Item 1. Cover Page

177 Huntington Ave, Ste. 1703
PMB 50966
Boston, MA 02115-3153
https://useorigin.com
617-227-3825

Form ADV Part 2A
Firm Client Advisory Brochure
CRD 305353
January 2, 2024

Origin Investment Advisory LLC (the "Firm") is a Delaware-domiciled limited liability company, with principal headquarters in Boston, MA 02115-3153. The Firm is online at https://useorigin.com.

This brochure provides information about the qualifications and business practices of the Firm. If you have any questions about the contents of this brochure, please contact us at hereforyou@useorigin.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC") or by any state securities authority. The Firm is an SEC-registered investment adviser, but registration does not imply a certain level of skill or training.

Pursuant to the requirements of 950 Mass. Code Regs. 12.205(8)(a)4, the disciplinary history of the Firm and its representatives can be obtained from the Massachusetts Securities Division upon request. Additional information about the Firm is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Material Changes

This section of the brochure is meant to reflect any material changes the Firm may have made since its last annual update. Investment advisers must update the information in their brochure at least annually. The Firm is only discussing material changes since the last annual update of this Brochure, which was published on March 30, 2023.

As part of this update the Firm made the following revisions:

- Updated to reflect Origin Investment Advisory LLC, wholly owned subsidiary of Blend Financial Inc. dba Origin Financial, is successor to Blend Financial Inc. dba Origin Financial. The advisory services and management of Origin Investment Advisory LLC, as successor to Blend Financial Inc. dba Origin Financial, will remain the same.

The Firm will deliver a brochure or summary each year to existing Clients within 120 days of the close of the Firm's fiscal year. If the Client does not receive this Firm Brochure at least 48 hours prior to entering into its Client Investment Advisory Agreement with the Firm, the Client has a right to terminate the contract without penalty within five business days after entering into the contract.

Item 3. Table of Contents

Item 4. Advisory Business

A. Introduction.

Origin Investment Advisory LLC, a Delaware limited liability company (the "Firm"), was formed in November 2022 and is the successor to Blend Financial Inc. dba Origin Financial, which was formed in January 2018 and became registered as an investment adviser with the U.S. Securities and Exchange Commission in January 2021. The Firm is a wholly-owned subsidiary of Blend Financial Inc. Blend Financial Inc.'s principal owner is Matthew Watson, Chief Executive Officer.

The Firm offers financial planning services and Managed Account Services (as defined below). The Firm also offers a personal financial management platform, including financial education materials and financial wellbeing tools through the Firm's parent company Blend Financial Inc. which does business under the name Origin (as distinct from Origin Investment Advisory LLC).

The Firm offers services on both a direct-to-consumer basis (the "DTC Model"), whereby Clients pay fees directly to the Firm, and on an employer basis (the "Employer Model"), whereby a third-party entity(ies) pay (i) all of the fees on behalf of a Client, or (ii) some of the fees on behalf of a Client, and the Client also has the option to purchase additional services directly from the Firm.

B. Types of Advisory Services.

Financial Planning

The Firm provides nondiscretionary investment recommendations based on the Client's financial situation and investment objectives. These recommendations may involve recommending investments in model portfolios established by the Firm (each, a "Model Portfolio") as well as other types of investments, as described in the materials related to the program on the Firm's website, any written materials on the Model Portfolios or other investments provided directly to the Client by the Firm, and in this brochure.

Clients complete a financial questionnaire prior to services being rendered, and the assigned Firm financial planner will also gather additional information from the Client where needed to provide financial advice in a fiduciary capacity to the Client, and the Client may be required to update information if it becomes outdated. The purpose of the Firm's platform is to provide financial planning services to Clients on every aspect of their financial well-being. Not only does the Firm provide advisory services on portfolio investments, but the Firm also provides advisory services on affairs related to the Client's current financial situation and financial goals. The Firm also makes recommendations about benefits, insurance coverages, budgeting, debt management, investment allocations, retirement planning, and compensation.

The Firm only recommends investments or other products that it believes would be in the Client's best interest based on information provided by the Client. The Client always has the right to decide whether to act on any recommendations made by a Firm financial planner. If a Client does decide to act, they always have the right to do so through the professional of their choosing.

Origin Invest

Clients may also invest in the Firm's "Origin Invest" product (the "Managed Account Services"). For this service, the Firm separately manages each Client's account based on a series of Model Portfolios.

The Firm recommends investments in one or more Model Portfolios based on the Client's financial situation and investment objectives and based on these recommendations, invests and trades Client assets held in an account that the Client has opened with DriveWealth LLC ("DriveWealth" or the "Custodian") for these purposes (the "Account"), as described below. The Firm reviews Client Accounts on a daily basis and typically rebalances Client Accounts when an asset class is in excess of 7% from the recommended allocation of the Model Portfolio(s). All Managed Account Services are provided on a discretionary basis, meaning that the Firm can direct transactions in the Client's Account assets without further consent from the Client. If a Client chooses to participate in the Managed Account Services, the Firm is solely responsible for implementing the investment strategy of the applicable Model Portfolio for the Account, provided that the Client may notify the Firm of restrictions to the investments purchased for the Account, subject to the Firm's determination that the restrictions are reasonable, which determination the Firm may make in its sole discretion.

The Custodian will provide Account statements directly to each Client on a monthly basis.

In an effort to maintain diligence regarding the monitoring and review of the Managed Account Services, the Firm has established an Investment Committee. The committee is composed of executive team members and members of the planning team. Meetings occur each calendar quarter. The purpose of the committee is to review the performance of assets managed by the Firm as compared to relative benchmarks, review portfolio strategy, and adjust allocations when required. The minutes of this meeting are recorded along with any actions taken by the committee.

C. Client Investment Objectives and Restrictions.

Financial Planning

The Firm tailors its advisory services to the individual needs of its Clients. First, Clients are instructed to answer a series of questions on the Firm's website during the onboarding process.

The questions provide the financial advisor with the Client's risk tolerance, investment objectives, current financial condition, investment time horizon, and relative prioritization of each financial goal to create the Client's Investment Profile.

Next, a financial advisor schedules a call or video meeting to speak to the new Client. During the call, the financial advisor confirms the information the Client provided in the Investment Profile. Based on the Client's unique situation and financial background, the financial advisor discusses the Client's investment objectives to create a Client Plan and make investment recommendations.

Since the Firm does not have discretionary authority over Client Financial Planning accounts, nor does it execute or arrange transactions on behalf of Clients, there is no process through which Clients may impose restrictions on investing in certain securities or types of securities. Clients have the choice to accept or reject advice from the Firm's software and/or financial advisors.

Origin Invest

The Firm invests on behalf of Clients' accounts according to the investment strategy of each model portfolio. To determine which of the Model Portfolios a Client receives, the Firm uses a risk assessment. The risk assessment allows the Firm to determine if a Client is aggressive, moderately aggressive, moderate, moderately conservative, or conservative. The Firm, therefore, does not generally tailor its advisory services to the individual needs of Clients. The Firm's Clients should understand that their account holdings will closely reflect those of other Clients. The Firm may accept reasonable restrictions from Clients related to their account.

D. Wrap Fee Program

The Firm does not participate in wrap fee programs.

E. Discretionary Assets Under Management.

For its financial planning service, the Firm provides non-discretionary investment advice to its Client. As of January 2, 2024, the Firm has no assets under management on a non-discretionary basis.

For the Managed Accounts Services, the Firm provides discretionary advice to Clients. As of January 2, 2024, the Firm has $548,444 on a discretionary basis.

Item 5. Fees and Compensation

A. Advisory Fees.

Financial Planning

DTC Model

Under the DTC Model, Clients may purchase a monthly subscription that is disclosed during the enrollment process (the "Subscription Fee"). The Subscription Fee will be charged to the payment method designated by the Client during the enrollment process. The Client's payment method will be charged once each month, at the beginning of the subscription, and then on the first calendar day thereafter unless and until the Client cancels their subscription. At the time of subscription, Clients will authorize the Firm to electronically charge the provided payment method for the monthly Subscription Fee. Also, the Client will authorize the Firm to electronically credit such payment method in the event of an erroneous debit.

Clients authorize the Firm to charge any payment method associated with the account in case the primary payment method is declined or no longer available. Clients remain responsible for any uncollected amounts. If a payment is not successfully settled, due to expiration, insufficient funds, or otherwise, and the Client did not cancel their subscription, then the Firm may suspend access to the services until the Firm has successfully charged a valid payment method.

Under the DTC Model, Clients may also purchase financial planning sessions with a Firm financial advisor (the "Financial Planning Fee"), whether or not they have a monthly subscription. The Financial Planning Fee will be charged to the payment method designated by the Client during the enrollment process. The Client's payment method will be charged at the point in time when the Client purchases the financial planning session.

Employer Model

Under the Employer Model, the Firm offers a flat Service Fee per month per Client; the Firm calculates the fee amount based on the number of Clients from the Client's employer. The Client's employer (through a contract with the Firm) is responsible for this fee. The fee is non-negotiable. The Firm does not charge performance-based fees.

Under the Employer Model, Clients may also have the option to purchase additional services directly from the Firm: (i) a monthly subscription, and/or (ii) financial planning sessions, as detailed above.

Certain end-user Clients who leave the employ of their employer or whose employer opts not to offer the Firm any longer have the option of continuing to access the Firm under the DTC Model by paying fees directly to the Firm.

The Service Fee is generally billed to the Client's employer annually upon execution of a contract with the Firm and then annually thereafter. The Firm does not deduct fees from Clients' assets. In all instances, the Firm will send the employer a written invoice, including the fee, and the time period covered by the fee. The Firm will send these to the employer concurrent with the request for payment of the Firm's advisory fees. The Firm sends an invoice to the employer, who is then able to pay the invoice by check, ACH or wire transfer. Partial-year services are still treated as full-year services. For example, if Clients enroll in or terminate their services in the middle of the contract year, the Clients' employer is still charged for the full year and may avail itself to the services for the remainder of the contract year.

<u>Origin Invest</u>

Clients who invest in the Managed Account Services are not subject to an annual Management Fee of the value of their account. However, certain administrative and trading costs are associated with this account. A schedule of the associated account fees is disclosed to the Client upon opening an account.

B. Advance Payment of Fees.

Fees can be paid in advance by employer Clients under the Employer Model. Individual Clients are billed monthly in advance, and, if an individual cancels their service in the middle of a billing cycle, they will have access through the end of that billing cycle.

C. Compensation and Commissions.

The Firm does not earn compensation for the sale of other investment products.

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

The Firm does not charge performance-based fees.

Item 7. Types of Clients

The types of Clients to whom the Firm provides investment advice are individuals, who either pay for the services directly through the Firm's DTC Model or receive the services through their employer through the Firm's Employer Model. There are no requirements for opening or maintaining an account; for instance, there is no minimum account size requirement.

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

A. Investment Strategies and Methods of Analysis.

Financial Planning

As described in Item 4, the Firm formulates investment advice based on the information provided by the Client during the initial onboarding survey and subsequent calls with a financial advisor. The financial advisor may review Client accounts through the Firm's financial advisor portal in order to review transaction and balance data from financial accounts that the Client has elected to link to the Firm's software platform.

The Firm's services are provided on a non-continuous "point in time" basis that is in response to specific Client questions and requests. This means that the advice provided by the financial advisor is given on each occasion based on the information provided by the Client to the financial advisor and is intended to be appropriate advice for that precise moment in time. The financial advisor will not periodically review or update prior services unless they are expressly requested to do so by the Client at a future date. Accordingly, the services provided by the financial advisor are not ongoing and continuous. Moreover, neither the financial advisor nor its personnel will proactively contact Clients to inquire about their desire for updated or new services or any changes in the Client's financial position or investment goals. It is solely the responsibility of the Client to seek updates or services, including financial planning or investment advice from the financial advisor or their personnel, and to provide any updated financial information and financial goals that the Client wants the financial advisor to consider in providing any new advice.

From time to time, a financial advisor may make specific recommendations and provide advice regarding a Client's exercise or selling of employer equity compensation awards (e.g., incentive stock options, restricted stock grants). Any advice with respect to such employer equity compensation awards is made solely from an overall investment allocation perspective and without regard to the potential future performance of the employer equity involved. The financial advisor does not provide advice on the likelihood of future performance of any individual security.

Origin Invest

The Firm's Managed Account Services have been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940 ("Rule 3a-4"). Rule 3a-4 provides similarly managed investment programs, such as the Managed Account Services, with a non-exclusive safe harbor from the definition of an investment company.

Portfolio Analysis

The investment philosophy underlying each of the Model Portfolios is grounded in Modern

Portfolio Theory, which refers to the process of attempting to maximize return for any level of risk in a portfolio. This risk-reward optimization is accomplished through diversification across asset classes and within asset classes for both equities and fixed income. The Firm aims to take the guesswork out of the investment process for Clients by providing streamlined options based on a Client's unique preferences, goals, and risk tolerance.

The Firm offers Clients twelve (12) different core asset allocation models. These models cater to investors with varying risk levels and time horizons. These allocations begin with the most aggressive mode option, with a 100% allocation to equities, suitable for long-term investors. As investors become more conservative and their time horizons shorten or their financial goals change, the equity component decreases in 10% increments. For the most conservative investors with a 1-3 year time horizon, the Firm has designed a portfolio consisting of 50% bonds and 50% cash. The twelfth (12th) asset allocation model is specifically for shorter-term investors and consists of an all-cash portfolio.

Certain Model Portfolios are thematic in nature in that they are thematically-concentrated portfolios that permit Clients to make targeted investments in specific areas of the market based on their personal financial goals, interests, risk tolerance, and situation (the "Thematic Portfolios"). The Thematic Portfolios have been vetted by the Firm's Investment Committee for their focus on a target theme, e.g., semiconductors, artificial intelligence, inflation protection, clean energy, as well as liquidity, and other market technicals. The Thematic Portfolios are generally invested in indexes, but because of the nature of these thematic concentrations, expense ratios may be higher than in a standard, broad-based index. On occasion, there may not be an index for a given theme, and in that case, active funds may be utilized as an alternative. The Firm does attempt to find lower-cost investments in these cases as well. As a general rule, Clients are limited to a total of 15% of their assets invested in the Managed Account Services in the Thematic Portfolios so that risk can be minimized.

Portfolio Assignment

To determine which of the Model Portfolios may be best suited for a Client, the Firm uses a risk assessment. The risk assessment allows the Firm to determine if a Client is aggressive, moderately aggressive, moderate, moderately conservative, or conservative. The Firm combines this with the Client's time horizon, unique preferences, and goals to determine which Model Portfolio is best suited to the particular Client.

Portfolio Fees

Clients who invest in the Managed Account Services are not subject to an annual Management Fee of the value of their account. However, certain administrative and trading costs are associated with this account. A schedule of the associated account fees is disclosed to the Client upon opening an account.

B. Material Risks of Investment Strategies and Methods of Analysis.

Please see below for an explanation of the various types of risks Clients incur when they invest in a certain type of security or partake in a particular investment strategy:

Market Risk – The price of any security or the value of an entire asset class can decline for a variety of reasons outside of the Firm's control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. If a Client has a high allocation in a particular asset class, it may negatively affect overall performance to the extent that the asset class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset classes in a particular period may cause that Client Account to underperform relative to the overall market.

Securities/investment vehicles prone to this risk include; equities, bonds, ETFs, and mutual funds.

Advisory Risk – There is no guarantee that the Firm's investment advice about particular securities or asset classes will necessarily produce the intended results. The Firm and its representatives are not responsible to any Client for losses unless caused by the Firm's breach of its fiduciary duty.

Securities/investment vehicles prone to this risk include; equities, bonds, ETFs, and mutual funds.

Management Risk – The Firm's investment approach in the Managed Account Services may fail to produce the intended results. If the Firm's perception of the performance of a specific asset class is not realized in the expected time frame, the overall performance of the Client's portfolio may suffer. Diversification does not assure or guarantee better performance and cannot eliminate the risk of investment losses.

Securities/investment vehicles prone to this risk include; equities, bonds, ETFs, and mutual funds.

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.

Securities/investment vehicles prone to this risk include; foreign equities, foreign bonds, and funds that hold foreign equities and/or bonds.

ETF Risks, including Net Asset Valuations and Tracking Error - ETF 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 Depositary 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. The Firm does not use leveraged or inverse ETFs as part of its portfolio construction. A non-indexed ETF can trade at a price above ("premium") or below ("discount") the share's net asset value. A non-indexed ETF purchased at a premium may ultimately be sold at a discount.

Securities/investment vehicles prone to this risk include; ETFs

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.

Securities/investment vehicles prone to this risk include; ETFs, and mutual funds.

Technology Risk – Since the Firm utilizes technological tools to help Clients simulate portfolio performance based on hypothetical allocations, Clients should make note of the following risks associated with using an online interface:

i. A computer-based portfolio simulator may still make incorrect assumptions about a Client's financial situation. There is always a possibility that the simulator may experience technical malfunctions that would cause its recommendations to be inaccurate.

ii. Clients must not construe the results of the Firm's computer-based portfolio simulator as investment advice. The simulator is merely a supplemental tool that helps Clients assess their financial situation and evaluate potential investments. Clients should note that the simulator bases its recommendation on the assumption that all the information the Client provided is correct and that there are no other external factors to consider.

iii. The simulator can only base its output on the input from the Client. As such the simulator's output is only as accurate as the data the Client inputs.

iv. The output that the simulator generates may not assess all of the Client's particular situation. Special circumstances, qualitative characteristics, and other intangible components of a Client's personal background that are not captured by the simulator may cause the simulator's assumptions to be incorrect.

Cybersecurity Risk – The Firm depends on its computer and technological systems to provide investment recommendations, reporting, and other services to clients. These systems are vulnerable to information security, operational, and related risks resulting from third-party cyberattacks and/or other technological malfunctions. Cyber-attacks may involve hackers and other unauthorized individuals gaining access to or misappropriating client information, stealing or corrupting data, releasing confidential information (including confidential client information) without authorization, preventing legitimate users from accessing their information or services through the Firm's website or causing other operational disruptions. Successful cyber-attacks against or technological breakdowns of the Firm or another service provider may adversely affect Clients. For example, cyber-attacks may cause the unauthorized release of client confidential information and may prevent clients from accessing information about their goals. While the Firm has security systems and business continuity plans intended to prevent or reduce the impact of such cyber-attacks and technological malfunctions, these systems and plans are subject to inherent limitations and may not be successful in preventing or reducing the impact of cyberattacks or technological malfunctions.

Clients are highly encouraged to speak with a financial advisor at any time to review their Investment Profile and Client Plan. The Firm also has procedures for reviewing Client accounts, which are outlined in Item 13 of this Firm Brochure.

Item 9. Disciplinary Information

There are no legal or disciplinary events that are material to the Firm's prospective Clients' evaluation of our advisory business or the integrity of our management. The Firm has no material disciplinary facts to disclose.

Item 10. Other Financial Industry Activities and Affiliations

Origin Investment Advisory LLC is a wholly-owned subsidiary of Blend Financial Inc. dba Origin Financial.

A. Management Persons as Registered Broker-Dealers.

Neither the Firm nor any of its management persons are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

B. Management Persons as Commodities Traders.

Neither the Firm nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

C. Material Relationships with Related Persons.

Neither the Firm nor any of its management persons have a relationship or arrangement that is material to the Firm's advisory business with any of the entities below

1. Broker-dealer, municipal securities dealer, government securities dealer or broker,
2. Investment company or other pooled investment vehicle (e.g., mutual fund, private fund, etc.),
3. Another investment adviser or financial advisor,
4. Futures commission merchant, commodity pool operator, or commodity trading advisor,
5. Thrift institution,
6. Accountant or accounting firm,
7. Lawyer or law firm,
8. Pension consultant
9. Real estate broker or dealer,
10. Sponsor or syndicator of limited partnerships.

Clients always have the right to decide whether to purchase investment products or services through the third-party entity that the Firm recommends to Clients

D. Recommendations of other Investment Advisers.

The Firm does not recommend or select other investment advisers for its Clients.

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

A. Code of Ethics

Every officer, director, employee, and contractor of the Firm (each, an "Employee") of the Firm must act in an ethical and professional manner. In view of the foregoing and applicable provisions of relevant law, the Firm has determined to adopt a Code of Ethics to specify and prohibit certain types of transactions deemed to create conflicts of interest (or at least the potential for or the appearance of such a conflict) and to establish reporting requirements and enforcement procedures relating to personal trading by Firm personnel. The Firm's Code of Ethics specifically deals with professional standards, insider trading, personal trading, gifts and entertainment restrictions, and fiduciary duties. It further establishes ideals for ethical conduct based on the fundamental principles of openness, integrity, honesty, and trust.

The Firm will provide a copy of our Code of Ethics to any Client or prospective Client upon request.

B. Conflicts of Interest in Connection with Investment Recommendations or Transactions

Resolution of Conflicts of Interest. In the case of all conflicts of interest, the Firm's determination as to which factors are relevant, and the resolution of such conflicts, will be made using the Firm's best judgment, but in its sole discretion. The Firm seeks to address these potential conflicts through the use of:

- A robust Code of Ethics (which is described in Item 11.A, above).
- An annual requirement that Employees complete a questionnaire detailing their other activities and potential conflicts.
- A requirement that Employees pre-clear outside business activities (other than outside activities related to charities, non-profit organizations/clubs, and civic/trade organizations).
- Disclosure of potential conflicts of interest and risks in this Form ADV.

C. Employee Investments

Since Firm Employees may also make use of the Firm's advisory services, there is a possibility that the Firm's Employees may invest in the same securities that the Firm also recommends to Clients. To resolve this conflict of interest, Firm Employees will receive the same service as any other Client would. They will not receive any special pricing, access, information, treatment, or timing. The Firm will only ever make recommendations to Firm Employees strictly based on the Employee's financial background, investment objectives, and suitability, thus addressing the conflict that arises from personal trading. In other words, recommendations that the Firm makes to a Client are never dependent upon another Client's recommendations. Per item 12.4 in the Firm's code of ethics, no Firm Employee may engage in what is commonly known as "frontrunning" or "scalping:" buying or selling securities in an Employee Covered Account, prior to Clients, in order to benefit from any price movement that may be caused by Client transactions or the Firm's recommendations regarding the security. No Employee may buy or sell a security when he or she knows the Firm is actively considering the security for purchase or sale (as applicable) in Client accounts. Employee transactions in options, derivatives, or convertible instruments that are related to a transaction in an underlying security for a Client ("inter-market front-running") are subject to the same restrictions.

D. Investing Personal Money in the Same Securities as Clients

Given that Firm Employees may also utilize the Firm's advisory services as Clients, there is a possibility that the Firm's related persons would trade securities for their own accounts at the same time they are recommending the same securities for other Clients' accounts. Please refer to Item 11.C for an explanation of how this conflict of interest is addressed.

E. Trading Securities at/around the Same Time as Clients' Securities.

As discussed above, Employees and related persons are subject to the Firm's Code of Ethics. The CCO has granted in the past and may grant in the future, exceptions to the 'Code of Ethics Personal Trading Restrictions' and 'Code of Ethics Personal Trading Preclearance' requirements outlined above.

Item 12. Brokerage Practices

A. Selection of Broker-Dealers

For its financial planning services, the Firm does not place trading orders or execute transactions on behalf of Clients. For the Managed Account Services, the Firm will select and recommend broker-dealers or custodians based on several factors, including, but not limited to, ease of administration, quality of execution, and commission rates. Currently, the Firm has elected to use DriveWealth, LLC ("DriveWealth") as the broker-dealer/custodian for Client accounts.

B. Research and Client Commission Management

The Firm does not engage in any "soft dollar" practices involving the receipt of research or other brokerage services in connection with Client transactions.

C. Brokerage for Client Referrals

The Firm does not compensate or otherwise reward brokers for Client referrals.

D. Directed Brokerage

The Firm does not permit a Client to direct brokerage.

E. Order Aggregation

For the Managed Account Services, whenever possible, the Firm aggregates the purchase and sale of securities for various Client accounts with similar orders to obtain the best pricing averages and minimize trading costs. Aggregating transactions of similar orders may provide Clients with better purchase/sale execution prices, lower commission expenses, better timing of transactions, or a combination of these factors.

Item 13. Review of Accounts

A. Periodic Reviews

Financial Planning

Each account advised by the Firm has investment guidelines set forth in the documentation provided by Clients during onboarding and updated from time to time thereafter. It is the Firm's policy to advise Client accounts in accordance with any objectives and guidelines imposed by the Client. If it is determined that a conflict between the investment strategy and the Client's investment goals could arise, the Firm will immediately contact the Client to explain the Firm's opinion and collectively determine the proper steps to take.

Origin Invest

The Firm reviews Client Accounts on a daily basis and typically rebalances Client Accounts when an asset class is in excess of 7% from the recommended allocation of the Model Portfolio(s). DriveWealth sends the Firm a list of proposed trades that would properly rebalance each Client's account. DriveWealth only executes the trades upon the Firm's approval. The Chief Compliance Officer has designated an employee who performs the periodic reviews.

B. Intermittent Review Factors

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or changes in Clients' financial status (such as retirement, termination of employment, relocation, or inheritance).

Clients are advised to notify the Firm promptly if there are any material changes to their financial situations or investment objectives, or in the event, they wish to place restrictions on their accounts.

C. Client Reports

For both financial planning and Managed Account Services, the Firm provides all Clients with continuous access to their profile via the Firm's website, where Clients can access their financial profile and investment recommendations. The written reports include the account's valuation and performance. The reports also include a summary of the holdings in a Client's portfolio, along with an analysis of the portfolio's progress in meeting the Client's investment objectives. Clients will also receive periodic email communications describing portfolio performance and product features.

Item 14. Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties.

The Firm does not receive any other compensation from any third party (other than Clients' employers) for the advisory services the Firm provides to its Clients.

B. Compensation to Non-Advisory Personnel for Client Referrals.

The Firm may engage in promoter arrangements for client referrals. These individual promoters offer our services to the public. The firm pays a referral fee to the promoter based on the number of clients brought to the firm and memorialized in a written agreement ("Promoter Agreement"). In all cases, the firm will comply with the cash solicitation rules established by the SEC, state regulators, and client disclosure requirements. If a referred prospective client enters into an agreement with the Firm, a referral fee is paid to the referring party. The referral relationship will not result in clients being charged any fees over and above the normal advisory fees charged for the advisory services provided. The Firm will pay the promoter their share of the total fee. The Promoter Agreement requires that the promoter be appropriately registered under federal and state securities laws where applicable. Clients receive all related agreements and disclosures prior to or at the time of entering into an agreement with the firm.

The Firm may license its software platform to non-advisory personnel for a platform fee.

Under the Employer Model, the Firm's fees may be paid, in whole or in part, by third parties, including the Client's employer.

The Firm may use client testimonials in marketing and advertising and those testimonials could include compensation. If compensation is provided, it will be disclosed with the testimonial.

The Firm may provide incentives to end-user Clients and their referrals in connection with a "refer a friend" program, consistent with applicable law. This arrangement may create an incentive for an end-user Client to refer prospective end users to the Firm , even if the current end-user Client would otherwise not make the referral.

The Firm has relationships with one or more advertisers pursuant to which the Firm compensates such advertisers for the advertising services provided.

Item 15. Custody

Financial Planning

The Firm does not maintain custody of Client funds or securities. All Client funds and securities are maintained with a qualified custodian of the Client's choosing.

Origin Invest

The Firm maintains all Client funds and securities with DriveWealth, a qualified custodian. DriveWealth sends account statements directly to Clients on a monthly basis. Clients should carefully review these statements upon receipt. Though the Firm does not send account statements directly to Clients, Clients may access written reports about their accounts on the Firm's website. Clients should compare the account statements they receive from DriveWealth with the account statements that the Firm makes available on its website for any discrepancies. The Firm does not have physical custody of any client funds and/or securities and does not take custody of client accounts at any time. However, by granting Origin Investment Advisory written authorization to automatically deduct fees from client accounts, the firm is deemed to have limited custody. The account statement from your custodian will indicate the amount of advisory fees deducted from your account(s) each billing cycle. Clients should carefully review statements received from the custodian.

Item 16. Investment Discretion

The Firm does not assume discretionary trading and investment authority over Client assets for the Firm's Financial Planning services.

For advisory services related to the Managed Account Services, the Firm does accept discretionary authority to manage securities accounts on behalf of Clients. Clients may not place any limitations on this authority. To grant discretionary authority to the Firm, Clients must sign the Investment Advisory Agreement during the onboarding process.

Item 17. Voting Client Securities

For its financial planning services, the Firm will not have or accept the authority to vote on Client securities. Clients will receive their proxies or other solicitations directly from their custodian. Clients may not contact the Firm with any questions about a particular solicitation.

For the Managed Account Services, the Firm does not have or accept the authority to vote on Client securities because ETF shares have no associated voting rights.

Item 18. Financial Information

The Firm does not require or solicit prepayment of more than $1,200 in fees, or any fees for that matter, per Client six months or more in advance.

The Firm is not involved in any financial conditions that are reasonably likely to impair the the Firm’s ability to meet contractual commitments to Clients.

The Firm has not been the subject of a bankruptcy petition within the past 10 years.