BRADY INVESTMENT COUNSEL LLC | INVESTMENT MANAGEMENT · SOCIALLY RESPONSIBLE INVESTING

FORM ADV, PART 3: CUSTOMER RELATIONSHIP SUMMARY (Form CRS) | September 24, 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:

- 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?

Item 3 – What Fees Will I Pay? How does your Firm make Money? What Conflicts of Interest do You Have?

Advisory Fee Schedule: 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. Asset-based management fees paid by you and the rest of our clients make up the overwhelming source of Brady revenue. We do our best to keep operating costs low, and what is left over is how we make money.

We charge a flat annual management fee of 0.75% of assets under management (AUM), billed quarterly in arrears based on the market value of your account at the end of the prior quarter.

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

Fees are deducted from your account by your custodian after we inform your custodian of the amount owed. It is your responsibility to check fee accuracy each quarter and let us know if you have questions concerning the amount withdrawn by your custodian or how your fee was calculated.

Other Costs You May Pay: In addition to our advisory fee, you will pay custodial and brokerage transaction costs charged by your custodian, and the internal operating expenses of any mutual funds or ETFs held in your account. These third-party costs are not shared with Brady. For full details on all fees and costs, see our Form ADV Part 2A, available at Investor.gov/CRS or upon request.

Potential Conflicts of Interest: 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.

For example, we may invest in the same securities as our clients, creating a conflict of interest because we have an incentive to favor our own accounts over client accounts when making investment and trading decisions.

Conversation Starters:

- Help me understand how these fees and costs might affect my investments. If I give you $100,000 to invest, how much will go to fees and costs, and how much will be invested for me?
- What are your typical total annual fees?
- Why do you personally invest in the same securities as your clients?

When we act as your investment adviser, we must 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.

How We Make Money and Conflicts of Interest: Our sole compensation is the advisory fee described above. Because our fee is based on AUM, we have an incentive to recommend that you increase assets in your account rather than, for example, pay down debt. We manage this conflict by our fiduciary obligation to act in your best interest and by full disclosure. We do not receive commissions, 12b-1 fees, or third-party compensation.

Conversation Starters:

- How might your conflicts of interest affect me, and how will you address them?
- As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 4 – Do You or Your Financial Professionals Have a Legal or Disciplinary History?

No. Brady and its financial professionals have no legal or disciplinary history. Visit Investor.gov/CRS for free and simple research tools to research our financial professionals and us.

Item 5 – Additional Information

For more detailed information about our services, please review our Form ADV Part 2A Brochure, available on the SEC's website at www.adviserinfo.sec.gov or by contacting us at (630) 453-0016 or david.brady@bradyinvestmentcounsel.com. To request a copy of this Form CRS or to report a problem, contact us at the number or email address above.