

Cover Page

Brochure

Investment Management Corporation

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This brochure provides information about the qualifications and business practices of Investment Management Corporation. Contact us by phone or email if you have any questions about the contents of this brochure. 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. Additional information about Investment Management Corporation also is available on the SEC's website at: www.adviserinfo.sec.gov

Material Changes

Investment Management Corporation is required to advise you of any material changes to the Firm Brochure (“Brochure”) from our last annual update. There have been no material changes.

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Advisory Business

Investment Management Corporation, an SEC registered advisory firm, has been managing client investment portfolios since 1986. We provide only discretionary investment portfolio management for individuals, businesses, trusts, and estates after evaluating the client's individual objectives and risk tolerance. This means that our clients authorize us to make any investment changes whenever we desire, which is based on our sole judgment from our analysis of market conditions and performance of the portfolio investments.

We are compensated only by fees received from our investment clients. We receive no other compensation, which distinguishes our service from other advisors that also may receive compensation from brokerage firms, insurance companies, mutual fund companies, or other investment providers.

We invest portfolios in individual stocks, bonds, exchange traded funds and mutual funds. On 12/31/2024, the total value of assets we managed for 182 clients was 169,572,084 dollars.

We do not take custody of client assets. Instead, we select an independent custodial firm to hold client investments, so that there will be independent reporting of client values and transactions sent directly to the client on a monthly basis from the independent custodian. To supplement this, Investment Management Corporation provides its own quarterly reporting that provides additional portfolio and investment returns, including any gains and losses.

Fees and Compensation

We recommend the use of investments that are “no-load”, meaning that we do not receive any compensation from your investments when buying, selling, or holding positions. We are compensated solely by our advisory fee and do not receive any other compensation, such as brokerage commissions on investments selected for your account. Our fees are either deducted from client assets or billed.

Investment Management Corporation's estimated quarterly advisory fee for its management service is not negotiable and is payable after delivery of a quarterly client report for the previous quarter. Fees are payable quarterly in advance and are calculated in accordance with the fee schedule that follows based on your

investment portfolio's average daily value for the quarter. Quarterly withdrawals are made from your investment account(s) to pay advisory fees. The following table illustrates our investment management fee schedule.

Assets Under Management	Annual Fee Rate	Quarterly Fee Rate
\$100,000 - \$500,000	1.25%	0.3125%
\$500,001 - \$1,000,000	1.10%	0.2750%
\$1,000,001 - \$2,500,000	1.00%	0.2500%
\$2,500,001 - \$5,000,000	0.80%	0.2000%
\$5,000,001 - \$10,000,000	0.60%	0.1500%
Over \$10,000,000	0.50%	0.1250%

Minimum annual advisory fee is \$1,250.

At any time, you may request that we terminate our advisory service by sending us written notification. However, you will still owe the total advisory fee for the remainder of the current quarter.

Your other costs in addition to our advisory fee will include any custodial or brokerage transactions that require charges, such as may be incurred when individual stocks, bonds, or ETFs are traded. You may be charged a brokerage account closing fee, mutual fund early redemption fees, and mutual fund company fund expenses, such as a mutual fund's portfolio management fee.

Performance-Based Fees and Side-By-Side Management

Investment Management Corporation does not charge performance-based fees.

Types of Clients

We manage investment accounts for individuals, business entities, pension and profit-sharing plans, and trusts. We require a minimum of \$100,000 in managed accounts to be retained under our investment management agreement.

Method of Analysis, Investment Strategies and Risk of Loss

Investment Management Corporation makes decisions to buy or sell portfolio investments based on both “fundamental” and “technical” analysis of economic data and investment markets. We compare current data to historical data to determine whether we should increase or decrease investments in specific asset classes such as stocks, bonds, and cash. We update our analysis each week to reflect new data for the previous week. An example of the fundamental data is the level of interest rates that the Federal Reserve establishes for its lending to banking institutions. An example of technical data is tracking the current price of an investment compared to its price in the past.

New investment funds may be allocated to the strategies chosen by clients in varying amounts over a period of time at our discretion based on our assessment of current investment market conditions.

It is important to understand that any investment of funds in investment securities in any of our strategies listed below involves the risk of loss which you should be prepared to bear whenever it may occur. There are no other material risks when compared to this. All investment funds remain “liquid”, which means they are readily available, since we only invest in investments that can be sold at any time, unless specifically directed otherwise by you.

We do not trade investment securities above a frequency that could negatively affect investment performance, since trading that is too frequent may adversely affect investment performance.

The following strategies asset class exposures may be changed at our discretion within these ranges:

Variable Equity Models

Focused Growth, Focused Growth TM, Dynamic Opportunities, Diversified Index

100% Maximum Stock to 0% Minimum Stock
100% Maximum Bonds to 0% Minimum Bonds
100% Maximum Cash to 0% Minimum Cash

Conservative Growth-

75% Maximum Stock to 0% Minimum Stock
75% Maximum Bonds to 0% Minimum Bonds
100% Maximum Cash to 0% Minimum Cash

Maximum Income-

30% Maximum Stock to 0% Minimum Stock
80% Maximum Bonds to 0% Minimum Bonds
100% Maximum Cash to 0% Minimum Cash

The following strategies asset class exposures remain near the following levels:

Fixed Equity Models

IS Growth, IS 25, Strategic Dividends-

100% to 90% Stock (Individual Securities)
10% to 0% Cash

In addition to the quarterly account statement issued by the custodian, IMC provides a quarterly letter to report model portfolio returns and exposure to stocks, bonds, and cash. The purpose is to provide the client with a way to verify account performance and holdings are in-line with the desired investment model strategy.

Disciplinary Information

Our firm and the personnel associated with us have never had any violations or disciplinary actions taken by the regulatory authorities who periodically audit our firm for compliance with the Securities and Exchange Commission federal and state regulations.

Other Financial Industry Activities and Affiliations

To eliminate potential conflicts of interest, our management persons and other employees are not permitted to be registered as or have relationships or arrangements with a broker-dealer or represent any broker-dealer, futures commissions merchant, commodity pool operator, commodity trading advisor, or associated person of any such entities. Our management persons and other employees are also not permitted to have any relationships or arrangements with others such as: other investment advisors or financial planners, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer, sponsor or syndicator of limited partnerships, investment companies or other pooled investment vehicles that are material to our investment advisory business or that creates a conflict of interest.

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

All persons working for our firm adhere to our Code of Ethics to protect material nonpublic information about clients and their transactions. It is based on the principle that Investment Management Corporation and its employees have a fiduciary duty to place the clients' interests above their own. Employees are expected to maintain the highest standards of ethics and conduct in all of their business relationships. A complete copy of our Code of Ethics is available upon request.

In general, the code requires all employees to:

- Always place the interests of IMC's clients ahead of their own personal interests
- Ensure that all personal securities transactions are conducted in such a manner as to avoid any actual or potential conflict of interest or any abuse of an employee's position of trust and responsibility
- Not take inappropriate advantage of information obtained as a result of their positions.

Employees must disclose personal securities transactions in any account that they have a beneficial ownership. IMC monitors its employees' personal securities trading activity on an ongoing basis. Employees who violate the code may be reprimanded, fined, suspended or terminated.

IMC is committed to acting in the best interests of our clients at all times. As a Registered Investment Advisor (RIA), IMC operates as a fiduciary, meaning we have a legal and ethical obligation to prioritize our clients' interests above our own.

Our fiduciary duty includes the following key principles:

- Acting in Good Faith – We provide investment advice and financial planning services with honesty, integrity, and full transparency.
- Putting Clients' Interests First – We avoid conflicts of interest whenever possible and disclose any potential conflicts that may arise.
- Providing Full and Fair Disclosure – We communicate openly about fees, compensation structures, and any relevant factors that may impact investment recommendations.
- Exercising Due Care and Prudence – We conduct thorough research and analysis to ensure our recommendations align with each client's financial goals, risk tolerance, and time horizon.
- Ongoing Monitoring and Duty of Care – We continuously review client portfolios, market conditions, and financial plans to ensure they remain aligned with our clients' evolving needs and objectives.

Our commitment to the fiduciary standard ensures that our clients receive objective, personalized financial guidance designed to help them achieve long-term financial success.

Brokerage Practices

Since our firm does not receive any compensation from brokerage firms that execute transactions for our clients, we select a broker based on their industry status and insured fiduciary standing. Any transactions that would result in a transaction fee to the broker must be highly competitive in comparison to other brokers.

So that there will be no conflict of interest, we do not permit the receipt of any benefits of any kind that may be considered a “soft-dollar” benefit, such as a product or service that we might otherwise have to spend money to obtain. We do not accept referrals from brokerage firms and do not permit clients to select brokerage firms for accounts managed by us. Aggregation of trades to lower transaction costs for clients is utilized by us when trading securities.

Review of Accounts

Investment Management Corporation reviews all Variable Equity Model strategies on a weekly basis. Fixed Equity Model strategies are reviewed on at least an annual basis. In addition, we review client accounts on at least an annual basis to learn whether clients’ accounts are in line with their investment objectives. Strategies utilizing individual securities, annuities, insurance, and any other investment accounts that require access to prior existing custodians that do not provide direct data downloads to us are reviewed on a quarterly basis. If, as a result of any model strategy review, an investment change is made, all client accounts following the affected strategy are changed to the new investment position. On a quarterly basis we provide a written report to our clients showing account values, additions, withdrawals, and rates of return.

Client Referrals and Other Compensation

Referrals come from existing clients and professionals such as Certified Public Accountants and Attorneys at their discretion.

Custody

We do not take custody of client funds or securities. An independent custodian, such as a stock brokerage firm, is selected to hold client investments. The independent custodian provides account statements to clients on a monthly basis showing all investment positions and transactions. We also send clients a quarterly report that we prepare summarizing our investment actions and investment returns.

Investment Discretion

Under our client advisory agreement, we require that you agree to our having “investment discretion”. This means that you are giving us unrestricted authority to make investment changes on your behalf without having to notify you or ask for your approval beforehand. All investment changes will be made taking into consideration the asset class exposure limitations that are described in section #5 titled Method of Analysis/Investment Strategies/Risk of Loss of this brochure.

Voting Client Securities

We do not accept authority to vote client securities. All clients will receive proxies and other such investment security solicitations to vote on shareholder issues directly from the brokerage firm acting as independent custodian of their account.

Financial Information

We do not have any financial condition that would impair our ability to meet contractual commitments to clients. We also do not require clients to pay advance fees for our services that are more than \$1200.00