

INTRODUCTION

SteelOaks Investment Advisers, Inc. is an SEC (Securities and Exchange Commission) registered investment adviser that acts as a fiduciary for our clients. We feel that it is important for you to understand how investment advisory services and compensation structures differ from that of a registered broker-dealer.

Free and simple tools are available to research firms and financial professionals at www.Investor.gov/CRS, this site also provides educational materials about broker-dealer, investment advisers and investing.

RELATIONSHIPS AND SERVICES

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We are a registered investment adviser that offers investment advisory services to clients. When opening an advisory account with our firm we will meet to discuss your current financial situation, goals, objectives, risk tolerance, resources and tax considerations. We will then recommend a portfolio of investments that is re-balanced annually and monitored to meet your needs, goals and objectives. We will offer your advice on a regular basis.

We generally manage accounts on a discretionary basis. After you sign an agreement with our firm, we're allowed to buy and sell investments in your account without asking you in advance. Any limitations will be described in the signed advisory agreement. We will have discretion until the advisory agreement is terminated by you or our firm.

Additional information about our advisory services is in Item 4 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/108197>.

FEES AND COSTS

WHAT FEES WILL I PAY?

You will be charged an ongoing quarterly fee based on the value of the investments in your account. Our Investment Management fee schedule is standard for all clients, and ranges from 0.80% to 1.25% annually depending on the value of the investments in your account. The more assets you have in your advisory account, the more you will pay us. We therefore have an incentive to increase the assets in your advisory account in order to increase our fees. Our firm's fees will be automatically deducted from your advisory account, which will reduce the value of your advisory account.

The broker-dealer that holds your assets charges you a transaction fee when we buy or sell an investment for you. The broker-dealer's transaction fees are in addition to our firm's fees for our Investment Management service.

You may also pay charges imposed by the broker-dealer holding your accounts for certain investments and maintaining your account. Some investments, such as mutual funds, and exchange traded funds, charge additional fees that will reduce the value of your investments over time.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Additional information about our advisory services is in Item 5 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/summary/108197>.

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:

As a fee-only adviser, a conflict of interest may exist any time we recommend that you keep your assets under our management rather than remove your assets from our management. Examples could include recommending that you rollover an account into an account managed by our firm, or recommending that your assets remain in your account rather than satisfying a debt obligation.

Our firm receives support services from our custodian that could include investment-related research, pricing information and market data, software and other technology that provide access to your account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or other products used by our firm in furtherance of our business operations. You should be aware, however, that the receipt of economic benefit by our firm or its related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of custodian for custody and brokerage services.

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professionals are paid a salary and additional compensation based on the revenue our firm earns from advisory services.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No, our firm and financial professionals do not have any legal and disciplinary history to disclose. We encourage you to visit www.Investor.gov/CRS to research our firm and our financial professionals.

ADDITIONAL INFORMATION

You can find additional information about our firm's investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching CRD #108197. You may also contact our firm at 304-723-6700 to request a copy of this relationship summary or ADV Part II.

KEY QUESTIONS TO ASK US

- Given my financial situation, why should I choose an advisory account?
- How much would I pay per year for an advisory account? What would increase/decrease those fees? What services will I receive for those fees?
- What is your experience, including licenses, education and other qualifications?
- Who is my primary contact person?
- How will you choose investments to recommend for my account?