



## Form ADV Part 2A: Firm Brochure

**Item 1**

**Cover Page**

Stairway Partners, LLC  
4999 France Avenue South  
Suite 260  
Minneapolis, MN 55410  
[www.stairwaypartners.com](http://www.stairwaypartners.com)

Date of Brochure: **December 31, 2025**

Stairway Partners, LLC (Stairway) is an Investment Advisor registered with the United States Securities and Exchange Commission (SEC). Registration of an investment advisor does not imply a certain level of skill or training.

The oral and written communications of an advisor provide clients and prospective clients with important information with which they determine to hire or retain an advisor. This brochure provides information about the qualifications and business practices of Stairway.

**If you have any questions about the contents of this brochure, please contact us at (630) 371-2626 or email [stairwaypartners@stairwaypartners.com](mailto:stairwaypartners@stairwaypartners.com).**

The information in this brochure has not been approved or verified by the SEC or by any state securities authority.

**Additional information about Stairway Partners, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2                    Material Changes**

As a fiduciary, Stairway has an ongoing obligation to inform its clients of any material information that could affect our advisory relationships. This section (Item 2) is used to provide clients with a summary of any material changes that have been made to our Form ADV Part 2A, commonly called a Brochure, since the previous update. Our last update was made on April 30, 2025.

This Brochure has no material changes from our previous update filing.

**A copy of Stairway's Brochure can be requested by contacting our Chief Compliance Officer at (630) 371-2626. Alternatively, our Brochure is always available on our website, [www.stairwaypartners.com](http://www.stairwaypartners.com), located at the bottom of the home page labelled 'ADV'.**

Additional information about Stairway Partners, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with Stairway who are registered, or are required to be registered, as investment advisor representatives of the firm.

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## Item 4 Advisory Business

### Our Owners

Stairway Partners, LLC ("Stairway") was founded in May 2004. James Jackson, Stewart Rallis, and Kevin Terhaar are Managing Principals and equity owners of Stairway. Our principal owners are James (Jamie) Jackson and Stewart (Stew) Rallis who each own 25% or more of the firm.

### Our Services

#### Discretionary Portfolio Management Services

Stairway Partners provides comprehensive portfolio management solutions to clients on a fully discretionary basis. This is our core business. Our mission is to provide clients with a low-cost, institutional investment capability that emphasizes global asset allocation and risk management. Our investment approach is based on long-term asset allocation strategies using liquid global markets. Our process is grounded in the fundamental principle that asset allocation is the single most important determinant of success in any investment plan, and that the vast majority of risk and return in a diversified portfolio can be attributed to its asset class mix, rather than to the selection of individual investments. This concept is a central tenet of the Stairway Partners investment philosophy and has been a guiding principle since the firm's inception.

Stairway provides discretionary portfolio management services primarily to institutional investors, including employee benefit plans, charitable organizations, and foundations. We also provide these services to high-net-worth individuals. For clients that are ERISA-governed employee benefit plans, Stairway explicitly acknowledges its role as fiduciary as defined under ERISA Section 3(38). Pursuant to an Investment Advisory Agreement, Stairway works with each client to construct an investment policy that most appropriately suits the client's investment objectives. Utilizing an expected risk and return framework, we establish a portfolio benchmark or "policy index" for each client portfolio using long-term high-level estimates of future returns, volatilities, and correlations of returns across global capital markets.

Within explicit guidelines, clients grant Stairway the discretionary authority to supervise and direct the investment of their assets in accordance with their investment policy. We employ proprietary valuation models based on fundamental valuation metrics and current market prices, which are used to estimate returns over a shorter time horizon. Stairway adjusts portfolio exposures across and within asset classes based on current market conditions. Custody of all client assets is maintained at unaffiliated qualified custodians. Clients pay a fee to Stairway for providing discretionary investment advisory services (see Item 5). **As of December 31, 2025, Stairway managed \$2,358,074,847 of client assets on a discretionary basis.**

#### Non-Discretionary Institutional Advisory Services

Stairway may also provide non-discretionary advisory services to certain institutional clients. For clients that have exposures to non-liquid alternative investments, Stairway will work closely with trustees and investment boards on strategic planning that includes addressing the risks in their portfolio, considering their short-term and long-term policy objectives. In concert with our discretionary investment advisory services, we may offer institutional clients a complementary suite of services which are designed to provide trustees and boards with the tools necessary to effectively manage their fiduciary obligations. These may include:

- Strategic planning and investment policy guidance.

- Asset allocation modeling based on the Fund's specific liability structure, liquidity needs, risk parameters and return hurdles.
- Streamlined portfolio implementation.
- Ongoing oversight and risk management.
- Comprehensive performance reporting and portfolio-level attribution analysis.
- Regular independent investment research and trustee education.

## **Item 5        Fees and Compensation**

### **Our Investment Management Fees**

Stairway does not receive compensation directly or indirectly from any source other than the fees paid to us by our clients. All our clients' assets are maintained in accounts at unaffiliated qualified custodians. This means that Stairway does not have custody of client assets unless authorized in writing by the client and, even then, only to deduct the quarterly investment advisory fees. Clients can elect to be billed for quarterly fees rather than having the fees deducted from their accounts.

Our annualized fees are noted in the table below labeled "Fee Schedule". The specific way fees are charged by Stairway is established in the Investment Advisory Agreement. Clients most often are billed quarterly in advance but can elect to be billed in arrears. Fees begin to accrue at the time Stairway begins managing an account. Fees are calculated based on the total market value of the assets of the account at that time and, if authorized by the client, are deducted by Stairway from the client's custodial account.

#### **Fee Schedule**

<b>Assets Under Management</b>	<b>Annual Rate</b>
First \$3 million	0.75%
\$3 – 10 million	0.50%
Over \$10 million	0.30%

The fee rate applied to a portfolio is computed based on the weighted average of the asset amount in each rate bracket. For example, a client with \$5 million in assets under management would pay 0.75% on the first \$3 million and 0.50% on the next \$2 million, making their weighted average annual fee rate 0.65%. When a client has multiple portfolios managed by Stairway, the fee amount will be based on the combined market value of all the portfolios. Stairway may negotiate client fee arrangements for accounts greater than \$25 million depending on the nature of the engagement and has historically done so for large institutional clients.

Either the client or Stairway can terminate the relationship on 30 days prior written notice. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Similar advisory services may be available from other advisors at a lower cost. Stairway's fees are exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses which are assessed by a broker or custodian and are incurred by the client.

Stairway does not utilize "soft dollars" or other similar forms of compensation from third parties. We do not receive 12(b)-1 fees from mutual funds or any portion of the commissions, fees, and costs that clients pay to a broker or custodian. Please see Item 12 for a detailed summary of our

brokerage practices including the factors that Stairway considers in selecting executing brokers and determining the reasonableness of their commission charges.

### **Our Non-Discretionary Institutional Advisory Services Fees**

The fees for our non-discretionary advisory services are individually negotiated and billed on a retainer basis.

### **Item 6        Performance-Based Fees and Side-by-Side Management**

Stairway does not charge a performance-based fee and therefore does not engage in side-by-side management of client assets (i.e., managing client accounts that are charged performance-based fees alongside accounts that are not charged performance fees).

### **Item 7        Types of Clients**

Stairway provides discretionary investment management services primarily to Taft-Hartley pension plans, foundations, charitable organizations, institutional clients, and high net worth individuals. To open an account, we generally require a client to have a minimum of \$1,000,000 in assets to be managed by the firm. We may make exceptions to the foregoing at our discretion and have historically done so for employees of the firm.

### **Item 8        Methods of Analysis, Investment Strategies, and Risk of Loss**

#### **Our Methods of Analysis**

Stairway's methods of analysis include using our proprietary valuation framework to build expected risks and returns for each asset class over relevant time horizons. Return is a function of expected fundamental cash flows discounted for the risk inherent in each asset class. Our risk model incorporates expected volatility and correlation and quantifies risk on both a relative basis (to a client's benchmark as stated in their investment policy) and an absolute basis for each client portfolio.

Stairway provides performance attribution monthly, based on actual returns for each client portfolio. This analysis is useful in understanding which exposures and investment decisions added to or detracted from a portfolio's value. Accountability is a key driver of Stairway's process.

#### **Our Investment Strategies**

Stairway is characteristically a long-term investor for our clients. We believe that keeping transaction costs low is a significant benefit. Our investment actions are typically the result of price changes in the market relative to fundamentals. Such price changes can necessitate a change in strategy to either invest in areas that have become attractive or reduce risk in markets that we believe have become overpriced. Generally, portfolio changes are implemented universally across accounts consistent with each client's investment policy.

The foundation of Stairway's investment process is the construction and maintenance of a custom benchmark and policy for each client. Stairway uses an internally developed methodology of translating a client's investment objectives and risk preferences into a long-term, explicit investment policy. We have also assembled a proprietary database that encompasses the liquid global capital markets. The data include risk, return, and financial and economic variables; data are sourced from various industry index providers and other intermediaries. These data are used in our proprietary research and modeling and are regularly updated.

Stairway offers investment advice in managing portfolios consistent with each client's objectives, benchmark, and investment policy using some or all of the following types of securities: mutual funds, exchange-traded funds, notes, bonds, and cash instruments

### **Types of Investments and Risk of Loss**

Liquidity, transparency, and low costs are all factors important in Stairway's selection of investment vehicles and are reasons why Stairway invests client assets primarily in Exchange Traded Funds (ETFs) and open-end mutual funds (MUTFs).

An ETF is a security that tracks an index or basket of assets like an index mutual fund, but trades like a stock on an exchange at approximately the same price as the net asset value of its underlying assets. Stairway believes ETFs are attractive as investments because of their low cost, tax-efficiency, and stock-like features.

A MUTF is a company that pools money from many stakeholders and invests the money in stocks, bonds, or other assets. Each share of a MUTF represents an investor's proportionate ownership of the fund's holdings and the income those holdings generate. Open-end MUTFs are not traded by investors on an exchange but are issued by the fund to each new investor and are redeemed back to the fund at their current net asset value when an investor withdraws.

Both ETFs and MUTFs are effective tools in implementing our core investment belief that asset allocation is the most important factor in an investment plan.

Stairway generally invests client assets in large, very liquid MUTFs and ETFs. As with any investment vehicle, there are risks. Some of the potential risks to be aware of in connection with trading in ETFs include stock market risk, liquidity risk, currency risk, and credit risk. Equity-based ETFs are subject to risks similar to those of stocks; fixed income-based ETFs are subject to risks similar to those of bonds. Investment returns will fluctuate and are subject to market volatility so that an investor's shares, when sold, may be worth more or less than their original cost.

Similarly, while the risks associated with MUTF ownership vary depending on the specific objective and underlying investments of the MUTF, the potential downside is the same – loss of principal and income. Some of the risks to be aware of in connection with investing in MUTFs include market risk, asset class risk, issuer risk, and management risk. Every fund issues a prospectus which provides detailed information about the MUTF including the material risks associated with investing.

Stairway may also invest directly in United States Treasury bonds. Because these securities are backed by the full faith and credit of the United States Treasury Department and trade in deep markets, we believe the diversification and liquidity benefits of an ETF or MUTF are not necessary.

In certain client relationships, Stairway acts as a fully discretionary Outsourced Chief Investment Officer (OCIO). In such relationships, Stairway manages a broader range of existing client assets including but not limited to: separate accounts managed by non-affiliated third parties; collective trusts, including publicly traded equities, fixed income, private real estate, private equity, and private credit; and limited partnerships, including real estate and private equity. An important part of analyzing and managing these investments, particularly the non-traditional "alternative" investments, is evaluating their suitability for each client in light of the liquidity risks, uncertain cash flows, understated volatilities and correlations, and changing risk characteristics.

**Please note that investing involves risk of loss that clients should be prepared to bear. Past performance with respect to an investment or an investment advisor is not an indication of future performance.**

**Item 9            Disciplinary Information**

Stairway is required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of our firm, or the integrity of Stairway's management. Neither Stairway nor its owners or employees have any current or past involvement with any legal or disciplinary events.

**Item 10            Other Financial Industry Activities and Affiliations**

Stairway has no current outside financial industry activities or affiliations.

**Item 11            Code of Ethics, Participation/Interest in Client Transactions, Personal Trading, and Rollover IRA Conflicts**

**Our Code of Ethics**

Stairway has adopted a Code of Ethics applicable to all employees and associated persons of the firm, describing our high standards of business conduct and our fiduciary duty to all of our clients. Among other things, the Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, and policies and procedures regarding personal securities trading. Stairway's associated persons are required to follow our Code of Ethics and to acknowledge annually their understanding of, and continued compliance with, the terms of the Code of Ethics.

**Stairway's clients and prospective clients can request a copy of our Code of Ethics by contacting our Chief Compliance Officer.**

**Our Participation/Interest in Client Transactions**

Stairway does not engage in any proprietary trading. We do not buy or sell as principal to any of our clients or act as an investment advisor to an investment company. Nevertheless, most of Stairway's associated persons have portfolios managed by Stairway. The portfolios of our associated persons are treated the same as every other client account, including purchasing and selling securities at the same time, and paying the same fees as all of our client accounts. (Also see Item 12 below for a detailed discussion of aggregating transactions.)

**Our Personal Trading**

Subject to satisfying our Code of Ethics and applicable laws, associated persons of Stairway are permitted to trade for their personal securities accounts, including in securities which Stairway transacts for its clients. All personal securities transactions by or for associated persons in their outside brokerage accounts are subject to Stairway's internal compliance program. Our compliance policies and procedures include disclosure and reporting requirements designed to prevent actual or apparent conflicts of interest between transactions effected by employees for their own brokerage accounts and transactions made by Stairway for its clients. In particular, the Code of Ethics requires pre-clearance of personal transactions, and restricts employee trading in close proximity to transactions effected for client accounts. Employee trading is regularly monitored to avoid conflicts and to ensure on-going compliance with the firm's policies and procedures.

## **Rollover IRA Conflicts of Interest**

Stairway seeks to avoid or minimize conflicts of interest through business and investment practices that are subject to policies and procedures reasonably designed to protect the interests of clients while maintaining our fiduciary obligations.

With regard to Individual Retirement Accounts (IRAs) in particular, providing IRA asset management services to clients who have rolled assets over from an employer-sponsored retirement plan (Employer Plan) presents a conflict of interest because Stairway earns fees on managing the assets in the rollover IRA. When Stairway receives compensation in connection with account types we offer, we have a financial incentive to make proposals that result in the receipt of that compensation. Clients should carefully consider this conflict. Stairway has adopted procedures designed to help clients evaluate the decision to roll an Employer Plan into an IRA. Prior to moving assets, we will review with clients the advantages and disadvantages of a rollover IRA.

## **Item 12 Brokerage Practices**

### **Soft Dollars**

As mentioned in Item 5, Stairway does not enter into soft dollar arrangements. Soft dollar arrangements are frequently associated with brokerage practices and involve an investment manager directing brokerage transactions to certain brokers in return for research products and other economic benefits. All resources received and used by us in conducting our business, including outside research, data vendors, software, and hardware, are paid for directly by Stairway. Additionally, we conduct our own proprietary research. Stairway has built proprietary models for risk, valuation, and performance attribution, as well as developed an in-house portfolio analytics system.

### **Best Execution**

Clients of Stairway authorize us, in our sole discretion, to place orders for their accounts with broker-dealers we select. Stairway chooses brokers based on our evaluation of best execution, including the size and difficulty of completing the transaction, and the most reasonable costs for our clients. Stairway also takes other broker-related factors into consideration including expertise in the type of security or transaction, access to relevant markets and prior experience, and the intrinsic value of ongoing relationships with a broker. We will evaluate and seek competitive commission rates but will not necessarily attempt to obtain the lowest possible commissions for transactions.

### **Order Aggregation and Transaction Allocation**

It is our goal to provide individualized asset management services to each of our clients while ensuring that the execution and distribution of transactions among participating client accounts is fair and equitable. One of the ways we accomplish this is by aggregating or “bunching” our client orders in an effort to obtain more favorable execution prices or commission rates. Order aggregation is the process of combining orders to purchase or sell the same security into a single larger order. Stairway aggregates client orders for execution when effecting portfolio rebalancing and strategy change transactions. Under other circumstances, we will aggregate orders when we believe that doing so will be in the best interest of the participating client portfolios. Once executed, we allocate aggregated transactions in a manner consistent with our fiduciary obligations to our clients in that every client account participating in an aggregated order is allocated trades at the average execution price, and execution costs are shared by the clients in proportion to each account's participation.

Stairway primarily transacts in highly liquid, well-capitalized securities such that “partial fills” are unlikely. However, in instances when an aggregated order is only partially executed, or executed at different prices, we will use price averaging to allocate the transaction to accounts pro rata based on each portfolio’s participation. In addition, Stairway maintains a Trade Aggregation and Allocation Policy to ensure aggregated orders are allocated in accordance with applicable laws and regulations.

#### **Directed Brokerage**

A client can direct Stairway, in writing, to use a particular broker to execute all transactions for their account (directed brokerage). Under such circumstances, the client will assume sole responsibility to negotiate terms and arrangements for the account with the broker. Stairway will not seek better execution services or prices from other brokers and may not be able to aggregate such transactions with orders for other accounts managed by us. As a result, clients electing to direct brokerage may pay higher commissions or other transaction costs or receive less favorable net prices on transactions for their accounts, than might otherwise be the case.

#### **Item 13        Review of Accounts**

Stairway’s Managing Principals regularly review all client accounts. A review of each account is made on a monthly basis when the performance analysis for the prior month has been completed. The formal reviews of each account include evaluating performance, appropriateness of benchmarks and investment policies, and investment management fee accuracy. This analysis incorporates the account’s return, attribution of return to management decisions, and performance relative to the client’s objectives.

Accounts are also reviewed whenever transactions are made in the account, when significant market movements occur, or when major news developments take place which could affect the portfolios. Stairway maintains a proprietary portfolio analytics system which includes a “drift monitor” to identify potential deviations of actual exposures from strategy targets across all client portfolios. Account reviews can also be triggered by notification of material changes in client circumstances that might necessitate adjustments in the client’s investment policy. Further, an automatic daily reconciliation is made between Stairway’s accounting system and the accounting downloads received from the qualified independent custodian(s) maintaining our clients’ assets.

Trade confirmations of all transactions and monthly account statements are delivered to each client by their custodian. Additionally, at any time, Stairway clients can access and view their portfolio holdings, risk, and performance on the firm’s website.

#### **Item 14        Client Referrals and Other Compensation**

Stairway currently does not have any active referral arrangements.

#### **Item 15        Custody**

Other than with respect to the payment of quarterly fees made by deduction from a client’s account held at an unaffiliated qualified custodian, Stairway does not maintain custody or possession of client account assets. Clients will receive trade confirmations and account statements directly from their qualified custodian. Stairway urges clients to carefully review these confirmations and statements. Stairway also reconciles the transaction and position files it receives from the custodian every day and makes client portfolio holdings available to each client on our website.

**Item 16**      Investment Discretion

Stairway exercises discretionary authority over each of our client accounts subject to each client's stated investment guidelines as set forth in their investment policy and in accordance with any additional limitations established by the client. Before assuming discretionary authority, clients execute an Investment Advisory Agreement granting Stairway full power and authority to supervise and direct the investment of their assets on a discretionary basis.

**Item 17**      Voting Client Securities

With discretionary authority over clients' portfolios, Stairway is required to vote proxies on the securities held in our clients' portfolios. Stairway's Proxy Voting Policy requires all proxies to be voted in the best interest of our clients. **Clients can obtain a copy of our Proxy Voting Policy and procedures upon request. Clients can also obtain information from Stairway about how we voted any proxies on their behalf.**

**Item 18**      Financial Information

Stairway has no financial commitments that impair our ability to meet contractual and fiduciary obligations to our clients. Nor has Stairway been the subject of a bankruptcy proceeding.

## Form ADV Part 2B – Brochure Supplement

### **Item 1** Cover Page

**James C. Jackson (Jamie)**  
Stairway Partners, LLC  
4999 France Avenue South  
Suite 255  
Minneapolis, MN 55410  
(630) 371-2626

Date of Brochure Supplement: **December 31, 2025**

**This Brochure Supplement provides information about James C. Jackson and is a supplement to Stairway's Brochure. You should have received a copy of that Brochure. Please contact our Chief Compliance Officer if you did not receive Stairway's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about James C. Jackson is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) .**

### **Item 2** Educational Background and Business Experience

#### **Jamie Jackson**

Year  
Of Birth: 1964

Education: Marquette University  
Bachelor of Science 1988  
Master of Business Administration 1993

#### **Professional**

Designation: Chartered Financial Analyst\* 1997

\*Established in 1962, "CFA" is a professional designation awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential exams over a multi-year time period. The three levels of the CFA Program test a wide range of topics, including ethical and professional standards, equity and fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. CFA charterholders must also have at least four years of acceptable professional experience in the investment decision-making process and commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

#### **Business**

Background: Stairway Partners, LLC  
Managing Principal 2009 to present  
Member Investment Advisory Committee 2009 to present

Ameriprise Financial (RiverSource Investment Management)  
Vice President and Sector Team Leader 2003 - 2009

UBS Global Asset Management (Brinson Partners)  
Executive Director - US Institutional Fixed Income 1997 - 2003

**Item 3**      **Disciplinary Information**

Jamie Jackson does not have any legal or disciplinary disclosure events.

**Item 4**      **Other Business Activities**

Not applicable.

**Item 5**      **Additional Compensation**

Not applicable.

**Item 6**      **Supervision**

At Stairway, we take our responsibility to comply with the applicable provisions of the Advisers Act and SEC rules very seriously. Likewise, we are diligent in adhering to our fundamental obligation to act in the best interest of our clients as their fiduciary. That is why in addition to our Code of Ethics (discussed in Item 11 of Form ADV Part 2A), Stairway maintains a robust Compliance Program consisting of a variety of policies and procedures designed to prevent regulatory rule violations. We also employ an experienced Compliance Officer whose primary focus is the administration of our Compliance Program. This involves supervising the activities of all Stairway staff, including Managing Principals, as well as reviewing, at least annually, policies and procedures for their adequacy and effectiveness of implementation.

In addition to our Compliance Officer's oversight, Stairway maintains an Investment Advisory Committee whose primary objectives are to monitor the investment process and support the Managing Principals in maintaining best industry practices. Committee membership includes James Jackson, CFA, Kevin Terhaar, CFA, and Norman Cumming. Norman Cumming is a member of the Investment Committees of Clare College, Cambridge and of the Cambridge University AC Pension Scheme. Stairway's Investment Advisory Committee meets, on average, quarterly to provide oversight of Stairway's investment process including the review of our critical economic and market assumptions and our investment modeling and asset allocation practices.

Any questions regarding the supervision of Stairway should be directed to the Chief Compliance Officer, Kevin Terhaar, at (630) 371-2626.

## Form ADV Part 2B – Brochure Supplement

### **Item 1** Cover Page

#### **Stewart J. Rallis**

Stairway Partners, LLC  
4999 France Avenue South  
Suite 255  
Minneapolis, MN 55410  
(612) 213-2323

Date of Brochure Supplement: **December 31, 2025**

**This Brochure Supplement provides information about Stewart J. Rallis and is a supplement to Stairway's Brochure. You should have received a copy of that Brochure. Please contact our Chief Compliance Officer if you did not receive Stairway's Brochure or if you have any questions about the contents of this supplement.**

Additional information about Stewart J. Rallis is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) .

### **Item 2** Educational Background and Business Experience

#### **Stewart J. Rallis**

Year  
Of Birth: 1960

Education: University of Minnesota – Carlson School of Management  
Bachelor of Science Business Accounting 1983

License: Series – 65 Investment Adviser Law Examination

Business  
Background: Stairway Partners, LLC  
Managing Principal 2013 to present

Investors Financial Group, LLC  
Principal 2010 to 2013

LPL Financial Corp.  
Registered Representative 2010 to 2012

Morgan Stanley Smith Barney  
Registered Representative and Investment Advisor Representative 1995 to 2009

**Item 3            Disciplinary Information**

Stewart Rallis does not have any legal or disciplinary disclosure events.

**Item 4            Other Business Activities**

Not applicable

**Item 5            Additional Compensation**

Not applicable.

**Item 6            Supervision**

At Stairway, we take our responsibility to comply with the applicable provisions of the Advisers Act and SEC rules very seriously. Likewise, we are diligent in adhering to our fundamental obligation to act in the best interest of our clients as their fiduciary. That is why in addition to our Code of Ethics (discussed in Item 11 of Form ADV Part 2A), Stairway maintains a robust Compliance Program consisting of a variety of policies and procedures designed to prevent regulatory rule violations. We also employ an experienced Compliance Officer whose primary focus is the administration of our Compliance Program. This involves supervising the activities of all Stairway staff, including Managing Principals, as well as reviewing, at least annually, policies and procedures for their adequacy and effectiveness of implementation.

In addition to our Compliance Officer's oversight, Stairway maintains an Investment Advisory Committee whose primary objectives are to monitor the investment process and support the Managing Principals in maintaining best industry practices. Committee membership includes James Jackson, CFA, Kevin Terhaar, CFA, and Norman Cumming. Norman Cumming is a member of the Investment Committees of Clare College, Cambridge and of the Cambridge University AC Pension Scheme. Stairway's Investment Advisory Committee meets, on average, quarterly to provide oversight of Stairway's investment process including the review of our critical economic and market assumptions and our investment modeling and asset allocation practices.

Any questions regarding the supervision of Stairway should be directed to the Chief Compliance Officer, Kevin Terhaar, at (630) 371-2626.

## Form ADV Part 2B – Brochure Supplement

### **Item 1** Cover Page

#### **Kevin Terhaar**

Stairway Partners, LLC  
4999 France Avenue South  
Suite 255  
Minneapolis, MN 55410  
(630) 371-2626

Date of Brochure Supplement: **December 31, 2025**

**This Brochure Supplement provides information about Kevin Terhaar and is a supplement to Stairway's Brochure. You should have received a copy of that Brochure. Please contact our Chief Compliance Officer if you did not receive Stairway's Brochure or if you have any questions about the contents of this supplement.**

Additional information about Kevin Terhaar is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) .

### **Item 2** Educational Background and Business Experience

#### **Kevin Terhaar**

Year  
Of Birth: 1959

Education: University of Virginia  
Bachelor of Arts 1980  
Master of Arts - Economics 1989

Professional  
Designation: Chartered Financial Analyst\* 1991

\*Established in 1962, "CFA" is a professional designation awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential exams over a multi-year time period. The three levels of the CFA Program test a wide range of topics, including ethical and professional standards, equity and fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. CFA charterholders must also have at least four years of acceptable professional experience in the investment decision-making process and commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Business  
Background: Stairway Partners, LLC  
Managing Principal 2017 to present  
Member Investment Advisory Committee 2004 to present

CFA Institute  
Director – Examination Development 2009 - 2017

Stairway Partners, LLC  
Co-Founder and Managing Principal 2004 to 2009

UBS Global Asset Management (Brinson Partners)  
Managing Director – Global Head of Asset Allocation 1994 - 2003

**Item 3**      **Disciplinary Information**

Kevin Terhaar does not have any legal or disciplinary disclosure events.

**Item 4**      **Other Business Activities**

Not applicable.

**Item 5**      **Additional Compensation**

Not applicable.

**Item 6**      **Supervision**

At Stairway, we take our responsibility to comply with the applicable provisions of the Advisers Act and SEC rules very seriously. Likewise, we are diligent in adhering to our fundamental obligation to act in the best interest of our clients as their fiduciary. That is why in addition to our Code of Ethics (discussed in Item 11 of Form ADV Part 2A), Stairway maintains a robust Compliance Program consisting of a variety of policies and procedures designed to prevent regulatory rule violations. We also employ an experienced Compliance Officer whose primary focus is the administration of our Compliance Program. This involves supervising the activities of all Stairway staff, including Managing Principals, as well as reviewing, at least annually, policies and procedures for their adequacy and effectiveness of implementation.

In addition to our Compliance Officer's oversight, Stairway maintains an Investment Advisory Committee whose primary objectives are to monitor the investment process and support the Managing Principals in maintaining best industry practices. Committee membership includes James Jackson, CFA, Kevin Terhaar, CFA, and Norman Cumming. Norman Cumming is a member of the Investment Committees of Clare College, Cambridge and of the Cambridge University AC Pension Scheme. Stairway's Investment Advisory Committee meets, on average, quarterly to provide oversight of Stairway's investment process including the review of our critical economic and market assumptions and our investment modeling and asset allocation practices.

Any questions regarding the supervision of Stairway should be directed to the Chief Compliance Officer, Kevin Terhaar, at (630) 371-2626.