

Bailey Financial Services, Inc.

Registered Investment Advisor

Bailey Financial Services, Inc.

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Form ADV Part 2A

Firm Brochure - Georgia

January 9, 2026

This brochure provides information about the qualifications and business practices of Bailey Financial Services, Inc. If you have any questions about the content of this brochure, please contact our President, Mr. Wilder Bailey, at (706) 354-1950. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information about Bailey Financial Services is available on the SEC's website at www.adviserinfo.sec.gov. Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD ("CRD") number, which is 173452.

While the firm and its associates may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

Item 2 – Material Changes

The firm has updated its Form ADV Part 2 from the previous version dated January 10, 2025 brochure due to its annual amendment requirement; no material changes have occurred.

This version of the firm's brochure is for clients and prospective clients in Georgia only.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's Website: www.adviserinfo.sec.gov or may contact our firm at (706) 354-1950 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

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Important Information

Throughout this document Bailey Financial Services, Inc. shall also be referred to as “the firm,” “firm,” “our,” “we” or “us.” The client or prospective client may be also referred to as “the client,” “client,” etc., and refers to a client engagement involving a single *person* as well as two or more *persons*, and may refer to natural persons and legal entities. The term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., Internet address, etc.).

Item 4 - Advisory Business

Description of the Firm

Bailey Financial Services, Inc. is a Georgia domiciled company formed in 1994. Firm registration as an investment advisor in the State of Georgia occurred in 2014. The firm subsequently registered in Alabama in 2016. Our firm is not a subsidiary of nor do we control another financial services industry entity. We may operate under the trade name Bailey Financial Services.

H. Wilder Bailey is our firm's President, Chief Compliance Officer (supervisor) and majority shareholder. Additional information about Mr. Bailey and his professional experience may be found at the end of this Brochure.

Description of Advisory Services Offered

During or prior to your first meeting with us you will be provided with our current Form ADV Part 2 firm brochure that includes a statement involving our privacy policy (noted in Item 11). Our firm will also ensure that any material conflicts of interest have been disclosed to you that could be reasonably expected to impair the rendering of unbiased and objective advice.

Should you wish to engage Bailey Financial Services for any advisory service, you must first execute a written engagement agreement with our firm; thereafter, discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, you may be asked to provide current copies of the following documents early in the process:

- Wills, codicils and trusts
- Current financial specifics including W-2s or 1099s
- Information on current retirement plans and benefits provided by your employer
- Statements reflecting current investments in retirement and non-retirement accounts
- Employment or other business agreements you may have in place
- Completed risk profile questionnaires or other forms provided by our firm

It is important that the information and/or financial statements you provide our firm is accurate. We may, but are not obligated, to verify the information you will provide, which will then be used in the advisory process. Our ability to provide advisory services depends on access to important information about our clients. Accordingly, it is necessary that you provide us with an adequate level of information and supporting documentation throughout the term of the engagement, including, but not limited to: source of funds, income levels, and an account holder or their legal agent's authority to act on behalf of the account, among other information. This helps us determine the appropriateness of our planning and/or investment strategies for your portfolio.

Concurrent with or following our initial consultation session and plan development, we will recommend one or more third-party investment manager to implement a portion or your entire portfolio. Prior to recommending a third-party investment manager, we will conduct what is believed to be an appropriate level of due diligence, to include ensuring the third-party investment manager is appropriately registered or notice-filed within your state of residence.

We begin by gathering information from you about your financial situation, investment objectives, and any reasonable restrictions you may want to impose on the management of your account. We then provide this data to the third-party investment manager to develop your portfolio.

Third-party managers will invest on behalf of your account in accordance with the strategies set forth in their own disclosure documents which will be provided to you by our firm prior to your portfolio employing such strategies. We have provided a general overview in Item 8 of this brochure.

These third-party investment managers typically assume discretionary authority over an account, and some of these programs may not be available for those clients who prefer an account to be managed under a non-discretionary engagement or who may have unique account restrictions. We do not serve your account under this form of investment authority, nor may we select or terminate a third-party investment manager without your prior authorization. Please refer to Item 16 of this brochure for further information involving account investment authority.

At least annually thereafter a review will be performed from both a compliance and performance perspective to determine whether the selected third-party investment manager remains an appropriate fit for your portfolio.

Wrap Fee Program

Our firm does not sponsor or serve as a portfolio manager in an investment program involving wrapped (bundled) fees.

Client Assets Under Management

Due to the nature and delivery of our advisory services, we do not have reportable assets under management.¹

General Information

Our firm will use its best judgment and good faith effort in rendering its services. We cannot warrant or guarantee the achievement of a particular goal or level of account performance, or that a client account will be profitable over time. Past performance is not necessarily indicative of future results. Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to the client's direction or that of the client's attorney-in-fact; any act or failure to act by a service provider maintaining an account.

Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document or our client engagement agreement shall constitute a waiver of any rights that a client may have under federal and state securities laws.

Retirement Plan Advice and Rollovers

As a registered investment adviser, our firm is a fiduciary to every client, meaning that we are obligated to act in our clients' best interests at all times. In addition to our fiduciary status as an investment adviser firm, when our firm provides advice to retirement investors, such as advice on an employer-sponsored retirement plan, Individual Retirement Account (IRA) or other qualified retirement plan, we may also be considered by the Department of Labor and the Internal Revenue Service to be acting as a fiduciary under Title I of ERISA and the Internal Revenue Code. These fiduciary obligations include requirements that we disclose our

¹ The term "assets under management" as defined by the SEC's 2010 *General Instructions for Part 2 of Form ADV*.

services and fees, conflicts of interest, and the reasons our recommendations are in the client's best interests.

After an analysis of the client's situation and plan documents, we will consider relevant factors including but not limited to the following:

- Alternatives to rolling the employer plan to an IRA, including leaving the money in an employer's retirement plan (if permitted); rolling the money to a new employer plan if available; or cashing out;
- The fees and expenses associated with both the employer's plan and the rollover IRA (or other alternatives such as noted above) and whether the employer currently pays for some or all of the plan's expenses;
- The different levels of services and investments available under the employer plan and the rollover IRA, and other alternatives;
- Evidence that a rollover is the most appropriate choice in light of any additional costs and the resultant decrease in the client's returns;
- How withdrawals are treated under each alternative (e.g., penalties up to age 55 vs. 59-1/2);
- Protection from creditors and legal judgments (unlimited vs. bankruptcy only; federal- and state-specific);
- Required minimum distributions;
- Tax implications of rolling shares of employer stock;
- The impact of economically significant investment features such as surrender schedules and index annuity cap and participation rates (such as in an employer-sponsored 403(b) plan account);
- Any other relevant variables particular to the client's situation.

The client will be made aware of conflicts of interest including but not limited to whether our firm will profit from a recommendation through financial planning and/or investment management fees, and whether services we offer are already provided by or available through the current plan, potentially at no additional cost.

Item 5 - Fees and Compensation

Method of Compensation and Fee Schedule

Each investment management program has a stated fee that will be described to you through the use of the third-party investment manager current disclosure documents prior to your selection of that manager. Fees range from 1.00% to 2.25% (100 to 225 basis points) depending upon the program selected, investment strategies involved, portfolio holdings, asset size of the account, and the services provided to the client. Our firm will share in part of the advisory fee for our consultation services and oversight of the various third-party manager relationships. We will receive from 0.50% to 1.25% (50 to 125 basis points) of the total annual asset-based fee, and that fee will be described to you in our engagement agreement.

In addition to the fees described above, the firm may assess an additional fee of up to 1% (100 basis points) for the initial consultation or for future account additions.

Advisory fees are paid quarterly, in advance. The fee is based on the reporting period ending value of your account (e.g., the last market day of the quarter), and account asset values are to be in consonance with the statement you will receive from your custodian of record for the purpose of verifying the computation of the advisory fee. Your first billing cycle will begin once your agreement is executed and account assets have

settled into your account held by the custodian of record. Fees for partial quarters will be prorated based on the remaining days in the reporting period in which our firm services the account. Fee payments will traditionally be assessed within the first 15 days of each billing cycle.

Third-party investment management services fees will be noted on your quarterly account statement that you will receive from your custodian of record. We are not directly involved in the billing process of your investment account. By signing our firm's and/or the third-party investment manager's engagement agreement(s), as well as the selected custodian account opening documents, you will be authorizing the withdrawal of advisory fees and transactional charges from your account. Please note that you share in the responsibility to verify the accuracy of fee calculations; the custodian may not verify the accuracy of advisory fee assessments for you.

The advisory services to be provided and their specific fees will be detailed in the client engagement agreement. Published fees may be discounted at the discretion of our firm but they are not negotiable. Our firm strives to offer fees that are fair and reasonable in light of the experience of our firm and the services to be provided to you.

Additional Client Fees

Any transactional or service fees (sometimes termed *brokerage fees*), individual retirement account fees, qualified retirement plan fees, account termination fees, or wire transfer fees will be borne by the account holder per your custodian of record's fee schedule. You will be notified of any future changes to these fees by the custodian of record and/or third party administrator for certain tax-qualified plans. Advisory fees paid by our clients to our firm for our services are separate from any of these fees or other similar charges, as well as those for mutual funds, exchange-traded funds (ETFs), exchange-traded notes (ETNs), or other investments of this type.

Please refer to Items 12 and 14 of this brochure for additional information about our fees in relationship to our "brokerage practices."

External Compensation for the Sale of Securities to Clients

We do not charge or receive a commission or mark-up on a securities transaction, nor do we receive "trailer" or SEC Rule 12b-1 fees from an investment company that we may recommend to you. Fees charged by issuers are detailed in prospectuses or product descriptions and you are encouraged to read these documents before investing. Each client retains the option to purchase recommended or similar investments through their own service provider.

Termination of Services

Either party may terminate the agreement, which will be in writing. Our firm will not be responsible for investment allocation or advice upon receipt of a termination notice. It will also be necessary that we inform the selected third-party investment manager that the relationship between our firm and the client has been terminated.

If our Form ADV Part 2 firm brochure was not delivered to the client at least 48 hours prior to entering into any investment advisory contract with our firm, then the client has the right to terminate the contract without penalty within five business days after entering into the contract. If a client terminates their agreement after the five-day period, the client will be assessed fees on a prorated basis for services incurred from either (i) as a new client, the date of the engagement to the date of the firm's receipt of the written notice of termination, or (ii) all other accounts, the last billing period to the date of the firm's receipt of the written termination notice.

Third-party investment managers will coordinate the remuneration of prepaid asset-based fees via the client's investment account held at the custodian of record. Return of prepaid fees will never involve a personal check, cash or money order from our firm or from an associate of our firm.

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

Our firm's advisory fees will not be based on a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as performance-based fees. Our fees will also not be based on side-by-side management, which refers to a firm simultaneously managing accounts that do pay performance-based fees (such as a hedge fund) and those that do not.

Item 7 - Types of Clients

We provide advisory services to individuals and high net worth individuals. Our firm does not require minimum income, asset levels or other similar preconditions, and we will inform you of third-party investment managers' account minimums prior to your investing with them. We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements or pre-existing relationships.

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

Methods of Analysis and Investment Strategies

Method of Analysis

When we are engaged to provide investment advice, we will first gather and consider several factors, including:

- current financial situation and need
- interim and long-term goals and objectives
- level of investment knowledge
- tolerance or appetite for risk
- reasonable investment restrictions involving your portfolio

We employ what we believe to be an appropriate blend of fundamental, technical and cyclical analyses. For example, fundamental analysis may involve evaluating economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. Technical and cyclical analyses involve studying the historical patterns and trends of securities, markets, or economies as a whole in an effort to determine potential future behaviors, the estimation of price movement, and an evaluation of a transaction

before entry into the market in terms of risk and profit potential. Our research is drawn from sources that include financial periodicals, reports from economists and other industry professionals.

Investment Strategies

We recognize that each client's needs and goals are different; subsequently portfolio strategies and underlying investment vehicles may vary. The firm and its recommended third-party investment managers employ active, Core + Satellite, passive, or value investment strategies in order to seek growth while concurrently managing risk. The following defines the common strategies utilized within a client's portfolio, *in alphabetical order*:

Active Asset Management

A portfolio manager engaging in an active asset management strategy believes it is possible to create a profit from identifying or leveraging mispriced securities, or producing similar returns with less risk, or producing returns greater than a stated benchmark, such as a well-known index. For example, a "large cap stock" fund manager might attempt to outperform the Standard & Poor's 500 Index by purchasing underpriced stocks or derivative instruments representing these positions.

At times, a portfolio manager may attempt to preserve capital during times of high risk through the use of cash and cash equivalents, and the percentage of account holdings invested in the market may vary substantially based on what is believed to be the prevailing risk in the market. For example, if a manager feels risk in the stock market is low, he might increase exposure to equities to attempt to take advantage of growth opportunities. When risk in the stock market is considered high, all of or a portion of the portfolio's equity exposure may be moved to more stable short-term fixed income instruments and cash equivalent alternatives in order to preserve capital.

Core + Satellite

This strategy blends passive (or index) and active investing, where passive investments are used as the basis or "core" of a portfolio and actively-managed investments are added as "satellite" positions. With this strategy, the portfolio core holdings are indexed to potentially more efficient asset classes, while outlying selections are generally limited to active holdings in an attempt to outperform a particular category (sector), or a selection of particular positions to increase core diversification, or to improve portfolio performance.

For example, the core of a portfolio may be built with low-cost index funds or ETFs; satellite holdings would include active investment managers (mutual funds) with unique strategies that are believed capable of adding value beyond a stated benchmark over a full market cycle. The core may represent the majority of the total portfolio, using primarily index funds or index-based ETFs. The remainder of the portfolio may then employ mutual funds or ETFs that take a shorter duration to assist in the over-or-under allocation to specific sectors, regions, assets classes, etc.

Passive Account Management

Our passive strategy is based on Modern Portfolio Theory; selecting securities whose price movements have historically low correlations to create efficient portfolios that offer the highest expected return for a given level of risk, or one with the lowest level of risk for a given expected return. This practice does not employ market timing or stock selection methods of investing but rather a long term, buy-and-hold strategy with periodic rebalancing of the account to maintain desired risk levels.

Value Investing

Value investing involves buying above-average positions (holdings) at below-average prices. Conversely, when a holding is considered over-priced, it becomes a candidate to be sold.

Recommended Investments

We strive to recommend portfolios that contain investment vehicles that are diversified, tax-efficient, and low-cost investments whenever practical. It is common to find a broad range of mutual funds and ETFs within a portfolio.

Investment Strategy and Method of Analysis Material Risks

Our firm believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, there is no guarantee that an investment objective or planning goal will be achieved. Each client must be able to bear the risk of loss that is associated with their account, which may include the loss of some or their entire principal invested. We have offered examples of such risk in the following paragraphs, and we believe it is important that our clients review and consider each of them risk prior to investing.

Active Management Risks

A portfolio that employs active management strategies may, at times, outperform or underperform various benchmarks or other strategies. In an effort to meet or surpass these benchmarks, active portfolio management may require more frequent trading or “turnover.” This may result in shorter holding periods, higher transactional costs and/or taxable events generally borne by the client, thereby potentially reducing or negating certain benefits of active asset management.

Company Risk

When investing in securities, such as stocks, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as *unsystematic risk* and can be reduced or mitigated through diversification.

Core + Satellite Strategies

Strategies involving Core + Satellite investing may have the potential to be affected by “active risk” (or “tracking error risk”), which might be defined as a deviation from a stated benchmark. Since the core portfolio attempts to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a “sample” or “optimized” index fund or ETF that may not as closely align the stated benchmark.

Cyclical Analysis

An economic cycle may not be as predictable as preferred; many fluctuations may occur between long term expansions and contractions. The length of an economic cycle may be difficult to predict with accuracy and

therefore the risk of cyclical analyses is the difficulty in predicting economic trends. Consequently, the changing value of securities is affected.

Financial Risk

Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Fundamental Analysis

The challenge involving fundamental analysis is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security's value.

Inflation Risk

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

Market Risk

When the stock market as a whole or an industry as a whole falls, it can cause the prices of individual stocks to fall indiscriminately. This is also called *systemic* or *systematic* risk.

Passive Investing

A portfolio that employs a passive, efficient markets approach has the potential risk at times to generate lower-than-expected returns for the broader allocation than might be the case for a more narrowly focused asset class, and the return on each type of asset may be a deviation from the average return for the asset class.

Political Risk

The risk of financial, market or personnel losses because of political decisions or disruptions in a particular country or region, and may also be known as "geopolitical risk."

Research Data

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. Therefore, while our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

Socially Conscious Investing

If you require your portfolio to be invested according to socially conscious principles, you should note that returns on investments of this type may be limited and because of this limitation you may not be able to be as well diversified among various asset classes. The number of publicly traded companies that meet socially conscious investment parameters is also limited, and due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially conscious mutual funds or ETFs. Therefore, there could be a more pronounced positive or negative impact on a socially conscious portfolio, which could be more volatile than a fully diversified portfolio.

Technical Analysis

The risk of investing based on technical analyses is that it may not consistently predict a future price movement; the current price of a security may reflect all known information. This may occur due to analyst bias or misinterpretation, a sector analysis error, late recognition of a trend, etc.

Value Investing

A portfolio employing a value-based investing strategy could be adversely affected by inaccurate or flawed financial information or statements. For example, a company may have erred while entering data into its financial statements, or inadequately defines its earnings, resulting in a faulty valuation of its stock. Other examples might involve a “value manager” overpaying for a holding, or missing the timing of a buy or sell of a position, making it a less valuable aspect of the portfolio.

Security-Specific Material Risks

ETF and Mutual Fund Risks

The risk of owning ETFs and mutual funds reflect their underlying securities (e.g., stocks, bonds, securities futures, etc.). These forms of securities typically carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. We do not make specific recommendation involving leveraged or inverse ETFs due to their inherent heightened risk.

Index Investing

Investment vehicles such as certain ETFs and indexed funds have the potential to be adversely affected by “tracking error risk” or “active risk,” which might be defined as a deviation from a stated benchmark. Since the core portfolio attempts to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a “sample” or “optimized” index fund or ETF that may not as closely align the stated benchmark.

QDI Ratios

While many ETFs and index mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be part of an ETF or mutual fund portfolio), may be considered “non-qualified” under certain tax code provisions. A holding’s QDI will be considered when tax-efficiency is an important aspect of the client’s portfolio.

Third-Party Managers

We will review with you the Form ADV Part 2A of any recommended third-party investment manager to ensure you are familiar with the investment strategy and types of investment vehicles they employ so that they align with your investment policy, as well as discuss the risks these may impose on the account for your consideration.

Item 9 - Disciplinary Information

Neither the firm nor its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding requiring disclosure per current published guidelines.

Item 10 - Other Financial Industry Activities and Affiliations

Firm policies require associated persons to conduct business activities in a manner that avoids conflicts of interest between the firm and its clients, or that may be contrary to law. Our firm will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest involving its business relationships that might reasonably compromise its impartiality or independence.

Our advisory firm is not registered nor has an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm, nor are we required to be registered with such entities. Neither our firm nor its management is or has a material relationship with any of the following types of entities:

- accountant or accounting firm
- bank, credit union or thrift institution
- insurance company or insurance agency
- lawyer or law firm
- pension consultant
- real estate broker or dealer
- trust company
- sponsor or syndicator of limited partnerships
- issuer of a security, to include investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)

Upon your request, you may be provided a referral to various professionals, such as an accounting or law firm. While these referrals are based on the best information made available, our firm does not guarantee the quality or adequacy of the work provided by these referred professionals. There is not an agreement with these entities nor are referral fees received from these professionals for such informal referrals. Any fees charged by these other entities for their services are completely separate from fees charged by our firm.

As referenced in Item 4 of this brochure, we provide recommendation to pre-screened, third-party investment managers (who are also required to be registered as investment advisors) to service part of or

the entire client portfolio, and in which both firms inevitably are paid a portion of an advisory fee as described in Item 5. Since our firm's compensation may differ among the various third-party investment manager programs offered, our firm and/or an associate may have an incentive to recommend one investment manager over another with whom our firm may have less favorable compensation arrangements. In light of this potential conflict of interest, the firm will review its recommendations across all similar offerings to ensure an appropriate "mix of business" has occurred, and in light of the client's needs, goals and objectives, and with respect to its third-party investment manager program.

Clients are welcome to review all of our third-party investment program offerings and their stated fee ranges, and should review their fee schedule referenced in their agreement with our firm before the engagement. In addition, there is the potential for clients fees assessed via a third-party investment manager engagement to be higher than had a client obtained those services directly from that investment manager. As stated in Item 5, each client has the option to purchase recommended or similar investments through their own selected service provider, and it should be noted that certain third-party investment managers may not be available to self-directed investors.

Mr. Bailey maintains insurance agent licenses in order to adequately offer advice with respect to insurance and annuity contracts but he does not receive commissions involving such services.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Our firm and its associates will act in the utmost good faith, performing in a manner believed to be in the best interest of our clients. We believe that our business methodologies, ethics rules, and adopted policies are designed to eliminate or at least minimize material conflicts of interest, and to appropriately manage any material conflicts of interest that may remain. You should be aware that no set of rules can possibly anticipate or relieve all material conflicts of interest. Our firm will disclose to its advisory clients any material conflict of interest relating to the firm, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Code of Ethics Description

We have adopted a Code of Ethics that establishes policies for ethical conduct for our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. We periodically review and amend our Code of Ethics to ensure that they remain current, and we require firm personnel to annually attest to their understanding of and adherence to the firm's Code of Ethics. A copy of the firm's Code of Ethics is made available to any client or prospective client upon request.

Statement Involving our Privacy Policy

We respect the privacy of all clients and prospective clients (collectively termed "customers" per federal guidelines), both past and present. It is recognized that clients have entrusted our firm with non-public personal information and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information.

The firm collects personal information about customers from the following sources:

- Information provided to us complete their plan or investment recommendation;
- Information provided via engagement agreements and other documents completed in connection with the opening and maintenance of an account;
- Information customers provide verbally; and
- Information received from service providers, such as custodians, about client transactions.

The firm does not disclose non-public personal information about our customers to anyone, except in the following circumstances:

- When required to provide services our clients have requested;
- When our clients have specifically authorized us to do so;
- When required during the course of a firm assessment (i.e., independent audit); or
- When permitted or required by law (i.e., periodic regulatory examination).

Within the firm, access to customer information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled in firm offices is confidential and they are instructed not to discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This includes, for example, providing information about a spouse's IRA account or to adult children about parents' accounts, etc.

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information.

The firm will provide the client with its privacy policy on an annual basis per federal law and at any time, in advance, if firm privacy policies are expected to change.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither the firm nor an associate is authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a "related person" (e.g., associate, an immediate family member, etc.) has a material financial interest, such as in the capacity as a board member, underwriter or advisor to an issuer of securities, etc.

An associate is prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

Each associate will describe how they are to be compensated for their role, the conflict of interest that or another role or service to be provided may involve (such as the potential for dual compensation and whether there is an incentive on their part to do so). The firm remains focused on ensuring that its offerings are based upon the needs of its clients, not resultant compensation received for such services. We want to also note that you are under no obligation to act on a recommendation from our firm and, if you elect to do so, you are under no obligation to complete them through our firm or a service provider whom we may recommend.

Firm/Personnel Purchases of Same Securities Recommended to Clients and Conflicts of Interest

Our firm does not trade for its own account (e.g., proprietary trading). The firm's related persons may buy or sell securities that are the same as, similar to, or different from, those recommended to clients for their accounts, and this poses a conflict of interest. We mitigate this conflict by ensuring that we have policies and

procedures in place to ensure that the firm or a related person will not receive preferential treatment over a client. In an effort to reduce or eliminate certain conflicts of interest involving personal trading (i.e., trading ahead of client recommendation, etc.), firm policy may require that we periodically restrict or prohibit related parties' transactions. Any exceptions must be approved by the firm, and we will maintain personal securities transaction records as required.

Item 12 - Brokerage Practices

Factors Used to Select Broker/Dealers for Client Transactions

We do not maintain physical custody of client assets. Your account must be maintained by a qualified custodian (generally a broker/dealer, bank or trust company) that is frequently reviewed for its capabilities to serve in that capacity by their respective industry regulatory authority. Our firm is not a custodian nor is there an affiliate of our firm that is a custodian.

Portfolio management accounts are maintained at one or more custodians of record that have been selected by the respective third-party investment manager, and they will be disclosed in the third-party investment manager's disclosure documents and account opening forms.

If you ask that we provide referral to a new custodian, we will do so based on your needs, overall cost, and ease of use. We conduct periodic assessments of any recommended service provider which generally involves a review of the range and quality of services, reasonableness of fees, among other items, and in comparison to industry peers. Our firm prohibits non-cash compensation (termed "soft dollars" in certain jurisdictions), and will not "pay up" to receive additional services from a service provider. All compensation paid to our firm is paid directly by the client and, therefore, the firm does not receive any additional compensation when its clients engage a recommended custodian or other service provider.

Best Execution

In light of the nature of our firm's advisory services, it is believed "best execution" review obligations with regard to client transactions are not required under current industry guidelines.

Directed Brokerage

We do not require or engage in directed brokerage involving client accounts, nor do we believe we are obligated to seek better execution services or prices from any provider. Clients are free to use any particular service provider to execute their transactions and they are responsible for negotiating any terms or arrangements for their account. Since transactions are completed at a service provider of the client's choice, they may pay more for their transactions.

Aggregating Securities Transactions

Our firm is not engaged for continuous investment supervisory services, nor do we have discretionary authority over an account, therefore, aggregating ("batching") trades on behalf of client accounts will not be conducted. Subsequently transactions that we assist with are completed independently at a client's service provider of choice and they may pay more for their transaction than those accounts where trades have been aggregated.

Item 13 - Review of Accounts

Schedule for Periodic Review of Client Accounts

We will periodically review reports provided to you by your third-party investment manager and contact you at least annually to review your financial situation and objectives. We will communicate information to your third-party investment manager as warranted and assist you in understanding and evaluating the services provided by the third-party manager. In certain instances, you may be able to communicate directly with your selected third-party investment manager but we ask that you coordinate the session through our firm.

Review of Client Accounts on Non-Periodic Basis

Additional reviews by your portfolio managers and/or our firm's supervisory personnel may be triggered by news or research related to a specific holding, a change in our view of the investment merits of a holding, or news related to the macroeconomic climate affecting a sector or holding within that sector. A portfolio may be reviewed for an additional holding or when an increase in a current position is under consideration. Account cash levels above or below what we deem appropriate for the investment environment, given the client's stated tolerance for risk and investment objectives, may also trigger a review.

Content of Client Provided Reports and Frequency

You will receive account statements sent directly to you from the custodian of record. We urge you to carefully review these account statements for accuracy and clarity, and to ask questions when something is not clear.

You may also receive portfolio performance reports directly from your third-party manager. We do not provide our own performance reporting involving your account. You are urged to carefully review and compare account statements that you have received directly from your custodian of record with any performance report that you may receive from any third-party investment manager.

Item 14 - Client Referrals and Other Compensation

Our firm does not receive economic benefit from any other external source that we may recommend to a client. We do not engage in solicitation activities involving unregistered persons. An associate of the firm may hold individual membership or serve on boards or committees of professional industry associations. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual participants within a selected state or region.

These passive websites may provide means for interested persons to contact a participant via electronic mail, telephone number, or other contact information, in order to interview the participating member. The public may also choose to telephone association staff to inquire about an individual within their area, and would receive the same or similar information. A portion of these participant's membership fees may be used so that their name will be listed in some or all of these entities' websites (or other listings). Prospective clients locating our advisory firm or an associate via these methods are not actively marketed by the noted associations. Clients who find our firm in this way do not pay more for their services than clients referred in any other fashion. Our firm does not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

Item 15 – Custody

Your assets will be maintained by an unaffiliated, qualified custodian (i.e., broker/dealer, trust company, etc.) Your account assets are not held by our firm or any associate or our firm. In keeping with this policy involving our client funds or securities, our firm:

- Restricts the firm or an associate from serving as trustee or having general power of attorney over a client account;
- Prohibits any associate from having authority to directly withdraw securities or cash assets from a client account;
- Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm;
- Will not collect advance fees of \$500 or more for services that are to be performed six months or more into the future; and
- Will not authorize an associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts) if such access would allow physical control over account assets.

You custodian of record will provide you with your investment account transaction confirmations and account statements, which will include all debits and credits as well as our firm's advisory fee for that period. Statements are provided on at least a quarterly basis or as transactions occur within their account. Our firm will not create an account statement for a client or serve as the sole recipient of an account statement.

Should you receive periodic reports that include investment performance information, you are urged to carefully review and compare your account statements that you have received directly from your custodian of record with that performance report.

Item 16 - Investment Discretion

Third-party investment managers generally provide their services on a *discretionary* basis. Similar to a limited power of attorney, discretionary authority allows the investment manager to implement investment decisions, such as the purchase or sale of a security on behalf of your account, without requiring your prior authorization for each transaction in order to meet your stated investment objectives. This authority will be granted through your execution of their engagement agreement and the selected custodian's account opening documents. We do not have discretionary authority over a client account under this engagement.

If you require your account be managed on a non-discretionary basis, you should be aware that most third-party investment managers retain the right to either refuse or terminate an account, or continue to manage the account under a higher asset-based fee due to increased operational costs. We will inform you in advance of the recommended third-party manager's requirements involving investment authority.

Item 17 - Voting Client Securities

You may periodically receive proxies or other similar solicitations sent directly from your selected custodian or transfer agent. Should we receive a duplicate copy, note that we do not forward these or any correspondence relating to the voting of your securities, class action litigation, or other corporate actions.

Our firm does not vote proxies on your behalf. We will not offer guidance involving any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets. However, we will answer limited questions with respect to what a proxy voting request or other corporate matter may be and how to reach the issuer or their legal representative.

You should thoroughly review the third-party investment manager's Form ADV Part 2 to determine their proxy voting policies. Otherwise, you will maintain exclusive responsibility for directing the manner in which

proxies solicited by issuers of securities that are beneficially owned by you shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other legal matters or events pertaining to your holdings. You should consider contacting the issuer or your legal counsel involving specific questions you may have with respect to a particular proxy solicitation or corporate action.

Item 18 - Financial Information

Our advisory firm will not take physical custody of your assets, nor do we have discretionary authority to have such control. We do not directly withdraw our advisory fees from your account.

Engagements with our firm do not require that we collect fees from you of \$500 or more for our advisory services that we have agreed to perform six months or more into the future.

Neither our firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

The firm and its management do not have a financial condition likely to impair its ability to meet commitments to clients, nor has the firm and its management been the subject of a bankruptcy petition.

Due to the nature of our firm's advisory services and operational practices, an audited balance sheet is not required nor included in this brochure.

Item 19 - Requirements for State-Registered Advisers

For further information involving firm principal executive and management personnel, their business activities as well as material conflicts of interest, please refer to areas previously disclosed in Items 6 and 9 through 11, as well as the accompanying Form ADV Part 2B brochure supplements that immediately follows this page.

Business Continuity Plan

Our firm maintains a business continuity and succession contingency plan that is integrated within the organization to ensure it appropriately responds to events that pose a significant disruption to its operations. A statement concerning the current plan is available under separate cover.

Item 1 - Cover Page

Bailey Financial Services, Inc.

Registered Investment Advisor

Bailey Financial Services, Inc.

1231 DaAndra Drive
Watkinsville, GA 30677

Tel: (706) 354-1950

H. Wilder Bailey

President/Chief Compliance Officer
Investment Advisor Representative

Form ADV Part 2B

Brochure Supplement

January 9, 2026

This brochure provides information about H. Wilder Bailey that supplements Bailey Financial Services, Inc. Form ADV Part 2A firm brochure. You should have received a copy of that brochure. Please contact Mr. Bailey at (706) 354-1950 if you did not receive the full brochure or if you have any questions about the contents of this supplement. Additional information about H. Wilder Bailey is available on the Securities and Exchange Commission's (SEC) website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience for at least the most recent five years.

Principal Executive Officers and Management Persons

President/Chief Compliance Officer/Investment Advisor Representative

Henry Wilder Bailey

Year of Birth: 1950

CRD Number: 713351

Educational Background and Business Experience

Educational Background

Attended the University of Georgia; Athens, GA

Registered Representative Examination¹/NASD (FINRA) Series 1 (Inactive)

General Securities Representative Examination¹/FINRA Series 7 (Inactive)

Investment Company Products/Variable Contracts Principal Examination¹/FINRA Series 26 (Inactive)

Corporate Securities Limited Representative Examination¹/FINRA Series 62 (Inactive)

Uniform Securities Agent State Law Examination¹/NASAA Series 63

Uniform Investment Adviser Law Examination¹/NASAA Series 65

Georgia Insurance Agent License¹/Georgia Department of Insurance

Business Experience

Bailey Financial Services, Inc. (1994-Present)

Watkinsville, GA

President (12/1994-Present)

Chief Compliance Officer/Investment Advisor Representative (10/2014-Present)

Resource Horizons Group, LLC/Resource Horizons Investment Advisory (2013-2014)

Marietta, GA Watkinsville, GA Office)

Registered Representative/Investment Advisor Representative

Investors Capital Corporation (2001-2013)

Lynnfield, MA (Watkinsville, GA Office)

Registered Representative/Investment Advisor Representative

Centennial Capital Management, Inc. (1997-2001)
Atlanta, GA
Registered Representative/Investment Advisor Representative

¹ Financial Industry Regulatory Authority (FINRA) and North American Securities Administrators Association (NASAA) examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of an industry examination does not constitute or imply a person is "approved" or "endorsed" by a state or federal regulatory body.
Washington Square Securities, Inc. (1997)
Des Moines, IA Registered Representative/Investment Advisor Representative

Chubb Securities Corporation (1987-1996)
Concord, NH
Registered Representative/Investment Advisor Representative

Item 3 – Disciplinary Information

Registered investment advisors are required to disclose certain material facts regarding legal or disciplinary events that would be material to the evaluation of each officer or a supervised person providing investment advice. Mr. Bailey has not been subject of an event requiring disclosure per current guidelines.

Item 4 – Other Business Activities

Investment advisor representatives are required to disclose outside business activities that account for a significant portion of their time or income, or that may present a conflict of interest with their advisory activities.

Mr. Bailey and our firm do not have a material relationship with the issuer of a security. He is not registered, nor has an application pending to register, as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. Therefore, he does not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service ("trail") fees from the sale of mutual funds.

Item 5 – Additional Compensation

Neither our advisory firm nor Mr. Bailey is compensated for advisory services involving performance-based fees. In addition, firm policy does not allow associated persons to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to firm clients.

Item 6 – Supervision

Mr. Bailey serves as the firm's Chief Compliance Officer. Because supervising one's self poses a conflict of interest, the firm has adopted policies and procedures to mitigate this conflict, and may use the services of unaffiliated professionals to ensure the firm's oversight obligations are met.

Questions relative to the firm, its services or this Form ADV Part 2B may be made to the attention of Mr. Bailey at (706) 354-1950. Additional information about the firm, other advisory firms, or an associated investment advisor representative is available on the Internet at www.adviserinfo.sec.gov. A search of this

site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD or CRD number. The CRD number for Bailey Financial Services is 173452. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling the Georgia Securities Division at (478) 207-2440.

Item 7 - Requirements for State-Registered Advisers

There have been neither awards nor sanctions or other matter where Mr. Bailey or Bailey Financial Services has been found liable in a self-regulatory or administrative proceeding requiring disclosure per current guidelines. Neither Mr. Bailey nor Bailey Financial Services have been the subject of a bankruptcy petition.