



FORM ADV PART 3 - CUSTOMER RELATIONSHIP SUMMARY (Date: 31 July 2024)

Item 1: Introduction

PensionBee Inc. is an investment adviser registered with the Securities and Exchange Commission. We offer online portfolio management services via a wrap fee program. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit www.investor.gov/CRS for free, simple tools to research firms and financial professionals, as well as educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationship and Services

What investment services and advice can you provide me? PensionBee offer online portfolio management services via a wrap fee program to retail customers rolling over or transferring defined contribution retirement accounts (e.g. 401(k)'s) into a new Individual Retirement Account (IRA). We manage your portfolio, investment strategy, and investments through an online interface. Customer accounts are not continuously reviewed or monitored on an ongoing basis by PensionBee save for annual automated allocation revisions and regular realignments within model portfolios offered by PensionBee. PensionBee offer both discretionary advisory services (where PensionBee make the decision regarding the purchase or sale of investments) as well as non-discretionary services (where the retail investor makes the ultimate decision). PensionBee offer model portfolio exchange traded funds ("ETFs") provided by a third party. PensionBee does not offer proprietary products. PensionBee does not have a minimum account size. See PensionBee's Form ADV Part 2A ("[Brochure](#)"), Items 4 & 7.

Questions to ask us: *Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me?*

Item 3: Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay? PensionBee's customers pay a fee based on assets under management. Additionally, the amount of assets in your account affects our fee: the more assets you have in your advisory account the more you will pay us. PensionBee has an incentive to encourage you to increase those assets in order to increase our fee. When a customer signs up to an account with PensionBee they authorize for PensionBee's fees to be withdrawn on a monthly basis in arrears directly from their account with us by the account custodian. You pay PensionBee's fees even if you do not have any transactions. Please also see Items 4, 5, 6, 7 & 8 of our "[Brochure](#)".

PensionBee's wrap fee program includes ETF management fee, custody fee and advisory fee. See Item 4.C of our "[Brochure](#)". Additionally, if you close your account with PensionBee, you will pay an administrative account closing fee to the account custodian (currently set at \$50 per account closure). As a wrap fee combines certain transaction fees our fee is higher than if you paid transaction fees separately. **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.** Please also see PensionBee's "[Brochure](#)" for additional details.



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Questions to ask us: *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?*

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 PensionBee acts 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 PensionBee makes money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice PensionBee provides to you. See PensionBee's "[Brochure](#)" for additional details. Here are some examples to help you understand what this means:

- **Management of Wrap Fee Program.** Because PensionBee manages our portfolio in a wrap fee program, PensionBee has an incentive to limit trading in your account and to favor asset types that do not have certain transaction fees in order to minimize trading expenses that PensionBee would have to normally pay out of our wrap program fee.
- **ETF Model Provider.** SSGA Funds Management, Inc. is our exclusive ETF model provider. PensionBee receives reimbursement payments from State Street Global Advisors Funds Distributors LLC for certain costs PensionBee incurs in marketing the ETFs included in the models, including the distribution of marketing materials for certain of the ETFs.

Questions to ask us: *How might your conflicts of interest affect me, and how will you address them?*

How do you make money? PensionBee receives cash compensation from the services we provide to you through the fees PensionBee receives from you. See PensionBee's "[Brochure](#)" for additional details.

Item 4: Disciplinary History

Do you or your team members have legal or disciplinary history? No. PensionBee does not have any legal or disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research PensionBee and its financial professionals.

Questions to ask us: *Do you or members of your team have any disciplinary history? For what type of conduct?*

Item 5: Additional Information

For additional information on our advisory services, see PensionBee's "[Brochure](#)" available at <https://adviserinfo.sec.gov/firm/summary/331741> and any individual brochure supplement your representative provides. If you have any questions, need additional information, or want another copy of this Customer Relationship Summary, then please contact PensionBee at (718) 502-9433.