



Bancolombia Capital LLC and Bancolombia Capital Advisers LLC
Form CRS Customer Relationship Summary – March 25, 2024

Item 1: Introduction

Bancolombia Capital LLC, "BCC" or the "Firm" is registered with the Securities and Exchange Commission (SEC) as a broker-dealer and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Bancolombia Capital Advisers LLC, "BCA" or the "Adviser" is an (affiliate) investment adviser registered with the SEC. BCC and BCA are often collectively referred to as "Bancolombia Capital" and referenced as "We" throughout this Summary. Bancolombia Capital related entities maintain both common ownership, as well as share certain office space and personnel that is dually associated with the referenced entities. While the aforementioned entities conduct in part shared operations, they offer separate and distinct services. Security products are offered and conducted through BCC and advisory products and services are offered through BCA. **Brokerage and investment advisory services and fees differ and it is important for you to understand these differences.**

Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

What investment services and advice can you provide me?

Bancolombia Capital offers brokerage services through BCC and investment advisory services through BCA to retail investors.

Our **brokerage** services include buying and selling securities. We offer recommendations; however, we do not have discretionary authority over your brokerage account. This means that you, the client, make the ultimate decision regarding the purchase or sale of investments. The recommendations we make available or offer advice on are not solely provided with respect to proprietary products or a limited menu of products or types of investments. BCC does not have any material limitations on the type of products it can recommend. Clients are able to transact different products, including stocks, bonds, mutual funds, ETFs, options, and alternatives products. BCC also offers institutional trading capabilities on equities, fixed income and structured notes. BCC does not offer account monitoring services. From time to time, BCC voluntarily reviews clients' accounts to determine whether our recommendation continues to be in clients' best interest. BCC targets account minimums of \$100,000, but we may reduce or waive this minimum in some circumstances.

Our **advisory** services include asset/portfolio management and financial advice to individuals, institutions, and corporations through discretionary and non-discretionary accounts pursuant to an Investment Advisory Agreement ("IAA"). The advice we provide is tailored to specific needs, goals, and objectives of each client. The investment management services that we will provide to you primarily consist of design, structure, and implementation of various personalized investment strategies for managed accounts. Investment activities focus on investments in various kinds of assets and securities in a variety of markets that are intended to fit within the client's objectives, strategies, restrictions, time horizon and risk profile as described by each client. The Adviser can hire a sub-adviser in reference to a client's account. The sub-adviser can be affiliated, or not, with the Adviser, however, the Adviser will always have ultimate discretion over the client's investments. The CEO monitors and reviews client portfolios on a periodic basis, or as needed, due to market conditions or transactional activity. The COO reviews trade transactions to ensure such transactions have been executed properly and are correctly recorded into client accounts. Monitoring of your account is included as part of the standard services we provide to you. We do not offer advice only with respect to proprietary products, or a limited menu of products or types of investments. We require a minimum account size of \$100,000 to manage your account, although we reserve the right to waive it.

For additional information, please see the Firm's Regulation Best Interest Disclosures, Form ADV, Part 2A brochure (Items 4, 7 and 13) and other applicable documents. Please also visit www.sec.gov / www.finra.org for BCA's Form ADV or BCC's full profile, respectively.

Conversation Starters. Ask your financial professional –

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

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

What fees will I pay?

The principal and main costs retail investors will incur for brokerage services are commissions charged to each transaction performed in the account. Every time the client buys or sells a security there will be a commission assessed on the transaction. The more transactions placed on an account, the more commissions are generated and therefore, the firm has an incentive to encourage you to trade often.

BCC will mark up the price when we sell you a security, and BCC will mark down the price when we buy a security from you. There are other fees and costs involved in a brokerage account and when dealing with a brokerage house which include but are not limited to: custodian fees, service fees, account maintenance fees, fees related to mutual funds or alternative investments and other transactional and product level fees.

Traditional fees for the management of accounts will be based upon a percentage of the total assets in the account. However, the Adviser also offers a Wrap Fee Program which allows clients to avoid incurring separate brokerage commissions and transaction charges. Our annual management fees range between 0.40% and 3%, based on the net asset value of the account, although all rates are negotiable. Clients of Discretionary and Non-Discretionary accounts are required to pre-authorize the Adviser or their custodian to directly debit management fees from their accounts on a monthly or quarterly basis. Depending on the custodian's capacities to calculate advisory fees, fees for all programs will be paid in arrears. Unless you are participating in our Wrap Fee Program, you will incur certain charges imposed by custodians, brokers, third party investment and other third parties. All accounts can be subject to additional wire transfer and electronic fund fees, and other fees and taxes, depending on their activity. These fees are not covered by BCC, even under a Wrap Fee Program. We can also send brokerage orders through our affiliate, BCC which will cause non-Wrap Fee Program clients to incur a separate charge utilized to cover certain operational and execution costs incurred by BCC's trading desk. If your account has a sub-adviser arrangement, no account will be subject to a separate fee for this service.

We also charge performance fees, if allotted in your agreement with us, which can be up to 20% of a client's account performance. The more assets you have in the advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees.

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

For additional information, please see the Firm's Regulation Best Interest Disclosures, Form ADV, Part 2A brochure (Item 5) and other applicable documents. Please ask us for more information.

Conversation Starters. Ask your financial professional –

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when providing recommendations as my broker- dealer or when acting as my investment adviser?

How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation as your broker-dealer or act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice, we provide to you. Here are some examples to help you understand what this means.

Examples of Ways We Make Money and Conflicts of Interest:

- **Financial Affiliations:** Adviser utilizes the Firm as an introducing broker-dealer for certain securities transactions of advisory clients. In such case, the Firm and/or associated persons will receive compensation for brokerage transactions affected in these advisory accounts, and for the purchase of investment products recommended. We direct execution of client securities through BCC and this creates a conflict of interest due to our direct affiliation, and limited ability to consider other execution venues and negotiate certain costs associated with your account. We have an incentive to direct trading through BCC as broker-dealer which means that our affiliate and shared associated persons will receive additional compensation depending on trading volume. Additionally, the Adviser's Wrap Fee, which includes brokerage trading commissions and custody charges, can result in a higher advisory fee to clients when the Adviser cannot negotiate lower trading commission rates or consider services offered through other execution venues.
- **Performance-based Fees:** When performance fees are charged for your account based on our agreement with you, those fees can potentially incentivize us to make more speculative investments than would be the case in the absence of such performance fee arrangement.
- **Rebates and/or Trailer Fees:** Certain Investment Adviser Representatives (IAR) who are dually associated with BCC may receive additional compensation related to advisory assets in the form of referrals fees and rebates/trailer (i.e. 12b-1 fees), from mutual funds companies in which the IARs invest your money. These trailer fees are received by the Firm and shared with IARs of the Adviser. The receipt of trailer fees creates a conflict of interest and material incentive for your IAR to recommend purchases of mutual funds with rebate arrangements with the Adviser and its affiliates.
- **Referral Fees/Third Party Payments:** We compensate individuals and/or entities for referring clients to us. There is a conflict of interest in utilizing a solicitor, or similar, as there is an incentive for us to select a particular individual / entity over another. There is also an incentive for us to manage more assets and receive higher compensation, while we share part of such compensation with the referring individual/entity.
- **Client Transactions and Personal Trading:** Our employees and their family members may recommend or invest in securities in which our related persons or affiliate, directly or indirectly, has a position or material financial interest. Similarly, we and our related persons may also buy or sell for ourselves securities that we also recommend to you. Such transactions can include trading in securities in a manner that may be inconsistent with the advice given to you. In certain instances, the results of the investment activities of our associated or related persons for their accounts can differ from the results achieved by or for the account we manage for you.
- **Principal Trading:** BCC may sell to its clients positions from its own book and could potentially profit from the transaction which would represent a conflict of interest.
- **Proprietary Products:** Registered Representatives offer products sponsored/managed by Grupo Bancolombia or related/affiliated entities under common control with BCC and/or BCA. In such instances, BCC, BCA, their associated persons, and affiliated entity(ies) earn compensation for all transactions directly and indirectly. The compensation received can potentially incentivize us to promote proprietary products to you over other ones available.

Any conflicts of interest related to recommendations of other professionals will be disclosed to you in the event they should occur. We have policies and procedures to monitor the potential conflicts disclosed above. We render only disinterested and impartial advice to clients, and we are responsible for recommending investments based on your financial profile and objectives.

Conversation Starters. Ask your financial professional –

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

For additional information, please see the Firm's Regulation Best Interest Disclosures, Form ADV, Part 2A brochure and other applicable documents. Please ask us for more information.

How do your financial professionals make money?

The Adviser's IARs are compensated by a salary and are subject to a variable compensation based on a percentage of assets under management and in certain accounts on the performance of the portfolios managed, but other factors are considered such as customer service, compliance, and overall firm performance; all of which have equal weight. In a

similar manner, BCC' financial professionals (of which are dually associated with the Adviser) are compensated by a salary and are subject to a variable compensation based on a percentage of the total revenues generated in each brokerage account or client, but other factors are considered such as customer service, compliance, and overall firm performance, which all have equal weight. Overall compensation for advisers and financial professionals are capped. There could be instances where certain products (i.e. mutual funds or ETPs or private investments) offer upfront commissions depending on total amounts invested and would also offer a back-end commission depending on performance of the investment. Our representatives can get increased compensation based partially on higher production, but other factors are also considered. This represents a conflict of interest since the more commissions they generate, the more they could earn. Certain products pay ongoing compensation (trailers), therefore our financial professionals (of which are dually registered) may be incentivized to recommend products that have higher fees and/or ongoing payments.

Item 4: Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No. Neither BCC nor BCA has legal or disciplinary history that is required to be disclosed on Form BD or Form ADV. Our financial professionals do not have legal or disciplinary history.

Please visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research us and our financial professionals.

Conversation Starters. Ask your financial professional –

- As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 5: Additional Information

For additional information about our brokerage or investment advisory services or to request a copy of the relationship summary, please contact us at compliance@bancolombiacapital.com. If you would like additional, up-to-date information or a copy of this disclosure, please call 786-551-9122.

Conversation Starters. Ask your financial professional –

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