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# Form ADV Part 2 Client Wrap Fee Program Brochure

## Form ADV Part 2A Appendix 1: Wrap Fee Program Brochure NOMAD FINTECH INC

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### Cover Page

This wrap fee program brochure provides information about the qualifications and business practices of NOMAD FINTECH INC (hereinafter “Nomad”). Registration does not imply a certain level of skill or training but only indicates that Nomad has registered its business with federal regulatory authorities, including the United States Securities and Exchange Commission (“SEC”). If you have any questions about the contents of this brochure, please contact us at +1(888)998-2261 and/or [support@nomadglobal.com](mailto:support@nomadglobal.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.

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

## Material Changes

This document serves as Nomad's brochure ("Brochure") and is dated December 5, 2024.

Clients and prospective clients should carefully review the disclosure contained herein. The following is a summary of material changes made to this Brochure. Additionally, other non-material edits were incorporated as part of the annual update process. We encourage all recipients of this Brochure to read it carefully in its entirety.

The following is a summary of material changes made to this Brochure:

- Update to include services related to fixed-income US Treasuries and Corporate bonds.
- Update to fees and compensation.
- Update to include additional brokerage practices.
- Update to include financial industry activities and affiliations.

Nomad has made other, non-material updates to this Brochure as well. We encourage all recipients of this Brochure to read it carefully in its entirety.

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## **Item 4: Services, Fees and Compensation**

### **General Information**

Nomad Fintech, Inc. (“Nomad”) is an application-based investment advisor registered with the U.S. Securities and Exchange Commission. Registration does not imply a certain level of skill or training but only indicates that Nomad has registered its business with regulatory authorities. Nomad Fintech, Inc. was founded in 2019 and it is wholly owned by Nomad Fintech Holdings, LLC. The firm offers investment advisory services to its clients and manages their investment accounts through Nomad’s mobile app (“mobile app”, “app”, “APP”, or “application”). Additional information about Nomad ownership structure and directors can be found in Schedule A of Part 1A of Nomad’s ADV form.

### **Program Description**

Through our mobile app, our clients answer a set of questions to compile their risk profile, and we recommend selected funds that suit the relevant risk profile.

Nomad’s advisory services result from the careful evaluation of market conditions, securities opportunities, and clients’ profiles by its investment staff. The investment decision-making at Nomad is carried out by an Investment Committee. The Investment Committee monitors recommendations to clients on an ongoing basis and may accordingly, make revisions, and has the authority to remove, add, or replace any element from the portfolios advised by Nomad. Nomad will maintain research files in connection with its investment recommendations.

Nomad offers non-discretionary investment services (where clients retain the ultimate responsibility for making investment decisions in their accounts). Nomad creates and curates a basket and/or a list of securities that may include any of the following: assets traded at the NYSE and NASDAQ including exchange-traded stocks, REITs, ETFs, and fixed income, in which clients make the ultimate decision regarding the purchase or sale of such securities.

Nomad may offer investment management services through wrap fee programs. A wrap fee program has a fee structure that provides clients with advisory and brokerage services for a bundled fee with no additional account activity charges for execution of trades. As such, Nomad may charge clients a single bundled fee that covers the investment advisory services it provides, as well as the custodial services associated with holding and trading securities provided by DriveWealth LLC and Apex Clearing.

In order to open a Wrap Fee Program account with Nomad, clients must open a brokerage account with DriveWealth LLC and/or Apex Clearing. By entering into an Advisory Agreement with Nomad, clients authorize and direct Nomad to place all trades in clients’ accounts through DriveWealth LLC and Apex Clearing.

Clients’ access to their funds are generally not affected by Nomad’s trade management practices. Clients can request to deposit or withdraw their money at any time. These money movements are subject to settlement times of securities, timing of the ACH network, and any additional procedures DriveWealth LLC and Apex Clearing have in place. When clients deposit to or withdraw money from their account, they are requesting

that Nomad purchase or sell available Funds within their account in amounts that reflect the current target allocation of their portfolio.

## **Fees**

### **A. Overview:**

Clients investing in selected funds pay an annualized wrap fee of 1.00% of their daily average account balance charged on a monthly basis. For certain clients, Nomad's annualized wrap fees may be reduced by discounts and other promotions.

### **B. Description:**

Nomad may charge an annual management fee of 1.00% (Advisory Fee) of assets under management on selected funds. Fees due shall be calculated by multiplying the Advisory Fee (divided by 12) by the average daily balance of the Client account. Except as provided below, the fees due for each calendar month shall be due and payable in arrears no later than the tenth business day of the immediately following calendar month. Nomad will promptly notify Clients of any increase or decrease in the Advisory Fee. An increase in the Advisory Fee will be effective for the Account beginning the next month that begins at least 30 days after Nomad sends or posts such notice. A reduction in the Advisory Fee will be effective for the Account starting in the next month following its reduction.

If a Client closes the Account, withdraws the entire balance of the Account, or otherwise terminates this Agreement on any date other than the last business day of the month, Client shall be responsible for paying any outstanding aggregate daily fees for the period from the day immediately following the last day of the last calendar month for which Client has paid, through the effective date of such withdrawal or termination, as of such effective date.

If, for any reason, Nomad shall close and liquidate all the positions held in the Account, Client will receive the proceeds of the liquidated portion of the Account minus any outstanding advisory or model fees, and this Agreement shall terminate.

If for any reason there is insufficient cash available in the Account to cover Nomad's fees at the time they are charged and deducted from the Account, Nomad, in its sole discretion, may effect Securities transactions in the Account to be liquidated to cover such fees.

Nomad reserves the right, in its sole discretion, to reduce or waive the Advisory Fee for certain Client Accounts for any period of time determined by Nomad. In addition, the Client agrees that Nomad may waive its fees for the Accounts of Clients other than the Client, without notice to the Client and without waiving its fees for Client.

Nomad does not charge a fee for periodicals or newsletters and educational seminars/workshops

### **C. Client Fee Considerations:**

Clients should consider that, depending on the amount of activity in a client's account and the value of custodial, trade execution, advisory, and other services that are provided under the arrangement, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately or by others.

Other than the Advisory Fee described previously, neither Nomad nor any of its employees receive or accept any compensation, direct or indirect, related to investments sold or purchased for client accounts.

However, due to the nature of the securities or products purchased or sold, clients may also pay other fees or expenses to third parties. The issuers of securities such as ETFs or other similar financial products may charge product fees that affect clients. An ETF typically includes embedded expenses and other fees may include management, legal, or accounting fees. Nomad does not benefit directly or indirectly from any such fees. Nomad encourages all Clients to review the prospectus or any other relevant material for such investments to ensure comprehension of applicable fees. Fixed-income securities are not traded on exchanges, and clients investing in these products may incur a fee known as a Mark-up or Mark-down. These fees affect the final price paid or received by the client. While Nomad discloses its fees, the final price may also include additional fees set by the liquidity provider.

## **Item 5: Account Requirements and Types of Clients**

Nomad offers its advisory services to individuals, other registered investment advisers, and pooled investment vehicles other than investment companies as defined by the Investment Company Act of 1940. Once an account is opened, investments can be made starting from \$1 USD. For certain clients, Nomad's minimum investment amount may be reduced or waived by discounts and other promotions, at Nomad's sole discretion.

## **Item 6: Portfolio Manager Selection and Evaluation Advisory**

### **Services**

Through our mobile app, our clients answer a set of questions to compile their risk profile, and we recommend selected funds that suit the relevant risk profile.

Nomad's advisory services result from the careful evaluation of market conditions, securities opportunities, and clients' profiles by its investment staff. The investment decision-making at Nomad is carried out by an Investment Committee. The Investment Committee monitors recommendations to clients on an ongoing basis and may accordingly make revisions, and has the authority to remove, add, or replace any element from the portfolios advised by Nomad. Nomad will maintain research files in connection with its investment recommendations.

Nomad offers non-discretionary investment services (where clients retain the ultimate responsibility for making investment decisions in their accounts). Nomad creates and curates a basket and/or a list of securities that may include any of the following: assets traded at the NYSE and NASDAQ including exchange-traded stocks, REITs, ETFs, and fixed income, in which clients make the ultimate decision regarding the purchase or sale of such securities.

## Tailored Services

Nomad does not tailor clients' portfolios to their individual financial goals. Rather, Nomad classifies their clients according to their risk profile. The risk profile is determined through a set of questions answered by each client. After Nomad has classified a user within a risk profile, Nomad recommends selected assets that suit the respective risk profile.

Nomad requests that clients reconfirm their responses as needed and no less than annually and encourages clients to update such information on an as-needed basis in response to material life events and changes in status. Nomad requests that clients reconfirm their responses as needed and on an annual basis, and encourages clients to update such information on an as-needed basis in response to material life events and changes in status.

The accuracy and quality of the information provided by our clients have a direct impact on the applicability of Nomad's recommendations, therefore, Nomad encourages clients to ensure that risk profile determinants and responses remain as up-to-date as possible to ensure that Nomad is providing recommendations that align with each client's interests.

## Wrap Fee Programs

Nomad may offer its services through a wrap fee program in which clients may be charged a single bundled fee that covers the investment advisory services it provides, as well as the custodial services associated with holding and trading securities provided by DriveWealth LLC and by Apex Clearing Corporation.

Clients investing in selected funds may pay an annualized wrap fee of 1.00% of their daily average account balance charged on a monthly basis.

**For more details on this fee please refer to Item 4: Services, Fees and Compensation.**

Nomad's annualized wrap fee may be reduced by discounts and other promotions.

## Performance-Based Fees and Side-by-Side Management

Nomad does not charge any performance fees. Some investment advisers experience conflicts of interest in connection with the side-by-side management of accounts with different fee structures. Our advisory fees are described in Item 4.

## Methods of Analysis, Investment Strategies and Risk of Loss

Nomad recommends certain assets through the Nomad application. Nomad selects these assets from a broad range of assets by considering different sectors, industries, geographies, benchmarks, and indexes. Nomad will consider eligible assets, any single stock, REITs (Real Estate Investment Trusts), ETFs (Exchange-Traded Funds), fixed income, and any other assets traded at NYSE and NASDAQ exchanges.



Nomad's app enables clients to determine their risk profile as the first step to proposing efficient selected assets. Once the clients approve the selected assets (which may be composed of stocks, REITs, ETFs, and/or fixed income), the client has the autonomy to invest and sell any amount starting from US\$1.

### **The Basket and/or The List**

Nomad may select a broad scope of stocks, ETFs, and Fixed Income assets taking into account different sectors, industries, geographies, benchmarks, and indices. These assets are chosen bearing in mind the ability to provide a broad and well diversified offering for Client.

### **Risk and Loss Considerations**

Nomad cannot guarantee the level of performance or that any client will avoid a loss of assets. Investing in any type of securities involves the possibility of financial loss that clients should be prepared to bear. Our recommendations are highly reliant on the accuracy of the information provided to Nomad by each client.

The following risks should be taken into account by clients to evaluate Nomad's services. Each one may affect the potential gains or losses on a portfolio and should be considered as possibilities, with regard to the actual probability of occurring and the effect on a portfolio if there is in fact an occurrence.

#### **A. Market Risk:**

The price of any security is subject to changes due to reasons that include but are not limited to, macroeconomic factors, market sentiment, economic developments, interest rates, inflation, regulatory changes, and political, demographic, and social events. Assets selection includes exposure to foreign investments, which implies the possible exposure to currency and sovereign risk in foreign countries. Nomad provides risk measures for market risk for each client's portfolios in order to allow our clients a risk assessment.

#### **B. Advisory Risk:**

Nomad does not guarantee that the investment decisions provided by our application will necessarily produce the expected results, resulting in a client not being able to achieve the expected objectives.

#### **C. Application Risk:**

Nomad's investment advisory services are delivered via its proprietary application. In the event of application issues, there is a chance that access to investment information or activity may be limited under such circumstances.

#### **D. Liquidity Risk:**

Lack of liquidity on a particular security on a specific market moment may result in the possibility of not being able to sell a security or selling with a significant discount. Nomad selects the possible stocks, ETFs,

REITs, and fixed income taking into account the liquidity and size of each security, it is possible to encounter moments of illiquid markets.

#### **E. Volatility and Correlation Risk:**

Nomad security selection process is based in part on a careful evaluation of performance and volatility to evaluate future probabilities. It is possible that different or unrelated asset classes may exhibit similar price changes in similar directions which may adversely affect a Client's account and may become more acute in times of market upheaval or high volatility. Past performance is no guarantee of future results, and any historical returns, expected returns, or probability projections may not reflect actual future performance.

#### **F. Credit Risk:**

Clients are exposed to the risk that financial intermediaries or security issuers may experience financial difficulties that may include default, bankruptcy, insolvency, or other credit events, any of which may affect the value of client's portfolios. ETFs provide credit risk mitigation through diversification. Clients investing through the fixed income platform will invest in a single issuer debt instrument and will be fully exposed to the credit risk of that issuer. In addition, exchange trading venues or trade settlement and clearing intermediaries could experience adverse events that may temporarily or permanently limit trading or adversely affect the value of Client securities.

#### **G. Tax Risk:**

Government legislation and tax codes and changes that can be introduced by governments may affect the performance of a client's portfolio, either directly or indirectly. Nomad does not deliver financial or tax advisory.

#### **H. Service Providers Risks:**

Nomad uses different Service providers in order to provide investment advisory services to clients. In the case a service provider is not able to provide its services to Nomad, it is possible that some features of Nomad services be temporarily stopped or delayed.

#### **I. Risks of Investing in ETFs:**

Nomad invests client assets in a type of investment company called an exchange-traded fund ("ETF"). ETFs are a recently developed type of investment security, representing an interest in a passively managed portfolio of securities selected to replicate a securities index, such as the S&P 500 Index or the Dow Jones Industrial Average, or to represent exposure to a particular industry or sector.

Unlike open-end mutual funds, the shares of ETFs and closed-end investment companies are not purchased and redeemed by investors directly with the fund but instead are purchased and sold through broker-dealers in transactions on a stock exchange. Because ETF and closed-end fund shares are traded on an exchange, they may trade at a discount from or a premium to the net asset value per share of the underlying portfolio

of securities.

As a relatively new type of security, the trading characteristics of ETFs may not yet be fully developed or understood by potential investors. In addition to bearing the risks related to investments in equity securities, investors in ETFs intended to replicate a securities index bear the risk that the ETFs performance may not correctly replicate the performance of the index (Tracking error and tracking difference). Investors in ETFs, closed-end funds, and other investment companies bear a proportionate share of the expenses of those funds, including management fees, custodial and accounting costs, and other expenses. Trading in ETF and closed-end fund shares also entails payment of brokerage commissions and other transaction costs. Furthermore, ETFs can also vary in leverage levels, currency exposure and foreign exchanges, this means the investors can incur in risks related to high volatility, currency exchange rates, market closing times, and foreign countries' politics.

Nomad allows clients to invest in cryptocurrency ETFs. The value of cryptocurrencies is highly volatile, and market prices can fluctuate significantly over short periods. Investments in digital assets may result in the loss of the entire investment. Cryptocurrency markets are relatively new, unregulated, and may be subject to high levels of fraud and other risks.

#### **J. Real Estate Investment Trust (REITs):**

Real estate-related investments may be adversely affected by factors affecting the real estate industry, which may include changes in interest rates and social and economic trends. REITs may also be subject to the risk of fluctuations in income from underlying real estate assets, poor performance by the REITs' managers, prepayments and defaults by borrowers, adverse changes in tax laws, and, for U.S. REITs, their failure to qualify for the special tax treatment granted to REITs.

Although public REITs allow investors to sell their shares on the public exchange market, the investments are less liquid compared to other investments, such as bonds and stocks. There is no secondary market for finding buyers and sellers for the property, and liquidity is only provided through the fund's repurchase offers. Also, there is no guarantee that all the shareholders leaving their investments will be able to sell all or part of the shares they desire to sell in the quarterly repurchase offers. Due to this liquidity risk, investors may be unable to convert stocks into cash at the immediate time of need.

#### **K. Equity Investments:**

Price changes may occur in the market, or in a country, industry, or sector of the market. In addition, different types of stocks tend to shift in and out of favor depending on market and economic conditions, and the types of stocks in which client accounts invest may underperform the market. For example, growth stocks can be more volatile than other types of stocks, and the market can undervalue value stocks for long periods of time. Dividends on common stocks are not fixed but are declared at the discretion of an issuer's board of directors. There is no guarantee that a company will pay dividends, or that if paid they will remain at current levels or increase over time.

#### **L. Fractional Shares Trading:**

The ETF and Stocks shares purchased or sold on behalf of clients may be either whole shares or fractional

shares, depending upon the asset allocation for that client Account. Nomad may invest client accounts in dollar-based quantities, whereby transactions are based on a fixed dollar amount rather than whole shares. Nomad and DriveWealth and/or Apex Clearing each reserve the right, at any time and each in its sole discretion, without prior notice to Clients, to limit or stop trading fractional shares. Fractional shares are typically unrecognized and illiquid outside of a client account. Therefore, clients may not transfer fractional shares when closing their accounts. Fractional shares will be converted to cash upon account closing.

**M. Fixed Income Risks:**

Fixed income investments are subject to various risks. Changes in interest rates may impact the market value of fixed income securities, and a decline in credit quality may affect the ability of issuers to repay obligations. Fixed income investments are not guaranteed and may result in loss of principal.

**N. Asset Allocation Risk:**

Asset allocation decisions can result in more portfolio concentration in a certain asset class or classes, which could reduce overall return if the concentrated assets underperform expectations. The more aggressive the investment strategy used for a client account, the more likely the client account will contain larger weights in riskier asset classes, such as equities. Asset classes can perform differently from each other at any given time (as well as over the long term), so the investment strategy will be affected by its allocation among the asset classes. Depending on market conditions, there may be times when diversified portfolios perform worse than less diversified portfolios. Diversification does not eliminate investment risk.

**O. Legislative and Regulatory Risk:**

Client accounts may be adversely affected by new (or revised) laws or regulations. Changes to laws or regulations can impact the securities markets, specific industries, individual issuers of securities, and Nomad's determinations with respect to the expected rate of return, value, or creditworthiness of a security.

**P. Cybersecurity:**

The digital app poses the risk of actual and attempted cyber-attacks, including denial-of-service attacks, harm to technology infrastructure and data from misappropriation or corruption, and reputational harm. Due to Nomad's interconnectivity with DriveWealth and Apex Clearing and other third-party vendors related, Nomad, and thus indirectly the client accounts, could be adversely impacted if any of them is subject to a cyber-attack or other information security event. Although Nomad takes protective measures and endeavors to modify them as circumstances warrant, its computer systems, software, and networks may be vulnerable to unauthorized access, misuse, computer viruses or other malicious code, and other events that could have a security impact, or render Nomad unable to transact business on behalf of client accounts.

**Q. Technology and Operational Risk:**

The digital app depends heavily on information technology and other operational systems. Shortcomings or failures in internal processes or systems of Nomad, DriveWealth, Apex Clearing and other third parties integrated into the digital app and other external events impacting those systems, and human error pose

the risk of underperformance (or the possibility of no returns) of the digital app. Operational risk can arise from many factors ranging from routine processing errors to potentially costly incidents such as major system failures.

**R. Limited Nature of Program:**

The digital app offered by Nomad is not intended as a complete investment program for every Client. The advice is provided exclusively on assets in the app and does not consider other investments the Client may have. Nomad may ask fewer questions and elicit less information than clients might be asked through a traditional advisory program. As a result, the use of the answers provided in response to client questionnaires to propose recommended securities for a client may result in a different recommendation than if the client completed a longer questionnaire and/or had an in-person interview with an adviser.

**S. Voting Client Securities:**

Nomad does not have the authority to vote on client's securities.

**Item 7: Client Information Provided to Portfolio Managers**

Because Nomad manages all client portfolios directly, there are no other portfolio managers with whom Nomad needs to share client information. However, in certain circumstances, the Client may request their information to be shared.

**Item 8: Client Contact with Portfolio Managers**

Clients should consider that Nomad primarily uses electronic rather than telephonic means to provide customer support. Clients should consider that such customer support is educational in nature only, and clients will generally not interact directly with such investment advisory personnel.

In addition to Nomad's customer service personnel, Nomad has a frequently asked questions site <https://benomad.zendesk.com/hc/en-us>. The information provided in this site is designed to address commonly asked questions clients have about their accounts and the advisory service Nomad provides.

**Item 9: Additional Information Disciplinary**

**Information**

Nomad and its employees do not have any legal, financial, regulatory, or any other disciplinary item to report to any client.

**A.** There have been no criminal or civil actions in a domestic, foreign or military court of competent jurisdiction involving either Nomad or a management person.

**B.** There have been no administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority involving either Nomad or

a management person.

**C.** There have been no self-regulatory organization (SRO) proceedings involving either Nomad or a management person.

### **Other Financial Industry Activities and Affiliations**

**A.** Nomad Investment Services, Inc, an affiliate of Nomad, has an application pending to register as a broker-dealer.

**B.** Neither Nomad nor any of its management persons are registered or have pending registrations as a futures commission merchant, commodity pool operator, a commodity-trading adviser, or as an associated person of the foregoing list.

**C.** Neither Nomad nor its management persons have relationships with other entities in the financial services industry that materially affect Nomad's advisory business or its clients.

**D.** Nomad does not recommend or select other investment advisers.

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

Nomad has established a Code of Ethics that requires all of its supervised persons to behave with the highest standard of honest conduct and business ethics, acting fiduciary to its Clients, always placing client's interest ahead of its own, and requiring careful management of any perceived or actual conflict of interest that may arise in relation to its advisory services. A copy of Nomad's code of ethics is available upon request.

Each new Nomad's Employee receives a copy of the Code of Ethics when hired. Nomad sends copies of any amendments to the Code to all Supervised Persons. Annually or as otherwise required, each Supervised Person must confirm that he or she has complied with the Code during such preceding period.

Nomad does not buy Securities for its own account so no conflict should exist at the firm level.

Directors of Nomad and Supervised Persons may own Securities that are also owned by Clients. Certain Supervised Persons may be Clients of Nomad and to the extent they are, they will receive recommendations at the same time as similarly situated Clients.

### **Review of Accounts**

Nomad reviews each client's account, targets selected funds on a semi-annually basis through the Investment Committee which seeks to ensure that: (i) each client's account is aligned with the portfolios he or she is invested in, (ii) the selected funds are still aligned with the risk profile. This review process may trigger a rebalance. Factors that result in rebalancing may include but are not limited to, market movements, significant changes in some assets that a client holds, or changes in a client's risk profile.

Nomad provides permanent access to the client's accounts which reflects the value of portfolios. The official value of the portfolios is provided by the client's broker dealer on a monthly basis. These values are presented to each client through a written report that contains: an account valuation summary, asset allocation summary, balances, holdings, and activity.

When a client places deposits in their investment account, the money only will be invested after the client chooses from the recommended securities. Clients have the autonomy to buy and sell securities and withdraw the money through the app.

### **Client Referrals and Other Compensation**

Nomad may perform advertising campaigns to attract clients to open accounts on the site. These campaigns may include promotions such as additional account services or products, more favorable fee arrangements, or waived advisory fees and reward programs for existing clients who refer new clients to the service. These promotions may cause a conflict of interest if clients refer the service based on the potential benefits these could imply for the client referring the service.

Nomad may also enter into agreements with third parties who are in a position to refer clients to Nomad who will receive a predetermined fee or compensation. If Nomad determines in the future to pay or compensate a third-party for client referrals, this practice will be disclosed in writing to the client and comply with the requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended, to the extent required by applicable law.

Nomad may receive compensation as agreed with DriveWealth and Apex Clearing under the terms of their respective cash management programs and in accordance with the agreements they signed with Nomad.

### **Financial Information**

Nomad does not require or solicit the prepayment of any advisory fees and does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our clients.