



Form ADV Part 2A - Wrap Fee Program Brochure
& Brochure Supplement
Pursuant to Part 2A & 2B of Form ADV

Revised February 25, 2021

This Program brochure provides information about the qualifications and business practices of Newday Funds, Inc.(SEC #801-112212) (CRD #174758), dba Newday Impact, a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. If you have any questions about the contents of this brochure, please contact us by email at: info@newdayinvesting.com

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Brokerage and clearing services are provided to **Newday Premier Clients** by Charles Schwab & Co., an SEC registered broker-dealer and member FINRA/SIPC.

Brokerage and clearing services are provided to **Newday Digital App Clients** by Apex Clearing Corporation, an SEC registered broker-dealer and member FINRA/SIPC.

Additional information about Newday Funds, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

San Francisco, CA
info@newdayinvesting.com



Item 2: Material Changes

This section discusses only material changes since the last annual update of this Brochure. This brochure was previously updated on June 1, 2020.

- 1) On January 27, 2021 Newday acquired Magni Global Asset Management LLC, a Minneapolis-based investment advisor (<https://adviserinfo.sec.gov/firm/summary/163440>).
- 2) Item 9.B Proxy Voting Digital Platform. Effective June 1, 2020, this brochure was updated to reflect that Newday will not vote proxies on behalf of clients on the digital platform.



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Item 4: Services, Fees and Compensation

Item 4. – Advisory Business

Newday Impact, d/b/a Newday Funds, Inc. (Newday) is a privately held corporation organized under Delaware law in 2015 for the purposes of providing advisory services, research, and investment management to individuals, registered investment advisors and institutional investors as defined under Rule 501 of the Securities Act of 1933, as amended. Newday's ownership is set forth below. Newday is an SEC-registered investment adviser that maintains its principal office in the State of California..

Newday Impact provides authentic strategies for responsibility-minded investors. Backed by insightful research and recognized community leaders, Newday Impact offers strategies aligned with the major ESG issues in the world, including climate action, fresh water, human rights, gender equality, animal welfare, and quality of governance. Newday provides solutions for institutional investors, high-net-worth individuals and novice investors who want their investments to generate competitive returns as well as make an impact in the world.

Newday has \$114,159,912 of assets under management as of December 31, 2020, which are managed on a discretionary basis.

This Disclosure Brochure describes the wrap program of Newday Impact. A separate brochure describes Newday's investment management services. As used in this Disclosure Brochure, the words "we", "our" and "us" refer to Newday and the words "you" and "client" refer to you as either a client or prospective client of Newday.

Ownership

Newday is owned by its employees, private individuals and certain investment and venture capital investors.

Research and Capabilities

Newday is a financial technology institutional asset management company offering automated investment solutions focused exclusively on environmentally sustainable, socially responsible companies and countries with good governance practices. Newday uses proprietary algorithms to identify companies that align with specific areas of social, economic or governance impact selected by the client. These are applied to create diversified equity portfolios that seek to maximize return subject to alignment with the area of desired impact chosen by the client.



The Newday Impact platform provides affordable, transparent, and easy to understand opportunities for individuals and institutions to invest responsibly.

General Information

Newday offers the Newday Wrap Fee Program to prospective and current clients and is the sponsor of the Newday Wrap Fee Program. If you have questions regarding the material in this brochure, please contact Newday at info@newdayinvesting.com

A. Program Description

Every Newday Impact Portfolio is custom-made, proprietary, and targeted investment strategy built to benefit a specific area of impact. Our multi-portfolio approach allows us to provide a fully-diversified investment strategy while impacting the areas the clients care about directly.

The Program is offered to clients through two platforms: a web-based digital investment advisory portal (the “Digital”) and a full service advisory (“Premier”) channel designed to complement our online services for clients requiring non-individual types of accounts.

Clients will receive Newday’s Investment Advisory Agreement which will further detail the services the Client will receive and the fees charged to the Client. It is important to note, Newday does not provide overall financial planning nor does it provide tax advice.

Newday offers investment advice to clients and manages assets through the Newday Wrap Fee Program. A wrap fee program has a fee structure that provides clients with investment advisory and custodial services for one-all inclusive fee with no additional account activity charges for execution of trades. Retirement accounts are assessed account closing fee and annual maintenance fee by the custodian, please see section regarding Additional Fees for further information.

Newday Wrap Fee Program offers services to individuals and family offices.

Digital Platform

The Newday App gives the Client access to automated investment guidance where they can learn about investing, create and manage a customized investment portfolio that is designed to meet their financial goals, interests and beliefs. Each Client is required to respond to a series of questions designed to identify the client’s investment objectives, risk tolerance and the impact theme(s) in which they are interested. Based solely on the information provided by the Client the Newday algorithms analyzes the information and provides the Client access to a selection of investment portfolios. Portfolios focus on the following themes: global, climate, diversity and inclusion, stakeholder capitalism, animal welfare, sustainable agriculture, ocean and religion. Our investment management services are currently limited to these portfolios, but additional



portfolios may be added in the future. Newday portfolios are managed by our portfolio managers.

The Program includes discretionary investment advice offered by Newday primarily over the internet through the Website and App. This may differ from other investment advisory relationships, and the Client must be willing to receive investment advice over the internet in order to participate in the program.

Newday provides discretionary investment advice to each Client based solely on the information the Client provides via the App, and each Client is solely responsible for implementing any such recommendations. Newday provides ongoing investment management services on a discretionary basis only. Newday's investment advice is tailored to the individual needs of the clients and clients may impose reasonable restrictions during onboarding. Clients should carefully review all information provided by Newday and any relevant company reports prior to investing. Newday provides investment advice solely via the App or website. Newday provides customer support via Chat, email or over the phone.

It is the Client's obligation to promptly update their information through the Newday App if there are changes to their financial situation, personal circumstances, goals, objectives or if other relevant information changes.

Clients should consider that the Newday digital platform is not designed to provide clients with a comprehensive financial plan. It is built to advise clients on how to achieve discrete impact financial goals selected by the client. Newday's investment recommendations are dependent on receiving accurate information from clients. If clients provide Newday with inaccurate information or fail to update client information promptly when it changes, the quality and applicability of Newday's recommendations could be materially impacted.

All investments in a portfolio with Newday are invested as fractional shares. Fractional shares allow us to give our users a well rounded diversified stock offering in our portfolios with minimum investment capital.

Premier Platform

The Premier platform allows Clients who are unable to open accounts through the digital platform due to account type, ie. entity accounts, access to all Newday portfolios in to addition traditional advisory services. Premier clients are able to consult with a Newday adviser via telephone or in person. Premier services are designed to help clients articulate and quantify goals, organize financial data, identify needs and opportunities, evaluate alternative courses of actions, and determine whether and how Newday can fit into clients' broader financial plan. Newday will base advice on information provided by clients regarding, among other things, their age, marital and family status, annual income, employment status, liquid net worth and other



investments, investment goals and investment experience during the financial consultation call or meeting.

Premier services will not include a comprehensive financial plan. Any tax information is not a substitute for the advice of a qualified tax Adviser. You should consult with your tax Adviser to discuss tax-related concerns.

Each Client is required to respond to a series of questions designed to identify the client's investment objectives, risk tolerance and time horizon.

Based solely on the information provided by the Client the Newday adviser analyzes the information and provides the Client investment portfolios recommendations. The Client should understand that the Newday adviser relies upon the information provided by the Client in making its risk assessment and providing investment advice.

There can be no assurances that any client's financial goals and objectives will be met. Clients are under no obligation to accept or follow any recommendations made by a financial adviser as part of the Premier program. Newday provides discretionary investment advice to each Client based solely on the information the Client provides.

B. Fees

Newday Wrap Fee Program (the "Program") offers investment advisory service to clients in a program that bundles services together and charges a single fee based on the value of assets under management (the "Program"). A wrap fee program allows Newday to manage client accounts for a single fee that includes advisory services, trade execution, clearance, custodial and reporting.

These fees may be negotiable depending upon the needs of the client and complexity of the situation.

Newday will not act as the custodian for accounts opened on either the Newday Premier or Digital platform, though our right to deduct advisory fees from the Client Account deems us to have "custody" of your funds. The securities and assets in each Client account are held in a separate account in the name of the Client at an independent custodian. Apex Clearing Corporation ("Apex") shall be the custodian for digital platform Client and Charles Schwab, Inc. ("Schwab") shall be the custodian for the premier Client, and it shall have possession of the assets of the Account. All brokerage and clearing services are provided by, and securities are offered through Apex or Schwab.

The fee schedule is set forth below:



Premier Platform

Fees are billed quarterly in arrears and using the last day of the quarter for purposes of determining the market value of the assets upon which the advisory fee is based. Advisory fees are withdrawn directly from the client's accounts with client's authorization unless otherwise requested.

Fee Schedule (All Accounts)

Account Balance	Fee	Wrap Fee Description
Assets under management	See stated in Appendix A of the advisory agreement	Annual fee

Digital Platform

Fees are billed quarterly in arrears using the last day of the quarter for purposes of determining the market value of the assets upon which the advisory fee is based.

Fee Schedule Individual Accounts

Account Balance	Fee	Wrap Fee Description
under \$100.00	0%	No fee on assets under \$100.00
\$101.00 or more	0.75%	Annual fee on assets invested in Equities and Mutual Funds

Fee Schedule IRA Accounts (Individual Retirement Accounts)

Account Balance	Fee	Wrap Fee Description
under \$100.00	0%	No fee on assets under \$100.00



\$101.00 or more	0.75%	Annual fee on assets invested in Equities/ETF and Mutual Funds
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Advisory fees are withdrawn directly from the client's accounts with client's authorization.

If a client terminates their investment advisory contract with Newday prior to quarter-end, the advisory fee will be pro-rated based on the portion of the quarter the account was opened, and Newday will automatically debit the amount of the fees from the assets in the account. Fees are billed in arrears therefore, no refund policy is necessary.

The program may cost the client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program, including the trading activity in the client's account, the adviser's ability to aggregate trades, and the cost of the services if provided separately (which in turn depends on the prices and specific services offered by different providers).

Newday reserves the right to waive the fee or any part thereof for any period for any Client at Newday's sole discretion.

C. Additional Fees

Clients incur certain charges imposed by custodians, brokers and other third parties such as fees charged by other managers, 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 charge internal management fee, which are disclosed in the fund's prospectus. Such charges, fees and commissions are exclusive of an in addition to our fee, and Newday does not receive any portion of these commissions, fees or costs incurred by the client.

Custodian Additional Fees (payable to the custodian not Newday)

Apex	\$60.00 \$20.00 \$5.00 \$2.00	Termination Fee Annual Maintenance Fee Paper Monthly Statement Paper Confirmation
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D. Compensation of Client Participation

Neither Newday, nor any representatives of Newday receive any additional compensation beyond advisory fees for the participation of client's in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and other services. Therefore, Newday may have a financial incentive to recommend the wrap fee program to clients.

Item 5: Account Requirements and Types of Clients

Newday generally provides its wrap fee program services to the following types of clients who are U.S. citizen or Permanent U.S. residents and maintain a checking account with a U.S. bank:

Digital Platform

Individuals

Premier Platform

Individuals
High-Net-Worth Individuals
Charitable Organizations
Corporations or Entities

Minimum Account Size

Digital Platform

There is a \$100.00 account minimum in order to open an account. It is recommended that the client invests a minimum of \$100 per portfolio selected. The minimum amount may be waived with the clients understanding that any portfolio with less than the \$100 minimum will not replicate the model.

Premier Platform

Currently, there is no account minimum in order to open a Premier Platform account.



Item 6: Portfolio Manager Selection and Evaluation

Newday directly manages the portfolios of Clients pursuant to each digital App client's Advisory Agreement and Premier Clients pursuant to the Newday Premier Advisory Agreement and in conjunction with the Adviser's instructions, as applicable.

Clients should carefully consider Newday's services before determining whether to engage Newday.

To use Newday's services, clients inform Newday of a client's financial goals, personal information, impact interest and beliefs through Newday's application either on the digital platform or the premier platform. Based on this information, either Newday's algorithm, for digital platform clients, will recommend a portfolio composed of the themed portfolios and cash for each client's financial goals and account type or an Adviser working with Premier Clients will recommend a portfolio composed of various investment types and/or asset classes for each client's financial goals and account type. Digital platform clients can choose to construct their own Impact Portfolios using features available through the App. Premier clients can also choose to construct their own portfolios. Each portfolio is associated with a target allocation (the "Allocation") of themed portfolios, investment types and/or assets classed depending on platform.

Newday's Investment Committee determines which themed portfolios and Assets to offer digital clients. Newday may change the specific Assets that comprise a particular portfolio or without notice to clients, clients can include or exclude any Portfolio. As described below, Advisers servicing clients on the Premier platform are responsible for the recommendation of portfolios to clients.

Portfolio Strategies for Digital Platform

Newday currently offers three investment portfolio strategies:

Newday's Conservative Portfolio: 70% fixed income portfolio and 30% equity impact themed portfolios

Newday's Moderate Portfolio: 60% fixed income portfolio and 40% equity impact themed portfolios

Newday's Aggressive Portfolio: 30% fixed income portfolio and 70% equity impact themed portfolios

All Newday's impact themed portfolio strategies reduce exposure to stocks of U.S. companies that do not meet certain environmental, social, and governance criteria. Thematic model portfolios are comprised of U.S equities and ADRs. Newday's fixed income portfolio consists of a green bond ETF and impact bond mutual fund. Newdays customized portfolio strategy offers investors the opportunity to seek outperformance by taking more systematic risk at a given allocation of equities and fixed income than is possible with the Newday recommended Portfolio



strategy. Newday also allows clients to choose their own area(s) of impact that are important to them by determining their own individual thematic portfolio allocation.

Clients may select any investment portfolio strategy. Clients, and not Newday, are responsible for determining whether the portfolio strategies that they select are consistent with client's goals and tolerance for risk and volatility.

Investing in securities involves risk of loss that clients should be prepared to bear. You can learn more about Newday's investment advice and methodologies on Newday's website.

Premier Platform Portfolio Management

Newday offers separate account clients on the Premier platform ongoing portfolio management services based on the individual goals, objectives, time horizon and risk tolerance of each Client. Newday Adviser creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the recommendation of a portfolio that matches each client's specific situation. Premier platform investment services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

Adviser evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Allocation Advice

Each Allocation corresponds to a specific set of asset classes and distribution of Assets among those asset classes. Clients are free to accept a Newday recommended Allocation or choose their own Allocation based on their own preferences or risk tolerance. Newday or Adviser will manage a client's account according to the Allocation the client sets.



When client's deposit or withdraw money from their Newday account they are requesting the Newday or Adviser purchase or sell available assets within their account in amounts that reflect their desired Allocation. Similarly, when clients adjust an Allocation, Newday or Adviser will buy and sell assets to approach the desired Allocation.

Rebalancing

In the absence of contrary direction, Newday or Adviser rebalances client portfolios at least quarterly so that each client's portfolio more closely replicates the portfolio(s) selected. Accounts with a balance of \$5.00 or less may not be rebalanced. In the event a company has drastically failed certain metrics, we will immediately consider removing said company from our portfolio, regardless of the time of year.

Digital Platform Use of Algorithms

Newday uses algorithms to advise clients and manage their accounts. These algorithms are developed, overseen and monitored by Newday personnel. When clients open a Newday account via the App, these algorithms determine Newday's recommended Allocation based on inputs from the client. Algorithms also generate advice regarding investment decisions, including but not limited to Allocation selection, automatic rebalancing and account type selection.

When clients make deposits or withdrawals from their accounts, an algorithm determines the specific securities to trade based on a client's Allocation. These algorithms may not perform as intended for a variety of reasons, including but not limited to incorrect assumptions, changes in the market, and/or changes to data inputs. Newday may modify periodically these algorithms, or a computer system's code or underlying assumptions, and these changes may have unintended consequences.

Trade Execution, Account Maintenance, and Asset Custody

In order to open a wrap fee program accounts with Newday, clients must establish a brokerage relationship with either Apex Clearing Corporation (digital platform clients) or Schwab (Premier Platform clients), both broker-dealers registered with the SEC and a member of Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). By entering into an Advisory Agreement with Newday, clients authorize and direct Newday to place all trades in client's accounts through platform broker-dealer. As such, the broker-dealer will maintain all client accounts and execute all securities transactions in client accounts without separate commission costs or other fees, except as identified in Section 4.B. Broker-dealers exercises no discretion in determining if and when trades are placed; it places trades only at the directions of Newday. Newday procedures are designed to make every attempt to obtain the best execution possible, although there can be no assurance that it can be



obtained. Clients should understand that the appointment of Broker-dealer as the sole broker for their accounts under this Wrap Fee Program may result in disadvantages to the client as a possible result of less favorable executions than may be available through the use of a different broker-dealer.

Clients should understand the Newday Wrap Fee Program is a discretionary investment advisory program, and not a self-directed brokerage service. Unlike self-directed brokerage accounts Newday clients do not enter individual buy or sell orders for specific securities to be executed at particular times. Rather, Newday places orders to buy and/or sell securities with custodian consistent with the discretionary authority granted to it by clients, which includes among other things, the authority to select which securities to buy or sell and when to place orders for the execution of securities.

Newday trades in client accounts for a number of reasons, including in response to client actions such as Allocation changes, deposits, or withdrawals. Newday also trades in order to rebalance client accounts, or replicate changes to the model portfolios.

Newday generally trades on the next business day in response to client accounts as noted above. However, transactions will be subject to processing delays in certain circumstances. For example, orders initiated on non-business days and after business hours. Newday maintains a general approach of not placing securities orders during the first thirty minutes after the opening of any market session or approximately the last ninety minutes before the close of any session. Further, account deposits are automatically subject to a processing period that may be up to five business days or longer; deposit-related transactions will not occur until the next business day after this processing period is complete.

In addition, Newday reserves the right, at any time and without notice, to delay or manage trading in response to market instability. Newday may do so where it determines it is appropriate to respond to extraordinary circumstances of market instability, as evidenced by extreme instances of elevated localized volatility, insufficient or unstable market depth, price dislocation, incomplete execution, fast markets, and rapidly widening bid-ask spreads. In the event that Newday delays placing orders in response to extraordinary market volatility for greater than sixty consecutive minutes during Newday's typical trading hours of 10:00 am to 2:30 pm (eastern time), Newday will undertake to provide notice of such delay to Clients by posting a message via the App and separately to Advisers for clients on the Premier platform. Newday does not delay or manage trading based on any view about whether markets are likely to rise or fall.

Newday may, but is not required to, aggregate orders involving multiple accounts trading in the same securities. In conducting these transactions no client is favored over any other client and each client that participates in an aggregated transaction will participate at the average share



price for transactions in the aggregated order. Client aggregated orders resulting in less than one whole share will need to be round to a whole share. In this instance the residual share not allocated to clients will be allocated to a Newday proprietary account.

There are never any separate fees for any trade execution or custody service.

Other Information About Newday's Portfolio Management

Newday manages all client assets on a discretionary basis.

Third Party Portfolio Managers

Newday does not offer to clients on the digital platform third-party managers. Third-party managers may be introduced to clients on the premier platform.

Risks of Specific Securities Utilized

Newday generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned above).

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Fixed Income is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Stocks & Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy).

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.



Fractional Share is a share of equity that is less than one full share. Fractional share amounts are typically unrecognized and illiquid outside of the Newday digital platform and that fractional shares might not be marketable outside the Newday digital platform or transferrable to another brokerage account.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 7: Client Information Provided to Portfolio Managers

Newday manages all client portfolios directly, there are not portfolio managers with whom Newday could share client information. However, for Clients on the Premier platform, Newday provides certain client information to clients' Adviser.

Item 8: Client Contact with Portfolio Managers

Digital platform clients should consider that Newday primarily uses electronic means to provide customer support. To receive customer support, clients may contact Newday via email or through the online Chat, and prospective clients should feel comfortable communicating through those channels. Clients should consider such customer support as educational in nature only, and that although the algorithms that manage client accounts are overseen, monitored, and updated by investment advisory personnel, clients participating in the Newday Digital program will generally not interact directly with such investment advisory personnel.

In addition to customer service personnel Newday provides materials related to investment decisions on our publicly available website, and the "Learn" tab, including a frequently asked questions site and the "Learn" tab, at <https://newdayimpact.com/learn/> site.

Clients on the Premier platform may schedule telephone consultations with a financial Adviser.



Item 9: Additional Information

A. Disciplinary Action and Other Financial Industry Activities

Disciplinary History

Newday and its Advisers do not have any legal or disciplinary events

Other Financial Industry Activities and Affiliations

The firm and its advisers do not have any other financial industry activities or affiliations.

Participation in Client Transactions and Possible Conflicts of Interests

Newday and individuals associated with Newday may buy or sell securities for their personal account that are identical to or different than those recommended to clients. Newday has a personal securities trading policy in place to monitor the securities transactions and securities holdings of certain employees. This policy is intended to prevent employees from benefiting from transactions placed on behalf of advisory clients.

B. Code of Ethics, Client Referrals, and Financial Information

Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

Recommendations Involving Material Financial Interests

Newday does not recommend that clients buy or sell any security in which a related person to Newday has a material financial interest.

Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Newday may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Newday to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Newday will always document any transactions



that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Newday may buy or sell securities for themselves at or around the same time as clients. Such transactions may create a conflict of interest; however, Newday will never engage in trading that operates to the client's disadvantage if representatives of Newday buy or sell securities at or around the same time as clients.

Review of Accounts

Newday provides Newday Digital Platform Clients with continuous access via the web-based application to real time reporting information about their accounts status, securities holdings and balances. Clients can utilize various tools on the App to review their account and better understand their holdings and performance information. Clients also receive periodic emails from Newday with information about their accounts as well as links to account statements and confirmations.

Newday's algorithms continuously review clients' accounts to ensure their portfolios are within a set range of their Allocation. If a client's portfolio deviates from this range, Newday will rebalance back to its target Allocation in certain circumstances. Newday personnel further conduct limited reviews when triggered by certain account activity, although clients should be aware that their individual accounts are generally not actively monitored directly by investment advisory personnel.

Client's are directed on at least a quarterly basis to update their information via App.

Clients using the Premier platform services, clients' agreement with their Adviser govern any additional responsibilities for conducting review of clients' accounts.

Statements Provided to Clients

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Newday does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Newday clients.



Client Referrals

Newday offers compensation to current clients for referring new clients. New clients are advised of the compensation prior to opening the account. Referring clients must adhere to terms and conditions established by Newday and set forth in an agreement with Newday in accordance with Securities and Exchange Commission Rule 206(4)-3 under the Investment Advisers Act of 1940. Referrals can only be made within the Newday application or website. Clients are not charged any fee nor do they incur any additional costs for being referred to Newday by a current client.

Termination of Advisory Relationship

Client agreements may be canceled at any time, by either party, for any reason upon notice in accordance with the applicable Advisory Agreement. Upon termination of any account any unpaid fees will be due and payable.

Voting Client Proxies

Premier Platform

All proxies solicited by or with respect to the issuers of securities in which Assets may be invested from time to time shall be voted by the Client. The Adviser shall have no authority or responsibility for exercising any of the foregoing rights unless otherwise agreed in writing between the Adviser and the Client.

Digital Platform

All proxies solicited by or with respect to the issuers of securities in which Assets may be invested from time to time shall be voted by the Client. The Adviser shall have no authority or responsibility for exercising any of the foregoing rights unless otherwise agreed in writing between the Adviser and the Client.

Privacy Policy

Newday is committed to protecting our clients' private information. Newday has instituted policies and procedures to ensure that customer information is kept private and secure. Newday does not disclose any non-public personal information about its customers or former customers to any non-affiliated third parties except as required by or permitted by law or agreed to by the client or as otherwise disclosed in Newday's Privacy Policy. In the course of servicing a client account, Newday may share some information with its service providers, such as transfer agents, and custodians. Newday restricts internal access to non-public personal information to those employees who need access to such information in order to provide products or services



to a particular client. Newday maintains physical, electronic, and procedural safeguards to protect client information.

A copy of Newday's Privacy Policy is available on the Newday website at: <https://newdayimpact.com/privacy-policy/>

Balance Sheet

Newday does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

To the best of Newday's knowledge, neither Newday nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

Bankruptcy Petitions in Previous Ten Years

Newday has not been the subject of a bankruptcy petition in the last ten years.

Subject to Change

From time to time Newday may adjust its wrap fee program and policies. In the event of such changes this brochure will be modified as needed and an updated copy will be made available on the Newday website.



Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Douglas Charles Heske

CRD #1458182

Of

Newday Funds, Inc.

CRD # 174758

San Francisco, CA

www.newdayinvesting.com

February 25, 2021

This Brochure Supplement provides information about Douglas (“Doug”) Heske, and supplements the Newday Funds, Inc. (“Newday”) Brochure. You should have received a copy of that Brochure. Please contact us at (925)683-8923, if you did not receive Newday’s Brochure, or if you have any questions about the contents of this Supplement. Additional information about Doug is available on the SEC’s website at www.AdviserInfo.sec.gov.



Item 2 - Educational Background and Business Experience

Prior to joining Newday, Douglas Charles Heske (born 1962) served as the head of Private Client Services for Stifel Nicolaus in San Francisco (2011 - 2016) as well as the COO and Head of Wealth Management for Nollenberger Capital Partners and subsequently Sterne Agee (2004 - 2011). Prior to his role at Nollenberger, he was the Regional Managing Director of Wealth Management with Piper Jaffray & Co. (1993 - 2004). He is a graduate of Rhode Island University with a Bachelor of Science in Finance.

Item 3 - Disciplinary Information

Mr. Heske was the subject of a consumer initiated arbitration in 1993, which was settled by the firm based on a cost-of-defense analysis. Mr. Heske was not required to participate in the settlement. You may review disciplinary history at the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov or the BrokerCheck website at <http://brokercheck.finra.org>.

Item 4 - Other Business Activities & Additional Compensation

Mr. Heske serves as a director and executive committee member for the San Francisco Child Abuse Prevention Center (2010 - present) a non-profit organization. He does not receive any compensation for this role and his activities with this charity do not conflict with his role as the CEO Newday and do not regularly require his attention during regular business hours.

Item 6 - Supervision

Mr. Heske's activities on behalf of the firm and clients are maintained according to the highest of professional standards. Should you have any questions or concerns regarding these standards, please contact Mr. Heske's supervisor, the Firm's Chief Compliance Officer, Denise Rusnak at (415)952-6992..