

**Client Relationship Summary March 2024**

**Item 1 - Introduction**

Composer Technologies Inc. doing business as Composer Trade (“Composer Trade” “we” or “our”) is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the difference. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://Investor.gov/CRS) which also provides educational materials about broker-dealers, investment advisers, and investing.

**Item 2 – Relationships and Services**

**What investment services and advice can you provide me?**

We offer limited, automated investment advisory services to retail investors (“Clients”) in the U.S. through a subscription program available on our interactive website (the “Platform”). We provide clients with a selection of model portfolios that they can choose to invest in as is or modify to suit their own needs. The model portfolios provided by Composer Trade are assigned risk ratings. Clients must complete the questionnaire and open an account with an approved broker-dealer to utilize our services (the “Custodian”). The Custodian will hold your cash and securities and facilitate standard account activities such as trade reporting, recordkeeping, and preparing and providing account statements. Model portfolios are comprised of a concentrated basket of securities and may include hedging strategies to protect against market downturns. Clients choose the model portfolio that they wish to invest in at their discretion, but are also given the opportunity to swap out, replace or remove securities from any available model portfolio. Composer Trade will rebalance model portfolios on a periodic basis to meet the specific portfolios target asset allocation, but will also rebalance and adjust the model portfolio allocations consistent with a Client’s selected frequency and to reflect any Client-directed changes to the portfolio.

***Monitoring***

Since the selection of a model portfolio is done at the Client’s discretion, Composer Trade does not monitor accounts or investments. Composer Trade provides all Clients with continuous access to the Platform regarding information about account status, portfolio allocations, securities, and account balances. Composer Trade will not prompt the Client to review their accounts and any deviations will be made on a unilateral basis by the Clients if so desired.

***Investment Authority***

Composer Trade has limited discretionary authority over client accounts, which means that Clients make the ultimate decision regarding investments in a model portfolio. Once a Client chooses to invest in a model portfolio, Composer Trade has the limited discretionary authority to facilitate the execution of the purchase, or sale. Composer Trade will also have the limited authority to rebalance the portfolio at the Client’s direction and to meet a specific portfolio’s target asset allocation.

***Limited Investment Offerings***

Composer Trade only selects equity and fixed-income exchange-traded funds (“ETFs”) and equity securities of companies for the model portfolios that are made available to Clients. Clients choose which model portfolio they invest in but can also make changes to the securities within the model portfolio.

***Account Minimums and Other Requirements***

There is a \$50 minimum to open an account with Composer Trade.

For more information regarding our services, see Items 4 and 7 on the SEC’s IAPD database at [adviserinfo.sec.gov](https://adviserinfo.sec.gov). We also encourage you to consider the below key questions before becoming a Client.

***Given my financial situation, should I choose an investment advisory service? How are investment recommendations formulated and provided to me? What is your relevant experience, including your licenses, education and other qualifications?***

We answer these questions in the Conversation Starter Supplement disclosure [here](#).

## **Item 3 – Fees, Costs, Conflicts, and Standard of Conduct**

### **What fees will I pay?**

#### ***Principal Fees and Costs***

Composer Trade charges a monthly or annual subscription fee. The subscription fee includes Composer Trade's advisory services. The subscription fee for the services is \$30 per month or \$288 annually. Fees are not negotiable.

For additional information regarding our fees, please see Item 5 of Composer Trade's Form ADV, Part 2A, which is available at [Form CRS](#) and <https://adviserinfo.sec.gov/firm/summary/311289>.

#### ***Other Fees and Costs***

You may incur certain charges imposed by custodians and other third parties, including transfer fees, administrative fees and other fees and taxes on brokerage accounts and securities transactions. The issuer of some of the securities or products purchased for clients, such as ETFs or other similar financial products, may charge product fees that affect clients. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

#### ***Additional Information***

For more information regarding our fees, read the accompanying Part 2A Brochure Item 5.

***What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? How might your conflicts of interest affect me, and how will you address them?***

We answer these questions in the Conversation Starter Supplement disclosure [here](#).

### **How do your financial professionals make money?**

Our employees receive a base salary and may receive a discretionary bonus (cash and non-cash benefits) linked to the revenue and growth of the company. Given that the advisory services are automated, we do not employ financial professionals in the traditional sense. Compensation is not based on commissions or fees of any kind.

## **Item 4 – Disciplinary History**

### **Do you or your financial professionals have legal or disciplinary history?**

No. Neither Composer nor its financial professionals have reportable legal or disciplinary events. Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research Composer Trade and our financial professionals.

***As a financial professional, do you have any disciplinary history? For what type of conduct?***

We answer these questions in the Conversation Starter Supplement disclosure [here](#).

## **Item 5 – Additional Information**

For additional information about our investment advisory services, please see Composer Trade's Form ADV, Part 2A, which is available at [Composer.Trade](#) and [adviserinfo.sec.gov](http://adviserinfo.sec.gov). If you would like additional, up-to-date information or a copy of this relationship summary, or if you have questions/complaints or technical issues, please email [help@InvestComposer.com](mailto:help@InvestComposer.com).

***Who is my primary contact person? Is he or she a representative of an investment adviser or broker-dealer? Who can I talk to if I have concerns about how this person is treating me?***

We answer these questions in the Conversation Starter Supplement disclosure [here](#).