



StreetOne Investment Management, LLC.  
Firm Brochure

Part 2A of FORM ADV

March 28, 2019

**ITEM 1 COVER PAGE**

This brochure provides information about the qualifications and business practices of StreetOne Investment Management, LLC. (hereinafter "StreetOne"). If you have any questions about the contents of this brochure, please contact our Chief Compliance Officer at 1-212-671-1030, or visit us at [www.streetone.com](http://www.streetone.com). 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. StreetOne Investment Management, LLC. is a registered investment adviser. Registration of an investment adviser does not imply a certain level of skill or training.

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

## **ITEM 2 MATERIAL CHANGES**

Since the initial filing on December 2, 2016 this ADV Part 2A Brochure has been materially amended as follows as of January 06, 2017. This list summarizes changes to Item 17 Voting Client Securities, StreetOne Proxy Voting Policy.

Clients will need to sign on to our custodian Folio Institutional at <https://www.folioclient.com>, which offers Folio Vote, an online service that provides access to proxy and other corporate action information as well as an integrated ballot for casting proxy votes. Neither we nor our custodian offer any consulting assistance regarding proxy issues to clients.

On November 13, 2017 our Form ADV Part 2A and 2B was updated to reflect our new office address.

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## ITEM 4 Advisory Business

### General Description of the Firm

Founded in December 2014 and registered with the Securities and Exchange Commission in January 2017, StreetOne Investment Management, LLC. ( StreetOne ) offers investment advice over the internet for retail individual investors. StreetOne provides individual investors with a broad array of equity, exchange-traded Funds (ETF) and fixed income investment strategies designed to meet long term goals.

### Summary of StreetOne's Advisory Services

StreetOne provides investment advisory services to retail clients. StreetOne generally exercises investment discretion for each account that it manages. However, the account composition within the same investment strategy may at any given time differ as to model composition. As a result, the performance of an account within a particular investment strategy may differ from other accounts within that same investment strategy. Clients should not expect that the performance of their portfolios will be identical to that of the average for that investment strategy. These differences in portfolio composition are attributable to a variety of factors, including, but not limited to, the type of account (e.g., manner of trade execution), sizes and significant account activity (e.g., significant number of contributions and/or withdrawals).

StreetOne executes purchases and sales of securities on behalf of its clients through broker-dealer firms StreetOne selects including those which, from time to time, furnish StreetOne with investment research information and other services. In executing trades for its retail client accounts StreetOne uses its best efforts to obtain the best available price and most favorable execution.

StreetOne is registered as an "Internet-Only" investment advisor pursuant to Section 203A-2(e) of the Advisers Act. Under this registration, StreetOne provides its investment advice solely through its interactive website at <https://www.streetone.com>. StreetOne's investment advisory service is not available to clients via telephone conversations or communications through other means such as U.S. mail, courier or email (other than operational emails). StreetOne does not meet with clients at its offices. All advice, support and inquiries are delivered through StreetOne's interactive website.

Clients register at StreetOne's website with a personal user id and a password. Taking into consideration clients' preferences, StreetOne devises a customized ETF and/or stock portfolio specific to each client's needs. Given the individual profiles, portfolios thus devised may include US Equity, International Equity, Emerging Equity, Commodities, Real Estate, Fixed Income, Digital Currency, and Inflation protection.

Currently, the StreetOne platform offers the following account types:

- Individual-Taxable
- Traditional IRA, Roth IRA, IRA Rollover

Accounts held under this program are eligible for comprehensive risk-management enabled by our proprietary risk-management technology.

### StreetOne Investment Management Wrap Fee Program

Accounts are custodied at Folio Investments, Inc. and charged a wrap fee. This wrap fee includes all portfolio management costs, trading costs, custodial costs, and operational costs. There are no sales charges or commissions ever paid. All portfolio management services offered in the program are managed internally. Therefore, no portion of the annual fee is paid to outside portfolio managers. Please find a fee schedule below. Fees are charged based on the average daily total size of all accounts on a monthly basis. Fees are charged on the client level, meaning the sum of all accounts managed under a unique tax identification number is considered when calculating fees. Fees are not negotiable. StreetOne does not allow clients to prepay fees.

Total Client Assets	Management Fee
\$100 - \$49,999	0.75%*
\$50,000 - \$99,999	0.55%
\$100,000 - \$249,999	0.35%
\$250,000 - \$999,999	0.30%
\$1,000,000 - \$1,999,999	0.25%
\$2,000,000 and up	0.20%

\*The minimum annual management fee for the StreetOne wrap fee program is \$60.

This is a tiered fee schedule. When a breakpoint is surpassed, the fees assessed are reduced only for the assets above each breakpoint. For example, if the fee for the first \$49,999 in assets is 0.75% and the fee for assets between \$50,000 and \$99,999 is 0.55%, only the assets above \$49,999 are assessed the lower 0.55% fee. The first \$49,999 would still be assessed a full 0.75%.

The total fees referenced above are inclusive of the StreetOne Management Fee and the fee for Custodial Services and Trade Execution Costs (known as a “wrap fee”). The wrap fee may cost the client more than if the services were purchased separately.

StreetOne reserves the right to waive the minimum fees. The fee is calculated as a prorated amount of a client’s average daily balance over a calendar month and deducted from client’s accounts on a monthly basis. AUM is based on the total assets of all accounts under the same tax identification number.

StreetOne chooses to offer the wrap fee pricing structure because of the convenience, transparency, and consistency to the client. If the services were purchased separately, the client would pay varying fees each month based on **the number of trades executed**.

**StreetOne's assets under management (as of March 27, 2019)**

Discretionary:	\$151,988
Non-Discretionary:	0
Total:	\$151,988

## ITEM 5 FEES AND COMPENSATION

The following information describes StreetOne's compensation for the advisory services it provides to each type of client account. Unless otherwise specified below or in the Advisory Contract between StreetOne and a particular client, StreetOne's fees will be automatically deducted from client accounts. Generally, advisory fees are paid monthly based on the average daily market value of assets in an account. StreetOne reserves the right to impose investment minimums on certain types of accounts. For a discussion of the applicable investment minimums, see Item 7.

### Fees for retail client accounts

When StreetOne enters into an Advisory Contract to provide portfolio management services to a retail client account, StreetOne will charge each such account a fee at a specified annual percentage rate of the account's assets under management. StreetOne's standard wrap fee rates for retail client accounts are detailed in Item 4 above.

### General Information about fees

#### Refunds of Pre-Paid and Unearned Advisory Fees

Either party to StreetOne's Advisory Contracts may typically terminate the contract at any time upon an email notice to the other party. Since the advisory fee is paid in arrears, if an Advisory Contract is terminated, StreetOne will promptly send an invoice for any outstanding advisory fees.

#### Portfolio Values for Fee Calculations

StreetOne generally determines portfolio valuations using its own asset valuations. These valuations are generally based upon information StreetOne receives from third party pricing vendors, and may be higher or lower than the portfolio valuation calculated by a custodian bank. If no pricing vendor information is available or StreetOne does not agree with the vendor's valuation, StreetOne uses various factors to determine a fair value.

#### Additional Expenses

StreetOne's Wrap Fee Program fees are inclusive of all management and transaction fees, except for any special fees charged by the custodian (for details, see <https://www.folioinstitutional.com/resources/service-fees.jsp>) If StreetOne invests a client's assets in an exchange-traded fund, the client may incur additional expenses and fees as a shareholder of those exchange traded funds. These additional expenses may include: advisory/management fees, distribution fees, administrative expenses, and other fund operating expenses. Clients wishing to obtain more information about the fees and expenses that may apply due to investing in exchange-traded funds should contact StreetOne. Clients may also obtain more information by reviewing the relevant prospectus(es) for the underlying exchange-traded funds in which the clients' assets are invested.

#### Services to Family and Friends of StreetOne

StreetOne may provide portfolio management services to certain family members or friends of StreetOne's principals without charge, or for fee rates that are lower than the rates available to other clients.

**Tax Implications; Liquidation of Existing Positions upon Transition to StreetOne**

Unless StreetOne is otherwise directed by a client pursuant to a contract, StreetOne will liquidate all securities deposited into an account if the securities are not suitable or consistent with StreetOne's investment models for a particular strategy. StreetOne will then re-allocate the cash resulting from the liquidations according to StreetOne's investment model the client has subscribed to. StreetOne does not consider a client's tax consequences when liquidating securities deposited into an account that it will manage.

**Miscellaneous**

StreetOne policy dictates that the firm will not take action regarding class action suits for stocks owned by its clients. Clients are advised to consult their attorneys to determine course of legal action.

**ITEM 6 PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

NOT APPLICABLE



## ITEM 7 TYPES OF CLIENTS

StreetOne provides portfolio management services to the types of clients described below. Where relevant, this disclosure also includes information about the minimum account size necessary to open and maintain each type of client account. See Item 5 for a discussion of StreetOne's compensation for managing each of the following types of client accounts.

### **Retail Individual Investor Accounts**

StreetOne provides portfolio management services to individual investor accounts. StreetOne's management of the individual investor's account will be consistent with the particular investment model or models the client selected for that account. The menu of investment models which StreetOne may make available to individual clients, a brief description of each model's investment objective(s), along with the investment strategies used to achieve the objective and the material risks associated with such investment strategies, is provided in response to Item 8. Additional detail about each model may be obtained at no charge by contacting StreetOne at 1-212-671-1030.

StreetOne generally requires a \$100 minimum account size for establishing an advisory account.

## ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

### **A. Our methods of analysis and investment strategies**

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.** StreetOne customizes portfolios for clients on signup using criteria which include age, goals, account type, account size, investment time horizon and risk tolerance.

StreetOne employs a multi-dimensional strategy that can adapt to and perform well in all types of market environments. This involves combining methodologies that have different uncorrelated return streams, such as intermediate-term momentum methodologies and short-term countertrend methodologies.

This methodology's aim is to protect against large losses during market downturns, while still positioning investors for gains when the market is trending upward. Our proprietary quantitative engine analyzes trends and countertrends, positioning investments according to confirmed information from the markets. The approach includes a strategy not only for markets with a clearly defined trend, but also for choppy, directionless markets.

The following strategies are employed, based on the client's risk profile characteristics

**Capital Preservation** The portfolio will typically be invested primarily in lower volatility assets. Investors in this category have a low tolerance for risk and typically a short term investment time horizon.

**Conservative Growth** The portfolio will typically include lower volatility assets as well as some exposure to growth or higher volatility assets. Investors in this category have some tolerance for risk and typically a short to medium-term investment time horizon.

**Moderate Growth** The portfolio may include exposure to all asset classes including low volatility and growth/higher

volatility assets. Investors in this category have a moderate tolerance for risk and typically a medium-term investment time horizon.

**Growth** The majority of the portfolio will typically be invested in a blend of growth/higher volatility assets. Investors in this category have a moderate to high tolerance for risk and typically a medium to long-term investment time horizon.

**Aggressive Growth** The portfolio may be invested primarily in growth/higher volatility assets and may have a greater proportion of higher risk investments. Investors in this category have a high tolerance for risk and typically a long-term investment time horizon.

## **B. Material Risks**

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **Stock Market Risk**

The value of the stocks and other securities owned in a Strategy will fluctuate depending on the performance of the companies that issued them, general market and economic conditions, and investor confidence. The market also may fail to recognize the intrinsic worth of an investment or StreetOne may misgauge that worth.

### **Strategy Turnover**

The Strategies do not have any limitations regarding portfolio turnover and may have turnover rates in excess of 100%. A portfolio turnover rate of 100% is equivalent to a portfolio buying and selling all of the securities in its portfolio once during the course of a year. The turnover rates of the Strategies may be higher than other Strategies with the same investment objectives. Higher strategy turnover rates may create adverse tax consequences.

### **Company Risk**

The stocks in the Strategies may not perform as expected. Common factors that can negatively affect a particular stock's price include poor earnings reports by the issuer, a restatement of earnings by the issuer, loss of major customers or management team members, major litigation against the issuer, or changes in government regulations affecting the issuer or its industry.

### **Opportunity & Strategy Risk**

There is the risk of missing out on an investment opportunity because the assets necessary to take advantage of that opportunity are held in other investments. The business of investing in securities is highly competitive and the identification of attractive investment opportunities is difficult and involves a high degree of uncertainty.

### **Industry and Sector Risk**

Companies that have similar lines of business are grouped together in broad categories called industries. Certain industries are grouped together in broader categories called sectors. StreetOne may overweight specific industries within vari-

ous sectors in a Strategy. The fact that StreetOne may overweight a Strategy's holdings in a specific industry or industries may cause a Strategy's performance to be more susceptible to the economic, business, or other developments that affect those industries or sectors. This overweighting means a Strategy may be less diverse and more volatile than its benchmark.

### **Exchange-Traded Fund ("ETF") Risks, including Net Asset Valuations and tracking error**

ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by StreetOne plus any management fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the fund may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary

### **Cyclical Analysis**

Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

### **Use of Leverage**

Leverage may be used in investment and trading, generally through purchasing inherently leveraged instruments such as exchange-traded funds. The prices of leveraged instruments can be highly volatile, and investments in leveraged instruments may, under certain circumstances, result in losses that exceed the amounts invested.

### **Institutional Risk**

Securities and futures exchanges typically can suspend or limit trading in any instrument traded on the exchange resulting in substantial losses.

## **Database Risk**

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. 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.

While this information provides a synopsis of the events that may affect your investments, this listing is not exhaustive. We want you to understand that there are inherent risks associated with investing and depending on the risk occurrence, you may suffer **LOSS OF ALL OR PART OF YOUR PRINCIPAL INVESTMENT**.

## **Recommendations of Particular Types of Securities**

### **Equities**

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Common stocks are susceptible to general stock market fluctuations and to volatile increases or decreases in value as market confidence in and perceptions of the company who issued the stock change. If an investor held common stock, or common stock equivalents, of any given company, they would generally be exposed to greater risk than if they held preferred stock and/or debt obligations of the company. Common stocks are often holdings within mutual funds and ETFs.

### **ETFs**

StreetOne will also use Exchange traded funds ("ETFs") which are professionally managed pooled vehicles that invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. ETFs' managers trade fund investments in accordance with fund investment objectives. While ETFs generally provide diversification, risks can be significantly increased for funds concentrated in a particular sector of the market, or that primarily invest in small cap or speculative companies, use leverage (i.e. borrow money) to a significant degree, or concentrate in a particular type of security (i.e. equities) rather than balancing the fund with different types of securities. ETFs can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. During times of extreme market volatility, ETF pricing may lag versus the actual underlying asset values. This lag usually resolves itself in a short period of time (usually less than one day), however, there is no guarantee this relationship will always occur. The market price of ETFs and HOLDERS traded on the secondary market is subject to the forces of supply and demand and thus independent of the ETFs NAV. This can result in the market price trading at a premium or discount to the NAV which will affect an investment's value.

## **Fixed-Income**

Investments in fixed-income securities are subject to interest rate risk and credit risk, including changes in debt ratings.

**Interest Rate Risk:** When interest rates change, the value of a Strategy's fixed-income investments will be affected. Debt securities tend to move inversely with changes in interest rates. For example, when interest rates rise, debt security prices generally fall.

**Credit Risk:** The value of the debt securities held by a Strategy fluctuates with the credit quality of the issuers of those securities. A Strategy could lose money if the issuer of a security is unable to meet its financial obligations or goes bankrupt. Failure of an issuer to make timely payments of principal and interest or a decline or perception of decline in the credit quality of a debt security can cause the price of the debt security to fall.

**Changes in Debt Ratings:** If a rating agency gives a debt security a lower rating, the value of the security will decline because investors will demand a higher rate of return.

**High-Yield Bond Funds:** The investor should note that the funds and sub-accounts that invest in lower-rated debt securities involve additional risks because of the lower credit quality of the securities in the Strategy. The investor should be aware of the possible higher level of volatility and increased risk of default.

**Tax-Free Municipal Bond Funds:** The investor should note that the income from tax-free municipal bond funds may be subject to state and local taxation and the Alternative Minimum Tax.

**Bank Loan/Senior Debt Funds:** Funds that contain bank loans and senior loans are impacted by risks associated with fixed income in general, including interest rate risk and default risk. Because they often invest in non-investment grade issues, the risk of default is high. These securities are also relatively illiquid. Funds that invest in bank loans or senior debt are often highly leveraged, which will produce a higher than normal level of volatility.

## **REITs**

REITs (Real Estate Investment Trusts) have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

## **Precious Metal ETFs**

(Gold, Silver, and Palladium Bullion backed "electronic shares" not physical metal). Investing in precious metal ETFs carries the risk of capital loss.

## **Temporary Defensive Investments**

In times of unstable or adverse market or economic conditions, StreetOne may purchase up to 100% of a Strategy's assets in temporary defensive instruments in an effort to enhance liquidity or preserve capital. Temporary defensive investments generally include cash, cash equivalents such as commercial paper, money market instruments, foreign time deposits, short-term debt securities, U.S. government securities, ETFs, inverse ETFs, or repurchase agreements. A Strategy could also hold these types of securities pending the investment of proceeds from the sale of securities held in a Strategy. A Strategy may be invested in temporary defensive investments for undetermined periods of time, depending on market or economic conditions. To the extent StreetOne invests defensively in these securities, it might not achieve a

Strategy's investment objective.

### **Small and Mid-Size Company Risk**

StreetOne may purchase securities in small or mid-size companies for a Strategy. While small and mid-size companies may offer greater potential for capital appreciation than larger and more established companies, they may also involve greater risk of loss and price fluctuation. The trading markets for securities of small-cap issuers may be less liquid and more volatile than securities of larger companies. This means that StreetOne could have greater difficulty buying or selling a security for the Strategy of a small-cap issuer at an acceptable price, especially in periods of market volatility.

### **Foreign Investment Risk**

Foreign securities refer to securities of issuers, wherever organized, that, in StreetOne's judgment, have their principal business activities outside of the United States. Investments in foreign securities involve different risks than U.S. investments, including fluctuations in currency exchange rates, potentially unstable political and economic structures, less efficient trade settlement practices, reduced availability of public information, and lack of uniform financial reporting and regulatory practices similar to those that apply to U.S. issuers. Foreign stock markets may also be less liquid than U.S. stock markets.

### **ADRs**

American Depositary Receipts and American Depositary Shares (collectively, "ADRs"). ADRs are receipts representing shares of a foreign corporation held by a U.S. bank that entitle the holder to all dividends and capital gains on the underlying foreign shares. ADRs are typically denominated in U.S. dollars and trade in the U.S. securities markets. ADRs are subject to many of the same risks as direct investments in foreign securities, including the risk that material information about the issuer may not be disclosed in the United States and the risk that currency fluctuations may adversely affect the value of the ADR.

## **ITEM 9 DISCIPLINARY INFORMATION**

Neither StreetOne, nor any of its management persons, has been the subject of any material legal or disciplinary action.

## ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

### A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither StreetOne nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

### B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither StreetOne nor its representatives are registered as a FCM, CPO, or CTA.

### C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

StreetOne Investment Management LLC is a wholly owned subsidiary of StreetOne Inc., a Delaware Corporation.

Neither StreetOne nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

### D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

StreetOne does not receive any compensation to select certain advisors or portfolio managers.

## ITEM 11 CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

StreetOne has established a Code of Ethics and Insider Trading Policies and Procedures Manual (the "COE") which details Ethical Behavior, Conflicts of Interest, Inside Information, Outside Employment and Directorships, Acceptance of Gifts and Entertainment, Confidentiality of Company and Client Information, Privacy, Employment Practices, Workplace Practices, Conduct of Audits and Financial Disclosures, Anti-Money Laundering, Compliance and Reporting Procedures, Reporting Violations, and Waivers of the Code.

These guidelines and restrictions must be followed for all transactions (purchase and sale) by all StreetOne employees, employee family members (including the spouse, minor children and adults living in the same household as the employee) accounts, and Trusts of which they are the trustee or in which they have a beneficial interest.

It is StreetOne's policy that no person employed by StreetOne may use material, non-public information obtained during the course of their work in deciding whether to purchase or sell any security prior to any pending transaction(s) being executed for an advisory account. This policy is intended to prevent employees from benefiting from transactions placed on behalf of advisory accounts.

Employees must submit required quarterly reports of securities transactions (or furnish brokerage statements) and must certify, at least annually, of receipt of and compliance with the COE. For a copy of the StreetOne COE please call 1-212-671-1030 or write to: StreetOne Investment Management, LLC, Compliance, 7 Victoria Drive, Somerset NJ 08873.



## ITEM 12 BROKERAGE PRACTICES

### Selection of Broker-Dealers to Execute Transactions in Client Accounts

#### General Practices

In exercising investment discretion over client accounts, or in responding to specific client subscriptions to investment models, StreetOne places orders with broker-dealers to execute transactions for the accounts. When trading errors occur for which StreetOne is responsible, StreetOne's policy is to make the client whole by correcting the error (i.e., to restore the client's account to the position it would have been in if the error had not occurred). The process of correction may result in cash shortfalls or overages and such amounts are credited or debited to StreetOne's trading error account.

Clients typically give StreetOne the authority to determine which broker-dealer will execute transactions. StreetOne may, from time to time, direct transactions through Folio Investments, Inc. its broker-dealer affiliate. Where StreetOne has the authority to select the broker-dealer, StreetOne's objective in effecting portfolio transactions is to use its best efforts to obtain the best available price and most favorable execution.

#### Brokerage Practices - Retail Client Accounts

When retail clients grant StreetOne brokerage discretion, StreetOne's general policy is to use its best efforts to obtain the best available price and most favorable execution for all portfolio transactions executed on its clients' behalf. "Best available price and most favorable execution" is defined to mean the execution of a particular transaction at the price and commission which provides the most favorable cost or proceeds reasonably obtainable under the circumstances. In our Wrap Fee Managed Account Programs, all accounts are opened with Folio Institutional. StreetOne chooses to offer the wrap fee pricing structure because of the convenience, transparency, and consistency to the client. If the services were purchased separately, the client would pay varying fees each month based on the number of trades executed.

#### Research and Other Soft Dollar Benefits

We currently do not receive soft dollar benefits.

#### Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

#### Directed Brokerage

We believe that recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by recommended broker-dealers, including the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm.

#### Aggregating Purchases and Sales of Securities

We may combine multiple orders for shares of the same securities purchased for advisory accounts we manage. We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. We do this to ensure to the extent possible that our clients receive the optimal execution and consistent results across our client base. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account per-

formance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate with your accounts in aggregated orders; however, they will not be given preferential treatment as per our trade rotation policy. Our policies and procedures define different type of trade errors. Trade errors must be reported immediately to the CCO, documented and resolved on a case-by-case basis.

## ITEM 13 REVIEW OF ACCOUNTS

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

StreetOne uses many internal analytics and risk management systems to help monitor accounts. StreetOne's software based financial advisor service assumes that a portfolio created using quantitative techniques will not stay optimized over time, and must be periodically rebalanced to maintain the intended risk level and asset allocations. StreetOne continuously monitors and periodically rebalances each Client's portfolio to seek to maintain a Client's targeted risk tolerance and optimal return for the Client's risk level.

StreetOne provides all Clients with continuous access via their website to real-time reporting information about Account status, securities positions and balances. Clients may also receive periodic e-mail communications describing portfolio performance, Account information, and product features. StreetOne conducts separate periodic reviews related to the securities used for Client portfolios. These reviews are approved by StreetOne's Investment Committee, which has the authority, if necessary, to take action up to and including the removal, addition or replacement of a security from the portfolios crafted by the StreetOne algorithms.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market movements, economic or political events, or by changes in the client's risk tolerance or goals. StreetOne's software based market state observer continuously scans the market for structural breaks and may trigger a portfolio rebalance.

### **C. Content and Frequency of Regular Reports Provided to Clients**

StreetOne provides an online platform to clients which can be accessed 24/7/365 to receive up to date account analytics, reports, and positions.

## ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

StreetOne expects to run periodic promotional campaigns to attract Clients to open Accounts on the Site. These promotions may include additional Account services or products offered on a limited basis to select Clients, more favorable fee arrangements, and/or reduced or waived advisory fees for Clients. These arrangements may create an incentive for a third-party or other existing Client to refer prospective Clients to StreetOne, even if the third-party would otherwise not make the referral. These arrangements may also create a conflict of interest for a Client to maintain a certain level of assets managed through StreetOne if doing so would result in eligibility to receive an incentive, bonus or additional compensation. StreetOne may also pay pre-determined fees to third-parties for driving new users to StreetOne, which may be in the form of so-called CPM, CPC or CPA arrangements (respectively, impressions, clicks or actions through other websites). StreetOne engages solicitors whom it pays for Client referrals. StreetOne discloses this practice in writing to the affected Clients and complies with the requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended, to the extent required by applicable law.

## ITEM 15 CUSTODY

Under SEC Rule 206(4)-2, StreetOne may be viewed for regulatory purposes as having custody of certain client assets due to (i) StreetOne's ability to deduct fees directly from certain client accounts. StreetOne encourages each client to establish an electronic access to the custodian's web site to view brokerage statements and account activity. If you have any questions on the information the custodian or StreetOne provides, please send an email to [support@streetone.com](mailto:support@streetone.com).

## ITEM 16 INVESTMENT DISCRETION

StreetOne enters into an investment management agreement with the client, whereby the client grants StreetOne sole investment authority and StreetOne assumes the investment duties relating to account assets. Pursuant to the Investment Management Agreement terms, StreetOne is generally not required to obtain specific client consent for specific securities to be bought or sold. However, the client subscribes to an investment model and StreetOne buys securities for the client's account that align with that investment model. StreetOne may or may not take action as it deems appropriate. StreetOne may but does not have to seek further consent or authority from the client, and may exercise its discretion and deal in and with such assets as fully and freely as the client might do as owner. However, StreetOne is not authorized to withdraw any money, securities, or other property either in the client's name or otherwise. StreetOne can sell securities in the account's portfolio without regard for how long they were held, or any potential gain or loss. As a result, transactions may result in taxable gains or losses in a client's account, as well as payment of commissions and other transaction costs. StreetOne can make investment changes without considering the resulting rate of portfolio turnover, when in its sole discretion it determines that such changes will promote the account's investment objective.

Since StreetOne manages accounts with full investment discretion, StreetOne generally does not manage accounts where the client's custodial account holds both managed and non-managed assets, i.e., assets subject to StreetOne's investment discretion under the terms of the Investment Management Agreement, and assets for which StreetOne has no discretion, authority, or responsibility. Occasionally, and under limited conditions, StreetOne will agree to manage an account where managed assets are held in a custodial account along with non-managed assets. The client is solely responsible for any and all losses non-managed assets sustain.

Clients should be well versed in determining appropriate investment models of StreetOne to meet their portfolio investment objectives taking into consideration the following guidelines when subscribing to StreetOne's investment model/s:

(1) The amount allocated to any one objective should be reasonable in light of overall asset allocation and the investor's overall investment goals.

(2) The investor's age, net worth and annual income should be compatible with his or her objective and primary goals.

(3) The investor's tolerance for risk and volatility should be reasonable in light of his or her objective and primary goals.

(4) The investor's time horizon should be consistent with his or her objective and goals.

Since investment goals and financial circumstances change over time, clients should review their investment programs at least annually with their account executives or financial planners.

## ITEM 17 VOTING CLIENT SECURITIES

### StreetOne Proxy Voting Policy

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other events pertaining to the client's investment assets. Clients will need to sign on to our custodian Folio Institutional at <https://www.folioclient.com>, which offers Folio Vote, an online service that provides access to proxy and other corporate action information as well as an integrated ballot for casting proxy votes. Neither we nor our custodian offer any consulting assistance regarding proxy issues to clients.

## ITEM 18 FINANCIAL INFORMATION

### A. Balance Sheet

StreetOne does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

StreetOne has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

### C. Bankruptcy petitions in the last 10 years

Neither StreetOne nor its management have been the subject of a bankruptcy petition in the last ten years.

## **PRIVACY POLICY**

StreetOne Investment Management LLC., ("StreetOne") is committed to protecting the confidentiality of information clients send to us. Regulation S-P adopted by the SEC requires that we provide the following information to you.

Information about you that we collect:

We collect non-public personal information about you and your transactions from the following sources: your applications or other forms or through our website; your transactions with us, our affiliates, or others.

How we use your information:

As permitted by law, we may share information about you with StreetOne's affiliated companies, parties that provide other services to us, and certain financial institutions with whom we have joint marketing arrangements. These parties and financial institutions have agreed to treat your information as confidential and not to share such information with other parties. Otherwise, we do not disclose your non-public personal information except as the law permits. This policy applies to present and former clients' non-public information.

How we protect your confidential information:

StreetOne has policies that restrict access to your non-public personal information to employees who need the information to provide investment alternatives or services to you. We maintain physical, electronic and procedural safeguards to protect your non-public personal information.