

EDLY ADVISORS LLC

CLIENT RELATIONSHIP SUMMARY

January 11, 2024

We have prepared this form to provide you with basic information about our adviser-client relationship. We are Edly Advisors LLC, and we are registered with the Securities and Exchange Commission (SEC) as an investment adviser. We are engaged in the business of providing advice to you about the purchase or sale of securities and similar investments. We are an affiliate of Edly Inc., a leading FinTech specialty finance firm focused on higher education finance. As such, our investment advisory services are directed towards the use of highly specialized alternative investment strategies in the fields of education finance (student loans) and similar financing contracts that are generally appropriate for financially sophisticated investors.

We are not a broker-dealer because we do not execute transactions you undertake for the purchase or sale of securities. Our services are to advise you about the investments you make and the investments you sell. Our fees, therefore, are different from the fees a broker-dealer receives for the services it provides. A broker-dealer's fees are based principally on the transactions they execute, while our fees are based mainly on the value of the investments we manage (and payments, such as principal and interest payments or their equivalent, made on loans or other similar investments that you hold).

You may obtain free and simple tools to aid in your investment choices, as well as educational materials about broker-dealers, investment advisers and investing in general, at www.Investor.gov/CRS.

What investment services and advice can you provide me?

You have selected us to provide investment advisory services to you about your investment in consumer loans, particularly student loans that provide students with the ability to defer payment of tuitions for some period of time.

These are highly selective and risky investments. But we believe they provide investors, like you, with good returns commensurate with the level of risk you are willing to undertake.

We provide our services to you either on a discretionary basis (where we make the decisions for you about what student loans, loan pools or participations therein to purchase or sell) or on a non-discretionary basis (where we simply recommend the purchase or sale of these investments to you).

We monitor your investments to determine whether the loans are collectible and should be retained, or should be sold.

Some programs have minimum investment amounts, and we do require you to meet the standard of an “accredited investor,” as defined in SEC rules, in order to make these investments. Because of the level of risk involved, we require that you have a certain level of financial knowledge and sophistication, which is the level of the “accredited investor,” in order to make these investments.

In addition to the question above, you may also seek answers to the following questions:

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

While we may have answered these questions in part above, you may obtain additional information that provides responses to these and other questions by referring to the discussion in Items 4 and 7 of our brochure, a copy of which we have distributed to you, or Part 2B of our Form ADV on file with the SEC. You may also contact Edly Advisors at info@EdlyAdvisors.com to obtain this information.

What fees will I pay and how often will I pay them?

You pay fees consisting of a base management fee and an additional fee based on a percentage of the payments made by obligors on the consumer loans. Actual amounts may vary by strategy but will range from 0.5% to 2.0% of assets under management in a given strategy. We send invoices to you quarterly for payment.

You pay fees and costs whether you make or lose money on your investments. These charges reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Please 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?

Your upfront costs can be as much as 7% of the investment amount because the loans are originated through a direct marketing process. Therefore, if you give me \$10,000 to

invest on your behalf, the fees and costs will be \$700. Our objective is to ensure that the target returns account for all fees and costs, as well as expected losses, so that these returns provide an accurate estimate of the net returns you will make.

For answers to these and other questions about the fees and costs you might pay, please contact Edly Advisors at info@EdlyAdvisors.com.

***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?***

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some possible conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is one example to help you understand what this means:

We may have large clients who demand a “right of first refusal” with regard to allocations of loan supply. We may choose to honor such a request if it leads to a sizable transaction.

How might your conflicts of interest affect me, and how will you address them?

You might be disadvantaged in connection with your participation if you are not a large or institutional client.

How do your professionals make money?

We currently have just two financial professionals on staff. Our professionals are compensated based on a salary and bonus basis with the bonus based on profitability which is driven by many factors, including the success we have in attracting clients to our strategy and the incentive fees we earn if our clients make profits.

Do you or your financial professionals have legal or disciplinary history? If so, for what type of conduct?

No. We recommend, however, that you visit www.Investor.gov/CRS to conduct a free and simple research of our professionals and me.

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

Robert Blake Murphy is my principal client contact. You may reach Mr. Murphy at Blake@EdlyAdvisors.com or (914) 785-8344. Mr. Murphy is also my Chief Compliance

Officer. You may address any concern you may have to him or to Chris Ricciardi, my Manager and Chief Executive Officer, CEO at *Chris@EdlyAdvisors.com*.

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You may obtain additional information about our business, including the services we provide and the fees you may pay for obtaining these services, from the *brochure* we have distributed or made accessible to you. Please visit us at <https://student.edly.com>.