

Global AutoTrading

www.global-autotrading.com

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This brochure provides information about the qualifications and business practices of Global AutoTrading. If you have any questions about the contents of this brochure, please contact us at service@global-autotrading.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Global AutoTrading is also available on the SEC's website at www.adviserinfo.sec.gov.

Summary of Material Changes

This brochure is being amended for our annual update. No significant changes from last year's brochure.

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4. Advisory Business¹

Global AutoTrading Inc. (Global AutoTrading) provides a monthly-fee-based automated trading (autotrading) service to its clients. Global AutoTrading does not recommend individual investments; which orders to place is dictated by the clients' existing subscription to various 3rd-party investment newsletters (Newsletters). Global AutoTrading does not recommend any Newsletter to its clients. The clients decide for themselves which Newsletter they want to subscribe to, and if the Newsletter is compatible with Global AutoTrading's service, then the clients can sign up to Global AutoTrading's autotrading service. Global AutoTrading trades equities, options and bonds.

Global AutoTrading has been in business since 2007. The principal owner of Global AutoTrading Inc. is Jimmy Talbot. As of February 17, 2021, Global AutoTrading autotrades USD 6M in assets.

5. Fees & Compensation

Global AutoTrading charges a monthly fee per account based on the number of newsletters being autotraded in the account, as well as the net liquidity of the account for accounts larger than \$100k. One newsletter costs \$70 per month; a second newsletter costs an additional \$30 per month; and each subsequent newsletter costs an additional \$10 per month. For accounts larger than \$100k, the high-water mark of the funds in use for trading for the month is divided by \$100k to come up with a scaling factor that is multiplied by the fee computed above. Thus, an account that has \$150k invested in a given month and that is autotrading a single newsletter would pay $\$70 \times 1.5 = \105 per month. These fees are non-negotiable and are payable monthly at the beginning of the billing period. These fees will be taken from a credit card, PayPal account or transferred from the client's brokerage account to Global AutoTrading's account. These fees are non-refundable. If a subscription to Global AutoTrading's autotrading service is terminated with at least 1 day prior to the next billing date, there will be no further subscription charges to the client, but there will be no refund for the remainder of the period of the subscription.

Global AutoTrading may have arrangements with some brokers where the brokers pay the autotrading fee to Global AutoTrading on behalf of the clients.

Some brokers may pay a referral fee to Global AutoTrading. Currently, tradier pays Global AutoTrading a referral fee for each new account Global AutoTrading brings to tradier.

Clients will incur brokerage and other transaction costs that are charged directly by the broker (please see section 12- Brokerage Practices).

6. Performance-Based Fees and Side-By-Side Management

Global AutoTrading does not accept performance-based fees.

¹ The numbering follows the SEC guidelines; item 1 is the cover page, item 2 the list of material changes, and item 3 the table of contents.

7. Types of Clients

Global AutoTrading clients include individuals, trusts, and corporations. The minimum account size varies from broker to broker, and depending on the kind of account. For example, Interactive Brokers' and tradier's minimum account size is USD2000 for margin accounts, and no minimums for cash accounts.

8. Methods of Analysis, Investment Strategies and Risk of Loss

Global AutoTrading does not analyze securities. Global AutoTrading receives recommendations from Newsletters via emails or other means, and places buy/sell orders in its clients' account according to those recommendations.

Please note that investing in securities involves risk of loss that clients should be prepared to bear.

9. Disciplinary Information

Not Applicable.

10. Other Financial Industry Activities and Affiliations

Jimmy Talbot, a Global AutoTrading management person, has a relationship with Gravitas Wealth Advisors, an SEC-registered investment advisor, to provide investment advisory services for non-US residents, or for clients that have brokerage accounts with brokers which Global AutoTrading does not work with. There is no conflict of interest due to this relationship.

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

Although Global AutoTrading does not recommend investments to its clients, it is possible that the Newsletters recommend investments in which Global AutoTrading or affiliates have a financial interest. In cases where orders for the same security for more than one client (or for Global AutoTrading and its affiliates or agents) needs to be submitted to the same broker at the same time and the orders are not combined, Global AutoTrading will submit the orders sorted by increasing number of contracts (smallest order first).

Global AutoTrading' complete code of ethics is available upon request.

12. Brokerage Practices

Global AutoTrading chooses brokers based on them meeting technical requirements for Global AutoTrading business model (such as support for Registered Investment Advisor accounts), as well as commission prices. Global AutoTrading does not receive commissions or other soft-dollar benefits from Interactive Brokers. Global AutoTrading may receive compensation for each new client introduced to some brokers.

Global AutoTrading may or may not aggregate (pool) orders together when submitting them to brokers that support order pooling. This may or may not affect commission prices. For example, with Interactive Brokers, any order for more than one option contract has the same cost per

contract whether it is large or small. Similarly for stocks, for any order involving more than 200 shares, the commission will be \$0.005 per share. It could affect commission prices for small orders or orders with other brokers; however, other brokers that Global AutoTrading works with does not support pooled orders as of this writing.

13. Review of Accounts

Global AutoTrading does not periodically review client accounts. If a client notifies Global AutoTrading that their financial state or their goals have changed, Global AutoTrading will examine the client's current newsletter subscriptions for suitability. Clients are urged to compare newsletter alerts with the state of their account to confirm that all trades have been executed as recommended.

Global AutoTrading sends weekly and monthly trade report supplements to clients. The supplements show individual transactions and positions specifying which newsletter the item is associated with. These reports do not include commission and other fees, and thus clients are urged to look at the broker's activity statements for a more accurate and complete state of their account (albeit without grouping by newsletters).

14. Client Referrals and Other Compensation

Global AutoTrading may, at times, enter into soliciting agreements to provide cash compensation to third parties for client referrals or introductions to Global AutoTrading. Our compensation agreements are in accordance with Rule 206(4)-3 under the Investment Adviser Act of 1940 and the applicable state regulations. To the extent required by Rule 206(4)-3 or applicable state regulations; the compensation is disclosed to clients by the third party referral source in a separate disclosure document. Generally, these arrangements provide compensation equal to a specific percentage of certain fees received by Global AutoTrading. This arrangement creates a conflict of interest in that cash compensation may impair the solicitor's evaluation of the client's suitability for Global AutoTrading's service. To mitigate or remedy this conflict of interest the Chief Compliance Officer will review referrals to ensure suitability with program before compensating the solicitor. Prior to compensating any individual for referrals, Global AutoTrading will ensure that these individual solicitors are appropriately registered as investment adviser representatives if registration is required by the jurisdictions in which solicitation activities are conducted.

Clients that engage Global AutoTrading's services as result of referrals from third parties will not pay more or less than other clients.

Global AutoTrading does not receive any compensation from any newsletters.

15. Custody

Global AutoTrading does not have custody of client assets.

16. Investment Discretion

Discretionary authority to determine the securities and total amount of securities to be bought or sold may be exercised only after a client executes a limited power of attorney granting such authority. Global AutoTrading may place orders to buy/sell equities or options in clients account, but may not transfer money in or out of the account (other than the billing of Global AutoTrading's monthly fee).

17. Voting Client Securities

Global AutoTrading does not have authority to vote client securities. Clients will receive their proxies or other solicitations directly from the broker.

18. Financial Information

Not applicable.