

arta finance

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PART 2A OF FORM ADV: FIRM BROCHURE

March 29, 2024

This brochure provides information about the qualifications and business practices of Arta Finance Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (650) 318-3898 or support@artafinance.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 Arta is also available on the SEC's website at www.adviserinfo.sec.gov.

Registration with the SEC as a registered investment adviser pursuant to the Investment Advisers Act of 1940, as amended (the "Advisers Act"), does not imply a certain level of skill or training.

ITEM 2 MATERIAL CHANGES

This Item requires us to summarize any material changes to our Form ADV Part 2A since our last annual amendment. We have summarized the following change to the current Form ADV Part 2A below:

- Item 4: Advisory Business – Updated to reflect our assets under management. As of December 31, 2023, Arta has \$134,905,755 in assets under management. \$45,820,275 of this is held in discretionary accounts, \$89,085,480 is in non-discretionary accounts.
- Item 4: Advisory Business – Updated to include additional products and services provided.
- Item 8: Method of Analysis, Investment Strategies and Risk of Loss – Updated to include additional investment strategies and risk sections.
- Item 10: Other Financial Industry Activities and Affiliations – Updated to include additional affiliations.
- Item 15: Custody – Updated to reflect change in custody status in an other-than-annual amendment filed on June 26, 2023, which subsequently is no longer applicable for this annual amendment.

Since the previous annual filing on March 27, 2023, the Adviser has also made other non-material edits to this brochure.

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ITEM 4 ADVISORY BUSINESS

Arta Finance Wealth Management, LLC (“Arta,” “Adviser,” “Firm”), a Delaware LLC, was established in 2022 with an office in Mountain View, CA. The Firm was previously incorporated as Arbo Works Inc. in 2021 until the current entity was created to house the investment advisory functions of the Firm. The Firm is owned by 8 co-founders as well as several Venture Capital firms, all of whom own less than 25%. As of December 31, 2023, Arta has \$134,905,755 in assets under management. \$45,820,275 of this is held in discretionary accounts, \$89,085,480 is in non-discretionary accounts.

Arta provides an interactive investment platform (the “Platform”) to its clients. The Platform is accessible through smartphone applications available on the Google Play Store and Apple App Store, as well as through the internet (via web browser). The Platform helps clients reach their financial goals by providing recommendations and investment strategies tailored to each individual’s preferences, objectives, and risk tolerance. Arta currently offers its services to Accredited Investors, Qualified Clients, and Qualified Purchasers, however, in our sole discretion, we may waive such accreditation or qualification requirements. Arta collects information from each client at time of onboarding, and periodically thereafter, including specific information about a client’s financial situation and overall investment objectives. Investment recommendations are then generated, and in certain instances executed, by Arta’s proprietary algorithms (“the Algorithm”) or qualified investment professionals. Such recommendations are based on the information provided by the client and the specific product or service being considered. Arta accepts full discretion over client assets for fully managed accounts and also offers services on a self-directed basis. Arta’s services are delivered through tandem accounts (discretionary and self-directed); therefore, at account inception, both such accounts are automatically and simultaneously opened on behalf of clients, as outlined in the Investment Management Agreement (“IMA”).

Arta offers clients the opportunity to transact, where applicable, in public and private market products and also provides related services. Certain products and services are subject to approval from the third party issuers or custodian/broker-dealers and must be compatible with the investment objectives of the client. Private placement and alternative investments (collectively, “Alts” or “Alt Investments”) will only be offered to qualified investors in compliance with applicable rules and regulations.

Arta does not participate in wrap fee programs.

ITEM 5 FEES AND COMPENSATION

Separately Managed Accounts (“SMA”)

As described above, Arta will provide clients with a self-directed account for which Arta does not

charge fees. However, it should be noted that clients may be charged fees for investments and related services provided by Arta that are funded by their self-directed account, for example Alt Investments, as described below, as well as services such as personalized investment strategy planning.

For accounts managed on a discretionary basis, clients will be charged fees as described on the schedule below. Fees are charged quarterly, in-arrears, and may be waived or discounted at Arta's sole discretion.

Public market investments, including AI-Managed Portfolios ("AMPs"), fee structure: Accredited investors pay an asset-based fee for public market investments. Qualified Clients and Qualified Purchasers can choose from among three pricing options when their AMP is created. Specific pricing for the various offerings can be viewed on the Platform prior to making an investment.

| Pricing Model | Pricing (Annual) |
|--------------------------------------------|------------------------------------------|
| Asset-based | 0.0-0.5% of amount invested |
| Hybrid (Asset-based and Performance-based) | 0.20% of amount invested + 5% of growth* |
| Performance-based | 10% of growth* |

*5-10% performance fee is based on incremental growth of monthly (or quarterly) average balance from previous month (or quarter).

Alt Investments

Alts offered via the platform are sponsored by third parties and offered through third-party platforms or offered directly through the private fund sponsor. Arta charges a fee to its clients for investments in Alts. The Arta fee is typically between 0.50% to 0.65%, but may range up to 1%, of the amount invested or committed capital depending on each specific Alt Investment. Fees based on committed capital are specific to Alts that are structured as drawdown funds. Underlying issuers will charge fees to Arta's clients, which will vary by each Alts Investment. Clients should refer to the underlying Alt Investment's subscription agreements to obtain detailed information regarding fees and expenses charged directly by the underlying issuers.

Fees for Investment of Client Assets in Third-Party Mutual Funds, Private Funds, and Other Pooled Investment Vehicles

Arta may invest, or the client may direct investment of, a client's assets in mutual funds (including money market funds or similar short-term investment funds) or other pooled investment vehicles sponsored by third parties, such as hedge funds, venture capital funds, REITs, structured products, exchange-traded notes ("ETNs") and/or exchange-traded funds ("ETFs"). To the extent that a client's

assets are invested in other pooled investment vehicles, the client will also typically pay management and/or other fees (such as performance fees) associated with each such mutual fund or other pooled investment vehicle, as described below. Those fees are described in each mutual fund or other pooled investment vehicles' offering documents (e.g., prospectus or offering memorandum). Such charges, fees, and commissions are exclusive of, and in addition to, Arta's investment advisory fee.

Additional Fees and Expenses Payable by Clients

Clients may incur brokerage commissions, transaction fees, service provider fees, feeder fund expenses, and other related costs and expenses directly from the custodian, issuer, or broker-dealer. Execution of client transactions may require payment of brokerage commissions by clients. "Item 12 – Brokerage Practices" further describes the factors that Arta considers when selecting or recommending broker-dealers for the execution of transactions and determining the reasonableness of their compensation (e.g., commissions). Investment activity may also involve other transaction fees payable by clients, such as sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. In addition, clients may incur certain charges imposed by outside custodians, broker-dealers, and other third parties, such as custodial fees, administrative fees, and transfer agency fees. Arta does not receive any payments from brokers, custodians, or any other third parties relating to its provision of investment advisory services.

Clients whose assets are invested in mutual funds may pay fees, such as various types of shareholder fees and/or annual fund operating fees. Clients should review the prospectus of any fund in which their assets are invested in order to understand the fees that may be applicable to their particular investment.

Arta Referral Program

Arta maintains a referral program ("Waives") that enables it and its clients to provide waivers of Arta fees on investments made through the Platform to existing or new clients. There are two types of Waives, those that can be applied to certain investments in a client's own account and those that can be gifted to other clients. The fee waivers only apply to Arta fees on investment products and do not waive fees levied by underlying security issuers, sponsors, or managers. Arta maintains Waives at its sole discretion and may make changes to the program without notice. Waives are subject to certain terms and conditions which can be viewed on Arta's website or upon becoming a client of Arta.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Performance-Based Fees

Arta offers performance-based pricing to Qualified Clients and Qualified Purchasers. Clients meeting these criteria may choose from pricing structures that are performance-based or based on assets under management, as mentioned in Item 5. Performance-based fees can incentivize Arta to take additional risk within a client's portfolio in order to receive this fee. A more volatile portfolio can benefit both the adviser and client during up markets, but can damage a client's portfolio during down markets.

Side-by-Side Management

Arta's Algorithm and Platform simultaneously manage accounts for various Arta clients, some of whom may have similar investment objectives. The simultaneous management of these different investment accounts could create certain conflicts of interest, for example if the fee structures for the management of certain types of accounts were higher than others. Arta recognizes that it has an affirmative duty to treat all such accounts fairly and equitably over time. Although Arta has a duty to treat all similarly managed accounts fairly and equitably over time, such portfolios will not necessarily be managed the same at all times. Specifically, there is no requirement that Arta uses the same investment practices consistently across all accounts. In general, investment decisions for each client account will be made independently from those of other client accounts, and will be made with specific reference to the individual needs and objectives of each client account. In addition, Arta will not necessarily purchase or sell the same securities at the same time or in the same proportionate amounts for all eligible accounts, particularly if different accounts have materially different amounts of assets under management or different amounts of investable cash available. As a result, although Arta manages numerous accounts with similar investment objectives, or may manage accounts with different objectives that trade in the same securities, the portfolio decisions relating to these accounts, and the performance resulting from such decisions, may differ from account to account.

ITEM 7 TYPES OF CLIENTS

Arta provides advice to individuals, trusts, and entities. All investors must be accredited investors at a minimum, as defined by Regulation D. Arta currently requires a minimum investment of \$100,000, which may be reduced or waived in the Adviser's sole discretion.

Conditions for Managing Accounts

Arta requires each client to execute an IMA that details the nature of the discretionary investment advisory authority given to Arta, among other items. Arta retains the right to provide investment

advisory services only to clients it, in its sole discretion, deems suitable and who have successfully completed the account opening process.

Alt investments will have issuer-imposed, investment-specific investment minimums and requirements. The specifics of such minimums and requirements can be found on the Platform and in the subscription documents for each such investment.

ITEM 8 METHOD OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Investment Strategies and Methods of Analysis

Public Market Investments (Discretionary)

For clients investing through the aforementioned discretionary account, Arta's public market investment strategies utilize custom-developed portfolio construction algorithms and use minimum volatility methodology to inform investment decisions, where applicable. These algorithms seek to enhance portfolios in various ways, for example to minimize risk and volatility, reduce cash drag and allow for customization of certain investment strategies. In addition, certain algorithms reallocate and rebalance investments with the aim of fulfilling specific investment objectives. Arta's public market investment strategies utilize a wide range of security types that include, but are not limited to, equities, cash and cash equivalents, fixed income securities and ETFs.

These algorithms process a range of data sources to inform its decisions. This includes historical pricing data of publicly traded securities as well as integrating insights from Arta's proprietary model. This model is capable of breaking down the risk associated with a specific security.

Arta will present clients with recommended investments based on the financial information and investment preferences shared by the client, such as investment objectives, risk tolerance, liquidity needs and other client preferences.

Public Market Investments (Self-Directed)

For clients investing through the aforementioned self-directed account, Arta's public market investment strategies focus on structured products and derivatives. For structured products, Arta relies on the deep expertise of its investment team and seeks to develop bespoke structured products with optimal structures based on current market dynamics. These structured products consider a number of factors, including but not limited to, potential return profile and analysis of the underlying securities. For derivative strategies, Arta consults directly with clients who are interested in such strategies and relies on the deep expertise of its investment team and preferences expressed by clients, such as investment objectives and risk tolerance, in order to recommend a derivative strategy tailored to client needs.

Alt Investments (Self-Directed)

Arta collects accreditation and qualification information electronically via the Platform in order to determine eligibility for Alts.

Alt Investment opportunities are made available on the Platform after Arta conducts due diligence on such investment opportunities. Clients can review and invest in these opportunities in a self-directed manner, or may receive specific recommendations from Arta pertaining to Alts. Arta will present clients with recommended investments based on the financial information and investment preferences shared by the client, such as investment objectives, risk tolerance, liquidity needs and other client preferences.

Alt investments available on the Platform are expected to include opportunities in a variety of underlying strategies, including, but not limited to, private equity, venture capital, private credit and private real estate.

Outside of strategies described above, self-directed accounts do not receive any investment advice from Arta.

Risks

Risk of Loss

All investing and trading activities risk the loss of capital. **Arta cannot guarantee any level of performance or that clients will not incur a loss of capital, including total loss.** The following risks are not meant to be all inclusive, but should be considered prior to engaging Arta for its advisory services.

Technology Risk

Advisers who rely on technology for the delivery of services, known as internet-based investment advisers, offer online investment management services using algorithms and automated processes. Arta offers algorithmic management of client assets in certain products, as described above.

Lack of Personalized Advice

While Arta receives certain information from clients in order to assess client's risk tolerance and investment goals, the advice provided may not be completely tailored to any particular client's specific financial situation, objectives, or preferences. Personalized advice that considers individual circumstances can be crucial in making appropriate investment decisions.

Reliance on Algorithms

As described above, some of Arta's investment strategies are based on algorithms that analyze

market data and historical trends. While algorithms can be effective tools for decision-making, they are not infallible. They may fail to account for certain market conditions, unexpected events, or changes in investment trends, which could lead to suboptimal investment outcomes.

Security Risks

Internet-based platforms are vulnerable to technological glitches, system failures, or cyber-attacks that could potentially compromise the security of a client's personal and financial information. Although Arta has security measures in place, there is always a risk of data breaches or unauthorized access to a client account.

Software Risk

Arta delivers investment advisory services primarily through its Platform and therefore develops and tests its Platform extensively before putting updates to the Platform into production with client accounts. Additionally, Arta monitors the behaviors of the Platform after deployment. Despite these safeguards, it is possible that the Platform may not always perform exactly as intended or as disclosed, especially in unusual circumstances. For example, there may be occasions where a number of client accounts may not rebalance back to the client's target asset allocation for extended periods of time, due to certain errors in the deployment of updates to the Platform or related issues. Arta continuously strives to monitor, detect, and correct any issues on its Platform that do not perform as expected or as disclosed.

Overemphasis on Historical Data

Algorithmic trading relies heavily on historical data to make investment recommendations. However, past performance is not always indicative of future results. Economic and market conditions can change, and over-reliance on historical data may overlook potential risks or fail to identify emerging investment opportunities.

Advisory Risk

There is no guarantee that Arta's algorithm, analysis, or recommendations pertaining to particular securities or strategies will produce the intended results. Arta's judgment may not be correct, and clients may not achieve their investment objectives. In addition, there is a risk that Arta or its clients may experience computer and/or mobile device issues, including equipment or Platform failure, loss of internet access, viruses, or other events that may impair our ability to provide advisory services.

General Market Risk

The price of any security or the value of an entire asset class can decline for a variety of reasons that Arta cannot control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, as well as domestic or foreign political, demographic, or social events.

Financial Institution Risk

An investment with Arta is subject to the risk that one of the Firm's service providers, including banks, brokers, hedging counterparties, lenders, or other custodians of some or all of the Firm's assets (each, a "Financial Institution") fails to perform its obligations or experiences insolvency, closure, receivership or other financial distress or difficulty (each, a "Distress Event"). Distress Events can be caused by factors including eroding market sentiment, significant withdrawals, fraud, malfeasance, poor performance or accounting irregularities. In the event a Financial Institution experiences a Distress Event, Arta may not be able to access deposits, borrowing facilities or other services on behalf of its clients for an extended period of time or ever. Although assets held by regulated Financial Institutions in the United States frequently are insured up to stated balance amounts by organizations such as the Federal Deposit Insurance Corporation ("FDIC"), in the case of banks, or protected by the Securities Investor Protection Corporation ("SIPC"), in the case of certain broker-dealers, amounts in excess of the relevant insurance are subject to risk of loss, and any non-U.S. Financial Institutions that are not subject to similar regimes pose increased risk of loss.

Although in recent years governmental intervention has resulted in additional protections for depositors, there can be no assurance that governmental intervention will be successful or avoid the risk of loss, substantial delays or negative impact on banking or brokerage conditions or markets. Any Distress Event has a potentially adverse effect on the ability of Arta to manage its client investments, and on the ability of the Firm to maintain operations, which in each case could result in significant losses and unconsummated investment acquisitions and dispositions. Such losses have the potential to require Arta to pay fees and expenses in the event the Firm is not able to close a transaction on behalf of its client (whether due to the inability to draw capital on a credit line provided by a Financial Institution experiencing a Distress Event), as well the inability of the Firm to acquire or dispose of investments at prices that the Firm believes reflect the fair value of such investments. Although Arta expects to exercise contractual remedies under the agreements with Financial Institutions in the event of a Distress Event, there can be no assurance that such remedies will be successful or avoid losses or delays. Many Financial Institutions require, as a condition to using their services or otherwise, that Arta maintain all or a set amount or percentage of their respective accounts or assets with the Financial Institution, which heightens the risks associated with a Distress Event with respect to such Financial Institutions. Although Arta seeks to do business with Financial Institutions that it believes are creditworthy and capable of fulfilling their respective obligations to the Firm's clients, Arta is under no obligation to use a minimum number of Financial Institutions with respect to any client, or to maintain account balances at or below the relevant insured or protected amounts.

Liquidity Risk

In situations where there is little or no active trading market for certain securities or investments, it may be more difficult to sell them at or near their perceived value, or at any price. When a portfolio

holds illiquid investments, the portfolio may be harder to value, especially in changing markets, and if a portfolio is forced to sell these investments to meet redemptions or for other cash needs, the portfolio may suffer a loss. In addition, when illiquidity in the market exists for certain securities, a portfolio may be unable to achieve its desired level of exposure to a certain sector

Alt Investment Risk

Due to the speculative nature of Alts, such investments carry larger general risk, including loss of principal. Additionally, Alt Investments carry other risks such as valuation and lack of liquidity. Clients should carefully review underlying fund documents when considering an investment in any Alt.

Derivative Risk

Committed securities can be called away from the client (i.e., underlying shares can be sold). Selling the underlying stock prior to expiration can result in losses. Derivative trades may produce adverse tax consequences depending on the strategies employed – investors should consult with a tax specialist regarding their unique scenario and circumstances to understand the types of tax obligations that may result from derivative trades. When selling covered options, the client may lose out on potential gains if the underlying asset price moves past the strike price of the option they traded. Purchasing options does not guarantee the client will be protected from loss or that the value of any protection will exceed the premium spent. The market value of a derivatives position may vary for a variety of reasons other than a change in the share price of the underlying asset, including but not limited to volatility, interest rates, dividends, or other unforeseen circumstances.

Equity Securities Generally

The value of equity securities generally varies with the performance of the issuer and movements in the equity markets. Investors in equity securities may lose a substantial portion of their principal.

Large Cap Stock Risk

Large cap companies may underperform other accounts invested in different types of equities, as large cap companies may not experience sustained periods of growth in the mature product markets in which they operate.

Small and Mid Cap Stock Risk

Small and mid cap stocks may have more risk and could underperform securities of larger more established companies because small and mid cap companies may have less revenue, narrower product lines, less management depth, small market share, fewer financial resources, and less competitive strength.

Exchange Traded Funds and Notes Risk

Investing in ETFs or ETNs carry additional risks, such as the risk of not having the same rights as

direct shareholders (e.g. voting rights), paying additional or unexpected fees and charges, not being able to choose the investments within the ETF/ETN, the ETF/ETN not tracking its underlying index or asset accurately or consistently, or of facing unfavorable or complex tax consequences.

Fixed Income Risks

Credit and Counterparty Risk

An issuer of bonds or other debt securities, or a counterparty to a derivatives contract, may not be able to meet interest, principal, or settlement payments, or otherwise honor its obligations.

Interest Rate Risk

Fixed-coupon payments (cash flows) of debt securities may become less competitive with the market in periods of rising interest rates and cause debt security prices to decline.

Prepayment Risk

Many bonds and debt securities have call provisions that may result in debtors paying back the debt prior to maturity during periods of decreasing interest rates.

Structured Product Risk

Underlying Asset Risk

The performance of structured products is often linked to underlying assets. If the value of these assets falls, the investment may suffer losses.

Issuer Credit Risk

Structured products are typically built using corporate bonds issued by financial institutions, and as such a client's invested principal is subject to the credit risk of the bond issuer. If the issuer encounters financial difficulties or defaults, investors may face the risk of losing part or all of their investment. Historically, investment-grade bonds carry more risk than US government bonds, but less risk than investing in the stock market.

Limited Liquidity

Many structured products have a holding requirement of multiple years. While it may be possible to withdraw funds before the term is over, liquidity is not guaranteed, and clients may lose principal, depending on market circumstances.

Tax Implications

Any investment income or capital gains received from structured products are taxable. These products have complex tax requirements; Arta does not provide tax advice and Arta always strongly recommends clients speak with their tax advisor to understand tax-related implications on their

investments.

Capital Protection Risk

Some structured products may promise capital protection, but the degree of protection can vary. Clients should carefully review the terms to understand the extent of capital protection offered.

Leveraged Instrument Risk

Leveraged instruments are financial instruments that use borrowed money to increase the potential return of an investment. However, they also increase the potential risk of loss. Using leverage can result in a much higher downside risk, sometimes resulting in losses greater than the initial capital investment. Use of leverage may be more expensive than other types of trading due to fees, margin rates, and contract premiums regardless of the success of the trade. Additionally, use of leveraged instruments is generally a more complex strategy to deploy, as trading may require additional capital and time based on portfolio needs. Most notably, volatility drag (also known as volatility tax, beta slippage, value erosion, decay, and other names) makes a long-term investment in leveraged ETFs more exposed to losses than many realize.

Force Majeure

Arta shall not be liable for any failure or delay in performing its obligations under its agreement with the Client or App Terms of Service if such failure or delay is caused by an event or circumstance beyond the reasonable control of the affected party ("Force Majeure Event"), including but not limited to acts of God, natural disasters, war, terrorism, riots, strikes, labor disputes, governmental actions, epidemics, pandemics, or any other events beyond the reasonable control of the parties.

If a Force Majeure Event occurs, Arta will seek to promptly notify the relevant parties in writing, providing details of the event, its impact on performance, and the expected duration of the event. Arta will seek to make reasonable efforts to mitigate the effects of the event and resume performance as soon as practicable.

During the continuance of the Force Majeure Event, the obligations of Arta that are prevented or delayed by the event may be suspended. Arta strives to act in good faith to find alternative methods of performance to accommodate the changed circumstances resulting from the Force Majeure Event.

ITEM 9 DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's evaluation of Arta or the integrity of our management or any employee of our Firm.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Arta's parent company is Arta Finance Inc. Arta's affiliate, Arta Finance Securities LLC, has a pending new membership application to register as a broker-dealer with the Financial Industry Regulatory Authority ("FINRA").

Arta is under common ownership with Arta Wealth Management Pte. LTD, which is regulated by the Monetary Authority of Singapore.

Another Arta affiliate , Arta Finance Insurance LLC, offers insurance products. In addition, Arta Finance Club, LLC, another affiliate, provides tax advisory and estate planning services, among other services.

Neither Arta nor any of its management persons is registered, or has applied to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person thereof.

None of Arta's employees or officers have relationships with related parties in the financial services industry that materially affect Arta's advisory service or any member.

None of Arta' employees or officers recommend or select investment advisers for clients or have any business relationships with other investment advisers.

Referring clients to affiliates of the Firm presents Arta with a conflict of interest, for example for insurance products or tax advisory and estate planning services. Arta is incentivized to refer clients to affiliates in situations where clients are seeking such products or services. However, affiliates of the Firm may not be the most suitable provider for clients depending on the client's specific circumstances. We address this risk by encouraging clients to consider, at their discretion, alternative options for such products and services.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

It is possible that employees may independently invest in the same securities that are held by and/or recommended to clients. Arta employees are eligible to hold accounts with Arta and invest alongside clients. As such, Arta has adopted a Code of Ethics that sets forth the standards of conduct expected of employees. All employees are required to comply with the provisions of the Code of Ethics. The Code of Ethics includes policies and procedures relating to personal trading, gifts and entertainment involving business associates, outside activities, political contributions as well as other potential or actual conflicts of interest. All employees and officers must acknowledge receipt of the Code of

Ethics and report any violations of the Code to the Chief Compliance Officer or their designate (collectively, “CCO”).

In addition, the Code of Ethics requires all employees to comply with certain rules designed to protect against insider trading. Pursuant to the Code of Ethics, upon commencement of employment, Arta’s employees who are designated as Access Persons are required to provide an initial holdings report disclosing all personal brokerage accounts and Alt Investments. In addition, employees must thereafter provide a personal trading report to the Compliance department within 30 days after the end of each calendar quarter. This report must include every securities transaction (excluding transactions effected in any account over which the employee has no direct influence or control, and transactions in securities that are direct obligations of the Government of the United States, bankers’ acceptances, bank certificates of deposit, commercial paper, and high quality short-term debt instruments, including repurchase agreements, or shares issued by registered open-end investment companies) in which the employee, the employee’s immediate family living in the same household or trusts of which the employee is a trustee or in which the employee has a beneficial interest have participated during the quarter.

Certain personal trades must be pre-cleared by the CCO, including investments in Alts, initial public offerings, and initial coin offerings, as described in Arta’s Code of Ethics. Each Access Person is also required to provide an annual report of brokerage accounts and holdings along with an acknowledgment at least annually that the Access Person will comply with the provisions of the Code of Ethics.

Arta is required to keep copies of the Code of Ethics and all records relating thereto. Clients or prospective clients may obtain a copy of the Code of Ethics upon written request using the address on the front page of this Brochure.

ITEM 12 BROKERAGE PRACTICES

Arta utilizes qualified custodians to maintain custody of client assets. These same broker/dealers will execute client transactions. Arta has a fiduciary duty to seek best execution (see further description below), and to ensure that trades are allocated fairly and equitably among clients over time.

Brokerage Relationships

Arta’s relationships with broker/dealers, particularly those affiliated with large financial services organizations, are complex. Arta may have other relationships with such firms in addition to trade execution services. For example:

- Arta may invest client assets in securities issued by broker/dealers or their affiliates; and

- Notwithstanding such relationships or business dealings with these broker-dealers, Arta has a fiduciary duty to its clients to seek best execution when trading with these firms, and has policies and procedures to monitor its efforts in this regard, as described further below.

Best Execution – Selection Factors for Broker/Dealers

As noted above, Arta has a duty to seek best execution of transactions for client accounts. In seeking best execution, Arta looks for the best combination of transaction price, quality of execution (e.g., the speed of execution, the likelihood the trade will be executed, etc.), institutional stability (e.g., solvency risk) and other valuable services that an executing broker/dealer may provide, for example, access to research.

Clients grant Arta the authority to select the broker/dealer to be used for the purchase or sale of securities. Arta, in seeking best execution, will make this selection based on a number of factors, which may include, but are not limited to, the following: the broker/dealer's financial soundness; the broker/dealer's ability to effectively and efficiently execute, report, clear, and settle the order; the broker/dealer's ability to commit capital; the broker/dealer's ability to timely and accurately communicate with Arta's trading desk and operations team; the broker/dealer's commission rates; the number of shares being purchased or sold; the broker/dealer's ability to provide liquidity, and similar factors. Arta does not consider any client referrals from a broker/dealer when determining best execution, or when placing client trades.

Arta is not obligated to choose the broker/dealer offering the lowest available commission rate if, in Arta's reasonable judgment, the total cost or proceeds from the transaction may be less favorable than what may be obtained elsewhere or if a higher commission is justified by the service and/or research provided by another broker/dealer.

Arta has implemented a policy to address the conflicts of interest associated with its brokerage practices. Currently, all client transactions are executed via market on close ("MOC") orders. Arta utilizes MOC orders in an effort to mitigate certain conflicts of interest, as all clients transacting in a particular security will receive the same price. In instances where Arta may be paying higher commission rates for its transactions, Arta will determine if the quality of execution and the services provided by the broker/dealer justify these higher commissions. Arta may cease to do business with certain broker/dealers whose performance may not have been competitive or may demand that such broker/dealers improve their performance before receiving any further orders.

Directed Brokerage

Arta requires its clients to use specified broker/dealers for portfolio transactions in their accounts.

Cross Trades

Arta does not engage in cross transactions as a matter of policy.

Soft Dollars

Arta does not currently engage in soft dollar or commission sharing arrangements with its brokers or custodians.

Trade Aggregation and Trade Sequence

Arta may utilize individual account or block trading. Selection will seek to favor the overall best client execution. Accounts are subject to constant, randomized algorithmic analysis in order to make appropriate transaction selections for each account. All transactions are then effected via MOC orders. In the event of a partial fill of a block order, Arta will prioritize based on each client's variation from their AMP target allocations. In the event of a partial fill of an individual order, the imbalance will be removed next time Arta rebalances the account.

Initial Public Offerings

Arta does not offer investments in Initial Public Offerings to its clients at this time.

Trade Errors

Arta has established error correction procedures which provide that the resolution of errors be made in light of the Adviser's fiduciary duties and in placing an affected client's interest before that of the Firm. Trade errors are determined and reimbursed at Arta's discretion. Any net gains will be allocated to the client's account. Where the custodian/broker-dealer is the source of trade errors, Arta will seek reimbursement from such custodian/broker-dealer.

ITEM 13 REVIEW OF ACCOUNTS

Arta typically performs ongoing monitoring of client accounts, and performs such reviews not less than annually. However, in circumstances where Arta has identified a discrepancy with the qualified custodian or other relevant third party, such as broker/dealers or Alt Investment managers, an Arta employee will review such discrepancies and facilitate a reconciliation process with the applicable third party. Arta currently provides reports to clients only through its Platform. Statements are provided to clients by the Custodian on at least a quarterly basis, as described in Item 15.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

Arta does not receive economic benefits from third-parties for providing investment recommendations for client referrals.

Arta does not utilize third-party solicitors for the purposes of obtaining new clients. Arta may occasionally compensate current clients for referrals as permitted by the Investment Advisers Act of 1940 Rule 206(4)-1.

ITEM 15 CUSTODY

Arta has appointed an independent qualified custodian as its agent to hold custody of clients' funds and securities. Such custodians may be broker/dealers, banks, trust companies, or other qualified institutions. The qualified custodian will provide the client with at least quarterly account statements relating to the assets held within the account managed by Arta. Each client should carefully review the qualified custodian's statement upon receipt to determine that it completely and accurately states all holdings in the client's account and all account activity over the relevant period. Any discrepancies identified by a client should be immediately reported to Arta and/or the qualified custodian. Such questions, concerns, or discrepancies may be communicated to Arta by writing, e-mailing, or telephoning us at the contact information listed in "Item 1 – Cover Page" of this Brochure.

ITEM 16 INVESTMENT DISCRETION

Arta is typically granted discretionary authority by a client at the outset of an advisory relationship to determine the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives of each client account. When selecting securities and determining amounts of securities for purchase or sale, Arta observes the investment policies, limitations, and restrictions that are applicable to our clients' accounts, as set forth by our clients. Any investment guidelines and restrictions, including amendments, must be provided to Arta by our clients in writing. A client will typically grant Arta discretionary authority by executing an IMA, which includes, among other items, a statement giving Arta authority to invest the assets, which are identified by the client, in a manner consistent with the investment objectives and limitations delineated by the client, and to engage in transactions on a discretionary basis in the client Account.

As noted above, the Adviser also allows for self-directed accounts.

ITEM 17 VOTING CLIENT SECURITIES

Arta does not have authority to vote securities on behalf of clients and does not provide advice as to how clients should vote.

ITEM 18 FINANCIAL INFORMATION

Arta does not require or solicit prepayment of fees from clients and does not have any financial condition that would impair its ability to meet contractual commitments to clients.

ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

This item is not applicable to Arta.