

Quantix Commodities LP

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This “**Brochure**” provides information about the qualifications and business practices of Quantix Commodities LP. If you have any questions about the contents of this Brochure, please contact the Chief Compliance Officer (“CCO”), Marc Srolovits, at 203-864-3388 or by email at msrolovits@quantixcommodities.com. Information in this Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“**SEC**”) or by any state securities authority.

Quantix Commodities LP has applied as an Investment Adviser with the SEC. Registration as an investment adviser does not imply that Quantix Commodities LP or any of its principals or employees possesses a particular level of skill or training in the investment advisory business or any other business.

Additional information about Quantix Commodities LP is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

This Brochure is Quantix Commodities LP's initial Form ADV Part 2A which has been submitted with our application for registration with the SEC; therefore, there are no material changes to report. In the future, if the Brochure contains material changes from our last update, we will identify and discuss those changes in this section.

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Item 4: Advisory Business

Quantix Commodities LP (hereinafter “**Quantix**”, “**we**”, “**us**”, “**our**” or the “**Firm**”) is organized as a Delaware limited partnership with a principal place of business in Greenwich, Connecticut.

Following registration with the SEC, Quantix will provide discretionary investment management services to its client, Harbor ETF Trust¹, herein referred to as the “**Fund**” or “**Client**”. However, Quantix will provide the Fund with advice only concerning the investment management of the sleeve of the Fund’s assets that it will be allocated. The Fund is advised by Harbor Capital Advisors, Inc. (“**Harbor Capital**”), and subadvised by Quantix.

The Client has been organized as a statutory trust under the laws of the State of Delaware to engage in the business of an investment company. The Client is an open-end, management investment company registered under the Investment Company Act of 1940.

Our investment decisions and advice with respect to the Client are subject to the investment objectives and guidelines, as set forth in its respective “**Prospectus**.”

We do not currently participate in any Wrap Fee Programs.

Currently, we have \$0 regulatory assets under management.

¹ ETF expected to be launched February 2022.

Item 5: Fees and Compensation

The fees applicable to the Client are set forth in detail in the corresponding Prospectus. A brief summary of such fees is provided below.

Management Fee

Harbor Capital compensates Quantix for the services provided with respect to the Fund based upon the Fund's average daily net assets (the "Advisory Fee").

Other Types of Fees or Expenses

The Firm is responsible for and shall pay, or cause to be paid, all of their own ordinary administrative and overhead expenses, including, without limitation, all costs and expenses related to rent, furniture, fixtures, equipment, office supplies, clerical expenses and all salaries, bonuses and benefits paid to, or on behalf of, personnel of the Firm.

The Firm will pay the compensation and expenses of all officers and executive employees of the Firm and will make available, without expense to the Fund, the services of such of its partners and employees as may duly be elected officers or Trustees of the Fund, subject to their individual consent to serve and to any limitations imposed by law. The Firm will pay its own office rent and will provide investment advisory, research and statistical facilities and all clerical services relating to research, statistical and investment work. The Firm will pay all expenses incurred in the performance of its duties with respect to the Client.

Information regarding the fees and expenses of the Fund may be found in the Fund's Prospectus and Statement of Additional Information.

Neither the Firm nor its employees accept compensation, including sales charges or service fees, from any person for the sale of securities or other investment products.

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

This item is not applicable to Quantix, as the Fund does not charge any performance-based fees.

Item 7: Types of Clients

Our client is the Fund, as described in Item 4 above, and the Fund is generally open to retail investors.

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

The descriptions set forth in this Brochure of specific advisory services that we offer to our Client, and investment strategies pursued and investments made by us on behalf of our Client, should not be understood to limit in any way our investment activities. We may offer any advisory services, engage in any investment strategy and make any investment, including any not described in this Brochure, that we consider appropriate, subject to the Client's investment objectives and guidelines as set forth in the Prospectus. The investment strategies we pursue are speculative and entail substantial risks. Clients should be prepared to bear a substantial loss of capital. There can be no assurance that the investment objectives of the Client will be achieved.

Investment Objective

The Fund seeks to track the performance of the Quantix Inflation Index (the “**Index**”) before fees and expenses. Investors should review the Fund's prospectus for a description of the investment objective, strategy, and risks.

Risk of Loss Factors

Investors should review the Fund's prospectus for a description of the Fund's risk factors.

Item 9: Disciplinary Information

To the best of our knowledge, there are no legal or disciplinary events that are material to an Investor's or prospective investor's evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

Neither we nor our management persons are registered as broker-dealers, and neither of us has any application pending to register with the SEC as a broker-dealer or registered representative of a broker-dealer, respectively.

Item 11: Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading

Code of Ethics

Quantix has adopted a “**Code of Ethics**” that establishes the high standard of conduct that we expect of our employees and procedures regarding our employees' personal trading of securities. Our employees are required to certify their adherence to the terms set forth in the Code of Ethics upon commencement of employment and

annually thereafter. Employees also are required to provide quarterly certifications of compliance with certain Code of Ethics provisions.

The foundation of our Code of Ethics is based upon the following underlying fiduciary principles:

- Employees must at all times place the interests of the Fund and Investors first;
- Employees must ensure that all personal securities transactions are conducted consistent with the Code of Ethics' Employee Personal Investment Policy (described below); and
- Employees should not take inappropriate advantage of their position at the Firm.

Employees are permitted to maintain personal brokerage accounts for the purpose of trading "**Reportable Securities**" (as defined in the Code of Ethics, and which includes a wide variety of investments such as stocks, bonds, fixed income, options, warrants, futures, and derivatives). Shares of single commodity ETFs, commodity linked ETF securities, and the Fund must be held for a minimum of 30 days. Employees are not permitted to purchase shares of the Fund one week prior and one week after the recalculation of the index weights. Employees are prohibited from participating in Initial Public Offerings ("**IPOs**"). Employees are also prohibited from personally, or on behalf of a Client, purchasing or selling securities that appear on the Firm's Restricted List, as well as listed commodity futures and options on commodity futures.

Employees must obtain pre-approval from the CCO before: (i) engaging in any outside business activities; or (ii) making any private investments.

Item 12: Brokerage Practices

Quantix is authorized to determine the broker-dealers to be used for executing securities or other financial instrument transactions for the Fund. In selecting broker-dealers to execute transactions, we do not need to solicit competitive bids and do not have an obligation to seek the lowest available commission cost. It is not our practice to negotiate "execution only" commission rates; therefore, the Fund may be deemed to be paying for research, brokerage or other services provided by the broker which are included in the commission rate.

The Firm's authority is limited by its own internal policies and procedures and each Fund's investment guidelines.

Best Execution

In selecting an appropriate broker-dealer to effect a client trade, we seek to obtain "**Best Execution**," meaning generally the execution of a securities transaction for a client in such a manner that a client's total costs or proceeds in the transaction are most favourable under the circumstances. Accordingly, in seeking Best Execution, we

will take into consideration the price of a security offered by the broker-dealer, as well as a broker-dealers' full range and quality of their services including, among other things, their facilities, reliability and financial responsibility, execution capability, commission rates, responsiveness to us, brokerage and research services provided to us (for example, research ideas, analysis, and investment strategies), special execution and block positioning capabilities, clearance, and settlement and custodial services. Quantix will trade over the counter bi-lateral commodity based swaps and listed commodity futures/options. Quantix will seek the most favourable price when possible.

Neither Quantix nor any related person receives client referrals from any broker-dealer or third party. However, subject to best execution, we may consider, among other things, capital introduction and marketing assistance with respect to Investors in the Fund in selecting or recommending broker-dealers for the Fund.

The provision by a broker of research and other services and property to us creates an incentive for us to select such broker since we would not have to pay for such research and other services and property as opposed to solely seeking the most favourable execution for a client. Any research, services or property provided by a broker may benefit any client and such benefits may not be proportionate to commission dollars related to the provision of such research, services or property.

Item 13: Review of Accounts

Our Portfolio Managers and investment professionals continuously monitor and analyze the transactions, positions, and investment levels of the Fund to ensure that they conform with the investment objectives and guidelines that are stated in the Fund's Prospectus. In these reviews, the Firm pays particular attention to any changes in the investment's fundamentals, overall risk management and changes in the markets that may affect price levels.

Account Reporting

We perform various periodic reviews of the Client's portfolio. Such reviews are conducted by our officers.

Item 14: Client Referrals and Other Compensation

We do not receive economic benefits from non-clients for providing investment advice and other advisory services. We may directly or indirectly, compensate third parties who are not supervised persons for client referrals.

Item 15: Custody

This item is not applicable as the Firm is not deemed to have custody of Client funds and securities.

Item 16: Investment Discretion

We will have full discretionary investment authority with respect to the Fund, including authority to make decisions with respect to which securities or other financial instruments to be bought and sold, as well as the amount and price of those securities or other financial instrument.

Item 17: Voting Client Securities

This item is not applicable to Quantix, as the Firm does not engage in proxy voting.

Item 18: Financial Information

We are not required to include a balance sheet for our most recent fiscal year, are not aware of any financial condition reasonably likely to impair our ability to meet contractual commitments to our Client, and have not been the subject of a bankruptcy petition at any time during the past ten years.