Item 1: Cover Page

Croft Financial Planning, LLC

70 Winding Brook Road
Newbury, NH 03255
802-952-0209

Form ADV Part 2A – Firm Brochure

Dated: November 24, 2026

This Brochure provides information about the qualifications and business practices of Croft Financial Planning, LLC . If you have any questions about the contents of this Brochure, please contact us at 802-952-0209. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Croft Financial Planning, LLC is a registered investment adviser. Registration does not imply a certain level of skill or training.

Additional information about Croft Financial Planning, LLC also is available on the SEC's website at www.adviserinfo.sec.gov, which can be found using the firm's identification number, 333357.

Item 2: Material Changes

The last filing of this brochure occurred on October 28, 2026. This firm Brochure is our disclosure document prepared according to regulatory requirements and rules. The firm has had the following material changes since the annual update to our brochure:

Item 5 – Fees and Compensation

The hourly rate for financial planning and educational seminars is $450 per hour billed in one-minute increments.

In the future, any material changes made during the year will be reported here. Either this complete Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Croft Financial Planning, LLC.

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Item 4: Advisory Business

Description of Advisory Firm

Croft Financial Planning, LLC is an Investment Adviser principally located in the state of New Hampshire. We are a limited liability company founded in August 2024. Croft Financial Planning, LLC became registered in 2024. Brett Croft is the principal owner and Chief Compliance Officer ("CCO").

As used in this brochure, the words "CFPlanning", "we", "our firm", "Advisor" and "us" refer to Croft Financial Planning, LLC and the words "you", "your" and "Client" refer to you as either a client or prospective client of our firm.

Types of Advisory Services

CFPlanning is a fee-only firm, meaning the only compensation we receive is from our clients for our services. We offer Financial Planning. From time to time, CFPlanning recommends third-party professionals such as attorneys, accountants, tax advisors, insurance agents, or other financial professionals. Clients are never obligated to utilize any third-party professional we recommend. CFPlanning is not affiliated with nor does CFPlanning receive any compensation from third-party professionals we may recommend.

Financial Planning Services

Financial planning involves an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients purchasing this service will receive a written report, providing the Client with a detailed financial plan designed to help achieve the Client's stated financial goals and objectives.

Financial Planning Services are provided on a time-based hourly assumption, although actual billing may be charged by hour, by fixed project fee, or by quarterly fee. Our advice, particularly on investments, is not ongoing and therefore terminates upon delivery of the plan/advice. The advice given may include the recommendation of annual reviews/updates and it would be the Client's responsibility to initiate additional services as may be needed.

Financial Planning is available for Clients looking to address specific questions or issues. The Client may choose from one or more of the below topics to cover or other areas as requested and agreed to by CFPlanning. For Financial Planning, the Client will be ultimately responsible for the implementation of the financial plan.

In general, the financial plan will address some or all of the following areas of concern. The Client and CFPlanning will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business.

Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.

- **Cash Flow and Debt Management**: We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- **College Savings**: Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to children and grandchildren (if appropriate).

- **Employee Benefits Optimization**: We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

- **Estate Planning**: This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals**: We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

- **Insurance**: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

- **Investment Analysis**: This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

- **Retirement Planning**: Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make

recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

  We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

***Project-Based Financial Planning*.** We provide project-based financial planning services on a limited scope of one-time engagement. Work is provided on a time-based hourly assumption, although actual billing may be charged by hour, by fixed project fee, or by quarterly fee. Our advice, particularly on investments, is not ongoing and therefore terminates upon delivery of the plan/advice. The advice given may include the recommendation of annual reviews/updates and it would be the Client's responsibility to initiate additional services as may be needed. . Project-Based Financial Planning is available for Clients looking to address specific questions or issues. The Client may choose from one or more of the above topics to cover or other areas as requested and agreed to by CFPlanning. For Project-Based Financial Planning, the Client will be ultimately responsible for the implementation of the financial plan.

On Demand Financial Advice. This option is an open-ended meeting where clients can bring documents and start asking questions. We provide general advice based on their situation without detailed analysis. No written presentation or report is provided unless requested. This is most appropriate for clients who are looking to have a specific question answered such as "What employer benefits should I take advantage of?" The final cost is based on the actual time involved.

Educational Seminars / Speaking Engagements

We may provide seminars for groups seeking general advice on investments and other areas of personal finance. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual's need, nor does CFPlanning provide individualized investment advice to attendees during these seminars. Topics covered during educational seminars will be determined by the Client and CFPlanning.

Client Tailored Services and Client Imposed Restrictions

We tailor the delivery of our services to meet the individual needs of our Clients. We consult with Clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the Clients' investment and/or planning needs.

Clients are able to specify, within reason, any restrictions they would like to place as it pertains to individual securities and/or sectors that will be advised on or recommended. All such requests must be provided to CFPlanning in writing. CFPlanning will notify Clients if they are unable to accommodate any requests.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets Under Management

CFPlanning does not manage Client's assets.

Item 5: Fees and Compensation

Please note, unless a Client has received this brochure at least 48 hours prior to signing an Advisory Contract, the Advisory Contract may be terminated by the Client within five (5) business days of signing the Advisory Contract without penalty or incurring any fees.

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Advisory Contract for more detailed information regarding the exact fees you will be paying. No increase to the agreed-upon advisory fees outlined in the Advisory Contract shall occur without prior Client consent.

Financial Planning

We charge an hourly fee for Financial Planning. Our hourly rate is $450 billed in one-minute increments. Fees are negotiable, in the sense that the scope of work can be limited, and the final agreed upon fee will be outlined in your Advisory Contract. CFPlanning collects a portion of the fee to be collected in advance with the remainder billed weekly, in arrears, as work is completed. CFPlanning will not bill an amount above $500 more than 6 months or more in advance of rendering the services.

Financial Planning Services are provided on a time-based hourly assumption, although actual billing may be charged by hour, by fixed project fee, or by quarterly fee. Our advice, particularly on investments, is not ongoing and therefore terminates upon delivery of the plan/advice. The advice given may include the recommendation of annual reviews/updates and it would be the Client's responsibility to initiate additional services as may be needed.

For clients who engage our services regularly, CFPlanning generates bills on a weekly basis to clients who have had work completed in the previous weeks. Projects spanning over a longer period will generally be billed monthly. These clients are charged by actual time worked, billed at our hourly rate. All charges are billed to the client via an invoice; CFPlanning does not deduct fees from client accounts.

Educational Seminars / Speaking Engagements

Seminars and speaking engagements are offered to organizations and the public on a variety of financial topics. Fees for this service are charged on an hourly basis. Our hourly rate is $450 billed in one-minute increments. The fee is based on the content, amount of research conducted, the number of hours of preparation needed, and the number of attendees. CFPlanning collects the fee in advance. Advisor offers its services in a virtual or in-person setting. Should the event require travel arrangements, both parties must agree to the terms of travel (i.e., cost, distance, hotel arrangements) at the start of the engagement.

Fee Payment

Fees are paid by electronic funds transfer (EFT) or check. We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client’s banking information at any time. The Client will be provided with their own secure portal in order to make payments.

Other Types of Fees and Expenses

When implementing an investment recommendation, the Client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Clients may incur fees from third-party professionals such as accountants and attorneys that CFPlanning may recommend, upon Client request. Such fees are separate and distinct from CFPlanning's advisory fees.

Terminations and Refunds

For Financial Planning services, this service is not an ongoing engagement, thus upon receipt of the final fees, the Advisory Contract will automatically be terminated. Clients may terminate at any time provided written notice. If fees are paid in advance, a prorated refund will be given, if applicable, upon termination of the Advisory Contract for any unearned fee. For fees paid in arrears, Client shall be charged a pro-rata fee based upon the percentage of the work done up to the date of termination.

For Educational Seminars and Speaking Engagements, Advisor or Clients may cancel the event with 30 days' advance written notice. Should the Client cancel the event within 30 days of the event (with the exception of weather or similar unforeseen causes), the Client will be responsible for reimbursement of any non-refundable travel expenses already incurred and a prorated fee for any work conducted in preparation of the event, based on the percentage of work done and the flat fee agreed upon by both parties.

Sale of Securities or Other Investment Products

Advisor and its supervised persons do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

Item 7: Types of Clients

We provide financial planning services to individuals, high net-worth individuals, families, businesses, trusts, estates, and charitable organizations.

We do not have a minimum net worth requirement to work with us.

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

Below is a brief description of our methods of analysis and primary investment strategies when we provide securities recommendations in the context of a financial plan.

Methods of Analysis

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Modern Portfolio Theory (MPT)
The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Mutual Fund and/or ETF Analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the Client's portfolio. In addition, we monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the Client's portfolio.

Investment Strategies

Asset Allocation
In implementing our Clients' investment strategy, we begin by attempting to identify an appropriate ratio of equities, fixed income, and cash (i.e. "asset allocation") suitable to the Client's investment goals and risk tolerance.

A risk of asset allocation is that the Client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of equities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the Client's goals. We attempt to closely monitor our asset allocation models and make changes periodically to keep in line with the target risk tolerance model.

Passive and Active Investment Management
We may choose investment vehicles that are considered passive, active, or a combination of both styles.

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio.

Active investing involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Actively managed funds are also designed to reduce volatility and risk.

We may engage in both passive and active investing in Client's portfolio. However, we strive to construct portfolios of funds and individual securities that we believe will have the greatest probability for achieving our Clients' personal financial goals with the least amount of volatility and risk rather than attempt to outperform an arbitrary index or benchmark.

Specific investment selections are based on a number of factors that we evaluate in order to select, what we believe to be, the highest quality funds or individual securities for our Clients. These factors include but are not limited to underlying holdings of funds, percentage weighting of holdings within funds, liquidity, tax efficiency, bid/ask spreads, and other smart/strategic beta factors. These factors may or may not result in the lowest cost ETFs and mutual funds available when utilizing funds in a Client's portfolio, but we strive to keep internal fund expenses as low as possible.

Long-term/Short-term purchases
We purchase securities and generally hold them in the Client's account for a year or longer. Short-term purchases may be employed as appropriate when:

- We believe the securities to be currently undervalued, and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Material Risks Involved

CFPlanning does not provide investment management, however investment recommendations may be made as part of the financial planning services. **All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: Actively managed mutual funds tend to have a higher turnover rate than passive funds. A high portfolio turnover would result in higher transaction costs and in higher taxes when shares are held in a taxable account. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit

quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above (premium) or below (discount) their net asset value and an ETF purchased at a premium may ultimately be sold at a discount; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Mutual Funds When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 9: Disciplinary Information

Criminal or Civil Actions

CFPlanning and its management persons have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

CFPlanning and its management persons have not been involved in any administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

CFPlanning and its management persons have not been involved in any self-regulatory organization (SRO) proceedings.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Neither CFPlanning or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Other Affiliations

Neither CFPlanning or its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Related Persons

Neither CFPlanning or its management persons have any relationship or arrangement with any outside financial industry related parties.

Outside Business Activities

Brett Croft owns and operates HFL House LLC, a residential real estate holding company. This activity occupies less than 5% of his time and is unrelated to investment advisory services.

Brett Croft also owns and operates 32Q LLC, a media entity providing consulting services and online educational content including a podcast. This activity occupies less than 5% of his time.

Recommendations or Selections of Other Investment Advisers

CFPlanning is engaged in fee-only hourly financial planning, as described more fully in Item 4. CFPLANNING may conduct seminars on financial planning or budgeting. CFPLANNING does not refer clients to other Investment Advisory Firms in return for a fee. Clients may engage our services as an hourly project to help them through a selection process. Referrals may be provided, only as a service and as requested by clients, but we receive no compensation from the Advisory Firm.

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

As a fiduciary, our firm has a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities. Additionally, CFPlanning requires adherence to its Insider Trading Policy, and the CFA Institute's Asset Manager Code of Professional Conduct and Code of Ethics and Standards of Professional Conduct.

Code of Ethics Description

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Access persons shall offer and provide professional services with integrity.
- Objectivity - Access persons shall be objective in providing professional services to Clients.
- Competence - Access persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Access persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Access persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Access persons conduct in all matters shall reflect the credit of the profession.
- Diligence - Access persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its access persons, or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, principal transaction, among others.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

From time to time, our firm and/or related persons may invest in the same securities that we recommend to Clients. However, we do not place trades on behalf of our clients. Thus, we have no control over which securities clients buy or sell as it’s the Client’s ultimate responsibility. Investment advice to Clients is always

made in light of the Client's objectives and Advisor and its personnel are prohibited from making recommendations that are for personal gain or not in the best interests of Clients.

Trading Securities At/Around the Same Time as Client's Securities

CFPlanning does not trade Client securities.

Item 12: Brokerage Practices

Factors Used to Select Custodians

As a fee-only financial planner who does not offer Investment Management Services, we do not have a concern over which custodians a Client may choose in order to implement our investment recommendations.

Research and Other Soft-Dollar Benefits

We do not have any soft-dollar arrangements with custodians.

Brokerage for Client Referrals

We receive no referrals from a custodian, broker-dealer or third party in exchange for using that custodian, broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

As a fee-only financial planner who does not offer Investment Management Services, we do not have a concern over which custodians a Client may choose in order to implement our investment recommendations.

Aggregating (Block) Trading for Multiple Client Accounts

Some investment advisers execute Client accounts on an aggregated basis as a way to lower expenses. As a fee-only financial planner who does not offer Investment Management Services, we do not execute trades on behalf of Clients. As a result, it is up to the Client to negotiate their own trading costs with their custodian.

Item 13: Review of Accounts

Periodic Reviews

CFPlanning provides consultation services on an hourly one-time basis, therefore CFPlanning will not perform review of client accounts or financial plans unless the Client requests a review. Clients engaging CFPlanning for financial planning will only receive reports at the time of the plan presentation or a snapshot if engaged for follow-up services.

Triggers of Reviews

Events that may trigger a special review would be unusual performance, addition or deletions of Client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs. It is the client's responsibility to initiate reviews and additional services of CFPlanning.

Review Reports

Clients will receive trade confirmations from the custodian(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Item 14: Client Referrals and Other Compensation

Compensation Received by Croft Financial Planning, LLC

CFPlanning is a fee-only firm. CFPlanning does not receive commissions or other sales-related compensation. We do not pay or receive referral fees, or any other form of compensation beyond the direct hourly fees described above, in connection with occasional consulting engagements from third party Consultants described in Items 4 and 5 above.

Client Referrals from Solicitors

CFPlanning does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

Item 15: Custody

CFPlanning does not maintain physical or constructive custody of client funds or securities. All client assets are held with an independent, qualified custodian (such as a registered broker-dealer or bank).
Clients will receive account statements directly from their qualified custodian, only, at least quarterly. The custodian s statements serve as the official record of the account.

Clients are strongly urged to carefully review and compare the official statements received from the custodian with any summary reports, invoices, or financial plans provided by CFPlanning.

Item 16: Investment Discretion

CFPlanning does not manage securities accounts on behalf of clients, does not execute trades, and operates strictly as a financial planning and consulting practice.

Under no circumstances does the Firm accept, maintain, or exercise discretionary or non-discretionary trading authority over client accounts, nor do personnel have access to client login credentials or trading platforms.

The implementation of any investment recommendations is entirely the responsibility of the client, who must place all trades directly within their own accounts through their chosen qualified custodian.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client has any questions on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than $500 in fees six months or more in advance.

Item 19: Requirements for State-Registered Advisers

Principal Officers

Brett Croft serves as CFPlanning's sole principal and CCO. Information about Brett Croft's education, business background, and outside business activities can be found in his ADV Part 2B, Brochure Supplement attached to this Brochure.

Outside Business

All outside business information, if applicable, of CFPlanning is disclosed in Item 10 of this Brochure.

Performance-Based Fees

Neither CFPlanning or Brett Croft is compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at CFPlanning has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

CFPlanning nor Brett Croft have any relationship or arrangement with issuers of securities.

Item 1: Cover Page

Croft Financial Planning, LLC

70 Winding Brook Road
Newbury, NH 03255
802-952-0209

Form ADV Part 2B – Brochure Supplement

Dated: October 1, 2026

For

Brett Croft

Owner, Founder and Chief Compliance Officer

This brochure supplement provides information about Brett Croft that supplements the Croft Financial Planning, LLC ("CFPlanning") brochure. You should have received a copy of that brochure. Please contact Brett Croft if you did not receive CFPlanning's brochure or if you have any questions about the contents of this supplement.

Additional information about Brett Croft is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 5630147.

Item 2: Educational Background and Business Experience

Brett Croft
Born: 1970

Educational Background

- 2003 – MBA, Liberty University
- 1996 – MS, Northwestern University
- 1993 – BS, University of Utah

Business Experience

- 09/2024 – Present, Croft Financial Planning, LLC , Owner, Founder and CCO
- 05/2021 – 08/2024, Manchester Capital Management LLC, Wealth Manager
- 07/2018 – 05/2021, Fidelity Personal and Workplace Advisors, MT
- 05/2011 – 05/2021, Fidelity Investments, Financial Representative

Professional Designation(s)

CFP® (Certified Financial Planner):

Brett Croft is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, Brett Croft may refer to themself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and Brett Croft may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and

Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Chartered Financial Analyst (CFA®): The CFA charter is a graduate-level professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative, and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Certified Trust and Financial Advisor (CTFA) The CTFA certification is issued by the Institute of Certified Bankers (ICB), a subsidiary of the American Bankers Association (www.aba.com). The CTFA designation is conveyed to wealth management professionals who have demonstrated mastery of five knowledge areas: fiduciary & trust activities, financial planning, tax law & planning, investment management and ethics. Successful candidates must have a minimum of ten years experience in wealth management; or five years experience in wealth management and a bachelor's degree; or a minimum of three years experience in wealth management and completion of one of the three ICB-approved wealth management training programs, along with adhering with the ICB's Professional Code of Ethics. The CTFA continuing education requirements is 45 credits (50 minutes of instruction is equal to one credit) every three years.

Item 3: Disciplinary Information

Brett Croft has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Brett Croft owns and operates HFL House LLC, a residential real estate holding company. This activity occupies less than 5% of his time and is unrelated to investment advisory services.

Brett Croft also owns and operates 32Q LLC, providing consulting services and educational and content. This activity occupies less than 5% of his time.

Item 5: Additional Compensation

Brett Croft does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through CFPlanning.

Item 6: Supervision

Brett Croft as Chief Compliance Officer of CFPlanning, supervises the advisory activities of our firm. Brett Croft is bound by and will adhere to the firm's policies and procedures and Code of Ethics. Clients may contact Brett Croft at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Brett Croft has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.