

AVRIO | WEALTH

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Part 2A of Form ADV: Firm Brochure

December 6, 2021

This Brochure provides information about the qualifications and business practices of Avrio Wealth Pte Ltd (*"Avrio" "Avrio Wealth" the Firm*). If you have any questions about the contents of this Brochure, please contact Ann Marie Regal at annmarie@avriowealth.com. Additional information concerning Avrio is available at www.adviserinfo.sec.gov. 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. Avrio is registered as an SEC Investment Adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Investment Adviser.

Item 2 – Material Changes

Material Changes

Regulatory rules require that we provide a summary of any material changes to this Brochure and any subsequent Brochures within 120 days of the close of our business's fiscal year. In addition, we will provide other ongoing disclosure information about material changes or an updated brochure when necessary.

Since our last Form ADV Filing on 03/15/2021 there were no material changes other than adding advisors as listed in Part 2 B.

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Item 4 – Advisory Business

Avrio was founded June 18, 2018 but did not start offering investment advisory until January 2, 2020. The majority shareholder of the company is Ann Marie Regal. Michael Borchert and Andrew Talbot also own a portion of the company. Please refer to the ADV Part 1 Schedule A for further ownership details via adviserinfo.sec.gov.

The company has a Financial Advisor license issued by the Monetary Authority of Singapore. The company shall provide financial planning, insurance and investment advisory services to individuals, corporations, and institutions.

Assets Under Management

Avrio had \$96,747,714 of Assets Under Management to report as of 12/31/2020. \$63,077,290 is non-discretionary, \$33,670,424 is discretionary.

Assets Under Advisement

As of 12/31/2020 Avrio had \$32,667,441 of Assets Under Advisement.

The Firm tailors its advisory service to individual clients' needs and objectives by having periodic personalized discussions among clients, their consultants and tax advisors, and the assigned Financial Advisor at Avrio. This process generally begins with a comprehensive financial plan which includes a careful review of the client's current financial position, future goals, cash flow requirements, tax status, suitability, and attitudes toward risk, liquidity, and volatility. Related documents supplied by the client are carefully reviewed. Clients may impose cash restrictions, asset allocation restrictions and restrict their portfolio to certain types of assets (i.e., public, or more liquid investments vs. private equity and physical assets). Avrio will manage advisory accounts on a discretionary or non-discretionary basis, depending on the client's preference. All Avrio clients have an Investment Policy Statement and an agreed upon asset allocation. Changes to a portfolio allocation must be confirmed in writing by the client.

Individual portfolios may include but are not limited to: Exchange-traded Equity Securities, US State and Local Bonds, Investment Grade Corporate Bonds, Securities Issued by Pooled Investment Vehicles, alternatives such as private placements and real estate investments and Cash/Equivalents. Avrio may review other asset types as warranted.

While we continuously monitor the securities in client accounts, each client account is reviewed at least quarterly and rebalanced, as necessary. If Avrio believes that a reallocation is necessary, or that a different investment is more appropriate for the client account, Avrio will suggest a different investment and will reinvest the client's assets upon receiving signed authorization from the client. Account supervision is guided by the stated objectives of the client (i.e., growth, growth and income, income).

Avrio seeks to maintain current client suitability information on file at all times. As such, the Firm requests that clients promptly notify us if there is any material change in their financial circumstances, risk tolerance, tax, or employment status. Avrio does not currently participate in fee programs.

We have an inherent conflict of interest whenever we provide Financial Planning services to a client that also has retained our Investment Advisory services. It could be in our best interest not to recommend paying down debt that would directly reduce the Assets Under Management that we manage and charge a percentage fee for. We mitigate this conflict by providing an overall plan suitable and in the best interest of the client.

Whenever we provide Financial Planning Services we shall:

1. Document the scope of work in an agreement.
2. Prepare a questionnaire to understand the client's needs.
3. Conduct a reasonable level of due diligence when referring other professionals to the financial planning client.
4. Disclose any and all compensation methods we shall receive.
5. Conduct reasonable due diligence when recommending or using technologies when providing professional CFP® services to a client.
6. Periodically monitor the CFP Board's Code of Ethics and Standard of Conduct.

Whenever Avrio makes a recommendation for the Financial Planning client to utilize the services of a third-party as mentioned above, Avrio shall:

- Have a reasonable basis for the recommendation or Engagement based on the person's reputation, experience, and qualifications.
- Disclose to the Client, at the time of the recommendation or prior to the Engagement, any arrangement by which someone who is not the Client will compensate or provide some other material economic benefit to the CFP® professional, the CFP® Professional's firm, or a Related Party for the recommendation or Engagement; and
- When engaging a person to provide services for a Client, exercise reasonable care to protect the Client's interests.

When selecting or using and recommending technology Avrio shall document the due-diligence process which will include:

- Exercising reasonable care and judgment when selecting, using, or recommending any software, digital advice tool, or other technology while providing Professional Services to a Client.
- Having reasonable level of understanding of the assumptions and outcomes of the technology employed.
- Having reasonable basis for believing that the technology produces reliable, objective, and appropriate outcomes.

The CFP® professionals of Avrio will also review the complete CFP Board Code of Ethics and Standards of Conduct and the Practice Standards to ensure proper implementation within the firm.

Item 5 – Fees and Compensation

The specific manner in which fees are charged by Avrio is established in a client's written agreement with Avrio. Fees for non- US clients may follow a different structure and it is possible the fees could be different for the same type services for all clients. However, all specific fee terms will be outlined in each client's written agreement.

Fees for Integrated Financial Planning and Investment Advisory Services

When a client engages Avrio to provide integrated financial planning, investment advisory and asset allocation services on a fee-only basis, Avrio generally provides these services on an annual flat fee which is negotiable, based upon various objective and subjective factors. These factors include, but are not limited to, the client's net worth, the amount of the assets placed under the Avrio's advisement, the level and scope of the overall investment advisory services to be rendered and the complexity of the engagement.

The terms of the flat fee engagement shall be set forth in the client's written agreement.

Avrio's clients may pay diverse fees based upon the market value, type and location of their assets, the complexity of the engagement, along with the level and scope of the overall financial planning and/or advisory services to be rendered and/or client negotiations.

Fees for Investment Advisory Services

The general fee structure is outlined below. Avrio will generally bill its fees in arrears, calculated on a daily average balance charged on a quarterly basis, unless otherwise stated below or in the client's written agreement.

Clients may also elect to be billed directly for fees or to authorize Avrio to instruct the custodian to pay fees from client accounts directly to Avrio. Management fees shall be prorated for each contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account any earned, unpaid fees will be due and payable.

Avrio's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses, which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment sponsors and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees, and commissions are exclusive of and in addition to Avrio's fee, and Avrio shall not receive any portion of these commissions, fees, and costs.

The annual fee for Asset Allocation/Investment Advisory Services may be charged as a percentage of assets under management, generally, according to the following schedule:

<u>Assets Under Management</u>	<u>Annual Fee (%)</u>
Up to \$1 million	1.00%
\$1,000,001 - \$2 million	0.80%
\$2,000,001 - \$7 million	0.50%
Over \$7 million	0.40%

Fees for Non- US clients are structured differently than the fee ranges indicated here for US clients. Fees for Non- US clients may be paid for in non-USD currency.

Financial Planning Fees

Fees for financial planning services may be invoiced hourly, flat fee or on a project-by-project basis. In special circumstances, the client may choose an annual flat fee which includes financial planning and investment advisory. This "hybrid" fee will be agreed upon in advance.

Avrio crafts a highly personalized financial plan with well-defined goals following the guidelines set up by the Certified Financial Planning Board of Standards.

Standard fees start at \$4,000 USD for an individual, \$6,000 USD for a couple and up to \$20,000 USD for clients with complex planning needs. The complexity of the client's finances and their stated goals may result in higher fees. The higher fee would be agreed upon in advance.

Hourly fees range from \$200 USD up to \$800 USD for HNW or complex planning.

Clients are invoiced 50% upfront which is non-refundable, the remainder is due upon the delivery of the engagement or financial plan but not later than six months following the initial engagement.

Fees for Non- US clients are structured differently than the fee ranges indicated here for US clients. Fees for Non- US clients may be paid for in local non-USD currency.

Should a client decide to engage Avrio to implement the investment advisory part of the financial plan, the annual fee charged may be a flat annual fee or a percentage of assets under management as agreed between Avrio and the client.

Negotiability of Fees

In certain circumstances, all fees may be negotiable. We reserve the right to adjust the fee schedule for accounts depending on the size and type of account and the services required. In some cases, negotiation of fees may result in different fees being charged for similar services and may be less than the stated fees. In addition, certain family members and personal or professional acquaintances of Avrio's affiliated persons (and affiliates) may receive advisory services at a discounted rate, which is not available to advisory clients generally.

Termination

The Investment Advisory Agreement between Avrio and the client (the "Agreement") may be terminated by either party at any time without penalty upon written notice. Written notice may be provided in the form of an e-mail, or direction to the custodian to terminate adviser's authorization. Termination will not, however, affect liabilities or obligations incurred or arising from transactions initiated under the Agreement prior to termination. Upon termination, it is client's responsibility to monitor the securities in the account, and Avrio will have no further obligation to act or advise with respect to those assets. Client may terminate the Agreement within five business days of its signing without penalty. If the Agreement is terminated after five business days of its signing, any prepaid fees will be prorated, and the unused portion will be returned to client. In calculating a client's reimbursement of fees, we will prorate the reimbursement according to the number of days remaining in the billing period.

Advisory Fees in General

Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Item 6 – Performance-Based Fees and Side-By-Side Management

Avrio does not have any performance-based fee arrangements. Side by side Management refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Avrio has no performance-based fee accounts, it has no side-by-side management.

Item 7 – Types of Clients

Avrio offers financial planning and investment advisory services to individuals and high net-worth individuals, corporations, and institutions.

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

Overview

Investment Advisory

Avrio offers investment advisory based on each client's goals, objectives, time horizon, cash flow requirements and risk tolerance. Portfolios are constructed utilizing a total return approach to wealth management, aiming to generate consistent investment returns while minimizing the risk of significant loss. We build globally diversified portfolios utilizing U.S. and international large, mid and small cap stocks, global bonds and alternative investments, such as commodities and real estate. Avrio employs investment strategies depending upon the type of client, investment discipline chosen and a client's investment guidelines, objectives, investment policy or investment mandate.

Avrio believes that asset allocation is the primary driver of investments returns. Each portfolio is constructed primarily of exchange-traded funds (ETFs), but may also hold stocks, bonds, mutual funds, and alternatives. We utilize investments that have low costs and are tax efficient. Trading costs are kept low. Portfolios are rebalanced as needed and wherever applicable, taxes are considered.

Avrio has the discretion to choose third-party investment advisors to manage some or all of a client's portfolio. Avrio conducts rigorous due diligence on any third-party investment advisor and will review the performance as part of the client's portfolio.

A. Methods of Analysis and Investment Strategy

Avrio uses a variety of sources of data to conduct its economic, investment and market analysis such as financial newspapers and magazines, economic and market research materials prepared by others, corporate rating services, annual reports, and prospectuses. We have relationships with third party providers who perform or distribute research of securities and we have a consultant review our core portfolios on a quarterly and ongoing basis.

Avrio is responsible for identifying and implementing the methods of analysis used in formulating investment recommendations to clients. The methods of analysis may include cyclical analysis, fundamental analysis, Modern Portfolio Theory, quantitative analysis, and technical analysis.

- Cyclical analysis – monitoring the business cycle to find favorable conditions for buying or selling a security.
- Fundamental analysis – reviewing financial statements, determining the financial health of companies along with the analysis of management and competitive advantages.
- Modern Portfolio Theory - constructing portfolios to optimize or maximize portfolio expected return based on a given level of portfolio risk or minimizing risk for a given level of expected return.
- Quantitative analysis- including analysis of historical data such as price and volume statistics, performance data, standard deviation, and related risk metrics, how the security performs relative to the overall stock market, earnings data, price- to -earnings ratios, and related data.

Certain investment guidelines and/or market conditions may present greater investment risks than others.

We manage portfolios based on total return strategies unless otherwise warranted, generally benchmarked to global indices, or based on non-relative return strategies where risk/return, portfolio construction decisions are made without reference to an index.

Certain investment guidelines and/or market conditions may present greater investment risks than others.

Real Estate:

We look to real estate (and real estate related assets) to provide cash flows, potential capital gains, and diversity in a portfolio. We approach our real estate investments from the perspective of understanding local markets, the asset's cash flows (and potential cash flows in the case of development or conversion properties), the economic environment, the long-term vision or outlook of the property, urban or ex-urban migration, temporary movements in the markets and business growth (and prospects of growth) where the property is located.

Private Equity Real Estate:

An asset class consisting of equity and debt investments in property. Investments typically involve an active management strategy ranging from moderate reposition or releasing of properties or extensive redevelopment.

Private Equity:

Private equity is capital that is not noted on a public exchange. Private equity is composed of funds and investors that directly invest in private companies, or that engage in buyouts of public companies, resulting in the delisting of public equity. Institutional and retail investors provide the capital for private equity, and the capital can be utilized to fund new technology, make acquisitions, expand working capital, and to bolster and solidify a balance sheet.

Other Assets:

We evaluate our investment approach to other or commonly referred to as "alternative" investments in an opportunistic manner. We first evaluate global economic and socio-economic trends, governmental policies, areas of high growth or decline, expected currency movements, recent discoveries of natural resources, new technology development and other factors which may make investment in certain jurisdictions or areas attractive.

Material risks

All investments carry a certain amount of risk, and a client may lose money by investing in any of our strategies. Avrio cannot guarantee that it will achieve its investment objectives. Private equity and other private (non-publicly traded) investment carries with it a significant liquidity risk in that such assets are difficult to sell and may be held for many years before a market or opportunity may present itself for the asset to be liquidated.

Below is a summary of certain risks that may be associated with our strategies. This list of risk factors is not a complete enumeration or explanation of the risks involved in any strategy or investment. Prospective clients should read this entire Brochure, and the prospectus or offering documents for any specific investment, if any, in connection with investments in pooled funds or direct investments. Clients should also consult with their own legal, financial, and tax advisors before deciding whether to invest in a strategy or make a specific investment that they do not understand.

- **Management risk:** Avrio's judgments about the fundamental value of securities or other factors showing the attractiveness of investments acquired for a portfolio may prove to be incorrect. In addition, Avrio's judgments about asset allocations, exposure to foreign currencies, interest rates, commodity values, and other macroeconomic factors may prove to be incorrect.
- **Risk of loss:** Investing involves risk of loss that clients should be prepared to bear. The investment decisions that Avrio makes for a client are subject to various market, currency,

economic, political, business, systemic, legal, interest rate, risks, and our investment decisions based on such factors will not always be profitable and could result in the loss of a client's entire investment.

- No guarantee of investment objectives: Avrio does not guarantee or warranty that a client's account will achieve its investment objectives, performance expectations, risk and/or return targets.
- No government guarantee: An investment in an account or fund managed by Avrio is not a bank deposit and is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency.
- Personnel risk: Avrio attempts to utilize a team approach to managing investment portfolios. However, certain strategies may be dependent upon the expertise of certain key personnel, and any future unavailability of their services could have an adverse impact on the performance of clients invested in such strategies.
- Diversification and liquidity risk: Unless otherwise agreed upon by a client and Avrio, we will not be responsible for the client's overall diversification, asset allocation or liquidity needs. In addition, certain of our strategies may be non-diversified and hold a low number of investments. Private equity or real estate investments may be required to be held for many years (e.g., 10 or 20) before a sufficient market develops that will enable the investment to be liquidated or sold, and some investments may have no readily available secondary market.
- Tax risk: Clients should consult their tax advisors regarding the tax consequences of their investments and any potential disclosures that may be required by their taxing authority. Avrio is not a tax advisor, although certain investment strategies may consider the potential tax implications of an investment decision. Avrio is a Singapore-based registered investment advisor, and as such its clients may be subject to a unique set of reporting requirements (*namely those who have financial and bank accounts in Singapore.*)
- Risk of equity instruments: Risks associated with investing in equity securities include:
 - The stock markets where a portfolio's investments are traded lose value. In very small markets it is possible for these markets to quit functioning altogether.
 - An adverse event, such as negative press reports about a company in the portfolio, may depress the value of the company's stock.
 - Small to mid-capitalization companies may have less diversified product or service offerings and less liquidity in the markets, which increases their volatility.
 - Companies may earn revenues in multiple currencies and are subject to the fluctuation of these currency values.
- Risk of fixed income investments: Risk associated with investing in fixed income securities include:
 - Interest rate risk: If interest rates rise, the prices of fixed income securities in the portfolio may fall, and the longer the maturity of a fixed income security, the greater its sensitivity to changes in interest rates.
 - Credit risk: The issuer may default on its obligation to pay principal or interest, may have its credit rating downgraded by a rating organization or may be perceived by the market to be less creditworthy. Lower-rated bonds are more likely to be subject to an issuer's default than investment grade (higher-rated) bond. Lower-rated bonds may have less liquidity and be more difficult to value in declining markets.

- Prepayment risk: If interest rates decline, the issuer of a security may exercise its right to prepay principal earlier than scheduled, forcing the account to reinvest in lower yielding securities.
- Extension risk: If interest rates rise, the average life of securities backed by debt obligations is extended because of slower than expected payments. This will lock in a below-market interest rate, increase the security's duration, and reduce the value of the security.
- Principal and interest may be stated in multiple currencies, which are subject to fluctuation in these currency values.
- Foreign country and emerging market risks: Risk associated with investing in foreign and emerging markets include:
 - Vulnerability to economic downturns and instability due to undiversified economies; trade imbalances; inadequate infrastructure; heavy debt loads and dependence on foreign capital inflows; governmental corruption and mismanagement of the economy; and difficulty in mobilizing political support for economic reforms.
 - Adverse governmental actions, such as nationalization or expropriation of property; confiscatory taxation; currency devaluations, interventions, and controls; asset transfer restrictions; restrictions on investments by non-citizens; arbitrary administration of laws and regulations; and unilateral repudiation of sovereign debt.
 - Political and social instability, war, and civil unrest.
 - Less liquid and efficient securities markets; higher transaction costs; settlement delays; lack of accurate publicly available information and uniform financial reporting and accounting standards; difficulty in pricing securities and monitoring corporate actions; and less effective governmental supervision.
 - Changes in foreign currency exchange rates and in exchange control regulations may adversely affect the value of securities denominated or traded in non-US currencies.
- Asset-backed and mortgage-backed securities risks: Certain strategies may invest in securitized debt, including asset-backed securities ("ABS") and/or mortgage-backed securities ("MBS"). The investment characteristics of MBS and ABS may differ from traditional debt securities in that interest, and principal payments are made more frequently, the principal may be prepaid at any time, and a number of state and federal laws govern and may limit the right to the underlying collateral. Principal and interest may be stated in multiple currencies, which are subject to fluctuation in these currency values.
- Non-publicly traded securities, private placements, and restricted securities: Investing in unregistered or unlisted securities may involve a high degree of business and financial risk that can result in substantial losses, due to the absence of a public trading market for these securities and the absence of public disclosure and other investor protection requirements applicable if the securities were publicly traded. These securities and their cash flows may be stated in multiple currencies, which are subject to fluctuation in these currency values.
- Illiquid investments: Certain strategies may invest in illiquid assets, such as private equity, venture capital, real estate, infrastructure, etc. Exposure to an illiquid asset class will be made by purchasing interests in a privately offered pooled investment vehicle ("illiquid asset vehicle") Investment in an illiquid asset (or vehicle) poses similar risks as direct investments in illiquid securities. In addition, investment in an illiquid asset vehicle will be subject to the terms and conditions of the illiquid asset vehicle's investment policy and governing documents, which often include provisions that may involve investor lock-in periods, mandatory capital calls,

redemption restrictions, infrequent valuation of assets, etc.

- Prior to investing an account in a fund, Avrio will assess whether it believes the investment is consistent with the client's investment guidelines as well as applicable law and regulation (e.g., Investment Company Act of 1940, ERISA, etc.). A client will generally bear, indirectly, fund investment expenses (e.g., brokerage commissions to execute portfolio trades, etc.) and operating costs (e.g., administration, custody, audit, etc.). When a client's account invests in an affiliated fund, the client will not normally pay any additional investment management fees to Avrio in connection with investing in the affiliated fund. When investing in an unaffiliated fund, the client will normally bear, indirectly, fees paid by the fund to its investment manager.
- REITS: An investment in REITs includes the possibility of a decline in the value of real estate, possible lack of available money for loans to purchase real estate, risks related to general and local economic conditions, overbuilding and increased competition, increases in property taxes and operating expenses, prolonged vacancies in rental properties, changes in zoning laws, casualty or condemnation losses, variations in rental income, changes in neighborhood values, the appeal of properties to tenants, costs of clean up and liability to third parties resulting from environmental problems, costs associated with damage from natural disasters not covered by insurance, increases in interest rates and changes to tax and regulatory requirements. Some REITs may have limited diversification and making them more susceptible to adverse developments affecting a single project or market segment than more broadly diversified investments. Also, the performance of a REIT may be affected by its failure to qualify for tax-free pass-through of income, or the REIT's failure to maintain exemption from registration under the Act. Rents may be earned in multiple currencies, which would make them subject to currency fluctuations.

Retirement Rollovers: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and could engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If we recommend that a client roll over their retirement plan assets into an account to be managed by us such a recommendation creates a conflict of interest if we will earn an advisory fee on the rolled over assets, which in most cases will be greater than the fees being paid in a 401K plan. No client is under any obligation to rollover retirement plan assets to an account managed by us.

Cybersecurity: The technology systems of Avrio and relevant third-party service providers may be vulnerable to inadvertent or deliberate interruption and consequent damage from technical or human sources. In addition to natural catastrophes, service/power outages, and network or telecommunication failures, security breaches and intrusion by unauthorized persons could result in damage, disruption, and theft of data, including investor information. Avrio has implemented cybersecurity procedures meant to address these risks. Nevertheless, given Avrio's fundamental dependence on technology, a cyber-attack or similar technology disruption could have a material adverse impact on clients. Additionally, there are inherent limitations in cybersecurity policies and procedures and controls including the possibility that certain risks have not been identified. Avrio has conducted limited due diligence and risk assessments of third-party providers. However, Avrio is not able to control the cybersecurity plans, breach notifications, incident response plans and controls put in place by other services providers and/or the issuers in which the client invests. It is in the client's best interest to monitor all of their accounts on a regular basis and stay informed of cybersecurity best practices.

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 Avrio or the integrity of Avrio's management. Avrio has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Ann Marie Regal CFP® and Jeremy Stobie, CPA, CFE are the controlling managing members of CPS German I, II and III LLC (the “CPS German Entities”). These entities are Delaware limited liability companies established December 21, 2018 for the sole purpose of aggregating investor loans and making first lien real estate loans. The CPS German Entities will be wound up after the return of final interest and principal payments to the investors and have no equity or other interest in the development of the German properties.

CPS German entities will provide the investors the Executive Summary related to the loan and the underlying real estate investments.

Item 11 – Code of Ethics

Avrio has adopted a Code of Ethics for all supervised persons of the Firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, and implementation of personal securities trading procedures, among other things. All supervised persons at Avrio must acknowledge the terms of the Code of Ethics at least annually, and when otherwise amended.

Avrio’s employees and persons associated with Avrio are required to follow Avrio’s Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors, and employees of Avrio and its affiliates may trade for their own accounts in securities, which are recommended to and/or purchased for Avrio’s clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Avrio will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Avrio’s clients.

In addition, the Code requires pre-clearance of Initial Public Offerings (IPO) and Private Placements. The Code of Ethics would permit employees to invest in the same securities as clients, there is a possibility that employees might inadvertently benefit from market activity by a client in a security held by an employee. Employees may also trade opposite of the client trades or holdings. Employees may not trade in any account based on non-public material insider information and may not knowingly trade in their personal accounts to harm the clients of Avrio. Employee trading is monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Avrio and its clients.

Trade Allocation

Avrio Wealth must allocate all investment opportunities among eligible clients promptly and on a documented, equitable basis. In some instances, the Firm may encounter situations where it may be beneficial for one or more of its clients’ accounts to purchase or sell a security where the investment opportunity is limited. In these instances, Avrio will allocate the opportunity among its eligible client accounts. The SEC requires registered advisers to allocate securities transactions and make advisory recommendations in a fair and equitable manner or provide a fair and clear disclosure that the adviser does not. Failure to meet these requirements may result in a violation of the anti-fraud provisions of the *Advisers Act*. Allocation decisions must be made in a timely manner. Generally, this means that decisions will be made prior to placing the order. The Firm or its supervised persons’ proprietary accounts cannot be traded in a manner known to negatively impact the client accounts.

Aggregation of Client Orders

Generally, on a day-to-day basis the Firm is unable to aggregate client orders due to the nature of the trading process. Not aggregating orders may result in the client paying higher execution charges.

When multiple clients have funds to be invested on the same day, trades will be placed at the same execution price whenever possible. The Chief Compliance Officer (“CCO”) or their designee will monitor the trades to ensure the applicable policies and procedures are being properly followed.

Avrio’s clients or prospective clients may request a copy of the Firm’s Code of Ethics by contacting Ann Marie Regal at annmarie@avriowealth.com or +65 6240 6865.

It is Avrio’s policy that the Firm will not affect any principal or agency cross securities transactions for client accounts. Avrio will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account.

An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Overview

This section of the Firm Brochure contains information regarding our brokerage practices, including the selection of broker-dealers (also referred to as “qualified custodian(s)” interchangeably) and commission rates. We also discuss the brokerage and research services we receive in connection with client securities transactions (often referred to as “soft dollars”).

We are unable to accept requests to direct trades to specific brokers, and we discuss our practices with respect to directed brokerage. In addition, we discuss the aggregation and allocation of orders.

Selection of Brokers and Dealers and Commission Rates

Avrio will seek to select broker-dealers or qualified custodians on the basis of a number of factors including their financial stability, their execution capabilities, and trading expertise to execute and settle transactions for client accounts, reporting, or a particular expertise in a relative market. In determining which broker-dealer may provide best execution for a particular transaction or series of transactions, Avrio considers the totality of the services that a broker-dealer can provide, including but not limited to: execution price, capability to execute difficult trades (possible market impact, size of the order and market liquidity); commitment of capital; opportunity for block transactions; access to IPOs and other new issues; research; confidentiality; clearance and settlement; responsiveness; access to markets; and/or financial stability. This means that a broker-dealer or qualified custodian offering the most favorable commission or spread may not be selected to execute a particular transaction. We will seek to negotiate favorable commissions and spreads on all transactions (other than client-directed brokerage).

We will determine the overall reasonableness of the brokerage commissions and other transaction costs on client transactions by taking into account various factors, including, but not limited to, the following: current market conditions; size and timing of the order; depth of the market; per share price; difficulty of execution; the time taken to conclude the transaction; the extent of the broker-dealer’s commitment, if any, of its own capital; and the amount involved in the transaction. In the course of executing client transactions, when in the best interests of our clients, we may

utilize the execution services of a broker other than the market-maker for certain over-the-counter securities transactions. As a result, clients may be charged a commission as well as an undisclosed mark-up or markdown on such transactions.

Best Execution

Avrio has a duty to obtain best execution for client transactions. This means that the Firm must execute transactions for clients in such a manner that the clients' total costs or proceeds in each transaction are most favorable under the circumstances. Avrio currently uses Interactive Brokers (IB) for clients who have US tax connections. In selecting any broker/dealer, to execute client securities transactions, the Avrio and its advisory representatives consider the full range of services offered.

The SEC has indicated that best execution is not determined by the lowest possible commission costs but by the best qualitative execution. Avrio must systematically and periodically evaluate the broker or brokers used to ensure that the best execution services are optimal. The CCO will be responsible for performing such periodic evaluations at least annually.

At all times Avrio, and its investment adviser representatives shall manage and recommend investments in the best interest of the client. Avrio is responsible for ensuring the fees and the asset classes used are reasonable for the client. Reasonable does not mean the compensation has to be the lowest; rather reasonable will mean not excessive based upon the going market rate for the services actually rendered.

Research and Brokerage Services

Avrio does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

Avrio may have an incentive to recommend the use of a specific Custodian/Broker-Dealer due to the services they may provide to Avrio that Avrio would not otherwise receive. These services could include, trading software/platforms, best practices workshops, compliance tools, technology tools, market data, and access to conferences or educational events.

Avrio does not allocate the relative costs or benefits of services received from brokers or dealers among clients because we believe that the service received is, in the aggregate, of assistance in fulfilling our overall responsibilities to clients. The services may be used in connection with the management of accounts other than those for which trades are executed by the brokers or dealers providing the services. Avrio may receive a variety services and information on many topics, which we can use in connection with our management responsibilities with respect to the various accounts over which we exercise investment discretion or otherwise provide investment advice.

Client Directed Brokerage

Avrio does not recommend, request, or require that a client provide direction to execute transactions through a specified broker-dealer. Avrio does not allow for directed brokerage arrangements. Directed Brokerage is generally defined as a relationship where the client requests that all or some trades are executed at a specific broker with which Avrio does not necessarily have a relationship. Due to the administrative trading execution functions, Avrio only has the ability to place trades with IB. If the client wishes to have a specific trade executed elsewhere, they will have to execute on their own, outside of the management of Avrio.

Item 13 – Review of Accounts

All accounts are reviewed no less than quarterly by Avrio. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in a client's financial situation or market and asset-specific conditions.

Factors Prompting Review of Client Accounts Other than a Periodic Review

Client accounts are also reviewed on a non-periodic basis, specifically when investments with respect to such accounts are being bought or sold. In addition, clients may request a review of

their accounts by the financial advisor assigned to their account at any time. Accounts are also reviewed on a random basis by Avrio's CCO or their designee to determine/confirm whether accounts are invested properly.

Content and Frequency of Account Reports to Clients

Clients may access their accounts at any time via their custodian's online portal. The information is updated daily. Clients may also contact Avrio at any time to discuss their accounts in detail. Avrio will periodically reach out to clients via email at least annually to review their portfolio.

The client will receive a report in hardcopy format or electronically from their custodian at least quarterly. In the event the client has not received a report that should contact Avrio or their custodian directly.

Client Protections

In the event Avrio believes the client is acting in a state of diminished capacity or suspects another third party is fraudulently directing the client in such a way that would financially harm the client, Avrio reserves the right not to transact an investment, withdrawal, or deposit.

Avrio will then report the incident to the proper authorities. If the client wishes they may also name a trusted contact that Avrio may contact on the client's behalf in case of diminished capacity or suspected Fraud. The client may Avrio to obtain documentation to add a trusted contact.

Item 14 – Client Referrals and Other Compensation

We do not directly or indirectly compensate any person for client referrals.

Item 15 – Custody

Avrio does not maintain custody of client assets (other than due to its ability to automatically debit client fees, upon client authorization). Avrio does not have custody for the purpose of a surprise audit based on the Custody Rule 206 (4)-2 under the Investment Advisers Act of 1940. There are other ways Avrio could obtain custody of client assets, such as by acting as Trustee for a client's account or other reasons. Avrio does not have custody other than the ability to deduct its fees.

Item 16 – Investment Discretion

Avrio requires clients to have a written investment policy statement that takes into account the client's timeline, risk profile, investment objectives, limitations and/or restrictions and securities chosen. Client funds are invested in the agreed upon portfolio and are rebalanced as needed. Changes to the portfolios are agreed upon in writing by the clients and executed by Avrio.

The client and Avrio must enter into a written investment management agreement.

Item 17 – Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted. Clients are responsible for instructing each custodian, generally on the custodian's account opening documentation, to send them copies of all proxy communications relating to the client's investment assets. We may provide clients with consulting assistance regarding proxy issues.

Item 18 – Financial Information

This item is not applicable because Avrio does not require or solicit the prepayment of any advisory

fees and does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our clients.

Avrio is required to maintain a paid-up capital position of no less than SG \$450,000 at all times as part of its regulatory requirement outlined by the Monetary Authority of Singapore.

AVRIO WEALTH PTE LTD

Singapore

**9 Battery Road, #28-01 Singapore, 049910
Telephone: +65 6240 6865
Email: info@avriowealth.com**

December 6, 2021

BROCHURE SUPPLEMENT (FORM ADV PART 2B) FOR Avrio Wealth Pte Ltd (“Avrio”)

www.avriowealth.com

CRD #306064

This Brochure Supplement provides information on Avrio’s advisory personnel as required by Rule 204-3 of the United States Securities and Exchange Commission (“SEC”).

The information contained within this Brochure Supplement is current as of the above date and is subject to change at Avrio’s discretion.

This Brochure Supplement provides information about the qualifications and business practices of Avrio. If you have any questions about the contents of this Brochure, please contact by email at info@avriowealth.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any International or State securities authority.

Avrio is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Avrio (CRD #306064) is available on the SEC’s website at www.adviserinfo.sec.gov. The SEC’s website also provides information about any persons affiliated with Avrio who are registered or are required to be registered, as investment adviser representatives of Avrio.

Brochure Supplement for Ann Marie Regal CRD#4042482

Item 1 - Cover Page

Person's Name: Ann Marie Regal, CFP® 1961

Business Address: 9 Battery Road, #28-01 Singapore, 049910

Firm Name: Avrio Wealth Pte Ltd

This brochure supplement to Form ADV Part 2 A dated December 2020 provides information about Ann Marie Regal and supplements Avrio's brochure. You should have received a copy of that brochure. Please contact info@avriowealth.com if you did not receive a copy of Form ADV Part 2 A or have any questions about the contents of this supplement.

Item 2 - Educational Background and Business Experience

Education

Syracuse University, NY B.A. Business Administration 1997

Business Experience

Avrio Wealth Pte Ltd	01-2020 - Present
Capital Privé Suisse S.A. ("CPS"), Registered Investment Advisor Representative	05/2015 - 03/2020
Globaleye Pte Ltd, Wealth Manager	02/2014 - 12/2019
Chartwell Associates Pte Ltd, Financial Advisor	12/2010 - 02/2014
Balance Planning Pte Ltd, Director	05/2009 - 12/2011
Legg Mason Investment Counsel, HNW Sales, AVP	08/2005 - 07/2007
Deutsche Bank Private Bank HNW Sales, AVP	10/2003 - 07/2005
Scudder Private Investment Counsel HNW Sales, AVP	12/2000 - 10/2003
Goldman Sachs NY Foreign Exchange Analyst	01/1998 - 12/2000

Certifications

Certified Financial Planner 2008

Item 3 - Disciplinary Information

There is no disciplinary information for Ann Marie Regal.

Item 4 - Other Business Activities

Ms. Regal is licensed by the Monetary Authority of Singapore (Financial Advisor License Number: RAM300022970).

Ms. Regal currently volunteers on finance and investment committees at non-profit organizations in Singapore.

Ms. Regal is a Director of Sherpa Markets Pte Ltd and dedicates .5 hour per month and 0 hours a day during trading hours to Sherpa Markets Pte Ltd.

As managing member Ms. Regal dedicates 1 hour a month to CPS Germany I LLC

Item 5 - Additional Compensation

Ms. Regal is a licensed life insurance producer and may receive commissions. Clients of Avrio are able to seek comparable insurance products and purchase the products elsewhere.

Where applicable the terms of the above will be outlined in agreements or detailed disclosures to clients.

Ms. Regal is also a managing member of CPS German Entities. The CPS German entities, LLC originate, monitor and service loans

Item 6 - Supervision

Ms. Regal's investment advice is monitored through a standard set of controls including Avrio's written supervisory procedures. Avrio's CEO/CCO - Ms. Ann Marie Regal will be ultimately responsible for the Company's compliance function. She will be supported by the Office Manager, Ms. Agnes Kuang, in the firm's administration of day-to-day compliance tasks.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university);
- CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Brochure Supplement for Michael David Borchert CRD#7205995

Item 1 - Cover Page

Name: Michael David Borchert, CFP® 1980

Business Address: Battery Road, #28-01 Singapore, 049910

Firm Name: Avrio Wealth Pte Ltd

This brochure supplement provides information about Michael David Borchert and supplements Avrio's brochure. Please contact info@avriowealth.com if you have any questions about the contents of this supplement.

Item 2 - Educational Background and Business Experience

Education

Elon University, NC BS, Business Administration	2002
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Business Experience

Avrio Wealth Pte Ltd, Executive Director	01/2020 - Present
Professional Investment Advisory Services, Financial Consultant	2012 - 2019
Affinity Financial Consulting, Financial Consultant	2010 - 2012
Precision Components Asia Division, Regional Director	2003 - 2009

Certifications

Certified Financial Planner (SG)	2016
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Item 3 - Disciplinary Information

There is no disciplinary information for Michael David Borchert

Item 4 - Other Business Activities

Mr. Borchert is licensed by the Monetary Authority of Singapore (registration number: MDB100093304).

Mr. Borchert is an Advisory Committee member for Asia Wealth Platform Pte Ltd. A Singaporean Investment Related business. (105 Cecil St, #14-01 The Octagon, Singapore 069534). Mr. Borchert spends approximately 3 hours a month and less than one hour during US trading hours in his role at Asia Wealth Platform Pte. Ltd. He is an educational resource for company.

Item 5 - Additional Compensation

Mr. Borchert not compensated outside of his role at Avrio.

Item 6 - Supervision

Mr. Borchert's investment advice is monitored through a standard set of controls including Avrio's written supervisory procedures. Avrio's CEO/CCO - Ms. Ann Marie Regal will be ultimately

responsible for the Company's compliance function. She will be supported by the Office Manager, Ms. Agnes Kuang, in the firm's administration of day-to-day compliance tasks.

The CFP® Certification Requirements (Singapore)

In order to be certified, a CFP® candidate must meet all four requirements of the certification process described below, while an AFPCM candidate must meet the education, examination, and the ethics requirements:

Education

Before applying for the Certification Examination(s), a candidate must complete academic coverage of the financial planning curricula including: foundations in financial planning (AFPCM course), risk management and insurance planning, tax planning and estate planning, investment planning, retirement planning, and financial plan construction and professional responsibilities. Completion of the academic requirement is available through three educational paths, namely self-study or distance learning, part-time course, or full-time course.

Examination

Upon successful completion of the academic requirement, the candidate is eligible to apply for the Certification Examination(s). The Certification Examination is designed to assess the candidate's ability to apply his/her financial planning education to financial planning situations in an integrated format, thereby protecting the public by assuring that he/she is at the appropriate level of competency required for practice.

Experience

This centers on work which involves personal financial planning-related experience. It is designed to provide the public with the assurance that the candidate understands the counseling nature of personal financial planning. The requirement is three years, performed before or after the successful completion of the Certification Examination.

An individual demonstrates relevant work experience working with clients while:

Engaging in practice described in FPAS's Financial Planning Practice Standards;

Applying the abilities, skills and knowledge described in FPAS's Financial Planner Competency Profile; and

Adhering to ethical principles described in FPAS's Financial Planner Code of Ethics and Professional Responsibility.

For additional information regarding the CFP® (SG) designation please see: <https://fpas.org.sg/cfp-certification/pathway-to-cfpcertification/>

Brochure Supplement for Kieran Rooney CRD#6831549

Item 1 - Cover Page

Person's Name: Kieran Rooney, CFP®, EA 1985

Business Address (Supervised From): 9 Battery Road, #28-01 Singapore, 049910

Firm Name: Avrio Wealth Pte Ltd

This brochure supplement to Form ADV Part 2 A dated December 2020 provides information about Kieran Rooney and supplements Avrio's brochure. You should have received a copy of that brochure. Please contact info@avriowealth.com if you did not receive a copy of Form ADV Part 2 A or have any questions about the contents of this supplement.

Item 2 - Educational Background and Business Experience

Education

University of Scranton BSc Counseling and Human Services	2007
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École des Hautes Études en Santé Publique, Master of Public Health	2011
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Business Experience

Avrio Wealth Pte Ltd	11/2021 - Present
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Rooney Advisors LLC Principal Consultant	01/2021 - 11/2021
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Modera Wealth Management LLC	04/2016 - 05/2019
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Certifications

Certified Financial Planner	2018
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IRS Enrolled Agent	2018
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Certified Expert in Financial Inclusion Policy	2021
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Item 3 - Disciplinary Information

There is no disciplinary information for Kieran Rooney.

Item 4 - Other Business Activities

Ms. Rooney has no other business activities to report.

Item 5 - Additional Compensation

Ms. Rooney is only compensated for her role as a financial planner with Avrio Wealth Pte Ltd

Item 6 - Supervision

Ms. Rooney's investment advice and financial planning duties are monitored through a standard set of controls including Avrio's written supervisory procedures. Avrio's CEO/CCO - Ms. Ann Marie Regal will be ultimately responsible for the Company's compliance function. She will be supported by Michael Borchert, CFP®, Executive Director.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

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- CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

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- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

IRS Enrolled Agent

An enrolled agent is a person who has earned the privilege of representing taxpayers before the Internal Revenue Service by either passing a three-part comprehensive IRS test covering individual and business tax returns, or through experience as a former IRS employee. Enrolled agent status is the highest credential the IRS awards. Individuals who obtain this elite status must adhere to ethical standards and complete 72 hours of continuing education courses every three years.

<https://www.irs.gov/tax-professionals/enrolled-agents/enrolled-agents-frequently-asked-questions>

Certified Expert in Financial Inclusion Policy

In collaboration with the Frankfurt School of Finance & Management, participants receive an understanding of the design and implementation of regulatory frameworks that help promote financial inclusion. The Seven Units are as follows:

- Aligning the Goals of Financial Inclusion, Integrity and Stability
- Measuring Financial Inclusion
- Digital Financial Services
- Consumer Empowerment and Market Conduct
- MSME Finance
- Microcredit, Microsavings and Microinsurance
- National Financial Inclusion Strategies

Participants develop skills to draft and analyze policies and design strategies that are most relevant to emerging economies.

Participants are required to pass an online test with multiple choice questions to get access to the subsequent module. The final exam is taken online. Upon successful completion of the final exam the Frankfurt School will issue a certificate that earns participants six European credit transfer system (ECTS).

If the exam is not taken or is failed the participants will receive a confirmation of course work.

<https://www.afi-global.org/activities/c>