

INVESTIRE

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Form ADV Part 2A Firm Brochure

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This brochure provides information about the qualifications and business practices of Investire, LLC (also referred to as we, us and Investire throughout this brochure) for a prospective and/or existing client who will be or is currently working with an individual who is registered as an investment adviser representative of Investire. If you have any questions about the contents of this brochure, please contact us by email at info@investire.co. 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 Investire is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for Investire, LLC or our firm's CRD number 299977.

***Registration as an investment adviser does not imply a certain level of skill or training.**

Item 2 – Material changes

There are no changes to inform in this section.

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Item 4 – Advisory Business

A. General Description of Our Firm

Investire is a limited liability company (LLC) formed under the laws of the State of Delaware. Investire is a registered investment advisor to manage investment portfolios in the state of Florida since July 16th, 2019.

Investire is a newly incorporated company with no track record to show as an advisor yet. Investire members are seasoned professionals that have been working in the financial markets for more than ten years. Check Item 19 for more detailed information about Investire members' expertise.

Investire principal owners are Julian Ricardo Siri, Lucas Fernando Rodriguez and Federico Santiago Zupan. There are no other direct or indirect owners of the LLC.

B. Description of Advisory Services

The investment advisory services of Investire described in this disclosure brochure are provided to you through an appropriately licensed and qualified individual who is an investment adviser representative of Investire. Your investment adviser representative is typically limited to providing the services and charging investment advisory fees in accordance with the descriptions detailed in this brochure. Your investment adviser representative is generally allowed to set Investire's fee within a range prescribed by Investire. As a result, the rates actually charged by two different investment adviser representatives of Investire may vary for similar services.

Investire offers multiple types of advisory services designed to meet the unique needs of our clients. Below are descriptions of the primary advisory services we offer. A written agreement detailing the exact services we will provide to you and the fees you will be charged will be executed prior to the commencement of any services.

Separately Managed Accounts Services – Investire offers discretionary portfolio management services on a discretionary basis. We will have the ability to buy or sell securities on your behalf without your prior permission for each specific transaction. Nevertheless, you will have the ability to impose restrictions on the management of your account, including the ability to instruct us not to purchase certain securities.

We will manage your account based on your financial situation, investment objectives, and risk tolerance. Accordingly, we will need to obtain certain information from you to determine your financial situation, investment objectives, and risk tolerance. As part of this process, an investment adviser representative will assist you in completing a risk questionnaire and review the information you provide. You will be responsible for notifying us of any updates regarding your financial situation, investment objectives, or risk tolerance and whether you wish to impose or modify any existing investment restrictions.

The financial situation, investment objectives, and risk tolerance for each client of Investire is unique. As a result, we may give advice to another client or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell or

recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

C. Tailor Advisory Services to Individual Needs of Clients

The separately managed advisory programs offered by Investire are based on the individual needs of our Clients. We make a thorough assessment of our Client's goals, objectives, investment horizon, and risk tolerance. Subject to any written guidelines, which the Client may provide, the Firm may be granted discretion and authority to manage the account.

Investire is authorized to perform various functions, at the Client's expense, without further approval from the Client. Such functions include the determination of securities to be purchased/sold and the amount of securities to be purchased/sold. Once the portfolio is constructed, Investire will provide continuous supervision and re-balancing of the portfolio as changes in market conditions and as Client circumstances may require.

Prior to engaging Investire to provide any of the aforementioned investment advisory services, the Client will be required to enter into one or more written agreements with Investire setting forth the terms and conditions under which Investire shall render its services.

At the beginning of the relationship, Investire meets with the new Client, gathers information, performs research and analysis as necessary and then prepares an investment plan for the Client. Once the Client portfolio is constructed, Investire will provide continuous supervision and re-balancing of the portfolio as changes in market conditions and as Client's circumstances may require. These objectives and other data are commonly revised or updated over time. In some instances, these changes are made in writing; in others, they are agreed to verbally and documented accordingly.

Once the objectives and risk tolerance of a Client have been established, Investire will develop and manage the investment portfolio on a discretionary basis. Under such an arrangement, Investire has the authority to supervise and direct the portfolio without prior consultation with the Client. Accordingly, Investire is authorized to perform various functions, at the Client's expense, without prior approval from the Client. Such functions include the determination of the securities to be purchased/sold.

Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without Client consent.

Clients are advised to promptly notify Investire in writing, in accordance with the Client's separately managed account agreement if there are any material changes in their financial situation, investment objectives, or in the event they wish to alter any restrictions upon investment management services.

D. Wrap Fee Programs

Investire is not a sponsor of any Wrap Fee Program(s).

E. Client Assets Under Management

To the date of this Brochure, Investire has Client Assets Under Management for USD 1,647,477

Item 5 – Fees and Compensation

This section provides detail regarding the fees and compensation we receive for the services that we offer. It should be noted that lower fees for comparable services may be available from other sources. Investire allows your investment adviser representative to set fees within ranges provided by Investire. As a result, your investment adviser representative may charge more or less for the same service than another investment adviser representative of Investire. The exact fees and other terms will be outlined in the agreement between you and Investire.

A. Advisory Fees

Discretionary Advisory Services

Upon the Client's engagement of Investire to provide separately managed account services, Investire shall perform that services for an annual fees, charged based on a percentage of assets under management, billed in arrears (at the end of the billing period) on a monthly calendar basis and calculated based on the average daily balance of the account for the preceding calendar month. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. Under the average daily balance method, each day's balance for the month is summed then divided by the number of days in the month, to compute the average daily balance. The average daily balance is then multiplied by the monthly portion of the annual fee to determine the monthly fee due.

The Separately Managed Account Management Fee will be exclusive of and in addition to brokerage commissions, transaction fees, borrowing costs, and any other costs or expenses incurred by the Client and payable to Client's broker. Investire will not receive any portion of these commissions, transaction fees, or other brokerage costs.

Investire could charge a performance fee (if applicable complying with rule 205-3 of the Investment Adviser Act). Performance-based fees could be billed quarterly or annually.

Investire could charge Flat Fees. Flat fees could be billed monthly, quarterly or annually.

Fees charged for our direct asset management services are negotiable by each of our investment adviser representatives based upon the type of client, the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual funds), the potential for additional account deposits, the relationship of the client with the investment adviser representative, and the total amount of assets under management for the client.

Based upon the above negotiability factors, each investment adviser representative is allowed to set Investire's investment management fee up to a maximum amount of 2.9% annually and a maximum performance fee of 25% with high watermark. The actual annual fee charged by Investire will be specified in the client's agreement with Investire believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs.

However, our annual investment advisory fee may be higher than that charged by other investment advisers offering similar services/programs.

Investment advisory fees will be deducted from your account and paid directly to our firm by the qualified custodian(s) of your account. You must authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to Investire. You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.

Management fees charged by Investire are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus.

Compensation for Sale of Securities

Investire investment adviser representatives are not affiliated with any broker-dealer, but they could be in the future.

You are never obligated to the broker-dealer(s) affiliated with our investment adviser representatives and you are never obligated to purchase investment products through our investment advisor representatives. You have the option to purchase investment products through other brokers or agents that are not affiliated with Investire.

B. Billing Procedures

Discretionary Portfolio Management Services

Separately Managed Account management fees are typically deducted daily. Fees are deducted from a designated Client account to facilitate payment collection. Clients must consent in advance, when engaging with Investire to provide separately managed account services, to direct debiting of their investment accounts. Investire collects advisory fees from the Client's custodian on a daily basis, with the amount of the advisory fee to be deducted from the account, given the agreed conditions when celebrating the discretionary management agreement. Furthermore, the custodian sends Clients account statements at least quarterly showing the deduction of the management or advisory fee.

The same logic applies for performance fees. These are typically deducted quarterly, in arrears, from Clients after the quarterly billing period has ended. Fees are deducted from a designated Client account to facilitate payment collection. As for management fees, the Clients must consent in advance, when engaging with Investire to provide separately managed account services, to direct debiting of their investment accounts. Performance fees will be collected in accordance to a high watermark hurdle.

Flat fees are deducted monthly. Fees are deducted from a designated Client account to facilitate payment collection. As for management fees, the Clients must consent in advance, when engaging with Investire to provide separately managed account services, to direct debiting of their investment accounts. A Flat fee is set to replace other fees in an investment management agreement.

Investire reserves the right to waive or reduce fees.

C. Other Fees & Expenses

There may be additional fees or charges that result from the maintenance of our trading within your account. These fees are imposed by third parties in connection with investments made through your account. Any additional fees, charges or expenses resulting from maintenance of our trading within the account shall be the sole responsibility of the Client.

D. Refund Policy

A Client may terminate the Investment Advisory Services Agreement for any reason at any time by notifying Investire in writing. Given that all payments will be made in arrears, no refund will be made.

Investire may terminate any of the services at any time by notifying the Client in writing.

E. Other Compensation

Investire does not receive or accept any other type of compensations in addition to the Management and Performance Fees.

F. Other Information

The investment terms offered to different Clients pursuing similar investment objectives may differ.

Advisory fees may be negotiable for Clients in certain circumstances and Investire may enter into individual agreements with particular Clients with respect to the method of payment and timing of charging any management fee or performance fee. Managed Accounts Clients may be invoiced for advisory fees or they may self-remit payment for those fees.

Investire's fees are in addition to brokerage commissions, transaction fees, service provider fees, distribution fees, as applicable, and other related costs and expenses which will be incurred by Clients. Execution of Client transactions typically requires payment of brokerage commissions by Clients. Investment activity may also involve other transaction fees and taxes payable by Clients, including but not limited to, sales charges, odd-lot differentials, transfer taxes, financial transaction taxes, wire transfer and electronic fund fees, overdraft fees and other fees and taxes on brokerage accounts and securities transactions. In addition, Clients may incur certain charges imposed by custodians, prime brokers, counterparties, banks, governmental authorities, third-party investment consultants, attorneys and other third parties, such as custodial fees, consulting fees, administrative fees, auditing fees, legal fees, and insurance fees. Clients may also pay certain fees and/or expenses relating to governmental, regulatory, licensing, filing, or registration filings and their preparation, incurred in compliance with the applicable rules of any self-regulatory organization or any foreign, U.S. federal, state or local laws; to the extent permitted by applicable law, and subject to applicable client documentation, legal fees and costs arising in connection with litigation or a regulatory investigation; and extraordinary expenses or costs that the Client may incur.

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

For Discretionary Portfolio Management Services

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. Investire may charge a performance fee (if applicable complying with rule 205-3 of the Investment Adviser Act). Performance-based fees could be billed quarterly or annually.

With respect to Investire's management of Client assets, performance fees may give rise to certain conflicts of interest. Specifically, Investire's entitlement to performance fees in managing one or more accounts may create an incentive to take risks in managing those accounts that Investire would not otherwise take in the absence of such fee arrangements. Additionally, since performance fees reward for performance in accounts which are subject to such fees, Investire may have an incentive to favor these accounts over those that have only asset-based fees with respect to trading opportunities, trade allocation, and allocation of new investment opportunities. Generally, Investire addresses these conflicts by utilizing an investment allocation policy designed to treat all Clients fairly and equitably.

Investire has defined an investment policy to address these issues, consisting in:

- 1) Block Trading and Allocation: we will buy the securities for all the accounts in a single operation per security and then proceed to allocate them in the accounts that will have those securities in its portfolios. There will be no price variations between accounts, no matter if the account has a performance fee or not.
- 2) Investire will offer a set of portfolios that are managed with independence of the accounts that subscribe those portfolios. Risk profiles of the clients will be approached by setting different percentages of allocation in the different portfolios we offer. More risk averse clients will have a greater participation of low risk portfolios in their individual portfolio than less risk averse clients.

Please see below and Item 12 – Brokerage Practices for more information.

Item 7 – Types of Clients

A. Description

Investire will provide separately managed account services to individuals and high-net-worth individuals. Client relationships vary in scope and length.

The investment terms offered to different Clients pursuing similar investment objectives may differ.

Clients are required to execute a written agreement with Investire specifying the particular advisory services in order to establish a client arrangement with Investire.

B. Minimum Investment Amounts Required

Investire's investment minimums may vary according to investment strategy, and Investire maintains the ability to waive such minimums at its discretion. Generally, Investire's Managed Account minimums is \$50,000. In addition, Investire reserves the right to waive investment minimums for particular Clients.

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

A. Methods of Analysis

Investire use the following methods of analysis in formulating investment advice:

Charting - Charting is a set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends.

Charting is likely the most subjective analysis of all investment methods since it relies on proper interpretation of chart patterns. The risk of reliance upon chart patterns is that the next day's data can always negate the conclusions reached from prior days' patterns. Also, reliance upon chart patterns bears the risk of a certain pattern being negated by a larger, more encompassing pattern that has not shown itself yet.

Cyclical – The Cyclical Method analyzes investments which are sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and in higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins.

While most economists and investors agree that there are cycles in the economy that need to be respected, the duration of such cycles is generally unknown. An investment decision to buy at the bottom of a business cycle may actually turn out to be a trade that occurs before or after the bottom of the cycle. If done before the bottom, then downside price action can result prior to any gains. If done after the bottom, then some upside price action may be missed. Similarly, a sell decision meant to occur at the top of a cycle may result in missed opportunity or unrealized losses.

Fundamental – The Fundamental Method evaluates a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market

forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong and could therefore lead to an unfavorable investment decision.

Technical – The Technical Method evaluates securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

To conduct analysis, Investire gathers information from financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses and filings with the SEC, company press releases and other public information sources. There are risks involved with any method of analysis that may be used.

B. Investment Strategies

Investire may employ the following investment strategies when managing client assets and/or providing investment advice:

Value investing. A value investing strategy selects stocks that trade for less than their intrinsic values. Value investors typically seek stocks of companies that they believe the market has undervalued. They believe the market overreacts to good and bad news, resulting in stock price movements that do not correspond with the company's long-term fundamentals. The result is an opportunity for value investors to profit by buying when the price is deflated. Often, value investors

select stocks with lower-than-average price-to-book or price-to-earnings ratios and/or high dividend yields. The risks associated with value-investing include incorrectly analyzing and overestimating the intrinsic value of a business, concentration risk, under performance relative to major benchmarks, macro-economic risks, investing in value traps i.e. businesses that remain perpetually undervalued, and lost purchasing power on cash holdings in the case of inflation.

Tactical asset allocation. A tactical asset allocation strategy allows for a range of percentages in each asset class (such as Stocks = 40-50%). The ranges establish minimum and maximum acceptable percentages that permit the investor to take advantage of market conditions within these parameters. Thus, a minor form of market timing is possible, since the investor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

Strategic asset allocation. A strategic asset allocation strategy calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a "buy and hold" strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client's goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

C.Types of Securities Offered and Risk of Loss

We do not primarily recommend one specific type of security to clients.

There can be no assurance that the objectives associated with any strategies described above will be met. At any time, Investire may add, remove, or modify any of the strategies it employs, and this includes any of the strategies discussed above. These methods, strategies, and investments involve risk of loss to Clients and Clients must be prepared to bear the loss of their entire investment.

There are many different events that can affect the value of a client's assets or portfolio(s) including, but not limited to, changes in financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters.

Some of the risks associated with Investire's investment strategies, and the securities and other assets utilized to implement those strategies, include, but are not limited to, those listed below:

- **Accuracy of Public Information Risk:** We select investments, in part, on the basis of information and data filed by issuers with various government regulators or made publicly available by the issuers or through publicly available sources other than the issuers. Although we evaluate this information and data, we are not in a position to confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information may not be available.
- **Borrowing and Embedded Leverage:** Some Clients allow secured and unsecured borrowing to the maximum extent allowable under applicable credit regulations. Like other forms of leverage,

the use of borrowing can enhance the risk of capital loss in the event of adverse changes in the level of market prices of the assets being financed with the borrowings. Leverage may also take the form of financial instruments, including OTC derivative instruments which are inherently leveraged, and products with embedded leverage such as options and short sales, in which an investor can lose more money than the initial cost of the investment. The use of leverage allows the Clients to increase their exposure to assets, such that total assets may be greater than capital invested. However, the use of leverage may also magnify the volatility – or the likelihood of short-term changes in value – of any portfolio. The effect of the use of leverage in a portfolio may result in losses to the portfolio that exceed losses to the portfolio if such portfolio did not utilize leverage.

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Computer System Risks:** Throughout its investment management process and business operations, Investire relies on a variety of computer hardware and software systems and platforms, some of which may be proprietary while others may be licensed from third parties (such systems and platforms, collectively, “Computer Systems”). Incorrect data, including stale or missing data, hardware or software malfunctions, programming inaccuracies, and similar errors may impair the performance of Computer Systems, which may negatively affect investment performance.
- **Concentration Risk:** This is the risk that a portfolio concentrates investments in a limited number of issuers, or in issuers within the same economic sector, industry, or geographic location. The value of such concentrated portfolios may be particularly susceptible to adverse economic, business or political developments compared to more diversified portfolios.
- **Crowding/Convergence:** There is significant competition among quantitatively focused managers. To the extent that Investire’s models come to resemble those employed by other managers, the risk that a market disruption that broadly affects the models of quantitatively-focused managers (including competitors of Investire) may adversely affect a Client is increased, as such a disruption could accelerate reductions in liquidity or rapid repricing due to simultaneous trading across a number of funds in the marketplace.
- **Currency Risk:** Currency risk is the risk that changes in currency exchange rates will negatively affect securities denominated in, and/or receiving revenues in, foreign currencies. The liquidity and trading value of foreign currencies could be affected by global economic factors, such as inflation, interest rate levels, and trade balances among countries, as well as the actions of sovereign governments and central banks. Adverse changes in currency exchange rates (relative to the U.S. dollar) may erode or reverse any potential gains from investments in securities denominated in a foreign currency or may widen existing losses.
- **Cybersecurity Risk:** With the increased use of technologies such as the Internet to conduct business, the Adviser and its Clients are susceptible to operational, information security and related risks. In general, cyber incidents can result from deliberate attacks or unintentional events. Cyberattacks include, but are not limited to, gaining unauthorized access to digital systems (e.g., through “hacking” or malicious software coding) for purposes of misappropriating assets or sensitive information, corrupting data, or causing operational disruption. Cyberattacks may also be

carried out in a manner that does not require gaining unauthorized access, such as causing denial-of-service attacks on websites (i.e., efforts to make network services unavailable to intended users). Cyber incidents affecting the Adviser and other service providers (including, but not limited to, accountants, law firms, custodians, transfer agents and financial intermediaries) have the ability to cause disruptions and impact business operations, potentially resulting in financial losses, impediments to trading, the inability of Clients and/or investors to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs. Similar adverse consequences could result from cyber incidents affecting issuers of securities in which a Client invests, counterparties with which a Client engages in transactions, governmental and other regulatory authorities, exchange and other financial market operators, banks, brokers, dealers, insurance companies and other financial institutions (including financial intermediaries and other service providers for Clients) and other parties. In addition, substantial costs may be incurred in order to prevent any cyber incidents in the future. While a Client's service providers may have established business continuity plans in the event of, and risk management systems to prevent, such cyber incidents, there are inherent limitations in such plans and systems including the possibility that certain risks have not been identified. Furthermore, the Adviser cannot control the cyber security plans and systems put in place by its service providers or any other third parties whose operations may affect a Client. As a result, Clients could be negatively impacted.

- **Database Errors:** Our strategies rely on proprietary databases and third-party data sources. As a result, any errors in the underlying data entry, database or the assumptions underlying the strategies may result in a portfolio acquiring or selling investments based on incorrect information. Additionally, data entry made by our internal team of financial analysts may contain errors, as may the database system used to store such data. When strategies and data prove to be incorrect, misleading, flawed or incomplete, any decisions made in reliance thereon expose our clients to potential risks. For example, by relying on our strategies and data, we may be induced to buy certain investments at prices that are too high, to sell certain other investments at prices that are too low, or to miss favorable opportunities altogether. Similarly, any hedging based on faulty strategies and data may prove to be unsuccessful. As a result, the portfolio could incur losses on such investments before the errors are identified and corrected. We do not reimburse the portfolios or Clients for database errors.
- **Options Risk:** An investment in options may be illiquid, difficult to price, and subject to leverage, such that small changes in circumstances generate disproportionate losses to a portfolio. Because of the complexity of options, such investments may not perform as anticipated and returns/losses may be difficult to monitor.
- **Emerging Markets Investments:** Investing in the securities or other instruments of issuers located in non-U.S. countries may involve certain risks not typically associated with investing in established economies or securities markets. Such risks may include (i) the risk of nationalization or expropriation of assets and confiscatory or other taxation; (ii) social, economic and political instability, including war; (iii) dependence on exports; (iv) less liquidity of securities markets; (v) significant currency exchange rate devaluations, fluctuations, and declines against the U.S. dollar; (vi) potentially higher rates of inflation (including hyper-inflation) and rapid fluctuations in inflation; (vii) controls on foreign investment and limitations on repatriation of invested capital and the

Client's ability to exchange local currencies for U.S. dollars; (viii) a higher degree of governmental involvement in and control over the economies; (ix) government decisions to discontinue support for economic reform programs and imposition of centrally planned economies; (x) differences in auditing and financial reporting standards which may result in the unavailability of material information about economies and issuers; (xi) less extensive regulatory oversight of securities markets; (xii) longer settlement periods for securities transactions; (xiii) less stringent laws regarding the protection of investors; (xiv) certain consequences regarding the maintenance of a Client's portfolio securities and cash with sub-custodians and securities depositories in such countries; (xv) difficulty in enforcing contractual obligations; (xvi) inexperience of financial intermediaries, lack of modern technology, and the lack of a sufficient capital base to expand business operations; and (xvii) less available information than is generally the case in the United States. All of the foregoing factors lead to greater market volatility.

- **Equity Securities:** Equity securities fluctuate in value in response to many factors, including the activities, results of operations, and financial condition of individual companies; the business market in which individual companies compete; industry market conditions; interest rates; and general economic environments. In addition, events such as domestic and international political instability, terrorism and natural disasters may be unforeseeable and contribute to market volatility in ways that may adversely affect investments made by a Client.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Foreign Investments Risk:** Foreign investments often involve special risks not present in U.S. investments that can increase the chances that an investment will lose money. For example, a Client may hold its foreign securities and cash in foreign banks and securities depositories, which may be recently organized or new to the foreign custody business and subject to only limited or no regulatory oversight. Changes in foreign currency exchange rates can affect the value of a portfolio. The economies of certain foreign markets may not compare favorably with the economy of the United States, and the governments of certain countries may prohibit or impose substantial restrictions on foreign investments in their capital markets or in certain industries. Many foreign governments do not supervise and regulate stock exchanges, brokers, and the sale of securities to the same extent as does the United States and may not have laws to protect investors that are comparable to U.S. securities laws. Settlement and clearance procedures in certain foreign markets may result in delays in payment for or delivery of securities not typically associated with settlement and clearance of U.S. investments.
- **Foreign (Non-U.S.) Risk:** A portfolio's investments in securities of non-U.S. issuers may involve more risk than those of U.S. issuers. The prices of these securities may fluctuate more widely and may be less liquid due to adverse market, economic, political, regulatory or other factors.
- **General Risks of Options Use:** Options trading is highly speculative. Price movements of options contracts are influenced by, among other things, changing supply and demand relationships, governmental agricultural and trade programs and policies, and national and international political and economic events. In addition, unless a portfolio is hedged against fluctuations in the exchange rate between the U.S. dollar and the currencies in which trading is done on some foreign

exchanges, any profits that such a portfolio realizes in trading on such exchanges could be eliminated by adverse changes in the exchange rate, or such a portfolio could incur losses as a result of any such changes. Due to the low margin deposits normally required in options trading, an extremely high degree of leverage is typical of a options trading account. As a result, a relatively small price movement in a options contract price may result in substantial losses to a portfolio. Like other leveraged investments, any purchase or sale of a options contract may result in losses in excess of the amount invested. Accordingly, relatively small options positions have the potential to erode significantly or erase gains and compound losses in other investments held by a portfolio.

- **Hedging:** There can be no assurances that a particular hedge is appropriate or that certain risk is measured properly. Further, while Investire may enter into hedging transactions to seek to reduce risk, such transactions may result in poorer overall performance and increased (rather than reduced) risk for the Client portfolios than if Investire did not engage in any such hedging transactions.
- **Inflation Risk:** When any type of inflation is present, a dollar will be worth more today than a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Investment Company and Exchange-Traded Fund ("ETF") Risks:** Investments in an investment company or ETF involve substantially similar risks to investments in the underlying securities of the company or ETF. Investment companies and ETFs may not achieve the intended investment objective, or may otherwise not execute the investment strategy effectively, which may adversely affect the value of a portfolio. ETFs include the added risk that they may no longer satisfy the listing standards of the exchange on which they are traded.
- **Issuer Risk:** The value of a security may decline for a number of reasons which directly relate to the issuer, such as management performance, financial leverage and reduced demand for the issuer's goods or services, as well as the historical and prospective earnings of the issuer and the value of its assets.
- **Key Person Risk:** Termination, disability, death, or departure of key personnel could adversely affect the underlying fund and its performance.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Market Drawdown Risk:** Investire deploys risk management strategies that seek to minimize market drawdowns. When reduced equity exposure is indicated, Investire will short index futures to reduce market exposure; however, client assets will remain fully invested in the affiliated investment company strategies, regardless of market signal. The purpose of this practice is to enable clients to follow a risk management strategy without recognizing tax liabilities. The use of this strategy exposes clients to additional risks associated with options and short trades, which are discussed more fully below.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- **Model and Data Risk:** Given the complexity of Investire's investments and strategies, the Adviser relies heavily on quantitative models (both proprietary models developed by the Adviser, and those supplied by third parties) and information and data supplied by third parties ("Models and Data"). Models and Data are used to construct sets of transactions and investments, to value investments or potential investments (whether for trading purposes, or for the purpose of determining the net asset value of a Client), to provide risk management insights, and to assist in hedging the Clients' investments, if applicable. When Models and Data prove to be incorrect or incomplete, any decisions made in reliance thereon expose Clients to potential risks. For example, by relying on Models and Data, the Adviser may be induced to buy certain investments at prices that are too low, or to miss favorable opportunities altogether. Similarly, any hedging based on faulty Models and Data may prove to be unsuccessful.

Some of the models used by Investire are predictive in nature. The use of predictive models has inherent risks. For example, such models may incorrectly forecast future behavior, leading to potential losses on a cash flow and/or a mark-to-market basis. In addition, in unforeseen or certain low-probability scenarios (often involving a market disruption of some kind), such models may produce unexpected results, which can result in losses to a Client's portfolio. Furthermore, because predictive models are usually constructed based on historical data supplied by third parties, the success of relying on such models may depend heavily on the accuracy and reliability of the supplied historical data.

All models rely on correct market data inputs. If incorrect market data is entered into even a well-founded model, the resulting valuations will be incorrect. However, even if market data is input correctly, "model prices" will often differ substantially from market prices, especially for securities with complex characteristics, such as options contracts.

- **Obsolescence Risk:** Investire's strategies are unlikely to be successful unless the assumptions underlying the models used to implement those strategies are realistic and either remain realistic and relevant in the future or are adjusted to account for changes in the overall market environment. If such assumptions are inaccurate or become inaccurate and are not promptly adjusted, it is likely that profitable trading signals will not be generated. If and to the extent that the models do not reflect certain factors, and Investire does not successfully address such omission through its testing and evaluation and modify the models accordingly, major losses may result. Investire will continue to test, evaluate, and add new models, as a result of which the existing models may be modified or discontinued from time to time. There can be no assurance as to the effects (positive or negative) of any modification on a Client's portfolio.
- **Operational Risk:** Investire has developed systems and procedures to manage operational risk. Operational risks arising from mistakes made in the confirmation or settlement of transactions, from transactions not being properly booked or accounted for, or other similar disruption in the Adviser's operations may cause the Adviser to suffer financial loss, the disruption of its business, liability to Clients or third parties, regulatory intervention, or reputational damage. Investire relies heavily on its portfolio management, trading, financial, accounting, and other data processing systems. The ability of its systems to accommodate an increasing volume of transactions could also constrain the Adviser's ability to properly manage a Client's portfolio.

- **Portfolio Turnover:** Active and/or frequent trading of securities and financial instruments within a portfolio may produce increased transaction costs, including brokerage commissions, fees, transaction taxes, and other transaction costs. Likewise, such active and/or frequent trading may result in short-term capital gains tax treatment.
- **Programming and Modeling Errors:** Investire's research and modeling process is extremely complex and involves financial, economic, econometric and statistical theories, research and modeling; the results of that process must then be translated into computer code. Although Investire seeks to hire individuals skilled in these functions and to provide appropriate levels of oversight, the complexity of the individual tasks, the difficulty of integrating such tasks, and the limited ability to perform "real world" testing of the end product raises the chances that the finished model may contain an error. One or more of such errors could adversely affect a Client's portfolio and would generally not constitute a trade error subject to reimbursement under Investire's policies.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Risks from Purchasing Options:** If a call or put option purchased by us is not sold when it has remaining value and if the market price of the underlying security, in the case of a call, remains less than or equal to the exercise price, or, in the case of a put, remains equal to or greater than the exercise price, you will lose its entire investment in the option. There is no assurance that a liquid or "fair" market will exist when we seek to close out an option position. Where a position in a purchased option hedges a related position, the price of the option may move more or less than the price of the related position.
- **Risks from Selling Options:** Selling or writing option contracts often results in a "short" position (see Short Selling Risk below). A short position can result in losses that substantially exceed your initial investment. There is no assurance that a liquid or "fair" market will exist when we seek to close out a short option position. This lack of marketability may result in further losses. In cases when we sell an option to hedge against price movements in a related underlying position, such as in connection with our risk management strategy described above, the price of the option may move more or less than the price of the related position and not fully hedge the position.
- **Short Selling Risk:** When an investor short sells a security, the investor's losses technically could be infinite. A short sale trade loses money when the price of the underlying security rises. Theoretically, a security price could rise by an unlimited amount. When the underlying securities prices go up, a short seller's losses get higher, and as sellers rush to buy the stock to cover their positions, the losses increase exponentially. This phenomenon is known as a short squeeze. Usually, news in the market will trigger a short squeeze, but sometimes traders who notice a large number of shorts in a stock will attempt to induce one. Timing is an additional complication. Even though a security is overvalued, it could conceivably take some time for the price to decline. In the meantime, the short investor is vulnerable to interest charges, margin calls, dividend payments if any and other adverse effects.
- **Tax Risk:** Tax laws and regulations applicable to an account are subject to change, and unanticipated tax liabilities could be incurred by investors as a result of such changes. Investors

should consult their own tax advisers and counsel to determine the potential tax-related consequences of investing.

- **Trading Decisions Based on Quantitative and Other Analysis:** Investire's portfolio management and trading decisions are based on quantitative models, signals, and other analyses. Any factor that would lessen the prospect of major trends occurring in the future (such as increased governmental control of, or participation in, the financial markets) may reduce the prospect that a particular trading method or strategy will be profitable in the future. In the past, there have been periods without discernible trends and, presumably, such periods will continue to occur in the future. Moreover, any factor that would make it more difficult to execute trades at desired prices in accordance with the signals of the trading method or strategy (such as a significant lessening of liquidity in a particular market) would also be detrimental to profitability. Further, many advisors' investment models and trading methods utilize similar analyses in making trading decisions. Therefore, bunching of buy and sell orders can occur, which makes it more difficult for a position to be taken or liquidated. No assurance can be given that the Adviser's strategies will be successful under all or any market conditions.

While this information provides a synopsis of the events that may affect a client's investments, this listing is not exhaustive. There are inherent risks associated with investing and depending on the risk occurrence; and one may suffer LOSS OF ALL OR PART OF THEIR PRINCIPAL INVESTMENT.

Item 9 – Disciplinary Information

We have no legal or disciplinary events to disclose that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

A. Financial Industry Activities

Investire is not a registered broker-dealer, or a futures commission merchant. Furthermore, none of Investire's management or supervised persons is a registered representative or has an application pending to register as a representative of a broker-dealer.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

A. Code of Ethics

All Investire personnel must act in an ethical and professional manner. In view of the foregoing, Investire has established a Code of Ethics that will apply to all of its associated persons. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Investire has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle for our Code of Ethics which also covers our Insider Trading and Personal Securities Transactions Policies and Procedures. Investire has the responsibility to make sure that the interests of all clients are placed ahead of Investire's own investment interests. Investire will disclose material facts and potential conflicts of interest to clients. Investire seeks to conduct business in an honest, ethical and fair manner and will take reasonable steps to avoid circumstances that might negatively affect our duty of loyalty to clients. This section is intended to provide clients with a summary of Investire's Code of Ethics. Clients may receive a complete copy of the Code of Ethics upon request.

B. Affiliate and Employee Personal Securities Transactions Disclosure

Investire or associated persons of the firm may buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a potential conflict of interest. It is the express policy of Investire that all persons associated in any manner with our firm must place clients' interests ahead of their own when implementing personal investments. Investire and its associated persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

To mitigate potential conflicts of interest, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, associated persons).

Any associated person not observing our policies is subject to sanctions up to and including termination.

Item 12 – Brokerage Practices

If the firm assists in the implementation of any recommendations, we are responsible to ensure that the client receives best execution for transactions. Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we may consider a number of factors other than prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the backoffice services, technology and pricing of services offered.

A. Brokerage Recommendations

In order to utilize our asset management services, Investire will require that you establish or maintain a brokerage account with Interactive Brokers through their Institutional Platform. Interactive Brokers is member of FINRA/SIPC/NFA. Interactive Brokers is independent and unaffiliated registered broker-dealer and is recommended by Investire to maintain custody of clients' assets and to effect trades for their accounts.

The primary factor in suggesting a broker/dealer or custodian is that the services of the recommended firm are provided in a cost-effective manner. While quality of execution at the best price is an important determinant, best execution does not necessarily mean lowest price and it is not the sole consideration. The trading process of any broker/dealer and money manager suggested by Investire must be efficient, seamless, and straight-forward. Overall custodial support services, trade correction services, and statement preparation are some of the other factors determined when suggesting a broker/dealer.

B. Directed Brokerage

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular broker/dealer, Investire may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/ dealers may cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, Investire has decided to require our clients to use broker/dealers and other qualified custodians determined by Investire.

C. Soft Dollar Benefits

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer or custodian. Except as described above, Investire does not have a soft dollar agreement with any broker-dealer, custodian or other third-party.

D. Block Trading Policy

When aggregating and allocating securities transactions, our Clients are treated in a fair and equitable manner. No account will be favored over any other accounts. All Clients participating in an aggregated order must be treated fairly. In the regular course of business, we may at times enter orders for multiple advisory accounts in order to obtain the best pricing averages and minimize trading costs for our Clients. Accordingly, our policies and procedures mandate allocating the orders to the appropriate Client accounts as soon as possible thereafter and allocating transactions equitably.

Investire will seek to allocate investment opportunities and trades fairly. "Fair" treatment does not mean identical treatment of all Clients. Rather, it means that Investire does not discriminate on an impermissible basis against one Client or group of Clients. When Investire transacts in securities or instruments for more than one Client, the investment opportunities and trades will be allocated in a manner consistent with Investire's fiduciary duties. Investire may not allocate trades in such a way that Investire's personal, proprietary or affiliated accounts receive more favorable treatment than Clients' accounts. Similarly, Investire may not allocate profitable trades at each day's end so as to disproportionately favor certain Clients without appropriate disclosure.

In making investment decisions for the accounts, securities considered for investment by one Client may also be appropriate for another Client. On occasions when the purchase or sale of a security is deemed to be in the best interest of more than one Client, Investire may, but will not be obligated to, aggregate or "batch" orders for the purchase or sale of securities for all such accounts to the extent consistent with best execution and the terms of the relevant investment advisory agreements. Such combined or "batched" trades may be used to facilitate best execution, including negotiating more favorable prices, obtaining more timely or equitable execution or reducing transaction charges.

When Investire decides to purchase or sell the same securities for several Clients at approximately the same time, Investire is not required to aggregate such transactions, but will do so absent a determination by our Firm's Compliance Officer based on the best interests of Investire's Clients. Investire will aggregate and allocate orders only in a manner designed to ensure no Client or account is favored over others over time. Investire believes that aggregation is consistent with Investire's duty to seek best execution and best price for Clients and is consistent with Investire's investment advisory agreements with each Client for which trades are being aggregated.

We will instruct our broker-dealer (custodian) to process our Clients' trades in the most cost-effective manner while securing quality of execution. The Compliance Officer will review transactions periodically to prevent and detect excessive costs related to non-compliance with order aggregation procedures.

Item 13 – Review of Accounts

A. Periodic Account Reviews

Accounts subject to our asset management services are reviewed at least annually. While the calendar is the main triggering factor, reviews can also be conducted at Clients request. Account reviews will include investment strategy and objectives review and making a change if strategy and objectives have changed. Reviews are conducted by investment adviser representative of record, with reviews performed in accordance with your investment goals and objectives.

B. Intermittent Review Factors

Although Investire reviews each Client's account on a regular basis, there are facts and circumstances which may prompt ad hoc reviews. Significant market events affecting the prices of one or more securities held by a Client, changes in investment objectives or guidelines of a particular Client, or specific arrangements with particular Clients or investors may trigger more frequent reviews of a particular Client's account.

C. Statements and Reports

Managed Account Clients receive regular written reports from their custodian and may receive operational reports from Investire upon request or as required in the investment management agreement. At a minimum, each Client will receive a quarterly report from their broker-dealer that will include a statement of account holdings, market value, broker commissions, and advisory fees charged for the period.

Clients are encouraged to compare any reports or statements provided by Investire against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact our firm and the qualified custodian preparing the statement.

Item 14 – Client Referrals and Other Compensation

Investire is required to disclose any direct or indirect compensation that it provides for client referrals. If a client is introduced to Investire by an unaffiliated solicitor, Investire may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Advisers Act and any corresponding state securities law requirements. Any such referral fee is paid solely from Investire's investment management fee and does not result in any additional charge to the client. If the client is introduced to Investire by an unaffiliated solicitor, the solicitor provides the client with a copy of Investire's written disclosure brochure which meets the requirements of Rule 204-3 of the Advisers Act and a copy of the solicitor's disclosure statement containing the terms and conditions of the solicitation arrangement including compensation.

Item 15 – Custody

Investire has no custody of client's funds or securities. Investire does not have custody of the assets of the Managed Accounts. Managed Accounts must make their own arrangements for custody of securities. Such custodians may be broker-dealers, prime brokers, banks, trust companies, or other qualified institutions. The qualified custodian will typically provide the Managed Account with at least quarterly account statements relating to the assets held within the account advised by Investire. Each Managed Account should carefully review the qualified custodian's statement upon receipt to determine that it completely and accurately states all holdings in the account and all account activity over the relevant period. Any discrepancies identified by a Managed Account should be immediately reported to Investire and the qualified custodian.

In addition to the account statements provided by qualified custodians to Investire's Managed Accounts, Investire may also provide account statements or reports to Managed Accounts on a periodic basis, as agreed upon between the Managed Accounts and the Adviser. These statements are intended to complement, not replace, the statements provided by the Managed Account's qualified custodian. As such, Investire encourages Managed Accounts to compare the statements provided to them by Investire against those provided to them by their qualified custodians who hold the assets of their accounts, and to report any questions, concerns, or discrepancies to both the Adviser and the qualified custodian promptly. Investire's statements may vary from custodial statements based on accounting procedures, reporting dates, and/or valuation methodologies of certain securities. However, please note that custodian statements reflect the official books and records for the Managed Accounts.

Item 16 – Investment Discretion

When providing portfolio management services, Investire maintains trading authorization over your Account and provides management services on a discretionary basis. Discretionary authority is granted through the execution of a limited power of attorney contained in the custodian's paperwork and the execution of an investment management agreement with Investire. We have the authority to determine the type of securities and the amount of securities that will be bought or sold for your portfolio without obtaining your consent for each transaction. Nevertheless, you will have the ability to place restrictions on the types of investments that may be purchased in your account. The platform provider will have the authority to buy and sell securities for your account based on directions provided by the portfolio manager without obtaining your prior consent.

Item 17 – Voting Client Securities

Proxy Voting

Investire does not vote proxies on behalf of clients. Therefore, it is your responsibility to vote all proxies for securities held in your Account. You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. Although we do not vote client proxies, if you have a question about a particular proxy feel free to contact your investment adviser representative.

Item 18 – Financial Information

A. Balance Sheet Requirements

Investire does not require or solicit prepayment of fees six month or more in advance. Therefore, Investire is not required to include a balance sheet for the most recent fiscal year.

B. Financial Condition

The firm does not have any financial impairment that will preclude it from meeting contractual commitments to Clients.

C. Bankruptcy Petition

The firm has not been the subject of a bankruptcy petition at any time.

Item 19 – Requirements for State Registered Advisers

Principal Executive Officers and Management Persons

Investire LLC principal executive officers are:

- ✓ Lucas Fernando Rodriguez, Chief Executive Officer
 - Lucas Fernando Rodriguez holds a Master's in Finance from CEMA University, Buenos Aires, Argentina. Has worked for more than ten year in the Argentinian financial markets, including 7 years as head of IRSA Group's trading desk.
- ✓ Julian Ricardo Siri, Chief Financial Officer
 - Julian Ricardo Siri holds a MSc in Financial Engineering from the University of Columbia, NY, USA. Has worked for more than ten years in different positions related to portfolio management.
- ✓ Federico Santiago Zupan, Chief Marketing Officer
 - Federico Santiago Zupan holds a MBA from Di Tella University, Buenos Aires, Argentina. Specialist in communication and marketing, he worked as Marketing manager for one of top Argentinian importing firms for ten years.

Other Business

Investire Principal Executive Officers have full time dedication to Investire and are not actively engaged in any other business.

Performance Based Fees Compensation

Some accounts managed under Investire could have a Performance Based Fee as part of the compensation for the management of it. A Performance Based Fee is calculated as a percentage of the capital appreciation of the account, in a period of time, above a high watermark.

Performance Based Fees could lead a portfolio manager to take more risk in the portfolios and to privilege accounts with Performance Based Fee compensation.

Investire has defined an investment policy to address these issues consisting in:

- 1) Block Trading and Allocation: we will buy the securities for all the accounts in a single operation per security and then proceed to allocate them in the accounts that will have those securities in its portfolios. There will be no price variations between accounts, no matter if the account has a performance fee or not.

- 2) Investire will offer a set of portfolios that are managed with independence of the accounts that subscribe those portfolios. Risk profiles of the clients will be approached by setting different percentages of allocation in the different portfolios we offer. More risk averse clients will have a greater participation of low risk portfolios in their individual portfolio than less risk averse clients.

Management Disciplinary Information

None. Neither of Investire managers have any legal or disciplinary events material to a client's or prospective client's evaluation.

Additional Compensation

None. Neither of Investire Managers receive any economic benefit from any third party for providing advisory services.

A more detailed individual report on Investire's Managers who are also Investment Adviser Representatives is provided in ADV Form Part 2B.