Form ADV Part 3 – Client Relationship Summary

Date: 05/29/2026

Item 1: Introduction

TWELVE POINTS WEALTH MANAGEMENT is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit *www.investor.gov/CRS* for free, simple tools to research firms and for educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

***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 investment services and advice can you provide me? Our firm primarily offers the following investment advisory services to retail clients: portfolio management via a wrap fee program (we review your portfolio, investment strategy, and investments) and financial planning (we assess your financial situation and provide advice to meet your goals). As part of our standard services, we typically monitor client accounts on a monthly basis. Our firm has discretionary management without any material limitations. We do *not* limit the types of investments that we recommend. Our firm has a minimum account size of $500,000 and a minimum fee of 1.00%. Please also see our Form ADV Part 2A ("Brochure"), specifically Items 4 & 7 and our Wrap Fee Program Brochure ("Wrap Brochure").

Item 3: Fees, Costs, Conflicts, and Standard of Conduct

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

What fees will I pay? Our fees vary depending on the services you receive. For retail clients, our fee ranges from 0.40% to 1.00% of the assets we manage, depending on the amount of assets we manage for a client. For retirement plans, our fee ranges from 0.10% to 0.50% of plan assets. Clients who engage the firm for advisory services are charged an asset management fee of 50 basis points (0.50%) for U.S. Treasury Bill securities. Additionally, the Firm charges a minimum fixed fee of $5,000 for creating client financial plans. Alternatively, the hourly fee for financial planning services ranges between $400 and $1,000 depending upon the planner. Additional information about our fees can be found in our Wrap Fee Program Brochure. The amount of assets in your account affects our advisory fee; the more assets you have in your advisory account, the more you will pay us and thus we have an incentive to increase those assets in order to increase our fee. For hourly fee arrangements, each additional hour (or portion therefore) we spend working for you would increase the advisory fee. Our fixed fee arrangements are based on the amount of work we expect to perform for you, so material changes in that amount of work will affect the advisory fee we quote you. Twelve Points Wealth Management portfolio management fees are charged quarterly in advance, while financial planning fees are paid upon delivery of the financial plan. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess shall be refunded to the client. You pay our fees even if you do not have any transactions and the advisory fee paid to us generally does not vary based on the type of investments selected. Please also see Items 4, 5, 6, 7 & 8 of our Brochure and our Wrap Brochure.

Some investments (e.g., mutual funds, variable annuities, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. The same goes for any additional fees you pay to a custodian. For the wrap fee program, you will not typically pay additional transaction fees and thus our advisory fee is higher than if you paid transaction fees separately. **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.** Please also see our Brochure and Wrap Brochure for additional details.

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 (see heading immediately below).

How do your financial professionals make money? Primarily, we and our financial professionals receive cash compensation from the advisory services we provide to you. This compensation may vary based on different factors, such as those listed above in this Item. When acting as separately licensed insurance agents, our financial professionals also receive commissions from clients and therefore have an incentive to recommend insurance products that provide them additional compensation over those that do not. Because we manage your portfolio in a wrap fee program, we have an incentive to limit trading in your account and to favor asset types that do not have a transaction fee in order to minimize trading expenses that we would have to normally pay out of our management fee. Please also see Item 10 of our Brochure and our Wrap Brochure for additional details.

Item 4: Disciplinary History

***Questions to ask us*: As a financial professional, do you have any disciplinary history? For what type of conduct?**

Do you or your financial professionals have legal or disciplinary history? Yes, we do have legal and disciplinary events. Visit https://www.investor.gov/ for a free, simple search tool to research us and our financial professionals.

Item 5: Additional Information

***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?**

For additional information on our advisory services**, see our Brochure and Wrap Brochure available at https://adviserinfo.sec.gov/firm/summary/171107 and any individual brochure supplement** your representative provides. If you have any questions, need additional up-to-date information, or want another copy of this Client Relationship Summary, then please contact us at 978-318-9500.

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Twelve Points Wealth Management
05/29/2026
Form CRS Material Changes

The Firm has made the following changes to this Form CRS since its last annual amendment filing on March 31, 2025:

Item 3: Fees, Costs, Conflicts, and Standard of Conduct
The CRS was updated to reflect the following:

- For retirement plans, our fee ranges from 0.10% to 0.50% of plan assets.
- Clients who engage the firm for advisory services are charged an asset management fee of 50 basis points (0.50%) for U.S. Treasury Bill securities.
- The Firm charges a minimum fixed fee of $5,000 for creating client financial plans. Alternatively, the hourly fee for financial planning services ranges between $400 and $1,000 depending upon the planner.