

Retirable, Inc.

41 East 11th Street, 11th Floor
New York, NY 10003
<https://www.Retirable.com>

This Brochure provides information about the qualifications and business practices of Retirable, Inc. (“Retirable”). If you have any questions about the contents of this Brochure, or would like to receive the most recent version, please contact us by telephone at (833) 222- 1807 or via email at info@retirable.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Retirable is a Registered Investment Adviser with the United States Securities and Exchange Commission. Registration as an Investment Adviser does not imply any level of skill or training. Additional information about Retirable is also available on the SEC’s website at www.adviserinfo.sec.gov.

March 25, 2024

Item 2 - Material Changes

The following material changes have been made to this Brochure since the last annual update filed in March 2023:

- Item 4 has been updated to reflect assets under management as of March 2024 and provide more detailed disclosure regarding the tools utilized through Altruist to assist Retirable in its provision of advisory services;
- Item 4 has also been updated to expand the breadth of financial planning services offered to clients;
- Item 5 has been updated to provide additional detail regarding the fees charged to clients, including the calculation of Retirable's advisory fee and other fees that may be charged to client accounts with an explanation of when would apply and more specificity around the assessment and calculation of such fees;
- Item 10 has been updated to disclose the conflict of interest that exists and how mitigated with certain partnerships Retirable engages in with respect to any third-party services;
- Item 12 has been updated to reflect its brokerage practices as a result of the change in custodian discussing the benefits and use of services offered to better serve our clients;
- Item 14 has been updated to reflect potential client referral arrangements; and
- Updates in relevant sections reflecting the change in custodian from Apex to Altruist.

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Item 4 – Advisory Business Introduction

Retirable, Inc. (“Retirable” or the “Adviser”) is an investment advisory firm that was founded in 2020 by R. Tyler End, CFP®, who is the principal owner and serves as the Chief Executive Officer. The Adviser is organized as a Delaware corporation and based in New York, NY.

Retirable’s primary focus is to provide financial planning and investment advisory services to clients who are retired or approaching and preparing to transition into retirement. Retirable aims to help clients demystify the transition into retirement through the creation of financial plans and access to a team of advisors to answer top of mind questions and prepare a roadmap through retirement. Financial plans can be created through online tools on Retirable’s website and other communications where a Retirable advisor gets to know each client’s financial situation and objectives. Investment advisory is provided to achieve clients’ goals and objectives through an online platform provided through Altruist LLC (“Altruist”) and is focused on diversified, long-term, and controlled risk holdings in exchange-traded fund (“ETF”) portfolios.

Clients that wish to utilize Retirable’s services, must maintain a brokerage account at Altruist Financial.

Investment Advisory Services

Retirable provides discretionary investment management services to clients through recommended portfolios using the Altruist platform. Investment advice is based on a client’s retirement plan, distribution timing, risk tolerance, life and financial circumstances, which are obtained through individual questionnaires focusing on different components of retirement. Based on this information, Retirable financial advisors work with clients to determine an investment strategy and target asset allocation designed to meet the client’s needs and objectives. Portfolio recommendations discussed and agreed upon with the client are summarized in an Investment Policy Statement (“IPS”) then provided to and executed by the client. Retirable generally recommends the use of Exchange Traded Funds (“ETFs”) and cash or cash equivalents in the client’s portfolio. Clients have the ability to select a portfolio not recommended by Retirable subject to confirmation of their understanding that the client is making such election at their own discretion and such portfolio is not recommended by Retirable. Although clients may elect alternative portfolios, clients are unable to make changes to the asset allocation within each portfolio. Additionally, clients in recommended portfolios have the ability to request restrictions regarding the securities purchased for their accounts and asset classes and weights are determined by Retirable. Any changes communicated by the client require an updated IPS and provided to the client for review and sign off.

Financial Planning Services

Retirable also provides guidance on certain financial planning and strategic wealth management issues. Depending on a client’s needs and complexity, Retirable provides financial planning and strategic wealth management services by gathering financial information through oral interviews

and/or the completion of questionnaires and the client's IPS. After this consultation and if deemed appropriate, Retirable prepares a financial plan based on the client's individual financial needs, goals and tax status which the client will have the opportunity to agree to implement. A financial plan estimates asset levels and retirement income over a client's projected lifetime based on current asset levels and several assumptions, including life expectancy, savings rate, investment returns, tax rates, and known obligations (such as mortgage).

Subject to the client's needs, the financial plan will include segments outlining insurance needs (life, long-term care, etc.), education funding, net worth, or an estate plan strategy review and recommendations, among other items. Retirable will base any advice on information provided by the client. Clients are under no obligation to accept or follow any recommendations made by Retirable.

To the extent requested by a client, Retirable will also provide investment advice on any legacy assets and financial planning impact. Retirable does not provide single security or options advice, nor legal or tax advice. Clients are encouraged to consult with their personal tax advisors.

As of March 10, 2024, Retirable managed approximately \$60 million in client regulatory assets under management on a discretionary basis, and none on a non-discretionary basis.

Item 5 - Fees and Compensation

Effective as of March 25, 2024, any new clients entering into an agreement with Retirable will be charged an investment advisory fee of 1.00% per annum on a monthly basis in arrears based upon the market value of the average daily balance of a client's account over the preceding month with a cap at \$5,000.

Since the asset-based fee is determined by the average daily account balance, if assets are deposited into or withdrawn from an account after the inception of a month, the fee payable with respect to such assets is adjusted accordingly. For the initial period of an engagement, the fee is calculated on a pro rata basis. In the event the Client Agreement is terminated, the fee for the final billing period is prorated through the effective date of the termination and the outstanding portion of the fee is charged to the client.

Existing clients will continue to pay the same fees they have historically on their accounts. And any existing clients who open new accounts within their household will pay the same fees as stated in their original agreement.

Retirable has entered into an agreement with Altruist to provide access to its electronic platform, in addition to brokerage and custodial services. As part of its service, Retirable utilizes the modeling and monitoring tools available on Altruist's platform to assist in providing clients with comprehensive portfolio management services. In addition, clients may also select between Altruist model portfolios which charge between 0% and 0.12% per annum on a monthly basis in

arrears based upon the market value of the average daily balance of a client's account over the preceding month.

Fees are debited from client's cash holdings by the custodian.

Fees are generally not negotiable, although Retirable reserves the right to waive or reduce fees at its own discretion.

Any clients that elect to receive general financial planning advice, pay an annual subscription fee of \$500 per year. If a client opts-in to an investment portfolio after purchase of an annual subscription, the client will be refunded a pro-rated amount of the subscription fee.

As described above, Retirable charges clients an asset-based fee paid monthly that covers the cost of its investment advisory services as well as trading and custody services provided by Altruist. Clients are also subject to additional fees and expenses relating to the administration of transfers, withdrawals, or other miscellaneous account servicing (as applicable). For more information, please refer to Altruist's fee schedule: <https://altruist.com/m/Altruist-Fee-Schedule.pdf>

Item 6 - Performance Based Fees and Side by Side Management

Retirable does not charge any performance-based fees.

Item 7 - Types of Clients

Retirable will provide retirement planning services to individuals, trusts, investment retirement accounts, and other legal entities based in the U.S.

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

Retirable provides discretionary investment advisory services by offering portfolios comprised of various publicly traded ETFs. Portfolios are constructed based on the client's financial plan and distribution requirements, and may include cash holdings, fixed-maturity fixed-income ETFs, and equity and fixed-income ETFs for long-term growth. These portfolios are intended to allocate assets among a diversified collection of instruments across different asset classes, industries, economic sectors, and geographies. The selection of a portfolio for a client is based primarily on the investment strategy and target asset allocation as determined by the Retirable advisor and reviewed by the client. Investment strategy is reflected primarily in one of two ways: 1) the target cash, equity, and debt allocations within the selected portfolio; or 2) number of distribution years held in fixed-maturity ETFs and the target allocations of the remainder of the account. Clients may be presented with multiple portfolio options that meet the recommended investment strategy and have the ability to make and update their selection by contacting their Retirable advisor. Retirable reserves the right to implement the investment strategy on behalf of clients and buy and sell

holdings to achieve rebalancing and distribution goals in accordance with the client's objectives and goals.

Although Retirable reviews the performance history of ETFs and model portfolios available to clients, Past performance may not be indicative of future results and clients should review their portfolio periodically and submit any concerns in writing to Retirable.

Clients are invested in a portfolio of ETFs, potentially with some cash allocation, to meet their objectives. Recommended asset allocation is driven by a review of the Client's retirement plan and assessed risk tolerance.

Retirable bases retirement planning advice on the Certified Financial Planner Standards of Ethics. Retirement advice relating to investment assets are provided with the fiduciary standard and focused on providing financial stability for the duration of retirement. Retirable determines a Client's risk tolerance based on a questionnaire and shares the results in the IPS sent to the client.

Retirable uses the information presented and agreed upon in the client's retirement plan, specifically distribution timing throughout retirement and the client's risk capacity, and the assessed risk tolerance to establish an investment strategy and target asset allocation. The recommendation is presented to the Client for review and agreement. Retirable then recommends a portfolio construction that is intended to meet the goals and objectives of the Client.

While Retirable is dedicated to providing retirement planning advice to help clients navigate their retirement period, there are risks inherent in securities investments so we cannot guarantee any performance based on our advice.

General Risks

The performance of Retirable's investment advice depends upon market movements. There can be no assurance that clients will achieve their goals or positive investment performance over any period of time. While it is not possible to enumerate all possible risks, below are some of the common factors that can produce a loss in securities investments:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline, and the market value of any mutual fund and/or exchange-traded fund holding those bonds.
- **Market Risk:** The price of a common stock, bond, or mutual fund and/or exchange-traded fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, purchasing power may be eroding at the rate of inflation making your investment worth less.

Investment-Related Risks

Exchange-Traded Funds. ETFs are typically investment companies that are legally classified as open end mutual funds or Unit Investment Trusts. However, they differ from traditional mutual funds, in particular, 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. The difference between the bid price and the 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. Although many ETFs are registered as an investment company under the Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company.

Fixed-Income Securities. Investments in fixed income securities are subject to credit, liquidity, prepayment, and interest rate risks, any of which may adversely impact the price of the security and result in a loss. The municipal market can be significantly affected by adverse tax, legislative or political changes and the financial condition of the issuers of municipal securities.

Reinvestment Risk. The risk that future proceeds from investments must be reinvested at a potentially lower return rate. Reinvestment Risk primarily relates to fixed income securities.

Item 9 - Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We do not have any information to disclose about Retirable. We are committed to serve our Clients’ best interest.

Item 10 – Other Financial Industry Activities and Affiliations

Retirable from time to time will enter into partnerships with third parties to offer promotions, benefits, and other rewards programs to our Clients. In connection with such programs, Retirable receives a benefit from the third parties in the form of compensation or other consideration, at no cost to our Clients.

These partnerships can provide an incentive to refer individuals to this partner instead of a business that does not have a partnership with Retirable. Depending on the partnership, Retirable receives marketing promotional compensation or other benefits to recommend certain services to

a third-party. In order to mitigate this conflict of interest, the nature of relationship is disclosed at the time of the introduction to such party.

Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading

General Information

We have adopted a Code of Ethics for all Retirable supervised persons describing our high standards of business conduct, and fiduciary duty to you, our Client.

The Code of Ethics includes provisions relating to the confidentiality of Client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, and as amended.

You may request a copy of the Retirable Code of Ethics by email info@retirable.com.

Privacy

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your personal information. Our Privacy Policy is available on our website.

Item 12 - Brokerage Practices

For operational and compliance efficiency, Retirable has elected to provide all advisory services to clients through one brokerage and custodial platform. If prospective clients do not wish to use Altruist, we are unable to provide our asset management services at this time although intend on adding additional options at a later date.

Retirable will generally execute transactions for client accounts at various points of the day as needed to fulfill client directed requests, rebalancing and other items requiring activity. As such, Retirable will at times purchase or sell the same security at different times during the day and thus, clients will receive different prices. Retirable creates trades by running the applicable strategy model for each account and certain activity will necessitate certain transactions to occur. In instances where multiple client accounts have triggered the release of execution instructions, Retirable's platform will place all applicable client accounts in a randomized trade rotation to ensure all participating client accounts are treated fairly and no one set of clients is continually favored or systematically disadvantaged.

In the event of a partial fill, Retirable will proportionally allocate shares across participating accounts according to the total shares which should have been purchased or sold and the amount which was actually purchased or sold.

Retirable does not provide any brokerage practices on behalf of Clients.

Item 13 - Review of Accounts

Retirable monitors and reviews Client's investment accounts on a regular and ongoing basis. Accounts are formally reviewed for rebalancing opportunities at least once per quarter. Financial plans, investment strategies, and target asset allocations are reviewed with the Client at least once per year or upon Client's request. At their discretion, Clients may select to maintain the same investment strategy without review with an advisor. However, Retirable will reach out to all clients at least once per year to recommend a review.

Clients will receive brokerage statements no less than quarterly directly from Altruist. Clients may also establish electronic access to the Altruist platform to view statements and account activity.

Item 14 - Client Referrals and Other Interests

Retirable compensates third parties ("promoters") to solicit or refer clients or otherwise provide an endorsement of Retirable or its personnel. If a client is referred to us by a promoter, the client will be informed of the material terms of the compensation arrangement and any other conflicts of interest. Depending on the agreed upon terms, a promoter will generally be compensated a flat one-time fee on a per lead basis using a tiered approach. Retirable will generally compensate promoters a nominal fee on a "per-click" basis (i.e., prospects that are directed to Retirable's website) and/or a higher fee for each account opened by a referred (directly or indirectly) party.

If a promoter is a registered broker dealer, Retirable will generally compensate the promoter a portion of the advisory fees earned for managing the capital of the client that was referred. In addition, Retirable will confirm at least annually that the promoter is not subject to statutory disqualification, as defined under section 3(a)(39) of the Securities and Exchange Act of 1934, as amended.

Retirable may also offer compensation to current clients, affiliate marketers, and other strategic partners who recommend Retirable and refer new clients. New clients are advised of such compensation prior to opening an account. Retirable supervises the referral activities of current customers, affiliate marketers (including "bloggers"), and other strategic partners. Clients are not charged any fee, nor do they incur any additional costs for being referred to Retirable by a current client, affiliate marketer, or other strategic partner.

Item 15 - Custody

For the benefit of no commissions or transaction fees, fully digital account opening, a large variety of security options and complete integration with software tools, Retirable utilizes Altruist Financial LLC, an unaffiliated SEC-registered self-clearing broker-dealer and FINRA/SIPC member, as the clients' custodian.

Retirable has the ability to access client accounts through the custodian for the purpose of deducting fees although does not maintain any physical custody of client assets, which remain with the custodian. Additionally, the custodian sends statements directly to the account owners on at least a quarterly basis.

Item 16 – Investment Discretion

Retirable has discretion over Client accounts for the following reasons:

- Purchasing and selling ETFs in accordance with the investment strategy, objectives, guidelines, and limitations agreed upon with the Client and sent via an Investment Policy Statement (IPS).
- Rebalancing holdings to remain consistent with the agreed upon investment strategy and target asset allocation.
- Sell holdings to maintain an appropriate cash position or meet Client distribution objectives.

All discretionary trades will be in accordance with the Client's stated retirement plan, objectives, and goals.

Item 17 – Voting Client Securities

Retirable does not have, nor do we accept, any authority to vote Client securities.

Item 18 - Financial Information

Not Applicable.