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Form ADV Part 2A Client Brochure

Form ADV Part 2A

NOMAD FINTECH INC

873 El Camino Real, Menlo Park, CA 94025 USA

+1 (888) 998-2261

support@nomadglobal.com

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Cover Page

This brochure provides information about the qualifications and business practices of NOMAD FINTECH INC (hereinafter “Nomad”). If you have any questions about the contents of this brochure, please contact us at +1(888)998-2261 and/or 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.

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:

- 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: Advisory Business

A. General Description of Nomad

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.

B. 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.

Nomad also provides clients with periodicals or newsletters and offers educational seminars/workshops that cover recent market and regulatory news for informational purposes.

C. Tailored Services

Nomad does not tailor clients’ portfolios to their individual financial goals. Rather, Nomad classifies clients according to their risk profile. As discussed in Item 4.B of this Brochure, 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.

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.

D. Wrap Fee Programs

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

For more details on fees please refer to Item 5: Fees and Compensation.

E. Assets Under Management

As of October 31, 2024, Nomad manages \$389,537,961 USD on a non-discretionary basis.

Item 5: Fees and Compensation

A. Advisory Fees

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.

B. Other Fees

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 6: 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 5.

Item 7: 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 8: 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.

ETFs

Nomad will only recommend exchange-traded funds (ETFs) from global asset managers whose investment strategies encompass various asset classes.

From a portfolio management perspective, Nomad aims to include as many individual assets as possible in its APP as long as they meet the specified criteria set by the Investment Committee. A broad selection of assets enhances diversification and helps mitigate idiosyncratic risk for our clients' portfolios.

Crypto ETFs

Nomad aims to provide a broad range of investment opportunities, covering various theses, sectors, and industries, to unlock financial options that were previously inaccessible in the Brazilian market.

REITs

Nomad will include in the APP all REITs that are currently or have been, as of 1 August 2022, in the iShares U.S. Real Estate ETF (IYR), which has US\$4 billion in AUM and more than 21 years of operations. This ETF (IYR) follows the Dow Jones U.S. Real Estate Capped Index. This index is designed to track the performance of Real Estate Investment Trusts (REITs) and other companies that invest directly or indirectly in real estate through development, management, or ownership, including property agencies.

Selected Funds

Nomad classifies clients according to their risk profile, which is determined through a set of questions each client answers during onboarding and periodic reviews (suitability questionnaire). After Nomad has classified the client within a risk profile, Nomad proposes selected funds suitable for that risk profile.

The selected funds are listed below:

- Conservative Selected Fund - iShares Treasury Floating Rate Bond ETF (TFLO)
- Moderate Selected Fund - iShares Core Conservative Allocation ETF (AOK)
- Aggressive Selected Fund - iShares Core Moderate Allocation ETF (AOM)

OTC - Fixed Income Assets

The fixed-income market encompasses a vast array of bonds. To provide our Brazilian retail clients with the best possible experience, we employ a rigorous selection process to narrow down the universe of bonds available in our app.

Unlike equities, fixed-income markets are decentralized and traditionally accessible only to institutional or accredited investors. At Nomad, our mission is to democratize bond investing in the US. A key part of this mission is ensuring we offer bonds with sufficient liquidity—those with both bid and ask prices—enabling seamless trading for our users.

Client Asset Selection Flexibility

We strive to offer a curated selection of assets to meet a wide range of client needs and risk preferences. However, recognizing that clients may have individual preferences for assets beyond those available in the APP, we provide the option to accommodate such requests. Requested assets that fall outside our selection criteria will be evaluated for suitability, considering market performance, risk management, and compliance with applicable regulations. We reserve the right to limit the inclusion of such assets based on their appropriateness for the client's portfolio. Clients will be informed if the asset does not match their risk profile at the time of purchase of said asset; then, clients will be periodically informed if their overall portfolio risk is not aligned with their calculated risk profile.

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 Clients.

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 securities 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 may 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 digital 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.

Item 9: 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.

Item 10: 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. Nomad does not recommend or select other investment advisers.

Item 11: 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.

Item 12: Brokerage Practices

Nomad establishes custodial and brokerage agreements with "qualified custodians", as defined by the SEC, to establish our client's agreements. Our selection of brokers is based on the management platforms offered by registered brokers, which must enable Nomad to execute trades on behalf of our clients, financial strength and reputation, trading platform, digital and technological development, experience, costs, asset availability as well as trade accuracy and confirmation.

Nomad clears and settles all trade orders for securities transactions on behalf of client accounts with DriveWealth and Apex Clearing. All clients must open brokerage accounts with DriveWealth or with Apex Clearing. Costs associated with the clearing and settlement of such securities transactions are borne by Nomad. The portion of these costs borne by Nomad is charged under the clearing arrangement between

Nomad, DriveWealth, and Apex Clearing. Nomad, in turn, may receive a single wrap fee as described above in Item 4.

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.

Nomad seeks to ensure that its client accounts receive the best overall execution for securities transactions by continuously monitoring and reviewing the services received by its counterparties. Nomad oversees DriveWealth's and Apex's provision of clearing, custody, trade execution, and related services to clients and will periodically evaluate DriveWealth's and Apex's execution quality as part of its ongoing oversight. To the extent that any counterparty's best execution capability does not appear to meet the quality of best execution on a consistent basis, Nomad would look to remove and replace such counterparty.

Nomad does not engage in any "soft dollar" practices involving the receipt of research or other brokerage service in connection with Client transactions, nor does Nomad compensate or otherwise reward any FINRA member firms for client referrals.

Item 13: Review of Accounts

Nomad reviews each client's account and target 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.

Item 14: 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)-1 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.

Item 15: Custody

Nomad does not act as a custodian for client assets and does not have physical custody of client funds or securities at any time. DriveWealth and Apex Clearing serve as the qualified custodians for all client accounts. DriveWealth and Apex Clearing will provide regular ongoing statements to you showing your securities positions and account activity. You should promptly and carefully review the statements provided by DriveWealth and Apex Clearing and compare them against the account information available online through the app and notify us promptly in writing via email or physical mail of any errors or discrepancies. Nomad will be deemed to have custody of client funds or securities as defined in Rule 206(4)-2 of the Advisers Act (“Custody Rule”) under certain circumstances. For example, Nomad may be deemed to have custody when it is authorized by clients to withdraw advisory fees from client accounts. Nomad will comply with all applicable Custody Rule requirements.

Item 16: Investment Discretion

Nomad’s advisory services are offered on a non-discretionary basis only, meaning the client retains the responsibility for investment decisions.

Item 17: Voting Client Securities

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

Item 18: 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.