

Guideline Investments, LLC
Client Relationship Summary
February 23, 2026

Introduction

Guideline Investments, LLC (“Guideline Investments”) is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”). Brokerage and investment advisory services and 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 provide investment management services to Individual Retirement Accounts (IRAs), Simplified Employee Pension (SEP) IRAs, and 401(k) plans, including selecting, monitoring, and managing the investment menu and portfolios for your account. We also recommend managed portfolios composed of mutual funds via our proprietary algorithm. You can choose to invest in one of our managed portfolios recommended by our proprietary algorithm or you may choose to create a custom portfolio from our menu of mutual funds.

Additional information about our advisory services is located in Item 4 of our Brochure which is available online at www.adviserinfo.sec.gov by searching CRD #281515.

Questions to ask us

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education, and other qualifications? What do those qualifications mean?

What fees will I pay?

We charge IRA and SEP IRA clients an annual account fee of 0.08% on assets under management based on their account balance on the last day of the month. Fees are non-negotiable.

For 401(k) accounts, we charge 401(k) plan participants (PT) an annual account fee of 0.25%, or as otherwise negotiated by the PS, on assets under management based on their account balance on the last day of the month. The PS has the option to pay on behalf of- or pass on to- PT’s, certain fees. Guideline Investments provides a detailed schedule of fees at the time of enrollment. Guideline Investments’ fees are subject to change at any time with thirty (30) day notice.

Lastly, the mutual funds within your portfolio charge fees to you which will reduce the value of your investments over time. Information on these fees can be found in each fund’s prospectus, made available upon request.

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 fees is located in Item 5 of our Brochure, which is available online at www.adviserinfo.sec.gov by searching CRD #281515, and on our website at <https://www.guideline.com>.

Questions to ask us:

- Help me understand how these fees and costs will 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 interests 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 affect the investment advice we provide you.

Here is an example to help you understand what this means. We charge an annual account fee that is based on the amount of assets we manage for you. The fee that you will pay will be computed based on the fee schedule set forth in the “What fees will I pay” section above as well as in our ADV Brochure. Therefore, the more assets in the accounts we manage for you,

the more you will pay in fees, and we have an incentive to encourage you to increase the amount of assets in your accounts. However, our employees are not paid based on the amount of assets that are in your account and we always strive to put the interest of our clients first as part of our fiduciary duty as a registered investment adviser.

Additional information about our conflicts of interest can be found in our Brochure under Items 10, 11, and 14 which is available online at www.adviserinfo.sec.gov by searching CRD #281515.

Questions to ask us:

- How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our financial professionals are employees of the firm and are paid a fixed monthly salary. They do not receive or accept compensation for the sale of securities or other investment products. Employees also receive compensation in the form of equity grant options in Gusto, Inc.

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

No, our firm and/or financial professionals do not have any legal and disciplinary history. Visit www.investor.gov/CRS for a free and simple search tool to research our firm and our financial 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 firm's investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 281515. You may also contact our firm at (888) 228-3491 and talk to any one of our investment professionals or support staff.

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?

Exhibit A – Summary of Material Changes

This Exhibit discusses material changes to our Client Relationship Summary since our update dated December 3, 2025. Material changes included in the February 23, 2026 update include the following:

- What fees will I pay: We changed our advisory fee from a tiered structure (0.15%-0.35%) to a flat 0.25% annual rate (unless otherwise negotiated by the PS). More information on Guideline Investments' fee structure can be found in our ADV Part 2A Brochure, made available on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 281515.