BRADY INVESTMENT COUNSEL LLC

INVESTMENT MANAGEMENT • SOCIALLY RESPONSIBLE INVESTING

FORM ADV, PART 3: CUSTOMER RELATIONSHIP SUMMARY (Form CRS)

September 14, 2026 | SEC CRD No. 128814 | Scottsdale, AZ | (630) 453-0016

ITEM 1 — INTRODUCTION

Brady Investment Counsel LLC ("Brady") is registered with the U.S. Securities and Exchange Commission ("SEC") as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. **Free and simple tools** are available to research firms and financial professionals at **Investor.gov/CRS**, which also provides educational materials about broker-dealers, investment advisers, and investing.

ITEM 2 — WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

Services Offered:

We provide **discretionary investment management** services to retail investors, including high-net-worth individuals, charitable foundations, religious organizations, and pension and profit-sharing plans. As your discretionary manager, we make investment decisions on your behalf without requiring your approval for each transaction, guided by your stated investment objectives and constraints. We monitor client accounts on an ongoing basis.

Investment Strategies:

- Core Growth — Diversified equity portfolio targeting long-term capital appreciation.
- Growth & Income — Balanced approach combining growth equities with income-generating assets.
- Focus — Concentrated, high-conviction equity portfolio.
- Balanced — Mixed allocation of equities and fixed income.
- ETF Solutions — Cost-efficient, diversified market exposure via exchange-traded funds.

Our approach is active, long-term, and **socially responsible**, driven by in-house fundamental research and a proprietary equity valuation model. We emphasize tax efficiency and customized portfolio construction.

Account Minimums: We generally require a minimum account size of **$3,000,000**. Minimums may be waived at our discretion based on individual circumstances.

⌖ Conversation Starters — Key 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?*

ITEM 3 — WHAT FEES WILL I PAY?

Advisory Fee Schedule:

We charge a **flat annual management fee of 0.75%** of assets under management (AUM), billed quarterly in advance based on the market value of your account at the end of the prior quarter. **The more assets you have in your advisory account, the more you will pay in fees, and we therefore have an incentive to encourage you to increase the assets in your account.**

Assets Under Management	Annual Rate	Quarterly Rate
All Assets	**0.75%**	**0.1875%**

Fees are billed quarterly in advance, based on the market value of assets at the end of the prior quarter. The annual fee on a $3,000,000 account would be $22,500. Fees are negotiable.

Other Costs You May Pay:

- Custodial fees charged by **Charles Schwab & Co., Inc. ("Schwab")**, our primary custodian. Schwab's fees are separate from and in addition to our advisory fee.

- Brokerage commissions and transaction costs on trades executed in your account.
- Internal expenses of any mutual funds or ETFs held in your account (expense ratios).

You will pay our advisory fee even if your account declines in value. Fees and costs are ongoing and will reduce returns on your investments over time. Please make sure you understand what fees and costs you are paying. For more detail, see our **Form ADV, Part 2A Brochure**.

✥ Conversation Starters — Key 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 the most common ways I might pay fees and costs to your firm? How much can I expect to pay each year?*

ITEM 4 — 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?

Our Standard of Conduct — Fiduciary Duty:

When we act as your investment adviser, we are held to a **fiduciary standard** under the Investment Advisers Act of 1940 — we are legally required to act in your best interest and not put our interests ahead of yours. This obligation applies to both the advice we provide and the management of your account. 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.

Conflicts of Interest:

- **Fee-only firm:** We do not earn commissions from the sale of investment products, which significantly reduces conflicts of interest associated with product recommendations.
- **AUM-based fees:** Because our fee is based on the value of assets we manage for you, we have an incentive to encourage you to increase the assets in your account.
- **Schwab relationship:** We recommend that clients custody assets at Schwab. While we receive no compensation from Schwab for this recommendation, the practice presents a conflict of interest. We believe Schwab's services and pricing benefit our clients.
- **Soft dollars:** We may receive research or other services from broker-dealers in connection with client brokerage transactions. We address this conflict by always seeking best execution for your transactions.
- **Single-owner structure:** David P. Brady, CFA, is the firm's sole owner, President, and Chief Investment Officer, eliminating conflicts arising from competing internal interests.

✥ Conversation Starters — Key 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?*

ITEM 5 — DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Neither Brady Investment Counsel LLC nor any of its financial professionals has any legal or disciplinary history to report. Visit **Investor.gov/CRS** for a free and simple search tool to research our firm and our financial professionals.

✥ Conversation Starters — Key Questions to Ask Us:

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

ITEM 6 — ADDITIONAL INFORMATION

For additional information about our investment advisory services, please refer to our **Form ADV, Part 2A Brochure**, available on the SEC's Investment Adviser Public Disclosure (IAPD) website at **www.adviserinfo.sec.gov** (search CRD No. 128814) or upon request. To receive an up-to-date copy of this relationship summary or to request additional information about our firm, contact us at:

Brady Investment Counsel LLC
David P. Brady, CFA | President & Chief Investment Officer
Scottsdale, Arizona
Phone: (630) 453-0016 | Email: david.brady@bradyinvestmentcounsel.com
Website: bradyinvestmentcounsel.com

Brady Investment Counsel LLC is registered with the **U.S. Securities and Exchange Commission** as an investment adviser. Registration does not imply a certain level of skill or training. As an Arizona limited liability company, Brady is also subject to applicable Arizona state laws. If you have a complaint, you may contact Brady Investment Counsel LLC at the address above, contact the SEC at **www.sec.gov/tcr**, or contact the **Arizona Corporation Commission — Securities Division** at (602) 542-4242.