probabilities. Technical analysis carries the risk that price signals are often misleading, and that markets are prone to periods of unexpected volatility caused by previously unknown fundamental realities becoming publicly known or disseminated to markets.

While it is the hope of the Company that the combination of these three approaches will result in satisfactory analytical outcomes, no guarantee can be made of the efficacy or success of this strategy.

Sankala Group LLC has a unique focus on global equity investments. Equity investments represent an ownership interest in business enterprises. While the ownership position carries certain benefits and the potential for significant capital appreciation, it is also a risky part of the corporate capital structure. Other investors, such as bank lenders, debt investors, and preferred stock investors are often better positioned to have their investments returned in the event of undesirable corporate outcomes. Investing in equities implicitly suggests the investor's willingness to take on more risk for the possibility of increased reward and corporate control.

Moreover, while the Company utilizes a range of investment products, it often uses Exchange Traded Funds (ETFs) to achieve diversified equity exposures in various countries, sectors, and other market segments. While ETFs may reduce some risk by providing diversified exposures, they also carry structural risks of their own. ETFs may become illiquid, trade on exchanges away from their actual net asset value, experience unexpected or undesired changes in terms and fees, or experience other adverse circumstances that cause them to underperform market indices to which they are benchmarked. They may also suffer from utilizing poorly conceived or inappropriate benchmark indices.

It is our firm's approach to construct portfolios from securities deemed to be trading at a price below their intrinsic worth, buying such securities at times when other market participants hold overly pessimistic viewpoints about them, while simultaneously respecting macro economic factors that could make such undervaluation a lasting rather than transitory condition. We also seek to combine securities that have diverse and varied return and correlation characteristics, such that the aggregate volatility of client accounts aligns with the risk tolerance specifications they provide us regarding their portfolio.

Investing in global capital markets is inherently risky. The Company does not

and cannot guarantee the future performance Client account(s), promise any specific level of performance or promise that investment decisions, strategies or overall management of account(s) will be successful. Both partial and complete loss of Client's initial investment is possible, and Clients should be prepared to bear potential losses. The investment decisions the Company makes are subject to various market, currency, economic, political and business risks, and have the potential for both profit and loss.

Except as may otherwise be provided by law, the Company will not be liable for any loss (i) that Clients may suffer as a result of the Company's good faith decisions or actions where it exercised the degree of care, skill, prudence and diligence under the circumstances that a person acting in a fiduciary capacity would use to conduct an enterprise of like character and like aims; (ii) caused by following Client instructions; or (iii) caused by the Independent Custodian, any Broker/Dealer to which the Company directs transactions for Client account(s), or by any other third-party. Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith, and this disclaimer does not waive or limit Client rights under those laws.

9. Disciplinary Information

Neither Sankala Group LLC nor any of its personnel have any material disciplinary events.

10. Other Financial Industry Activities and Affiliations

Sankala Group LLC does not receive monetary compensation from third-parties in the securities industry. The Company's revenues are generated solely from Client fees, and no monies are accepted related to the recommendation of any securities related product or suite of products.

The Company does receive research and software products from its Broker/Dealers. More information on this conflict of interest can be found in *Section 12 "Brokerage Practices."*

11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

The guiding principle of the Company's Code of Ethics is that all employees have the duty to place the financial interests of Clients before their own and the Company's. All Employees must avoid activities, interests, and relationships that might interfere or appear to interfere with making decisions in the best interests of the Company's Clients.

Sankala Group LLC seeks to offer its Clients the benefits of separately managed accounts and independent custody, while maintaining the values of a traditional investment partnership. As a result, the officers of the Company are committed to having a major portion of their liquid net worth invested in the same strategies as the Company's Clients. Under certain circumstances, this may result in Clients taking an interest in investments which the Company's employees may already own. This is a conflict of interest and these circumstances could potentially accrue benefits to the Company's employees. The Company will mitigate this conflict with its policy to transact all new recommendations for Clients prior to or simultaneously as transacting for its officer's and employee's accounts. Whenever possible, the firm will utilize batch ordering technologies to allocate trades pro-rata to each advised account in the most equitable fashion possible. Due to the particularities and liquidity

constraints of certain markets, there can be no guarantees that certain transactions will not benefit certain accounts to the detriment of others. To help avoid these problems, the Company will generally seek the maximum liquidity available to conduct its strategies, and distribute new investment opportunities across Client accounts fairly, mindful of our fiduciary obligations to each of our Clients.

The Company's complete *Code of Ethics* is available to Clients on upon request.

12. Brokerage Practices

The Company recommends certain Independent Custodians and Broker/Dealers to carry and transact for Client accounts. Currently, our firm recommends Charles Schwab and Interactive Brokers as Independent Custodians, depending on the client's unique portfolio requirements. As a fee-only advisor, the Company will not collect commissions or any other compensation on Client transactions. Clients will pay the commissions and fees of our Independent Custodian and Brokers/Dealers directly.

The Company may, however, receive certain services from the Independent Custodian and Brokers/Dealers. The services provided may include software, data, and both proprietary and third-party analysis and investment research.

This receipt of these services creates a conflict of interest, but this conflict is mitigated by the Firm's ongoing evaluation of Charles Schwab and Interactive Brokers as custodians appropriate for the Firm's clients. Factors considered when choosing these custodians include fees charged and services provided. Many of the research and software services are typical of industry standard, and are provided by the vast majority of Broker/Dealers.

The Company may also at its discretion cause Client accounts to pay brokers a commission greater than another qualified broker might charge to effect the same transaction. This conflict is mitigated by the Company's fiduciary relationship with Clients, and the competitive marketplace for custodial and brokerage services which assists the Company in determining if the commissions are reasonable in relation to the value of the various services received. The Company consistently seeks the most efficient vendors for servicing Client accounts. By aggregating Client transactions with particular Broker/Dealers, the Company also seeks to gain economies of scale that will reduce these transaction costs for all Clients.

13. Review of Accounts

As managers of active investment strategies, the Company continually and frequently reviews Client accounts for changes in risk exposure. Account reviews are conducted on a quarterly basis during the performance and investment strategy Client review process. During account review, the Company seeks to ensure that the investment strategies being employed in Client accounts continue to be appropriate given the risk tolerance declarations and special instructions the Client has supplied on *Schedule* A of the Company's *Investment Management Agreement.* The review will be conducted by an Investment Advisor Representative employed by the Company. No account reviewer will be responsible for the review of more than 100 clients.

If any deficiency is found during the account review process, the Company will notify the Client in writing. Similarly, if a Client believes any deficiency has arisen in their accounts related to the risk tolerance declarations and special instructions they have supplied, they commit to notify the Company in writing under the Company's *Investment Management Agreement.*

14. Client Referrals and Other Compensation

Sankala Group LLC does not offer third-parties any type of compensation for Client referrals, nor does it direct brokerage or custodial fees in exchange for Client referrals.

Our firm also offers operational, financial, and technology consulting services to clients, alongside our asset management and investment advisory services. In the course of this work, we may recommend outside service providers or vendors such as CPAs, attorneys, software companies, etc. To mitigate any conflicts of interest inherent in these referrals, we do not accept compensation for such referrals.

15. Custody

Sankala Group LLC utilizes qualified Independent Custodians to safeguard client assets. Such custodians have no common ownership or affiliation with our Company, are subject independent audits, SEC regulation, and they must segregate client assets from other client assets while providing statements of account to clients at least quarterly, but most often monthly. Each custodian we utilize also offers 24/7 online access to account positions, balances and banking tools.

While Sankala Group LLC does not take direct custody of any client assets, we may have "constructive custody" or the ability to access client assets, governed by specific legal agreements and documentation, in two (2) instances customary to the investment advisory industry for ease of operations and client service:

1.] We are able communicate our quarterly fees to the Independent Custodian for electronic debit, subject to the provision of an account-by-account statement of billing calculation delivered to both the Client and the Independent Custodian, and the Client's custodial statements including the amounts of these charges.

2.] With the Client's written approval, meeting important legal/documentation criteria, our firm may utilize *Standing Letters of Authorization* (SLOAs) to remit payments to third-parties such as the IRS, state tax authorities, or other professionals, as approved by the client for our ongoing use, including our determination of the correct amounts to be paid. Such services are offered to clients as a private banking service, and are optional for the Client. They may be canceled by the client at any time. Each individual payment can also be signed/approved by the Client according to their preference, or paid directly with other Client funds.

Our firm currently utilizes Charles Schwab & Co., as our primary Independent Custodian, but may recommend others according to specific client needs.

The monthly statements provided by our Independent Custodians are the ultimate source for account balances and position history. Clients should review these statements carefully and keep them for their records. We can easily help Clients access such records at any time.

For analytical and performance reporting purposes, the Company uses third-party software that may not include "unsettled" cash transactions in client balances. The Company has decided the advantages of having such aggregated information accessible to Clients on demand outweighs this drawback. Unsettled cash is not usable, so reasonable not to consider until it has been completely settled by banks/brokers. Unsettled cash can be easily monitored on the website of our Independent Custodians. Please see additional disclosures on our firm's Client reports for relevant details.

16. Investment Discretion

Sankala Group LLC's asset management Clients give the Company discretionary authority to effect transactions in Client accounts. The Company will make all decisions to buy, sell, exercise, lend, convert or hold securities, cash or other investments for these accounts, in its sole discretion, without requiring consultation with Clients. However, in practice, Clients are regularly consulted on key investment decisions as they desire. The Company's investment decisions will be limited by the investment preferences detailed in the *Investment Management Agreement* and its related schedules. Clients give the Company full power and authority to carry out these decisions by giving written notice of this authority to the Brokers/Dealers and Independent Custodian of the accounts. The Company will not have authority to remove or transfer funds from the accounts to any third-party, and certain other account preferences will remain in the sole control of the account owner(s.) The Company's trading authority can be revoked by the Client at any time through notification of the Independent Custodian.

The investment objectives, risk tolerances, and any special instructions or limits that Clients want Sankala Group LLC to follow in managing their accounts are recorded on the additional Schedules of the *Investment Management Agreement.*

17. Voting Client Securities

The Company strives to help its Clients uphold their shareholder rights. The Company will generally vote proxies for securities held in Client accounts for which we are authorized, when we determine that such action is important to Client interests and/or our firm's strategic objectives. We will also make formal recommendations, at our discretion, to Clients with consulted assets so they may vote their shares accordingly. Proxy materials for managed accounts will be delivered to the firm's address on record unless the client specifically retains proxy authority for themselves. Proxy materials for consulted accounts will be delivered to the account address of record.

Additionally, Sankala Group LLC, as further detailed in our *Privacy Policy*, may retain, on a contingency basis, outside service providers to monitor the universe of class action securities litigation and cross reference that information with our firm's trading records. The aim of this policy is to file eligible securities holdings for any class action lawsuit pending in investments we hold, or have held in the

past. We believe that such participation is critical to our fiduciary responsibility to clients as any settlement will be paid out of the subject company's assets, but is only payable to investors who file timely such claims. We will monitor the marketplace for such contingency fee-based services, making sure our chosen service provider remains both accurate and cost effective for the scheduled contingency fees.

18. Financial Information

Sankala Group LLC does not take direct custody of Client assets nor does it require pre-payment of any advisory fees. The Company has never been the subject of a bankruptcy petition, and is not required to present a corporate balance sheet.

Form ADV Part II (B)

Brochure Supplement
(Advisor Profiles)

This brochure supplement provides information about our investment advisors that supplements the Sankala Group LLC brochure. You should have received a copy of that brochure. Please contact us if you did not receive Sankala Group LLC's brochure or if you have any questions about the contents of this supplement. Additional information about our investment advisors is available on the SEC's website at www.adviserinfo.sec.gov

If you have any questions about the contents of this brochure, or the regulatory organizations with which we are registered, please contact us:

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Harold A. Hallstein IV – Managing Partner

Mr. Hallstein has been advising families and institutions on investment strategy and risk management since founding the Sankala Group in 2011.

He previously worked as a Fund Analyst for RCG Capital Advisors where he performed analytical, risk management, and operational functions for a long-short equity investment partnership. While there he also assisted with the launch of HedgeMark International, a separately managed account platform for alternative equity strategies that was ultimately acquired by BNY Mellon in 2014. Prior to RCG, he worked as a Research Analyst for Brighton House Associates, providing data and consultation to a variety of alternative asset management clients. He began his career working as a Project Manager for Wisdom Publications, a non-profit publisher of Buddhist books.

Mr. Hallstein previously served the board of directors of the Winter Wildlands Alliance from 2015-2024, as both board president and treasurer. The WWA is national environmental organization that advocates for the preservation of winter landscapes, educates children about watershed hydrology, and produces the Backcountry Film Festival.

He also previously chaired the board of the City of Boulder's *Open Space Board of Trustees,* which provides oversight and strategic direction for Boulder's 47,000 acre land conservation and public lands department, Open Space and Mountain Parks.

Hal received his B.A. in 2003, *magna cum laude*, from Colby College in an independent regional study of Asia. He has been investing in global equity markets for 22 years and holds the Uniform Investment Advisor Law license. *(Item 2, 2B)*

Mr. Hallstein has no disciplinary events requiring disclosure. *(Item 3, 2B)*

Mr. Hallstein does not engage in any compensated business activities outside Sankala Group LLC. He is, however, a limited partner in a real estate investment partnership, *Caravel III LLC.* That role represents a potential conflict of interest. Accordingly, the firm is not authorized to and does not recommend investment in any of these partnerships. *(Item 4, 2B)*

Mr. Hallstein does not receive any additional compensation from third-parties for his advisory work. His compensation is based solely on Client fees. *(Item 5, 2B)*

Mr. Hallstein is the Managing Member and Chief Compliance Officer of the Company. He guides the Companies compliance activities, and oversees regulatory requirements for the Company and all Company registered representatives. *(Item 6, 2B)*

Mr. Hallstein has never been found liable in any arbitration claim, nor has he ever been found liable in any civil claim related to securities advice. He has also

never been subject to a bankruptcy petition. *(Item 7, 2B)*

Thomas M. Denkenwolf – Advisory Partner

Prior to joining the Sankala Group LLC in 2016, Mr. Denkenwolf worked as an investment advisor focused on portfolio construction for high-net worth clients at Merrill Lynch. He received his B.S. in 2004 in Molecular Biology from Pennsylvania State University. He then received his M.S. in Molecular Biology from the University of California in 2007.

Mr. Denkenwolf previously served on the board of directors for the Boulder/Front Range Mensa Group.

He holds both the Series 7 and Series 66 securities licenses.

Mr. Denkenwolf has no disciplinary events requiring disclosure. *(Item 3, 2B)*

Mr. Denkenwolf does not engage in any non-investment advisory related business. *(Item 4, 2B)*

Mr. Denkenwolf does not receive any additional compensation from third-parties for his advisory work. His compensation is based solely on Client fees. *(Item 5, 2B)*

Mr. Denkenwolf is supervised by the Chief Compliance Officer of the Company, Harold Hallstein IV, who oversees regulatory requirements for the Company and all Company registered representatives. *(Item 6, 2B)*

Mr. Denkenwolf has never been found liable in any arbitration claim, nor has he ever been found liable in any civil claim related to securities advice. He has also never been subject to a bankruptcy petition. *(Item 7, 2B)*

Peter S. Burns – Advisory Partner

Mr. Burns joined the Sankala Group in 2023, after independent work in commercial real estate investment, and obtaining a B.A. in physics at the University of Montana, and subsequently, a PhD from University of Colorado, Boulder, specializing in quantum computing, in 2019

Peter received nine awards/scholarships in his academic career, including the Presidential Leadership Scholarship, and the Montana Governor's Best and Brightest Scholarship, honoring his academic achievements over many years. Peter has shared that love of learning, tutoring extensively in math and science for students in both the United States and Africa.

Driven by his lifelong passion for science, Peter developed a keen interest in investment finance. Applying his process driven and scientific mindset, his primary objective is to provide clients with a transparent, understandable, and effective approach to personal finance and portfolio construction. Peter seeks to help clients safeguard and augment their portfolios through investments that

foster both a personally and environmentally sustainable future.

Beyond his professional pursuits, Peter is an avid backcountry enthusiast, cherishing access to our public lands.

Mr. Burns holds the Uniform Investment Advisor Law license.

Peter has no disciplinary events requiring disclosure. *(Item 3, 2B)*

Mr. Burns engages in private real estate investment related business through *Catalina Properties LLC*, and *Catalina Properties II LLC*. These commercial real estate companies are not open for outside investment. Each of these roles represents a potential conflict of interest. Accordingly, the firm is not authorized to and does not recommend investment in these partnerships. *(Item 4, 2B)*

Mr. Burns does not receive any additional compensation from third-parties for his advisory work. His compensation is based solely on Client fees. *(Item 5, 2B)*

Mr. Burns is supervised by the Chief Compliance Officer of the Company, Harold Hallstein IV, who oversees regulatory requirements for the Company and all Company registered representatives. *(Item 6, 2B)*

Mr. Burns has never been found liable in any arbitration claim, nor has he ever been found liable in any civil claim related to securities advice. He has also never been subject to a bankruptcy petition. *(Item 7, 2B)*

Kate Grace – Advisory Partner

Ms. Grace joined the firm in 2025, and her career in investment consulting stems from her unique background. Kate is passionate about guiding both business owners and athletes to set themselves up for more enduring future success and financial freedom through a straightforward investment strategy and clearheaded approach to personal finance.

Ms. Grace was an Olympian and spent 12 years as a professional athlete in track and field, sponsored by Nike. She has been one of the most successful and enduring American distance athletes of the last decade, finishing as the top American in the 800m at the Rio Olympics. She was ranked in the top 20 in the world for 6 years in a row, culminating in a top 3 world ranking in 2021.

Kate was an Environmental Studies major at Yale University. Her research focused on the human health impacts of air pollution, and she has a deep appreciation for the value of public lands and open space – and combining all those interests through her work with the Sankala Group – especially in support of clients with environmentally focused investment mandates.

Kate's life in Colorado started with a program through the *Rocky Mountain Field Institute*, volunteering on trail restoration in the Sangre de Cristo mountain range around Crestone Peak and Needle. She loves spending time with her family in the mountains around her home in Boulder, Colorado where she makes

great use of the open space for runs.

Kate holds the Uniform Investment Advisor Law license.

Ms. Grace currently is also the Managing Member of *FastKate LLC,* the entity through which her professional athletic career was operated. It is not open to outside investment. *(Item 4, 2B)*

Ms. Grace does not receive any additional compensation from third-parties for her advisory work. Her compensation is based solely on Client fees. *(Item 5, 2B)*

Ms. Grace is supervised by the Chief Compliance Officer of the Company, Harold Hallstein IV, who oversees regulatory requirements for the Company and all Company registered representatives. *(Item 6, 2B)*

Ms. Grace has never been found liable in any arbitration claim, nor has she ever been found liable in any civil claim related to securities advice. She has also never been subject to a bankruptcy petition. *(Item 7, 2B)*