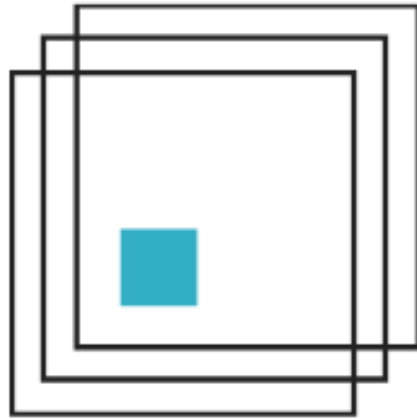


Registered as: Tribe'let Capital Management PTY LTD | CRD No. 297481



tribe'let
capital management

Form ADV 2A – Firm disclosure Brochure

118 Russell Street, Suite 901 | Melbourne, Victoria Australia 3000

www.tribelet.capital

March 26, 2021

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Tribe'let Capital Management Pty Ltd (“the firm”). If you have any questions about the contents of this brochure, please contact us at +613-9013-7270 or kevin.saunders@tribelet.capital. 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. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about the firm to assist you in determining whether to retain the firm. Additional information about Tribe'let Capital Management Pty Ltd also is available on the SEC’s website at www.adviserinfo.sec.gov by searching our CRD number 297481.

Item 2 – Material Change

This section will be updated as required to disclose any material changes. Annually, a complete Disclosure Brochure will be offered to Clients along with a summary of material changes, if any, within 120 days from the firm's fiscal year-end.

There are no material changes to disclose since the previous annual amendment.

A complete copy of our current Form ADV Part 2A and/or 2B may be requested free of charge by contacting us by telephone at +613 9013 7270 or by email at kevin.saunders@tribelet.capital.

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Item 4 – Advisory Business

Tribe’let Capital Management Pty Ltd (hereinafter referred to as “Tribe’let Capital Management”, “we”, “us”, or “our firm”) is a proprietary limited company with its principal office located in Melbourne, Victoria and has been in business as an Australian financial services company since 2013. Since 2017, it has been a Corporate Authorised Representative (CAR) of the Australian Financial Service License 499 882, CAR Number 001261080.. The principal owners of the firm are Kevin Saunders (50%) and James Roche (50%). The firm registered with the US Securities and Exchange Commission (SEC) in 2019 by virtue of having the principal place of business outside of the United States. In 2021 the firm began to actively manage assets.

As a registered investment adviser, we are a fiduciary to you, our client, meaning we have a fundamental obligation to act and provide investment advice that is in your best interest. Should any material conflicts of interest exist that might affect the impartiality of our investment advice, they will be disclosed to you in this Brochure. We urge you to review this Brochure carefully and consider our qualifications, business practices and the nature of our advisory services before becoming our client.

Advisory Programs



Tribe’let Capital Management provides investment management services to our clients. In connection with our investment management services, Tribe’let provides advice with respect to a broad range of asset classes, including equities (common stocks and equivalents), mutual funds, exchange traded funds, and alternative investment strategies. Tribe’let Capital Management may also utilize, where appropriate, options contracts, futures contracts, foreign currencies to purchase foreign securities and derivatives to hedge against foreign currency exchange rates or to engage in speculation.

Our advisory services are offered through certain individuals who have registered with Tribe’let Capital Management as its investment adviser representatives (“advisors”). Clients should refer to such advisor’s Form ADV Part 2B (the “Brochure Supplement”) for more information about their qualifications.

Tribe’let Capital Management’s advisory services are tailored to the needs of our clients based on their individual investment objectives, risk tolerance, cash or income needs, and any investment restrictions. Although Tribe’let seeks to accommodate any reasonable investment restrictions or guidelines set by our clients, we may decline to accommodate certain investment restrictions that are incompatible with our firms’ investment philosophy or that may have an adverse effect on our ability to manage your account.

Tribe’let Capital Management enters into formal written agreements with our clients setting forth the terms and conditions under which we will provide our advisory services (the “Engagement

Agreement”). The Engagement Agreement sets forth the scope of the services to be provided and the compensation we receive from the client for such services. The Engagement Agreement may be terminated by either party in writing at any time by giving thirty (30) days signed written notice to the other party. Our advisors may offer all or any combination of the advisory services described below to our clients:

	
<p>Tribe’let Capital Management provides investment consulting services and decision support through a relationship with Equity Story, an unaffiliated third-party. Equity Story is a member-based market research firm that provides education and execution strategies. All information provided by Equity Story is general in nature and should not be considered a personal recommendation to buy or sell any asset or security.</p> <p>Tribe’let continually monitors the client’s investments at the third-party investment advisers to ensure they remain aligned with the client’s stated investment goals and objectives, and if deemed to be in the client’s best interest, Tribe’let Capital Management may recommend that the client reallocate their assets to another third-party investment adviser. Tribe’let does not manage or exercise investment discretion or trading authority over these client portfolios.</p> <p>Clients seeking additional advice, guidance and discretionary management services can open a Tribe’let managed account.</p>	<p>Tribe’let Capital Management provides investment accounts where client portfolios are managed according to the client’s stated investment goals and objectives. Working closely with an advisor, clients will establish realistic and measurable investment goals and objectives to meet those goals will be defined. An advisor will recommend that clients allocate their investment portfolio among various asset classes, then once the appropriate asset allocation has been determined, the portfolio will be monitored and rebalanced on an ongoing basis as changes in market conditions and client circumstances occur.</p> <p>As part of these investment management services, Tribe’let Capital Management has an ongoing responsibility to select and make recommendations as to specific securities or other investments that may be purchased or sold for a client’s portfolio.</p> <p>Tribe’let Capital Management generally exercises discretionary authority over managed accounts.</p>

Wrap Fee Programs.

A wrap fee program is a comprehensive advisory account with a single fee that covers a bundle of services; such as, portfolio management, advice, and investment research as well as trade execution, custody, and reporting fee. Tribe'let Capital Management does not act as the sponsor or portfolio manager of a wrap fee program.

Important Note: It is the client's responsibility to ensure that Tribe'let Capital Management is promptly notified if there are ever any significant changes to their financial situation, goals, objectives or needs so we can review our previous recommendations and make any necessary adjustments.

Assets Under Management

As of December 31, 2020, the assets under management are as below. Assets under management will be amended at least annually as of December 31st.

Assets under Management	
Discretionary	\$0.00
Non-Discretionary	\$0.00
Total	\$0.00

Item 5 – Fees and Compensation

The following information describes how Tribe'let Capital Management is compensated for the advisory services we provide to our clients. The specific manner in which fees are charged and the compensation we receive may differ between clients depending upon the individual Engagement Agreement with each client. Tribe'let Capital Management reserves the right to negotiate our compensation with clients depending on the scope of our advisory relationship, and we may charge higher or lower fees than are available from other firms for comparable services. Tribe'let Capital Management has the general discretion to waive all or a portion of our fees, but typically only exercises this discretion for our employees.

Investment Management Fees

In consideration for providing investment management services and pursuant to the Engagement Agreement with the client, Tribe'let charges an annual asset-based fee equal to 1.5% and a 15% performance fee for accredited investors. Non-accredited investors are subject to a 2% asset management fee without a performance fee based on the client's assets under management ("AUM") as valued by the custodian. Fees are negotiated with each client based on a variety of factors, such as the amount of assets being managed, future deposits to the accounts under our management, the level and type of services provided and/or the nature of the relationship with the client.

Tribe'let Capital Management generally bills our management fees on a monthly basis in arrears.

Tribe'let Capital Management generally bills our performance fees on a quarterly basis in arrears. Clients may elect to have our advisory fees deducted from their brokerage accounts held at Interactive Brokers or invoiced to allow for payment to come from another source. If a client decides to have fees deducted from their brokerage accounts, the client must authorize the deduction of our fees from their managed accounts by the qualified custodian, Interactive Brokers. If the client decides to be invoiced separately for our fees, Interactive Brokers will generate an invoice, which will be sent to the client via email. In both cases, Interactive Brokers will calculate the fees using a customizable template generated by Interactive Brokers, and signed in agreement by the client. The client makes this election when applying for their account at Interactive Brokers or at any time. All fees will be supported by a statement prepared by Interactive Brokers, to the client itemizing the fee.

Clients typically pay our firm by instructing Interactive Brokers, the qualified custodian, to deduct a certain amount of advisory fees from their account(s) and pay those fees to our firm. Interactive Brokers does not accept or process requests to deduct fees received from our firm without the client's express written authorization. Specifically, clients can elect to use the automatic advisor fee billing functionality offered by the qualified custodian, Interactive Brokers, through which the client instructs Interactive Brokers to calculate and deduct our advisory fees from the client's account(s) and remit the fees to our firm. Clients must specify the exact method by which our fees are to be calculated (i.e., percentage of net liquidation value, flat fee, percentage of positive P&L) as well as the timing of each (i.e., daily, monthly, quarterly, etc.). Once the fee agreement signed by the client is processed by Interactive Brokers, our fees will be processed in accordance with the client's instructions to Interactive Brokers.

Any advisory fees deducted from the client's account are reflected on the client's periodic activity statements as well as the client's account management window when they log in to their account. The periodic activity statement also specifies the calculation method. In addition to providing advisory fee information in the client's periodic account statements and online, IB sends a separate quarterly summary statement to the client's residential address that details the trading activity, positions, investment rate and the method of calculating advisory fees, if any, during the preceding quarter. The statement provided by Interactive Brokers reflects the fee charged and the period covered by the fee. The fee agreement generated by Interactive Brokers describes the fee calculation methodology.

Investment Consulting Fees

Our firm charges on an hourly or flat fee basis for financial planning and consulting services. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client. The maximum hourly fee to be charged will not exceed \$500. Flat fees will not exceed \$10,000 p/month Our firm will not require a retainer exceeding \$10,000 p/month when services cannot be rendered within 6 months.

Additional Fees and Expenses

Clients will incur transaction charges and/or brokerage fees when purchasing or selling securities.

Interactive Brokers does not charge transaction fees for U.S. listed equities and exchange traded funds. These charges and fees are typically imposed by the broker-dealer or qualified custodian through which account transactions are executed. For more information on our brokerage practices, please refer to the "Brokerage Practices" section of this Brochure.

The fees that clients pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds (described in each fund's prospectus) to their shareholders. The fees charged directly by mutual funds and exchange traded funds will typically include a management fee and other fund expenses.

To fully understand the total costs associated with their investment portfolio, clients should review all the fees charged by mutual funds, exchange traded funds, our firm, and others.

Termination

The Engagement Agreement with our clients may be terminated by either party at any time upon thirty (30) days written notice. Upon termination of our status as the client's investment adviser, Tribe'let Capital Management will not take any further action with respect to the client's account(s) unless specifically notified by the client in writing. Clients will be responsible for instructing their custodian and monitoring their account for the final disposition of assets. Financial Consulting clients may terminate their agreement at any time before the delivery of a financial plan by providing written notice.

Refunds

any earned unpaid fees will be billed on a pro-rata basis based on the amount of work performed by us up to the point of termination.

Upon receipt of a proper notice of termination from the client, as described in the Engagement Agreement, any earned unpaid fees will be billed on a pro-rata basis based on the amount of work performed by us up to the point of termination.

Brokerage Commissions

Tribe'let Capital Management does not receive brokerage commissions from the sale of securities or other investment products. Our compensation for recommending securities and investment products is limited to the advisory fees described above.

ERISA Accounts

Tribe'let Capital Management is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the

Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Tribe'let Capital Management may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset Tribe'let Capital Management's advisory fees.

Any material conflicts of interest between clients and Tribe'let Capital Management or our employees are disclosed in this Brochure. If at any time, additional material conflicts of interest develop, Tribe'let Capital Management will provide our clients with written notification of those material conflicts of interest or an updated Brochure.

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

A performance fee is compensation based on capital appreciation where a Registered Investment Advisor retains a portion of the gains, typically 15%, in a Client's account as the asset management fee.

Performance fees are in addition to a 1.5% asset management fee. Tribe'let Capital Management will negotiate performance-based fee arrangements with “qualified clients” also known as accredited investors. An accredited investor is a person with annual income exceeding \$200,000 (\$300,000 for joint income) for the last two years with the expectation of earning the same or a higher income in the current year. An individual must have earned income above the thresholds either alone or with a spouse over the last two years. The income test cannot be satisfied by showing one year of an individual's income and the next two years of joint income with a spouse.

A person is also considered an accredited investor if they have a net worth exceeding \$1 million, either individually or jointly with their spouse or if they are a general partner, executive officer, or director for the company that is issuing the unregistered securities. A natural person can qualify as an accredited investor based on certain professional certifications, designations or credentials or other credentials issued by an accredited educational institution, or holding a FINRA Series 7, Series 65, and Series 82 license.

- Tribe'let Capital Management requires a client to have a net worth greater than \$2,000,000 or an opening account value of at least \$1,000,000 prior to charging a performance fee.

Side-by-side management refers to the simultaneous management of client accounts with a performance-based fee and others with an asset-based fee arrangement. This creates a conflict of interest to favor accounts where a performance-based fee is earned over accounts with an asset-based management fee.

- Tribe'let Capital Management participates in side-by-side management.

Item 7 – Types of Clients

Tribe'let Capital Management offers investment advisory services to a diversified group of clients including individuals, high net worth individuals, trusts, estates, banking or thrift institutions, investment companies (including mutual funds), investment advisers, pension and profit sharing plans (other than plan participants), charitable organizations, corporations and other business entities, insurance companies, state and municipal government entities, non-profit organizations, wrap programs and managed investment pools (e.g. hedge funds). Client relationships vary in scope and length of service.

- Tribe'let Capital Management generally requires a minimum account balance of \$100,000 for our investment management services.
- Tribe'let Capital Management in its sole discretion may waive or lower the minimum account balance requirement based on various criteria (i.e., anticipated future additional assets to be managed, related accounts, account composition, negotiations with the client, etc.).

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

The securities analysis methods employed by Tribe'let Capital Management is purely technical, based on price levels and their relationships to long term averages, long term trend and recent price swings. Investments are based on a series of mathematical models, designed to predict when an individual equity price has reached a favorable divergence from long-term averages.

Tribe'let Capital Management follows a philosophy that short-term buying and selling is emotional and non-rational. The effect of irrational behavior is to drive price beyond what is appropriate, given the timeframe over which it occurs. Furthermore, rapid, and large price movements exhaust the short-term supply of buyers (or sellers). The exhaustion of short-term buyer or seller initiative provides an opportunity to participate in a price-reversion to a more typical price level. Tribe'let Capital Management's mathematical models predict these phenomena by daily price-scanning the universe of approved equities.

Investment Strategies

Strategies include both long and short position purchases comprised of individual equities and exchange traded funds. Tribe'let Capital Management strives to build portfolios that are flexible and diversified to manage the risk associated with the capital markets. Capital is allocated actively and involves frequent trading to adapt to changing market conditions and capitalize on opportunities. During periods where it is difficult to identify attractive opportunities cash levels are likely to increase. When investing client portfolios, we seek to maintain discipline and objectivity by focusing on the client's financial goals and objectives and maintain a systematic approach to the deployment of capital in the global equities markets.

- The investment strategy for a specific client is based upon the objectives and risk tolerances

stated by the client during the initial consultations.

- Clients may change these objectives at any time.

Risk of Loss

Investing in securities involves certain investment risks. Securities can fluctuate in value or lose value up to the entire principal amount invested. Clients should be prepared to bear the potential risk of loss. Tribe'let Capital Management will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. While the models help evaluate a potential investment, it does not guarantee that the investment will increase in value.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Clients should be aware of at least the following types of risks that apply to investing and are encouraged to discuss the specific risks applicable to their account holdings:

- **Business Risk** – the measure of risk associated with a particular security. It is also known as unsystematic risk and refers to the risk associated with a specific issuer of a security. Generally speaking, all businesses in the same industry have similar types of business risk. More specifically, business risk refers to the possibility that the issuer of a particular company stock or a bond may go bankrupt or be unable to pay the interest or principal in the case of bonds.
- **Credit Risk** – the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Currency/Exchange Rate Risk** – the risk of a change in the price of one currency against another.
- **Inflationary Risk** – the risk that future inflation will cause the purchasing power of cash flow from an investment to decline.

- **Interest Rate Risk** – the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Legislative Risk** – the risk of a legislative ruling resulting in adverse consequences.
- **Liquidity Risk** – the possibility that an investor may not be able to buy or sell an investment as and when desired or in sufficient quantities because opportunities are limited.
- **Market Risk** – the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.
- **Pandemic Risk** – Large-scale outbreaks of infectious disease that can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.
- **Reinvestment Risk** – the risk that falling interest rates will lead to a decline in cash flow from an investment when its principal and interest payments are reinvested at lower rates.
- **Social/Political** – the possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.
- **Taxability Risk** – the risk that a security that was issued with tax-exempt status could potentially lose that status prior to maturity. Since municipal bonds carry a lower interest rate than fully taxable bonds, the bond holders would end up with a lower after-tax yield than originally planned.

All investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear.

Types of Investments

Tribe'let Capital Management generally manages Client portfolios that consist of, Exchange Traded Equities (ETFs) and individual securities.

- **Equity** – An investment that generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environment.

- **Exchange Traded Funds (ETFs)** – An ETF is a portfolio of securities invested to track a market index similar to an index mutual fund, but the shares are traded on an exchange like an equity. An ETF share price fluctuates intraday depending on market conditions instead of having a net asset value (NAV) that is calculated once at the end of the day. The shares may trade at a premium or discount; and as a result, investors pay more or less when purchasing shares and receive more or less than when selling shares. The supply of ETF shares is regulated through a mechanism known as creation and redemption that involves large, specialized investors, known as authorized participants (APs). Authorized participants are large financial institutions with a high degree of buying power, such as market makers, banks or investment companies that provide market liquidity. When there is a shortage of shares in the market, the authorized participant creates more (creation). Conversely, the authorized participant will reduce shares in circulation (redemption) when supply falls short of demand. Multiple authorized participants help improve the liquidity of a particular ETF and stabilize the share price. To the extent that authorized participants cannot or are otherwise unwilling to engage in creation and redemption transactions, shares of an ETF tend to trade at a significant discount or premium and may face trading halts and delisting from the exchange. The performance of ETFs is subject to market risk, including the complete loss of principal. ETFs also have a trading risk based on cost inefficiency if the ETFs are actively traded and a liquidity risk if the ETFs has a large price spread and low trading volume. In addition, investors buying or selling shares in the secondary market pay brokerage commissions, which may be a significant proportional cost not incurred by mutual funds.

Additional types of investments will be considered per Client for asset allocation and risk management purposes.

Item 9 – Disciplinary Information

There are no legal, regulatory, or disciplinary events involving Tribe'let Capital Management or any of its Supervised Persons.

Item 10 – Other Financial Industry Activities and Affiliations

Kevin Saunders of Tribe'let acts as the key person as defined by the Australian Securities and Investment Commission (ASIC) on the license held by Non Correlated Capital Pty Ltd¹. His duties are to monitor

¹ Non Correlated Capital Pty Ltd is an Australian-based investment management company, dedicated to generating absolute returns via active trading strategies and portfolios for clients. Non Correlated Capital holds AFS License (#499 882) and Tribelet Capital Management is a Corporate Authorised Representative of NCC (#001261080) Non Correlated Capital's website is www.noncorrelatedcapital.com

compliance activities at this firm. Kevin Saunders manages several private separately managed accounts (SMAs) for friends and family, for the purposes of building a real trading track record of performance. The private SMAs are not charged fees of any kind by Kevin Saunders or Tribe'let Capital Management.

Neither Tribe'let Capital Management nor any of its employees are registered, or have an application pending to register, as a broker-dealer or registered representative of a broker dealer, futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

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

Tribe'let Capital Management has adopted a Code of Ethics (the "Code") that sets forth a standard of business conduct for our firm and all our associated persons. The purpose of the Code is to set out ideals for integrity, objectivity, competence, fairness, confidentiality, professionalism and diligence for our firm and our associated persons to espouse in the interest of our clients and investor protection. The Code includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All employees of Tribe'let are required to handle their personal securities transactions in such a manner as to avoid any actual or potential conflicts of interest or any abuse of position of trust and responsibility. Annually, we require all employees to certify that they have read, understand, and will comply with the Code.

- Clients and prospective clients may request a full copy of our firm's Code of Ethics by contacting our firm in writing at kevin.saunders@tribelet.capital.

Personal Trading with Material Interest

Tribe'let Capital Management and/or our advisors may invest in the same securities that are recommended to and/or purchased for our clients. Tribe'let and/or our advisors do not recommend securities to our clients in which Tribe'let and/or our advisors has a material financial interest. Tribe'let has adopted procedures designed to assure that the personal securities transactions, activities, and interests of Tribe'let and/or our advisors will not interfere with our ability to make investment decisions in the best interest of our clients.

Personal Trading in Same Securities as Clients

Tribe'let Capital Management maintains and enforces written policies and procedures reasonably designed to prevent the misuse of material non-public information by our firm or any access persons of our firm with regards to their personal securities transactions.

- Personal trading activities are continually monitored to reasonably prevent conflicts of interest between our firm and our clients.

Personal Trading at Same Time as Client

Supervised Persons may not purchase or sell any security immediately prior to or immediately after a transaction being implemented for an advisory account, thereby preventing an employee from benefiting from transactions placed on behalf of advisory accounts.

Item 12 – Brokerage Practices

Securities transactions are generally executed through Interactive Brokers, LLC (“Interactive Brokers”), a FINRA/SIPC member broker/dealer (CRD No. 36148). Interactive Brokers maintains custody of our clients’ assets and effects securities transactions for our investment management clients’ accounts.

- Tribe’let Capital Management is independently owned and operated and is not affiliated with or a related person of Interactive Brokers.
- Interactive Brokers is compensated through commissions, trails, or other transaction-based fees for trades that are executed and settle.

Interactive Brokers is an electronic trading and order routing system. Electronic trading and order routing systems differ from traditional open outcry pit trading and manual order routing methods. Transactions using an electronic system are subject to the rules and regulations of the exchanges offering the system and/or listing the contract.

Trading through an electronic trading or order routing system exposes you to risks associated with system or component failure. In the event of system or component failure, it is possible that, for a certain time period, you may not be able to enter new orders, execute existing orders, or modify or cancel orders that were previously entered. System or component failure may also result in loss of orders or order priority. In this regard, Customer must maintain alternative trading arrangements in addition to Customer’s IB account in the event that the IB system is unavailable for any reason.

- Some contracts offered on an electronic trading system may be traded electronically and through open outcry during the same trading hours.
- Exchanges offering an electronic trading or order routing system and/or listing the contract may have adopted rules to limit their liability and the amount of damages for system failure and delays.

Benefits Received

Interactive Brokers, LLC makes available various products and services designed to assist the firm in managing and administering client accounts. These services include software and other technology that provide access to client account data (such as trade confirmation and account statements); facilitate trade

execution (and aggregation and allocation of trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of fees; and assist with back-office functions; recordkeeping and client reporting.

Interactive Brokers, LLC also makes available other services intended to help manage and further develop its business. Some of these services assist the firm to better monitor and service program accounts maintained at Broker/Dealer, however, many of these services benefit only the firm, for example, services that assist with growing its business. These support services and/or products may be provided without cost, at a discount, and/or at a negotiated rate, and include practice management-related publications; consulting services; attendance at conferences and seminars, meetings, and other educational and/or social events; marketing support; and other products and services used in furtherance of the operation and development of its investment advisory business.

Best Execution

Although the commissions and/or transaction fees paid by our clients generally comply with our duty to obtain best execution, you may pay a commission that is higher than what another qualified broker/dealer might charge to affect the same transaction when we determine, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services received.

In seeking best execution, the determining factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, we may not necessarily obtain the lowest possible commission rates for client transactions. The brokerage commissions or transaction fees charged by the broker-dealer/custodian are exclusive of, and in addition to, our investment management fee. Our best execution responsibility is qualified if the securities we purchase are mutual funds that are traded at net asset value as determined at the daily market close.

Aggregation & Allocation of Transactions

Although each client's portfolio accounts are individually managed, the firm can purchase or sell the same securities at the same time for multiple clients. When this occurs, it is often advantageous to aggregate the securities of multiple clients into one trading block for execution.

- If securities are purchased or sold in an aggregated transaction with the securities of other clients, each client will receive the same execution price.
- If the aggregated purchase or sale involves several executions to complete the transaction, each client will receive the average price paid or received on the aggregated transaction.

Tribe'let Capital Management does not aggregate trades, but orders might be aggregated by the custodian when such opportunities are available.

Brokerage for Client Referrals

Tribe'let Capital Management does not consider broker/dealer or third-party referrals in selecting or recommending broker/dealers to our clients as this would create a conflict of interest.

Directed Brokerage

In rare cases, Tribe'let Capital Management may utilize a broker/dealers at a Client's direction. In such a case, Clients must be aware that it may limit our ability to achieve best execution or limit their participation in block trading. As a result, Clients may pay higher commissions, have higher transaction costs, or receive less favorable prices. In situations where the client directs us to effect their transactions through a particular broker/dealer, we require such directions to be in writing.

Soft Dollars

Soft dollars are revenue programs offered by broker/dealers whereby an advisor enters into an agreement to place security trades in exchange for research and other services. Tribe'let Capital Management does not participate in a soft dollar arrangement or any other express arrangements that involves the execution of client transactions as a condition of receiving services.

Trade Errors

If a trade error occurs, Tribe'let Capital Management will correct the trade as soon as we discover the error. Trading errors will be corrected at no cost to clients. In most cases, we will correct trade errors via our executing broker/dealer's trade error desk. If there is a cost associated with this correction, such cost is borne by Tribe'let Capital Management and not the client. Note that we do not credit accounts for market losses unrelated to our error.

Item 13 – Review of Accounts

Tribe'let Capital Management conducts account reviews on an ongoing basis for clients subscribed to our investment management services. The frequency of the review depends upon a variety of factors such as: the client's risk profile, activity in the account, economic and market conditions, and the client's preferences, if any. Additional reviews may be triggered by changes in the investment objectives or guidelines for a particular client or specific arrangements with the client.

Financial Consulting clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. Our firm does not provide ongoing services to financial consulting clients, but are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc. Financial Consulting clients do not receive written or verbal updated reports regarding their financial plans unless they separately engage our firm for a post-financial plan meeting or update to their initial written financial plan. Formal client review meetings are generally conducted on a regular basis at intervals and format mutually agreed upon by the advisor and the client, but no less than annually. During these reviews, any changes in the client's investment objectives are discussed so we can review our previous recommendations and make any necessary adjustments.

Item 14 – Client Referrals and Other compensation

Tribe'let Capital Management does not engage paid solicitors for Client referrals or receive compensation from a source other than clients for providing advisory services.

Item 15 - Custody

Interactive Brokers is the qualified custodian and maintains custody of client funds in separate brokerage account(s) for each client under the client's name. Tribe'let Capital Management may assist the client in preparing paperwork to open a new brokerage account at Interactive Brokers, but only the client is permitted to authorize, by their signature, the opening of the account. Interactive Brokers sends an account-opening letter to each client at their physical mailing address after the account is approved. Tribe'let Capital Management does not have constructive custody of client assets held by Interactive Brokers LLC based on the inability to deduct advisory fees directly from client accounts. Clients authorize Interactive Brokers LLC by separate agreement to deduct advisory fees on behalf of Tribe'let Capital Management. Clients should review the fee calculated and deducted by the custodian to ensure that the fees were calculated correctly.

Clients can access daily, monthly, and annual account statements as well as daily trade confirmations through a password protected portion of Interactive Brokers' website, www.interactivebrokers.com. Clients should also expect to receive quarterly account summaries from the qualified custodian by first-class mail. Clients should carefully review the account statements and summaries received from the qualified custodian(s) and compare such official custodial statements to any account reports provided by Tribe'let Capital Management. Any client that does not receive an account statement or summary from the qualified custodian should call our firm immediately so that we can arrange to have another statement sent by the custodian.

Clients can also access information concerning their account(s) and access (and generally change) the settings for their brokerage account online on at www.interactivebrokers.com.

Item 16 – Investment Discretion

Tribe'let Capital Management manages Client securities portfolios on a discretionary basis. Tribe'let Capital Management is granted limited discretionary authority in writing by the client at the outset of the advisory relationship. This limited discretionary authorization gives Tribe'let Capital Management the authority to manage the client's investment assets at our firm's sole discretion and without consulting with the client in advance, subject to the investment objectives, guidelines and restrictions set by the client. This authorization will remain in full force and effect until we receive a written termination notice of the Engagement Agreement from the client.

Item 17 – Voting Client Securities

Tribe'let Capital Management does not accept authority from clients with respect to voting of proxies solicited by, or with respect to, the issuers of any securities held in client portfolios. The qualified custodian holding clients' assets will send all such proxy documents it receives to the client so that the client may take whatever action the client deems appropriate. Tribe'let does not offer clients any consulting assistance regarding proxy issues.

Item 18 – Financial Information

Neither the firm, nor its management, have any adverse financial situations that would reasonably impair their ability to meet all obligations to its Clients.

- Neither the firm, nor any of its the control persons, has been subject to a bankruptcy or financial compromise.
- The firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future. In fact, the firm does not collect any fees in advance.

Registered as: Tribe'let Capital Management PTY LTD | CRD No. 297481

Kevin Saunders

Form ADV Part 2B – Individual Disclosure Brochure

118 Russell Street, Suite 901 | Melbourne, Victoria Australia 3000

www.tribelet.capital

March 26, 2021

This brochure supplement provides information about your Investment Advisor Representative that supplements the firm disclosure brochure. You should have received a copy of the firm brochure that describes the investment advisory services offered through Tribe'let Management a registered investment advisor. Please contact the Tribe'let Management at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about your Investment Advisor Representative is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Name: **Kevin Saunders**

Year of birth: **1971**

Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial the firm attended the institution but did not attain a degree.

FINSIA DipFin (Dux of Victoria) National Subject Prizewinner

FEP Regulation of Australian Financial Services

Responsible Person RG105

Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

Tribe'let Capital Management PTY LTD; Investment Advisor Representative / CCO / Co-Owner
11/2013 – PRESENT

Item 3 - Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events required to be disclosed in response to this item. Any such disciplinary information would be available at www.adviserinfo.sec.gov.

Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that create a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"),

or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

Kevin Saunders of Tribe'let acts as the key person as defined by the Australian Securities and Investment Commission (ASIC) on the license held by Non-Correlated Capital Pty Ltd². His duties are to monitor compliance activities at this firm. Kevin Saunders manages several private separately managed accounts (SMAs) for friends and family, for the purposes of building a real trading track record of performance. The private SMAs are not charged fees of any kind by Kevin Saunders or Tribe'let Capital Management.

Item 5 - Additional Compensation

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Our supervised persons do not receive any additional compensation, apart from their regular salary and bonuses, that is based, all or in part, on the number or number of sales, client referrals, or new accounts. Our supervised persons do not receive any economic benefit from anyone who is not a client for providing advisory services.

Item 6 – Supervision

This section explains how Tribe'let Management, LLC supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

The Chief Compliance Officer ("CCO"), Kevin Saunders, supervises and monitors the advisory and personal trading activities of all supervised persons for compliance with federal and/or state securities laws. The CCO may be contacted by email at kevin.saunders@tribelet.capital.

Kevin Saunders as the Chief Compliance Officer ("CCO") has no internal supervision placed over him. He is, however, bound by our firm's Code of Ethics.

² Non Correlated Capital Pty Ltd is an Australian-based investment management company, dedicated to generating absolute returns via active trading strategies and portfolios for clients. Non Correlated Capital holds AFS License (#499 882) and Tribelet Capital Management is a Corporate Authorised Representative of NCC (#001261080) Non Correlated Capital's website is www.noncorrelatedcapital.com.

Registered as: Tribe'let Capital Management PTY LTD | CRD No. 297481

James Roche

Form ADV Part 2B – Individual Disclosure Brochure

118 Russell Street, Suite 901 | Melbourne, Victoria Australia 3000

www.tribelet.capital

March 26, 2021

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Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Name: **James Roche**

Year of birth: **1964**

Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, attended the institution but did not attain a degree.

Royal Melbourne Institute of Technology – (RMIT) Computer Science

Business Experience

The following information details your Financial the firm's business experience for at least the past 5 years.

Tribe'let Capital Management PTY LTD; Investment Advisor Representative / CCO / Co-Owner
6/2014 – PRESENT

TradingCoders.com – financial software developer / Owner / CEO
Dec 2009 - PRESENT

Item 3 - Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events required to be disclosed in response to this item. Any such disciplinary information would be available at www.adviserinfo.sec.gov.

Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that create a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures

commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

James Roche of Tribe’let duties :

* to oversee, design and implement information technology regarding.

- trading systems and algorithms
- trading execution
- office administration

* provide oversight for trading activities and systemized implementation.

Item 5 - Additional Compensation

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person’s regular salary, if any.

Our supervised persons do not receive any additional compensation, apart from their regular salary and bonuses, that is based, all or in part, on the number or number of sales, client referrals, or new accounts. Our supervised persons do not receive any economic benefit from anyone who is not a client for providing advisory services.

Item 6 – Supervision

This section explains how Tribe’let Management, LLC supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

The Chief Technical Officer (“CTO”), James Roche, monitors the technological aspects of the firm’s trading activities. The CTO may be contacted by email at james.roche@tribelet.capital

The Chief Compliance Officer (“CCO”), Kevin Saunders, supervises and monitors the advisory and personal trading activities of all supervised persons for compliance with federal and/or state securities laws. The CCO may be contacted by email at kevin.saunders@tribelet.capital.

Registered as: Tribe'let Capital Management PTY LTD | CRD No. 297481

David Tildesley

Form ADV Part 2B – Individual Disclosure Brochure

17a Brighton Street Balgowlah | Sydney, New South Wales Australia 2093

www.equitystoryusa.com

www.equitystory.com.au

www.edisoncapital.com.au

March 26, 2021

This brochure supplement provides information about your Investment Advisor Representative that supplements the firm disclosure brochure. You should have received a copy of the firm brochure that describes the investment advisory services offered through Tribe'let Management a registered investment advisor. Please contact the Tribe'let Management at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about your Investment Advisor Representative is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Name: **David Tildesley**

Year of birth: **1964**

Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial firm attended the institution but did not attain a degree.

SURREY UNIVERSITY: BA HONS - HISTORY(1986)

SURREY UNIVERSITY: BSC - SOCIOLOGY (1986)

FINSIA - Diploma of Financial Services:

- 503a - Provide advice in managed investments
- 506a - Determine client requirements and expectations
- 507a - Record and implement client instructions
- 502a - Provide appropriate and timely information and advice to clients
- 502a – Conduct research to support recommendations

Responsible Person RG146

Business Experience

The following information details your business experience for at least the past 5 years.

Equity Story PTY LTD; Investment Advisor Representative / Director / Co-Owner
2010 – PRESENT

Edison Capital PTY LTD; Investment Advisor Representative / Director / Co-Owner
2018 – PRESENT

Item 3 - Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events required to be disclosed in response to this item. Any such disciplinary information would be available at www.adviserinfo.sec.gov.

Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that create a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

David Tildesley of Equity Story also acts as the key person for Edison Capital Pty Ltd as defined by the Australian Securities and Investment Commission (ASIC) on the license held by Boutique Capital Pty Ltd. His duties are as the Investment Advisor at this firm. Edison Capital is not charged fees of any kind by David Tildesley or Equity Story.

Item 5 - Additional Compensation

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Our supervised persons do not receive any additional compensation, apart from their regular salary and bonuses, that is based, all or in part, on the number or number of sales, client referrals, or new accounts. Our supervised persons do not receive any economic benefit from anyone who is not a client for providing advisory services.

Item 6 – Supervision

This section explains how Tribe'let Management, LLC supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

The Chief Compliance Officer ("CCO"), Kevin Saunders, supervises and monitors the advisory and personal trading activities of all supervised persons for compliance with federal and/or state securities laws. The CCO may be contacted by email at kevin.saunders@tribelet.capital.

Registered as: Tribe'let Capital Management PTY LTD | CRD No. 297481

Michael Sun

Form ADV Part 2B – Individual Disclosure Brochure

4809 Gray Fox Dr | Austin, Texas 78759 | USA

www.tribelet.capital

March 26, 2021

This brochure supplement provides information about your Investment Advisor Representative that supplements the firm disclosure brochure. You should have received a copy of the firm brochure that describes the investment advisory services offered through Tribe'let Management a registered investment advisor. Please contact the Tribe'let Management at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about your Investment Advisor Representative is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Name: **Michael Sun**

Year of birth: **1993**

Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial firm attended the institution but did not attain a degree.

Tufts University: Master of Sciences – Biomedical Sciences

Emory University: Bachelor of Sciences – Biology

Business Experience

The following information details your business experience for at least the past 5 years.

Galaxy Venture Capital LLC; Senior Analyst/Project Manager
11/2017 – PRESENT

Full-time Student
2011 – 11/2017

Item 3 - Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events required to be disclosed in response to this item. Any such disciplinary information would be available at www.adviserinfo.sec.gov.

Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that create a material conflict of interest with clients and describes the nature of

the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

Michael Sun is not actively engaged in any investment-related business or occupation and is not registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated person of an FCM, CPO, or CTA.

Item 5 - Additional Compensation

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person’s regular salary, if any.

Our supervised persons do not receive any additional compensation, apart from their regular salary and bonuses, that is based, all or in part, on the number or number of sales, client referrals, or new accounts. Our supervised persons do not receive any economic benefit from anyone who is not a client for providing advisory services.

Item 6 – Supervision

This section explains how Tribe’let Management, LLC supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

The Chief Compliance Officer (“CCO”), Kevin Saunders, supervises and monitors the advisory and personal trading activities of all supervised persons for compliance with federal and/or state securities laws. The CCO may be contacted by email at kevin.saunders@tribelet.capital.

Privacy Policy

Effective Date: March 26, 2021

Our Commitment to You

The firm is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment the firm, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. the firm (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

The firm does not sell your nonpublic personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below. Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

How We Gather Information.

We get most Information directly from you when you provide us with information from any of the following sources:

- Applications or forms (for example: name, address, social security number, birth date, assets, income, financial history)
- Transactional activity in your account (for example: trading history and account balances)
- Information services and consumer reporting sources (for example: to verify your identity or to assess your credit history)

Other sources with your consent (for example: your insurance professional, attorney, or accountant)

Why you need to know?

Registered Investment the firms (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information. We require third parties that assist in providing our services to you to protect the

personal information they receive from us.

How do we share your information?

The firm shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share nonpublic personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, consultants other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes The firm does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where the firm or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your nonpublic personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients The firm does not disclose and does not intend to disclose, nonpublic personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Other Important Information

Information for California, North Dakota, and Vermont Customers

In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

Massachusetts

In response to a Massachusetts law, clients must “opt-in” to share nonpublic personal information with non-affiliated third parties before any personal information is disclosed. We may disclose nonpublic personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.

Sharing Information with Other Companies Permitted Under Law.

We do not disclose Information obtained in the course of our practice except as required or permitted under law. Permitted disclosures include, for instance, providing information to unrelated third parties who need to know such Information in order to assist us with providing services to you. Unrelated third parties may include broker/dealers, unaffiliated third-party investment advisers, mutual fund companies, insurance companies, and the custodian with whom your assets are held. In such situations, we stress the confidential nature of information being shared.

Former Customers.

Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at +613-9013-7270 or kevin.saunders@tribelet.capital.