

# **SAVVY ADVISORS, INC.**

***d/b/a “Savvy”***

## ***Form ADV Part 2A***

36 East 12th Street, Floor 2  
New York, NY 10003  
Phone: (833) 745-6789

1313 East Maple  
Bellingham, WA  
Phone: (630) 915-8424

<https://www.savvywealth.com/>

**April 5, 2024**

This brochure provides information about the qualifications and business practices of Savvy Advisors, Inc. (“Savvy” or “the Firm” or “us”, “we”, “our”). If you have any questions about the contents of this brochure, please contact Savvy’s Chief Compliance Officer at [compliance@savvywealth.com](mailto:compliance@savvywealth.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

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

REGISTRATION WITH THE SEC AS AN INVESTMENT ADVISER DOES NOT IMPLY THAT SAVVY OR ANY PRINCIPALS OR EMPLOYEES OF SAVVY POSSESS A PARTICULAR LEVEL OF SKILL OR TRAINING IN THE INVESTMENT ADVISORY OR ANY OTHER BUSINESS.

## **Item 2 - Material Changes**

Savvy is required to update this Brochure on an annual basis or more frequently in the event information contained herein becomes materially inaccurate. The last Brochure was dated March 27, 2024. There have been no material changes since the last update of this Brochure.

Clients are encouraged to review this brochure in its entirety. The information set forth in this brochure is qualified in its entirety by the applicable governing documents. In the event of a conflict between the information set forth herein and the applicable governing documents, the information set forth in the applicable governing documents shall control.

Savvy's complete Firm Brochure is available upon request by contacting Savvy at (833) 745-6789 or [compliance@savvywealth.com](mailto:compliance@savvywealth.com).

### **Item 3 - Table of Contents**

Item 2 - Material Changes.....	2
Item 3 - Table of Contents.....	3
Item 4 - Advisory Business.....	4
Item 5 - Fees and Compensation.....	6
Item 6 - Performance Based Fees and Side-by-Side Management.....	9
Item 7 -Types of Clients.....	9
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss.....	9
Item 9 - Disciplinary Information.....	17
Item 10 - Other Financial Industry Activities and Affiliations.....	17
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	18
Item 12 - Brokerage Practices.....	19
Item 13 - Review of Accounts.....	21
Item 14 - Client Referrals and Other Compensation.....	22
Item 15 - Custody.....	23
Item 16 - Investment Discretion.....	23
Item 17 - Voting Client Securities.....	24
Item 18 - Financial Information.....	24

## **Item 4 - Advisory Business**

Savvy Advisors, Inc. (“Savvy” or “the Firm”) was founded in 2022 by its parent company, Savvy Wealth, Inc., and Ritik Malhotra, Savvy’s Chief Executive Officer. In April 2022, the Firm completed registration with the SEC as an investment adviser. The Firm’s principal office is in New York, NY with an additional office in Bellingham, WA.

### ***Separately Managed Accounts***

Savvy is an adviser to separately managed accounts (the “Separately Managed Accounts”), (together, the “Clients” or “Client Accounts”). The Firm provides customized discretionary and non- discretionary investment and wealth management services to high net worth individuals and associated trusts, estates, pension and profit sharing plans, and other legal entities. Savvy generally invests client discretionary assets in domestic and international stocks, bonds, mutual funds, exchange traded funds (“ETFs”), private funds, and real estate. The Firm works with each client to establish an appropriate investment profile outlining the client’s objectives, risk tolerance, liquidity needs, and investment time horizon. Savvy considers the client’s specific goals and risk tolerance and its capital markets outlook when directing assets to specific investments.

Savvy also provides investment advice to clients with held away assets such as 401ks and shares in private companies. In providing these services, Savvy may or may not have the ability to transact in the client’s account, depending on the platform. Provision of these services is subject to the client’s investment advisory agreement with Savvy.

Savvy’s investment advisory services are provided pursuant to the agreed upon investment guideline terms set forth in the investment policy statement. Clients may impose reasonable mandates, guidelines, or restrictions relating to investments. For example, clients may impose limits on concentration, risk, exposure, and liquidity. Savvy’s clients own the positions in their separately managed account; therefore, the Client will typically have full, real-time transparency to all transactions and holdings in such accounts.

Savvy currently provides advice to Separately Managed Account clients, but reserves the right to provide advice to other types of clients. The Firm does not participate in or offer wrap fee programs to Clients.

As part of our portfolio management services, we may use one or more sub-advisers to manage a portion of your account on a discretionary basis. The sub-adviser(s) may use one or more of their model portfolios to manage your account. We will regularly monitor the performance of your accounts managed by sub adviser(s), and may hire and fire any sub-adviser without your prior approval. You may pay a higher advisory fee as a result of our use of sub-advisers.

### ***Held Away Assets***

Savvy uses a third-party platform to facilitate the discretionary management of held away assets such as defined contribution plan participant accounts, and 529 plans. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once a Client account(s) is connected to the platform, the adviser will review the current account

allocations. When deemed necessary, the adviser will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least annually if not more frequently based on client needs and market events etc. and allocation changes will be made as deemed necessary.

### ***ERISA Plan Services***

Savvy provides advisory services to retirement plans subject to the Employee Retirement Income Security Act of 1974, as amended (“ERISA”), including participant-directed defined contribution plans, such as 401(k) plans (“ERISA Plan Clients”). Each ERISA Plan Client is required to enter into an investment advisory agreement with Savvy describing the services that Savvy will perform for the ERISA plan and its participants. Savvy may provide both ERISA fiduciary services and non-fiduciary services to ERISA Plan Clients.

For participant-directed defined contribution plans, Savvy provides investment advisory services on a non-discretionary basis and in that capacity, the ERISA Plan Client retains and exercises final decision-making authority and responsibility for the implementation (or rejection) of Savvy’s recommendations or advice. Savvy Advisor’s ERISA fiduciary investment advisory services may include assisting the ERISA Plan Client in developing an investment policy statement, assisting the ERISA Plan client in selecting a broad range of plan investment options consistent with ERISA Section 404(c), assisting the ERISA Plan Client in making decisions about the selection, retention, removal and/or replacement of plan investment options, and if the ERISA Plan Client has determined that the plan should have a qualified default investment alternative (a “QDIA”) for participants who fail to make an investment election, assisting in the selection of the investment that will serve as a QDIA. Savvy’s non-fiduciary services to participant directed defined contribution plans may include assisting the ERISA Plan Client in monitoring, selecting and supervising plan service vendors, assisting in group enrollment meetings and educating plan participants about general investment principles and the investment options available under the plan.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interests ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations;
- Never put our financial interests ahead of yours when making recommendations;
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

### ***Direct Indexing***

Savvy provides discretionary investment advisory services to managed account clients based on direct indexing models created through client input and the client’s securities holdings. Savvy constructs these securities portfolios with the objective of tracking a particular index, within a reasonable degree of similarity, without holding each security in the index. Benchmarks include broad market equity indexes representing domestic and/or foreign companies. Each client’s account is customized to include the client’s

existing positions and/or to reflect specific securities or sector exclusions, which differ from account to account based on the account size and the index against which the client's portfolio is benchmarked. Savvy also constructs certain portfolios that intentionally tilt towards single factor exposures or multiple factors. When providing direct indexing services, Savvy also provides proactive tax harvesting services if agreed to by the client. In these situations, Savvy uses quantitative tools to consider the tax benefit generated for clients as well as the impact on the tracking error of the portfolio.

### ***ESG (Environmental, Social, Governance)***

Savvy may invest on behalf of interested clients in ESG-oriented funds and/or portfolios constructed of individual securities. For individual securities portfolios, Savvy uses a third party portfolio and model construction tool to create a portfolio customized to the clients' ESG focuses. Through a questionnaire, Clients can identify areas of ESG focus that they are interested in and can indicate desired areas of exclusion. The platform analyzes ESG data to provide impact scoring across 45 causes that align with the United Nations Sustainable Development Goals and excludes funds or securities that do not match the clients' focus areas. Savvy will review the output and invest in the funds or securities deemed appropriate for the client.

### **Assets Under Management**

As of March 31, 2024, Savvy has approximately \$401,296,753 in assets under management ("AUM"), of which \$372,157,980 is managed on a discretionary basis and \$29,138,773 is managed on a non-discretionary basis. In addition, Savvy has \$18,592,170 in assets under advisement ("AUA").

## **Item 5 - Fees and Compensation**

The specific manner in which fees are charged by Savvy is established in each client's written investment advisory agreement. Savvy's offers two distinct fee models for its investment management and consulting services, which may be blended or independently structured:

### ***Asset-Based Fees***

Investment management fees will be based on a percentage of the client's total managed assets. Fees are negotiable and typically range between 0.3%-1.9% per year, depending on the size and complexity of the client account, among other factors. Fees are billed quarterly in arrears or in advance based on the previous quarter's end value or average daily balance as agreed upon by Savvy, and the client. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the number of days that the account(s) was managed.

The market value of assets includes accrued interest and dividends, as well as margin balances (if applicable). Most clients authorize Savvy to deduct fees automatically from their brokerage accounts, but clients may request that the Firm send quarterly invoices to be paid by check or ACH. The custodian of the client's brokerage account is responsible for sending statements at least quarterly indicating, among other things, management fees disbursed from the account. Savvy may agree to aggregate the assets of multiple separate accounts of a client and other affiliated clients for fee calculation purposes.

### ***Fixed Fees***

Clients can be charged an annual fixed fee for investment management services. Annual fixed fees are negotiated based on the size and complexity of the relationship and charged based on the frequency stated in the agreement with the client.

#### ***Fee for Services to ERISA Participant-Directed Plans***

Savvy is a fiduciary under ERISA and the Internal Revenue Code (the “IRC”) in providing investment advisory services to ERISA Plan Clients (described in Item 4). As such, Savvy is subject to specific duties and obligations under ERISA and the IRC that include, among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Savvy may only charge fees for investment advice about products for which Savvy and/or its affiliates do not receive any commission, 12b-1 fees or other compensation.

The annual fee for Savvy Advisor’s investment advisory services to ERISA Plan Clients is set forth in the investment advisory agreement and is based upon a percentage (%) of included plan assets as reported by the plan custodian or record-keeper. Included plan assets are the plan assets for which Savvy provides services as described in the investment advisory agreement.

The fee is payable quarterly in advance or in arrears (the “Fee Period”). The ERISA Plan is obligated to pay Savvy Advisor’s fee. As agreed to under the investment advisory agreement between Savvy and the ERISA Plan Client, the ERISA Plan Client may authorize the plan custodian to automatically deduct the fee from the plan or the plan sponsor of the ERISA Plan Client may choose to pay the fee.

Either Savvy or the ERISA Plan Client can terminate the investment advisory agreement at any time, without penalty, by sending the other party 30 days prior written notice. Both parties remain responsible for obligations arising under any transactions initiated before the agreement was terminated. If the agreement is terminated prior to the end of a Fee Period, fees will be prorated for the number of days in the Fee Period prior to the effective date of termination.

#### ***Flat Fee Arrangements***

Fees for financial planning and consulting services are billed on a flat rate. Fees are negotiable, are determined by the complexity of the services to be provided, and are subject to annual increases. The fees are assessed quarterly, and clients can select the billing form- bank account, credit card, or fees may be deducted from a selected brokerage account. In the event a client’s financial planning or consulting agreement is terminated, the fee will be prorated based on the services provided through the date of termination.

The Firm has waived or negotiated lower fees for certain clients, such as charitable organizations or employees’ family members.

#### ***Direct Indexing***

Clients may be charged an additional fee for direct indexing. This fee is in addition to the advisory fee. All fees will be disclosed and agreed upon in the agreement between the client and Savvy Advisors and may be waived at the advisor's discretion.

#### **Compensation for the Sale of Securities or Other Investment Products**

Savvy is not a registered broker/dealer, nor does Savvy have an affiliated broker/dealer. Some persons providing investment advice on behalf of our firm are also registered representatives (“RRs”) with unaffiliated third-party broker/dealers (“Unaffiliated Broker/Dealers”). All Unaffiliated Broker/Dealers are registered with the SEC and are members of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). In their capacity as RRs, these persons receive compensation in connection with the purchase and sale of securities and/or other investment products, including asset-based sales charges, service fees, transaction-based fees (i.e. commission) or 12b-1 fees, for the sale or holding of mutual funds. Compensation earned by these persons in their capacities as RRs is separate from and in addition to advisory fees you pay to Savvy. This arrangement with Unaffiliated Broker/Dealers (often referred to as “dual registration” or “dually registered RRs”) presents a conflict of interest because persons who are dually registered RRs have an incentive to recommend the sale or purchase of securities products and/or investment products offered by Unaffiliated Broker/Dealers based on the compensation they receive from these products rather than solely based on an evaluation of your needs. Persons providing investment advice to advisory clients on behalf of our firm can select or recommend mutual fund investments in share classes that pay 12b-1 fees when clients are eligible to purchase share classes of the same funds that do not pay such fees and are less expensive. You are under no obligation, contractually or otherwise, to purchase securities products and/or investment products from RRs who receive compensation described above.

Savvy is not an insurance broker, nor does Savvy have an affiliated insurance agency. Some persons providing investment advice on behalf of our firm are licensed as independent insurance agents (“Insurance Agents”) with unaffiliated insurance brokers (“Unaffiliated Insurance Agencies”). These Insurance Agents will earn transaction-based (i.e. commission) compensation for selling insurance products, including insurance products they sell to you. Commissions earned on insurance products by Insurance Agents are separate and in addition to advisory fees you pay to Savvy. This arrangement with Unaffiliated Insurance Agencies presents a conflict of interest because Insurance Agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

To learn more about your Savvy financial professional and any outside business activities or unaffiliated arrangements they may have, please request a copy of their ADV Part 2B (“Brochure Supplement”).

### ***Custodian Fees and Other Expenses***

#### ***Pooled Investment Fees/Expenses***

Fees paid to Savvy for investment advisory services are separate and distinct from the fees and expenses charged by underlying pooled investments such as mutual funds and exchange traded funds. In the case of mutual funds, these fees and expenses are described in each fund’s prospectus. These fees will generally include a management fee, other fund expenses, and possible distribution fee. As a general rule, Savvy does not use mutual funds that charge sales charges or distribution fees. Expenses of a fund, including management fees payable to the mutual fund manager and other expenses, will not appear as transaction fees on a client’s Savvy statement, as they are deducted from the value of the fund shares by the mutual fund service provider.

#### ***Custodial and Transaction Fees and Expenses***



Clients will incur certain charges imposed by financial institutions and other third parties such as custodial fees, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to the Savvy asset-based fee. For information relating to custodial fees and expenses, please refer to the applicable custodial agreement or contact the applicable custodian.

### ***Margin Interest***

Clients may choose to employ margin strategies in eligible accounts. This use of leverage, or investing with borrowed funds, is generally not recommended or permitted in Advisory programs; however, may be approved on an exception basis when requested specifically by individual Clients, or for use in specialized strategies. Employing margin strategies in Advisory accounts is a more aggressive, higher risk approach to pursuing investment objectives. Clients should carefully consider whether the additional risks are affordable prior to employing margin strategies due to the potential to experience significantly greater losses than if not employing margin strategies. The risks associated with investing, as well as costs, may be increased when employing margin strategies, and depending upon the return achieved, may make investment objectives more difficult to realize. Clients pay interest on the outstanding loan balance of their original margin loan. Fees are calculated as a percentage of assets under management; therefore, employing margin strategies to buy securities in Advisory accounts generally increases the amount of, but not the percentage of, fees. This results in additional compensation to Savvy, its Financial Advisors, and Independent Managers. The amount of the margin loan is not deducted from the total value of the investments when determining account value for purposes of calculating the fee. The decision to leverage Advisory accounts is the sole decision of Clients and should only be made if Clients understand the risks associated with employing margin strategies, the impact the use of borrowed funds may have on Advisory accounts, and how investment objectives may be negatively affected. Specifically, Clients may lose more than their original investments. Likewise, a positive or negative performance, net of interest charges and fees, is magnified. Gains or losses are greater than would be the case in accounts that do not employ margin strategies. Clients may not benefit from employing margin strategies if the performance of individual accounts does not exceed interest expenses on the loan plus fees incurred as a result of depositing the proceeds of the loan. Certain eligibility requirements must be met and documentation must be completed prior to using leverage in Advisory accounts. Specifically, Clients are required to execute separate margin agreements.

## **Item 6 - Performance Based Fees and Side-by-Side Management**

Savvy does not charge performance-based fees or other fees based on a share of capital gains or capital appreciation of client assets. Some investment advisers experience conflicts of interest in connection with the side-by-side management of accounts with different fee structures. However, these conflicts of interest are not applicable to Savvy.

## **Item 7 -Types of Clients**

Savvy primarily provides customized investment management services to high-net-worth individuals and associated trusts, estates, pension and profit sharing plans, and other legal entities. Savvy's minimum account size is generally \$500,000 but this amount is negotiable at the advisors discretion.

## **Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss**

### ***Methods of Analysis and Investment Strategies***

Savvy develops customized investment recommendations for each individual Client based on a variety of factors including the client's investment objectives and risk tolerance among other factors. The Firm typically meets with the new individual Client at least once before developing an investment plan and recommended asset allocation strategy. The Firm works carefully to understand each individual Client's risk tolerance and investment goals, but Clients should understand that all investing involves the risk of loss.

The Firm primarily invests for relatively long term periods (more than 3 years) using primarily an index-based approach to investing in a broad range of diversified exchange-traded funds (ETFs) and mutual funds in addition to direct ownership of individual equities. In addition to mutual funds and ETFs, Savvy provides advice on exchange traded notes (ETNs), bonds, stocks, hedge funds, private equity funds, real estate, restricted stock, private stock, and structured notes. In managing client assets, the Firm seeks to limit risk through diversification among asset classes and, as appropriate for certain clients, will recommend third party sponsored alternative investments or sub advisors.

### ***Direct Indexing***

Direct indexing is an approach to index investing that involves buying individual stocks that make up an index, in the same weights as the index, subject to client constraints. Savvy uses mathematical models and software to manage certain client accounts that employ direct indexing. These accounts are typically customized to client specifications and have a defined benchmark and can have a set of client defined restrictions/targets. The number of stocks in these accounts can vary depending on the referenced benchmark, strategy, and client constraints. For taxable clients, portfolios are rebalanced using a tax-efficient approach to maximize loss harvesting and minimize capital gains. Savvy's direct indexing methodologies consider portfolio risk, transaction costs, and taxes when making investment decisions.

### ***ESG***

Savvy may invest on behalf of interested clients in ESG-oriented funds and/or portfolios constructed of individual securities. For individual securities portfolios, Savvy uses a third party portfolio and model construction tool to create a portfolio customized to the clients' ESG focuses. Through a questionnaire, Clients can identify areas of ESG focus that they are interested in and can indicate desired areas of exclusion. The platform analyzes ESG data to provide impact scoring across 45 causes that align with the United Nations Sustainable Development Goals and excludes funds or securities that do not match the clients' focus areas. Savvy will review the output and invest in the funds or securities deemed appropriate for the client.

### ***General Material Risks***

No guarantee or representation is made that Client Accounts will achieve their investment objective. Investing involves risks. The risks set out below do not purport to be exhaustive. Additional risks and uncertainties that are currently unknown or currently deemed immaterial may become material factors that affect clients. Prospective clients should carefully consider the risks involved in an investment with Savvy.

### ***Managed Portfolio Risk***

Savvy Advisor's investment strategies or selection of specific securities may be unsuccessful and may cause clients to incur losses.

#### *Market Risks*

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of our recommendations and/or investment decisions depends, to a great extent, upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. There can be no assurance that we will be able to predict those price movements accurately or capitalize on any such assumptions.

#### *General Investment and Trading Risks*

An investment involves a high degree of risk, including the risk that the entire amount invested may be lost. The Firm invests in securities and other financial instruments using strategies and investment techniques with significant risk characteristics. No guarantee or representation is made that the Firm's investment strategies will be successful.

#### *Pandemics and Other Public Health Crisis Risks*

Pandemics and other national or international health crises resulting in restrictions on travel or imposing quarantines could have a negative impact on the economy or investments. Such disruption, or the fear of such disruption, could have a significant and adverse impact on activity of all kinds including global economic production, credit and capital markets, labor force and operational disruptions, and the securities markets. Related impacts and disruptions can lead to increased market volatility or a significant market downturn, and have adverse long-term effects on world economies and markets generally.

#### *Cybersecurity*

Savvy and its service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes and practices designed to protect networks, systems, computers, programs and data from both intentional cyber-attacks and hacking by other computer users as well as unintentional damage or interruption that, in either case, can result in damage or interruption from computer viruses, network failures, computer and telecommunications failures, infiltration by unauthorized persons and security breaches, usage errors by their respective professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes.

A cybersecurity breach could expose Savvy, its employees and clients to substantial costs (including, without limitation, those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, adverse investor reaction, the dissemination of confidential and proprietary information and reputational damage), civil liability as well as regulatory inquiry and/or action. In addition, any such breach could cause substantial withdrawals from client accounts. While Savvy has established a business continuity plan in the event of, and risk management strategies, systems, policies and procedures to seek to prevent, cybersecurity breaches, there are inherent limitations in such plans, strategies, systems, policies and procedures including the possibility that certain risks have not been identified. Furthermore, Savvy cannot control the cybersecurity plans, strategies, systems, policies and procedures put in place by other service providers to the client accounts and/or the issuers in which client assets are invested.

### *Small- and Mid-Cap Risks*

A portion of the Client Accounts' assets may be invested in securities of small-cap and mid-cap issuers. While in Savvy's opinion the securities of small- and mid-cap issuers may offer the potential for greater capital appreciation than investments in securities of large-cap issuers, securities of small-cap issuers may also present greater risks. For example, some small- and mid- cap issuers often have limited product lines, markets, or financial resources. They may be subject to high volatility in revenues, expenses and earnings. Their securities may be thinly traded, may be followed by fewer investment research analysts and may be subject to wider price swings and thus may create a greater chance of loss than when investing in securities of larger-cap issuers. The market prices of securities of small- and mid-cap issuers generally are more sensitive to changes in earnings expectations, to corporate developments and to market rumors than are the market prices of large-cap issuers. Transaction costs in securities of small- and mid-cap issuers may be higher than in those of large-cap issuers.

### *Liquidity Risk*

A client portfolio is exposed to liquidity risk when trading volume, lack of a market maker or trading partner, large position size, market conditions, or legal restrictions impair its ability to sell particular investments or to sell them at advantageous market prices. Consequently, the client portfolio may have to accept a lower price to sell an investment or continue to hold it or keep the position open, sell other investments to raise cash or give up an investment opportunity, any of which could have a negative effect on the portfolio's performance. These effects may be exacerbated during times of financial or political stress.

### *Convertible Securities*

Convertible securities are bonds, debentures, notes, preferred stocks or other securities that may be converted into or exchanged for a specified amount of common stock of the same or different issuer within a particular period of time at a specified price or formula. A convertible security entitles its holder to receive interest that is generally paid or accrued on debt or a dividend that is paid or accrued on preferred stock until the convertible security matures or is redeemed, converted or exchanged. Convertible securities have unique investment characteristics in that they generally (i) have higher yields than common stocks, but lower yields than comparable non-convertible securities, (ii) are less subject to fluctuation in value than the underlying common stock due to their fixed-income characteristics and (iii) provide the potential for capital appreciation if the market price of the underlying common stock increases. The value of a convertible security is a function of its "investment value" (determined by its yield in comparison with the yields of other securities of comparable maturity and quality that do not have a conversion privilege) and its "conversion value" (the security's worth, at market value, if converted into the underlying common stock). The investment value of a convertible security is influenced by changes in interest rates, with investment value declining as interest rates increase and increasing as interest rates decline. The credit standing of the issuer and other factors may also have an effect on the investment value of convertible securities. The conversion value of a convertible security is determined by the market price of the underlying common stock. If the conversion value is low relative to the investment value, the price of the convertible security is governed principally by its investment value. To the extent the market price of the underlying common stock approaches or exceeds the conversion price, the price of the convertible security will be increasingly influenced by its conversion value. A convertible security generally will sell at a premium over its conversion value by the extent to which investors place value on the right to acquire the underlying common stock while holding a fixed-income security. Generally, the amount of the premium decreases as the convertible security approaches maturity. A convertible security may be subject to redemption at the option of the

issuer at a price established in the convertible security's governing instrument. If a convertible security held by the Client's Account is called for redemption, the Firm will be required to permit the issuer to redeem the security, convert it into the underlying common stock or sell it to a third-party. Any of these actions could have an adverse effect on the Client Account's ability to achieve its investment objective.

#### *Debt and Other Income Securities*

The Client Accounts may invest in fixed-income and adjustable rate securities. Income securities are subject to interest rate, market and credit risk. Interest rate risk relates to changes in a security's value as a result of changes in interest rates generally. Even though such instruments are investments that may promise a stable stream of income, the prices of such securities are inversely affected by changes in interest rates and, therefore, are subject to the risk of market price fluctuations. In general, the values of fixed income securities increase when prevailing interest rates fall and decrease when interest rates rise. Because of the resetting of interest rates, adjustable rate securities are less likely than non-adjustable rate securities of comparable quality and maturity to increase or decrease significantly in value when market interest rates fall or rise, respectively. Market risk relates to the changes in the risk or perceived risk of an issuer, industry, country or region. Credit risk relates to the ability of the issuer to make payments of principal and interest. The values of income securities may be affected by changes in the credit rating or financial condition of the issuing entities. Income securities denominated in non-U.S. currencies are also subject to the risk of a decline in the value of the denominating currency relative to the U.S. dollar.

#### *Derivatives and Hedging*

Savvy may invest and trade in a variety of derivative instruments, both to hedge the client's account and for profit. Derivatives are financial instruments or arrangements in which the risk and return are related to changes in the value of other assets, reference rates or indices. The Client Account's ability to profit or avoid risk through investment or trading in derivatives will depend on Savvy's ability to anticipate changes in the underlying assets, reference rates or indices.

#### *Brokerage Commissions/Transaction Costs*

During some periods, Savvy's activities may involve a high level of trading, and the turnover of its portfolio may generate substantial transaction costs. These costs will be borne by the Client's Account(s) regardless of its profitability.

#### *Currency*

The Firm may invest a portion of its assets in instruments denominated in currencies other than the U.S. dollar, the price of which is determined with reference to currencies other than the U.S. dollar. Client Accounts will, however, be valued in U.S. dollars. To the extent unhedged, the value of the assets will fluctuate with U.S. dollar exchange rates as well as the price changes of investments in the various local markets and currencies. Thus, an increase in the value of the U.S. dollar compared to the other currencies will reduce, all other economic factors being constant, the effect of increases and magnify the effect of decreases in the prices of the account's securities in their local markets. Conversely, a decrease in the value of the U.S. dollar will have the opposite effect on non-U.S. dollar securities. To the extent permitted, the Client Account also may, but does not expect to regularly do so, utilize options and forward contracts to hedge against currency fluctuations, but there can be no assurance that such hedging transactions will be effective.

### *Information Sources*

Savvy selects investments for the Client Accounts based in part on information and data that the issuers of such securities file with various government agencies or make directly available to Savvy or that Savvy obtains from other sources. Savvy is not in a position to confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information is not readily available.

### *Counterparty Risk*

Some of the markets in which the Firm executes its transactions are “over-the-counter” or “interdealer” markets. The participants in such markets are typically not subject to credit evaluation and regulatory oversight as are members of “exchange-based” markets. This exposes the Client Account to the risk that a counterparty will not settle a transaction in accordance with its terms and conditions because of a dispute over the terms of the contract (whether or not bona fide) or because of a credit or liquidity problem, thus causing the client’s account to suffer a loss. The Firm is not restricted from dealing with any particular counterparty or from concentrating any or all of its transactions with one counterparty. Moreover, the Firm has no internal credit function that evaluates the creditworthiness of their counterparties. The ability of the Firm to transact business with any one or number of counterparties, the lack of any meaningful and independent evaluation of such counterparties financial capabilities and the absence of a regulated market to facilitate settlement may increase the potential for losses experienced by the client.

### *Reliance on Quantitative Models*

Savvy may employ quantitative models in part of its investment strategy. Although these quantitative models have been tested, no assurance can be made that such models will perform the same in the future. Model driven strategies may result in substantial losses in a short period of time.

### *Third-Party Managers*

The use of third-party managers in investment programs involves additional risks. The success of the third party manager depends on the capabilities of its investment management personnel and infrastructure, all of which may be adversely impacted by the departure of key employees and other events. The future results of the third-party manager may differ significantly from the third-party manager’s past performance. While Savvy intend to employ reasonable diligence in evaluating and monitoring third-party managers, no amount of diligence can eliminate the possibility that a third-party manager may provide misleading, incomplete or false information or representations, or engage in improper or fraudulent conduct, including unauthorized changes in investment strategy, insider trading, misappropriation of assets and unsupportable valuations of portfolio securities.

### *Tax-Managed Investing Risk*

Investment strategies that seek to enhance after-tax performance may be unable to fully realize strategic gains or harvest losses due to various factors. Market conditions may limit the ability to generate tax losses. A tax-managed strategy may cause a client portfolio to hold a security in order to achieve more favorable tax treatment or to sell a security in order to create tax losses. A tax loss realized by a U.S. investor after selling a security will be negated if the investor purchases the security within thirty days. Although Savvy avoids “wash sales” whenever possible and temporarily restricts securities it has sold at a loss to prevent them, a

wash sale can occur inadvertently because of trading by a client in portfolios not managed by Savvy.

#### *Tax Risk*

The tax treatment of investments held in a client portfolio may be adversely affected by future tax legislation, Treasury Regulations and/or guidance issued by the Internal Revenue Service that could affect the character, timing, and/or amount of taxable income or gains attributable to an account. Income from tax-exempt municipal obligations could be declared taxable because of unfavorable changes in tax laws, adverse interpretations by the Internal Revenue Service or non-compliant conduct of a bond issuer.

#### *Tax-Straddle Risk*

Investment strategies that utilize off-setting positions on a security or a portfolio of securities must adhere to specific rules and provisions under the Internal Revenue Code in order to avoid negative tax consequences. These provisions apply to an investor's entire investment portfolio including accounts not managed by Savvy. While Savvy seeks to avoid "tax straddles", an investor's ability to realize tax benefits (e.g., defer gains, deduct interest, convert short term gains into long term gains) may be negated by transactions and holdings of which Savvy is not aware.

#### *Tracking Error Risk*

Tracking error risk refers to the risk that the performance of a client portfolio may not match or correlate to that of the index it attempts to track, either on a daily or aggregate basis. Factors such as fees and trading expenses, client-imposed restrictions, imperfect correlation between the portfolio's investments and the index, changes to the composition of the index, regulatory policies, high portfolio turnover and the use of leverage all contribute to tracking error. Tracking error risk may cause the performance of a client portfolio to be less or more than expected.

### ***Risks Associated with Specific Types of Securities***

#### *Exchange Traded Funds (ETFs)*

ETFs are typically investment companies that are legally classified as open-end mutual funds or unit investment trusts. ETFs differ from traditional mutual funds in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and ask price is often referred to as the "spread." The spread varies over time based on the ETF's trading volume and market liquidity and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Liquidity risks are higher for ETFs with a large spread. ETFs may be closed and liquidated at the discretion of the issuing company. Clients can find more information regarding the risks associated with a specific ETF in the fund's prospectus.

#### *Mutual Funds*

Mutual funds may invest in different types of securities, such as value or growth stocks, real estate investment trusts, corporate bonds or U.S. government bonds. There are risks associated with each asset class. An investment in a money market fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other governmental agency. Although money market funds seek to preserve the value of

your investment at \$1.00 per share, it is possible to lose money by investing in the fund. Redemption is at the current net asset value, which may be more or less than the original cost. Aggressive growth funds are most suitable for investors willing to accept price per share volatility since many companies that demonstrate high growth potential can also be high risk. Income from tax-free mutual funds may be subject to local, state and/or the alternative minimum tax. Because each mutual fund owns different types of investments, performance will be affected by a variety of factors. The value of your investment in a mutual fund will vary from day to day as the values of the underlying investments in a fund vary. Such variations generally reflect changes in interest rates, market conditions and other company and economic news. These risks may become magnified depending on how much a fund invests or uses certain strategies. A fund's principal market segment(s), such as large-cap, mid-cap or small-cap stocks, or growth or value stocks may underperform other market segments or the equity markets as a whole. Clients can find additional information regarding these risks in the fund's prospectus.

#### *Alternative Investments*

Alternative investments are illiquid investments and do not trade on a national securities exchange. Alternative investments typically include investments in direct participation program securities (partnerships, limited liability companies, business development companies or real estate investment trusts), commodity pools, private equity, private debt, or hedge funds. Alternative investments are subject to various risks, such as illiquidity and property devaluation based on adverse economic and/or real estate market conditions. Alternative investments are not suitable for all investors. Investors considering an investment strategy utilizing alternative investments should understand that alternative investments are generally considered speculative in nature and may involve a high degree of risk, particularly if concentrating investments in one or few alternative investments. These risks are potentially greater and substantially different than those associated with traditional equity or fixed income investments. Additional information regarding these risks can be found in the product's prospectus or offering documents.

#### *International Investing*

The risks of investing in foreign securities include loss of value as a result of political or economic instability; nationalization, expropriation or confiscatory taxation; changes in foreign exchange rates and foreign exchange restrictions; settlement delays; and limited government regulation (including less stringent reporting, accounting, and disclosure standards than are required of U.S. companies). These risks may be greater with investments in emerging markets. Certain investments utilized by the Firm may also contain international securities.

#### *Cash and Cash Equivalents*

A portion of your assets may be invested in cash or cash equivalents to achieve your investment objective, provide ongoing distributions, and/or take a defensive position. Cash holdings may result in a loss of market exposure.

#### *Fixed-Income Securities*

The return and principal value of bonds fluctuate with changes in market conditions. Fixed-income securities are subject to interest rate risk and credit quality risk. The market value of fixed-income securities generally declines when interest rates rise, and an issuer of fixed-income securities could default on its payment obligations. Changes in interest rates generally have a greater effect on bonds with longer maturities than



on those with shorter maturities. If bonds are not held to maturity, they may be worth more or less than their original value. Credit risk refers to the possibility that the issuer of a bond will not be able to make

18

principal and/or interest payments. High yield bonds, also known as “junk bonds,” carry higher risk of loss of principal and income than higher rated investment grade bonds.

### *Equity Securities*

In general, prices of equity securities (common, convertible preferred stocks and other securities whose values are tied to the price of stocks, such as rights, warrants and convertible debt securities) are more volatile than those of fixed-income securities. The prices of equity securities could decline in value if the issuer’s financial condition declines or in response to overall market and economic conditions. Investments in smaller companies and mid-size companies may involve greater risk and price volatility than investments in larger, more mature companies.

### *Structured Products*

A structured product, also known as a market-linked product, is generally a pre-packaged investment strategy based on derivatives, such as a single security, a basket of securities, options, indices, commodities, debt issuances, and/or foreign currencies, and to a lesser extent, swaps. Structured products are usually issued by investment banks or affiliates thereof. They have a fixed maturity and have two components: a note and a derivative. The derivative component is often an option. The note provides for periodic interest payments to the investor at a predetermined rate, and the derivative component provides for the payment at maturity. Some products use the derivative component as a put option written by the investor that gives the buyer of the put option the right to sell to the investor the security or securities at a predetermined price. Other products use the derivative component to provide for a call option written by the investor that gives the buyer of the call option the right to buy the security or securities from the investor at a predetermined price. A feature of some structured products is a “principal guarantee” function, which offers protection of principal if held to maturity. However, these products are not always Federal Deposit Insurance Corporation insured; they may only be insured by the issuer, and thus have the potential for loss of principal in the case of a liquidity crisis, or other solvency problems with the issuing company. Investing in structured products involves a number of risks including but not limited to: fluctuations in the price, level or yield of underlying instruments, interest rates, currency values and credit quality; substantial loss of principal; limits on participation in any appreciation of the underlying instrument; limited liquidity; credit risk of the issuer; conflicts of interest; and, other events that are difficult to predict.

### *ESG (Environmental, Social and Governance) Investing Risk*

Stocks screened by the third party portfolio and model construction tool for ESG criteria may underperform the stock market as a whole or particular stocks selected will, in the aggregate, trail returns of other investment strategies screened for ESG criteria. Incorporation of ESG factors may affect the client’s exposure to certain companies, sectors, regions, countries or types of investments, which could negatively impact the client account’s performance depending on whether such investments are in or out of favor. Applying impact investing goals to investment decisions is qualitative and subjective by nature, and there is no guarantee that the criteria utilized by the third party provider will reflect the beliefs or values of any particular investor. In evaluating potential ESG investments, the third party provider is dependent upon information and data obtained through voluntary or third-party reporting that may be incomplete, inaccurate or unavailable, which could cause the third party provider to incorrectly assess a company’s ESG practices and/or related

risks and opportunities. ESG-related practices differ by region, industry and issue and are evolving accordingly, and a company's ESG-related practices or the assessment of such practices may change over time.

***The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment managed by Savvy.***

## **Item 9 - Disciplinary Information**

Neither Savvy nor any of its officers, directors, or employees or management persons, has been involved in any legal or disciplinary events that would require disclosure in response to this Item.

## **Item 10 - Other Financial Industry Activities and Affiliations**

Savvy and its employees do not have any relationships or arrangements with other financial services companies other than referral relationships listed in item #14 that pose material conflicts of interest.

### ***Registered Broker-Dealers***

Some persons providing investment advice on behalf of our firm are registered representatives with Kingswood Capital Partners LLC, a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). Kingswood Capital Partners LLC is not affiliated with Savvy, nor is it under common control or ownership with Savvy. See the Fees and Compensation section in this brochure for more information on the compensation received by registered representatives who are affiliated with our firm. In their capacity as a registered representative, advisors may purchase specific securities not offered through Schwab or Fidelity.

### ***Licensed Insurance Agents***

Persons providing investment advice on behalf of our firm are licensed insurance agents. See the Fees and Compensation section in this brochure for more information on the compensation received by licensed insurance agents who are affiliated with our firm.

### ***Registered Futures Commission Merchants, Commodity Pool Operators and Commodity Trading Advisors***

No one at Savvy is registered as a registered futures commission merchant, commodity pool operator or commodity trading advisor.

### ***Selection or Recommendation of Other Advisers***

Savvy recommends or selects other investment advisers but does not receive compensation from such advisers in a manner that would create a material conflict of interest. Savvy does not have other business relationships with other advisers that create a material conflict of interest.

## **Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

As an SEC registered investment adviser, Savvy has adopted and implemented a written Code of Ethics ("Code" or "the Code") under Rule 204A-1 of the Investment Advisers Act of 1940 ("Advisers Act") that is applicable to all employees. Savvy's Code describes its fiduciary duties and responsibilities to its clients and sets forth Savvy's (a) policies on receipt of gifts by employees and campaign contributions and (ii) practices of reporting and monitoring the personal securities transactions of supervised persons with access to client investment recommendations. Under Savvy's Code, all supervised personnel have a duty to act only in the best interests of its clients and all potential conflicts and violations of the Code must be promptly reported to the Chief Compliance Officer ("CCO"). All supervised personnel must acknowledge their receipt and understanding of the terms of the Code annually, or as amended.

### ***Code of Ethics***

The Code contains policies and procedures with respect to personal securities transactions by employees and related accounts that are designed to prevent front-running, scalping, the misuse of any material non-public inside information, and other improper activities. Employees must report all personal transactions to the CCO on at least a quarterly basis. Additionally, employees are required to seek CCO pre-approval before transacting in Initial Public Offerings (IPOs), private placements, and limited offerings. The CCO monitors all transactions by employees in order to identify any pattern of conduct that may evidence conflicts or potential conflicts with the principles and objectives of the Code, or other inappropriate behavior.

### ***Statement on Insider Trading***

Savvy and/or its employees may, from time to time, come into possession of material non-public or other confidential information which, if disclosed, might affect an investor's decision to buy, sell, or hold a security. Under applicable law, Savvy and its employees may be prohibited from improperly disclosing or using such information for their personal benefit or for the benefit of any other third party. Accordingly, should Savvy and/or its employees come into possession of material non-public or other confidential information with respect to any company, they may be prohibited from communicating such information to, or using such information for the benefit of, Savvy's clients and their underlying investors. Savvy has adopted a Statement on Insider Trading ("Insider Trading Policy") in accordance with Section 204A under the Advisers Act, which establishes procedures to prevent the misuse of material non-public information by Savvy and its employees. A copy of Savvy's Code of Ethics is available upon request by contacting [compliance@savvywealth.com](mailto:compliance@savvywealth.com).

### ***Statement on Principal and Cross Trades***

Section 206(3) of the Advisers Act makes it unlawful for any investment adviser, directly or indirectly, acting as principal for its own account, knowingly to sell any security to or purchase any security from a Client without disclosing to the Client in writing the capacity in which the adviser is acting and obtaining the Client's consent to the transaction. Savvy does not anticipate engaging in principal transactions with Clients. Should Savvy decide to engage in a principal transaction with a Client, it will affect the transaction in compliance with Section 206(3) of the Advisers Act.

## Item 12 - Brokerage Practices

Savvy generally recommends that clients arrange for their assets to be held with Fidelity and/or Charles Schwab (“Custodians”). The Firm generally executes securities transactions through the institution where client accounts are held. Savvy believes that Fidelity and Schwab provide reliable, quick, responsive and efficient brokerage services.

Our Custodians provide Savvy with access to their institutional trading and operational services, which are typically not available to retail individual investors. Their services also include custody and access to mutual funds and other investments that are otherwise generally available only to institutional investors or that would require a significantly higher minimum initial investment. Additionally, our Custodians generally do not charge clients separately for custody of their investment accounts, but do receive compensation from account holders through transaction-related fees (i.e. commissions or trading fees) or some asset-based fees.

### ***Best Execution Considerations***

Subject to the Clients’ investment management agreements, Savvy has discretionary authority to determine the type, amount, and price of securities and investments to be bought and sold on behalf of each Client, including the selection of, and commissions paid to, brokers. Savvy considers a variety of factors in its selection of trading counterparties.

Savvy seeks to trade with reputable counterparties. In addition to trading costs and listed prices, the Company periodically and systematically evaluates approved counterparties based on factors such as:

- The ability to execute large or difficult transactions;
- The brokers’ or dealers’ facilities;
- The ability to execute quickly when necessary;
- The ability to work orders when necessary;
- The ability to obtain locates for short sales;
- Special execution capabilities;
- Efficiency of execution and error resolution;
- Willingness to execute related or unrelated difficult transactions in the future;
- Custody, recordkeeping and similar services
- The protection of Savvy Advisory’s proprietary trading information;
- Financial responsibility, regulation, and integrity;
- The frequency of trade errors; and
- The responsiveness to Savvy during trading and settlement.

Savvy has not acquired any products or services with client brokerage commissions. Services constituting “research” under Section 28(e) that Savvy may receive in connection with Client Accounts’ trading may include, but are not limited to: research reports; financial newsletters and trade journals; attendance at certain seminars and conferences; economic and market information; industry and company comments; technical data; recommendations; information on industries, groups of securities, individual companies, political developments, legal developments affecting portfolio securities and technical market action; statistical information; accounting and legal interpretations relating Client Account transactions; credit analysis; risk measurement analysis, and performance analysis. These research services are received primarily in the form of written reports, calls, and meetings with research analysts. In addition, such

research services may be provided in the form of access to computer-generated data and meetings arranged with corporate and industry spokespersons, economists, academicians and/or government representatives. Products and services constituting “brokerage” under Section 28(e) that the Company may receive in connection with Client Accounts’ trading may include, but are not limited to: services related to the execution, clearing and settlement of securities transactions and functions incidental thereto, such as connectivity services between Savvy and a broker-dealer and other relevant parties such as custodians; trading software operated by a broker-dealer to route orders; software that provides trade analytics and trading strategies; software used to transmit orders; trade clearance and settlement; electronic communication of allocation instructions; routing of settlement instructions; post-trade matching of trade information; and services required by the SEC or a self-regulatory organization, such as comparison services, electronic confirms or trade affirmations.

### ***Directed Brokerage***

Clients generally do not direct the Firm to trade through any particular counterparty or custodian. A Client’s insistence on the use of one or more particular counterparties in connection with the trading of its account can have a materially adverse effect on the quality of execution that is available to the Client. Among other things, Clients that direct the use of trading counterparties may pay higher transaction costs as a result of being excluded from aggregated orders, and trade after other Clients have traded.

### ***Trade Aggregation and Allocation***

Trading activities of Client accounts will overlap. While Client accounts invest in the same issuers, the purchase and sale of such investments may be at different times and upon different terms, based on each Client’s overall investment objectives and strategy, legal or regulatory concerns, and/or other relevant considerations.

When Savvy purchases or sells securities of the same issuer at the same time for the Clients, Savvy may submit an aggregated trade for execution if Savvy believes that the use of an aggregated trade reasonably furthers its efforts to seek best execution. Participants in aggregated trades receive the average execution price and incur their pro rata share of the trading costs.

To the extent that partial fills occur, Savvy will allocate the results of the partially completed trade pro rata between participating Clients based on the initial allocation instructions submitted for execution. Impacted accounts receive the average execution price and incur their pro rata share of the trading costs with respect to the partially completed trade.

Instances in which Client orders may not be aggregated include, but are not limited to, the following: (1) Savvy determines that the aggregation is not appropriate because of market conditions; (2) Situations where Savvy must effect the transactions at different times or prices, making aggregation unfeasible; and (3) A determination is made by Savvy not to aggregate orders because of tax, legal, regulatory or administrative reasons such as typical trading increments or quantities.

### ***Trade Errors***

While Savvy takes the utmost care in making and implementing investment decisions on behalf of Clients, it may make an error while placing a trade for Clients. Savvy attempts to minimize trade errors by promptly reconciling confirmations with trade tickets, and by reviewing past trade errors to understand the internal

control breakdown that caused the errors. If Savvy makes an error while placing a trade, the Firm will seek to correct the error promptly in a way that mitigates any losses. The cost of errors will be borne by Savvy for any error that is the result of bad faith, gross negligence, or willful misconduct by Savvy. Savvy will generally bear any costs associated with correcting any error for a client's account subject to the terms of the relevant investment management agreement.

#### ***Valuation of Client Assets***

Savvy relies on the custodians of client accounts to provide accurate valuations of client investments. The Firm does not value investments separately from the values received from the custodians of the client accounts. However, Savvy's periodic client investment performance reports may vary slightly from custodial statements received by its clients due to the Firm's reliance on third party portfolio management systems to aggregate client account information. Clients should contact Savvy if any significant discrepancies or errors are discovered.

### **Item 13 - Review of Accounts**

Savvy strives to review managed client accounts regularly with clients, but there is no rigid schedule for doing so. However, clients are offered a review on an annual basis. Each client works with an Advisor who is responsible for helping them determine an investment plan, establishing a target allocation percentage and answering any questions the client may have about their specific financial situation.

Savvy's reviews client accounts periodically to ensure allocation thresholds are being met, and to invest money or withdraw it as necessary given the client's guidelines. Additional or focused reviews can be triggered by factors such as political and economic developments, corporate announcements, and changes in market conditions.

#### ***Reports to Clients***

Savvy provides quarterly reports on managed client accounts and balances. Clients also receive regular monthly statements from their custodian(s) for the same accounts which show account transactions and month-end holdings.

Clients should review their custodial statements and contact Savvy Advisors if any significant discrepancies or errors are discovered.

### **Item 14 - Client Referrals and Other Compensation**

We receive an economic benefit from Fidelity and Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at these Custodians. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of the Custodians' products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

#### ***Indirect or Direct Compensation for Client Referrals***

### ***Entity Solicitor Programs***

Savvy may participate in referral programs through various third parties to which Savvy pays a solicitation fee in connection with participation in the referral program (described more specifically in the respective program solicitation disclosures presented to referral program clients).

The amount and level of fees charged by Savvy to clients referred to it through a referral program will not be higher than the fees charged, and the level or quality of services provided will not be inferior to the level or quality of services provided, to a client of Savvy's for which Savvy does not have to pay a referral fee to a third party and which client receives comparable services for a comparably sized account.

A client's participation in a referral program does not reduce or eliminate Savvy's fiduciary duty to obtain best execution when selecting brokers to execute securities transactions on behalf of clients. While conflicts of interest may arise through Savvy's participation in the referral programs, as always, Savvy will make every effort to ensure that all recommendations are in the client's best interests. Savvy is not affiliated with any referral program sponsoring entity.

### ***AgouraGrowth***

Savvy has entered into a written agreement with AgouraGrowth, an advertising service, that facilitates introductions to Savvy for a fee. Investors are referred to Savvy based on a prospect's responses to a questionnaire. Investors decide whether to visit either site, and are not required to engage Savvy. Clients introduced to Savvy through AgouraGrowth do not incur any additional fees as a result of the introduction.

## **Item 15 - Custody**

When a client establishes a relationship with Savvy for investment management services, their assets will be maintained by an unaffiliated broker dealer or bank. These institutions are deemed "qualified custodians" by the SEC. The Firm relies on the custodians to price and value assets, execute and clear transactions, maintain custody of client account assets and perform other custodial functions.

Savvy can access client accounts through its ability to debit advisory fees. For this reason, the Firm is considered to have custody of client assets. Clients will receive account statements directly from their qualified custodian, who maintains the Clients' cash and securities assets. Savvy encourages Clients to compare the account statement received from its custodian to the reporting received from the Firm. Clients should promptly notify Savvy if they do not receive account statements from their custodian at least quarterly or if they believe the information contained in the statements is inaccurate.

Savvy is deemed to have custody when clients authorize us, via standing letters of instruction, to direct funds to third-parties from their custodial accounts. In connection with standing letters of instruction, a client must provide signed written instruction to the custodian to direct transfers to a third party, which the client may instruct the custodian to terminate or change at any time. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction. We and our employees may not accept funds in connection with standing letters of instruction, nor may funds be delivered to locations where we conduct business

## **Item 16 - Investment Discretion**

Savvy has investment discretion from most of its clients to select the identity and amount of securities to be bought or sold within the client's account or to identify a third party investment advisor to do the same. Clients grant the Firm investment discretion through the execution of a limited power of attorney included in Savvy's investment management agreement. Where discretion has been granted, Savvy or the Firm's designated third party investment advisor, has authority to manage the client's account and make investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives/goals of the client and/or financial plan created for each client.

Clients can place reasonable restrictions on Savvy's investment discretion. For example, some clients may ask the Firm to not buy securities issued by companies in certain industries, or not to sell certain securities where the client has a particularly low tax basis.

For certain client accounts, Savvy will work with third party platforms to facilitate management of held away assets, such as defined contribution plan participant accounts with investment discretion. The Firm is not affiliated with the third-party service provider providing the platform and receives no compensation from them for using their platform. Once the client's held away account is connected to the platform, Savvy will review the current allocations. When deemed necessary, the Firm will rebalance the account considering the client's investment goals and risk tolerance, and any change in the allocation will consider current economic and market trends.

## **Item 17 - Voting Client Securities**

Savvy does not vote proxies or monitor or act on security class actions on behalf of client securities, unless otherwise instructed and accepted by us (see below). Clients maintain exclusive responsibility for: (i) directing the manner in which proxies solicited by issuers of securities they beneficially own will be voted, and (ii) making all elections relative to mergers, acquisitions, tender offers, bankruptcy proceedings, corporate actions, or other types of events pertaining to the client's investments.

We do not render advice to or take any actions on behalf of clients with respect to any legal proceedings, including bankruptcies and shareholder litigation, to which any securities or other investments held in client accounts, or the issuers thereof, become subject, and do not initiate or pursue legal proceedings, including without limitation shareholder litigation, on behalf of clients with respect to transactions, securities or other investments held in client accounts. The right to take any actions with respect to legal proceedings, including shareholder litigation, with respect to transactions, securities or other investments held in a client account is expressly reserved to the client.

## **Item 18 - Financial Information**

Savvy is required to disclose certain information to clients regarding financial matters of the firm.

- Savvy does not require or solicit prepayment of more than \$1,200 in fees per client for investment



advisory services expected or scheduled to be delivered more than six months after such prepayment.

- Savvy has no financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.
- Savvy has not been subject of a bankruptcy petition at any time.