



FORM ADV PART 2A
FIRM BROCHURE
March 31, 2022

This Form ADV Part 2A (“Firm Brochure”) provides information about the qualifications and business practices of Wizest, Inc. and its registered investment adviser representatives. Any questions about the contents of this brochure may be directed to Wizest, Inc. by calling 617-842-8856 or by emailing Axel Thibon, Chief Compliance Officer, at axel@wizest.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. Registration does not imply a certain level of skill or training. Additional information about Wizest, Inc. also is available on the SEC’s website at www.adviserinfo.sec.gov. The site may be searched by a unique identifying number known as a CRD number. Wizest, Inc.’s CRD number is 315156.

ITEM 2 MATERIAL CHANGES

This Firm Brochure is our Annual Amendment Brochure and contains information about our business practices as well as a description of potential conflicts of interest relating to our advisory business that could affect a client's account with us. We are providing this material in accordance with Rule 204-3 of the Investment Advisers Act of 1940, which requires a registered investment adviser to provide a written disclosure statement upon entering an advisory relationship.

Material Changes:

Since our firm's initial SEC-registration on September 9, 2021, the following material changes have occurred:

- Item 5 has been updated to reflect the definitions of Industry Expert and Industry Influencer.
- Item 10C has been amended to reflect that the Firm nor its management or related persons have any material outside business activities.
- Item 10D has been amended to disclose the relationship and compensation structure before the Firm and the Firm's relationship with other investment advisers.
- Additional Information has been amended to clarify the requirements for Investment Experts and Investment Influencers, affiliated and unaffiliated, to be admitted to the platform.

Full Brochure Available:

We will provide a new version of the Firm Brochure as necessary when updates or new information are added, at any time, without charge. To request a complete copy of our Firm Brochure, contact us by telephone at 617-842-8856 or by email to axel@wizest.com.

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ITEM 4 ADVISORY SERVICES

A. FIRM DESCRIPTION

Wizest, Inc. (“The Firm” or “Wizest”) is as an internet-based SEC-registered investment adviser, formed under the laws of the State of Delaware in 2019. The Firm is owned by Axel Thibon, Rafael Alvarez Vallina, William Littlefield, and Lazaro Gonzalez. Mr. Thibon is the principal owner.

The Firm’s primary focus is to help clients build and preserve their financial wealth through its mobile application (the “Wizest Platform”). Wizest offers model investment portfolios and investment education to individual investors.

B. TYPES OF ADVISORY SERVICES

All services provided by the Firm will be facilitated exclusively through the internet-based Wizest Platform.

Model Portfolio Investment Services:

Each client will have the ability to invest in a model portfolio that best fits their financial goals and corresponds with their investment risk tolerance. Clients will complete a risk profile questionnaire that identifies their investment and risk preferences. This questionnaire allows the Wizest Platform to recommend clients a narrowed selection of model portfolios that are designed by a Investment Expert or Influencer that aligns with the client’s risk profile. For more information about the definition of an Investment Expert or Influencer please review the section called Additional Information.

Clients can search the Wizest Platform to review all model portfolios hosted on the platform by Investment Experts and Investment Influencers. Wizest provides a description of each model portfolio. Each description will include information about the Investment Expert or Influencer who curated the portfolio, the underlying securities of the portfolio and the risk profile of the portfolio. Each model portfolio can be made up of low cost and highly liquid stocks, mutual funds, bonds, and Exchange Traded Funds (ETFs) that will include a mix of equity and/or fixed income allocations.

The Wizest-recommended model portfolios are designed to maximize the client’s returns based on their individual risk tolerances. When using the Wizest Platform, clients have multiple customization options and remain in control of their investments. As the ultimate decision maker, the Client can choose to replicate the Wizest model portfolios, or replicate and customize the model portfolio allocation by increasing or decreasing the target percentage of a particular investment and selecting new securities to invest in. Clients will be able to pick between following the portfolio methodology of an Investment Expert or Investment Influencer. An Investment Expert is licensed as an Investment Adviser Representative. The Investment

Expert may hold a designation such as Certified Financial Planner (“CFP”), Certified Financial Advisor (“CFA”), or Chartered Financial Consultant (“ChFC”). Investment Influencers, on the other hand, are not licensed as Investment Adviser Representatives and do not have careers as financial advisers. Rather, they are investment enthusiasts who have created their own trading strategy for their own accounts and share those portfolios with Wizest clients. Clients decide whether they would like to invest their assets in a portfolio created by an Investment Expert or Investment Influencer.

The Model Portfolio services are offered on a discretionary or non-discretionary basis. Portfolios created by Investment Influencers will only be offered on a non-discretionary basis. Portfolios managed with Investment Experts will be managed on a discretionary or non-discretionary basis. Clients who grant Wizest limited discretionary authority will have their portfolio rebalanced automatically when the model has been updated by the Investment Expert. Once our client has selected a particular model portfolio(s), their portfolio may be rebalanced based on the fluctuation of the market or other changes, as implemented by Wizest. For portfolios managed on a non-discretionary basis, the client will be responsible for rebalancing based on guidance from the Investment Expert or Influencer.

Clients are provided notification when the model portfolio they elected to replicate and invest in is changed. The notification will include details about the change and an explanation provided by the Investment Expert. Clients invested on a non-discretionary basis must opt into any portfolio changes recommended by their Investment Influencer.

Prior to engaging the Firm to this service, the Firm requires an Investment Management Agreement (“IMA”) endorsed by the client. The IMA outlines the services and fees the clients will incur pursuant to the IMA with the Firm. This agreement is available through the virtual platform.

Wizest evaluates each proposed portfolio prior to its addition on the platform and conducts daily monitoring of all model portfolios recommended on the site to determine if the model is aligned with the assigned risk profile granted and remains appropriate for use on the platform.

All proposed changes to portfolios are reviewed by Wizest prior to posting on the Wizest Platform. Wizest frequently reviews interactions on its platform to ensure conformance with its terms of use and agreements.

Financial Education:

The Wizest Platform offers an electronic messaging board feature where Investment Experts and Investment Influencers provide general information about investing, portfolio compositions, and performance data. Subscribers of the platform can elect to follow the Investment Expert or Investment Influencer to receive notifications anytime there is a new post.

In addition to this service, Wizest provides general investment education in the form of articles within the Wizest Platform for individual investors to review.

C. TAILORED RELATONSHIPS

Wizest offers the same suite of services to all its clients. The services offered by the Firm are organized by risk tolerance and investment objectives. Specific client portfolio decisions and their implementation are dependent upon the client's current situation (income, objectives, and time horizons for their investment goals). The analysis of their current situation is then used to recommend a selection of portfolios that matches the risk tolerance and investment objectives of the client's goals.

Clients are ultimately in control of their investments and may impose restrictions in their portfolios at any time.

D. WRAP FEE PROGRAMS

The Firm does not participate in and is not a sponsor of wrap fee programs.

Wrap Fee Programs are arrangements between broker-dealers, investment advisers, banks and other financial institutions and affiliated and unaffiliated investment advisers through which the clients of such firms receive discretionary investment advisory, execution, clearing and custodial services in a "bundled" form. In exchange for these "bundled" services, the clients pay an all-inclusive (or "wrap") fee determined as a percentage of the assets held in the wrap account. Due to the nature of its advisory services.

E. ASSETS UNDER MANAGEMENT

When calculating regulatory assets under management, an Investment Adviser must include the value of any advisory account over which it exercises continuous and regular advisory or management services.

As of December 31, 2021, Wizest did not manage any assets on a discretionary basis or non-discretionary basis.

ITEM 5 FEES AND COMPENSATION

A. DESCRIPTION AND BILLING

Model Portfolio Investment Services:

Fees associated with the model portfolio investment services and account aggregation tool are directly correlated to the cost of the financial mobile platform and are absorbed by the subscription to the platform itself. Wizest is compensated by charging a monthly subscription fee of up to \$20 for each model portfolio

the client elects to replicate with a maximum combined subscription fee of \$50. The subscription fee for the platform will be charged monthly in advance. Subscribers will have the option to have the fee deducted from their bank account, credit card or investment account.

The Firm reserves the right, in its sole discretion, to negotiate, reduce or waive the subscription fee for certain Clients for any period determined solely by the Firm. In addition, Wizest may reduce or waive its fees for the Accounts of some Clients without notice to, or fee adjustment for, other Clients.

The Investment Management Agreement is valid for terms of one year with automatic one-year renewals. Any changes, such as an increase or decrease to the annual advisory fee, may be made to the IMA in writing upon mutual agreement of the parties.

Financial Education:

Financial educational materials are included in the subscription fee for access to the platform and does not incur any additional costs. Investors may receive the financial education services without the obligation of investing assets with the Firm.

B. BILLING

For services provided on a discretionary basis, fees will be automatically deducted from the client's account. For services provided on a non-discretionary basis, the client may pay through the Wizest platform using a credit card.

C. OTHER FEES AND PAYMENTS

In addition to the subscription fees, Clients may also pay other fees or expenses to third parties. The issuer of some of the securities or products we purchase for Clients, such as ETFs, stocks, bonds, and mutual funds, may charge product fees that affect Clients. Wizest, Inc. does not charge these fees to Clients, nor does it benefit directly or indirectly from any such fees.

An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of an ETF may include management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer.

Clients may also incur commissions paid on certain securities trades, as well as transaction fees on certain securities purchases or sales. Transaction fees are often assessed on those funds that do not pay or limit payment of fees, such as administrative service fees and fees associated with certain money market and mutual funds.

D. REFUND AND TERMINATION POLICY

Wizest's subscription fee can be terminated by the client through the Wizest platform. The termination of a client's relationship with the custodian would result in the termination of the Firm's discretionary investment management services to the client's portfolio and would terminate the subscription service with the platform at the end of the month.

Clients who terminate services within the first five (5) business days will be refunded all subscription fees deducted. Clients enrolled in a month-to-month payment plan and would have their services terminate at the end of the month of notification. Clients who have pre-paid fees for a period of more than a month in advance, will receive a pro-rated refund amount minus any discount negotiated in exchange for the pre-payment of subscription fees.

E. OTHER COMPENSATION

Neither the Firm nor any of its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sales of any securities.

Unaffiliated Investment Experts and Investment Influencers admitted to the platform may receive other compensation but are not considered supervised persons of the Firm. For more information about how unaffiliated Investment Experts are compensated, please refer to their Form ADV Part 2 brochure.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

A. PERFORMANCE-BASED FEES

Neither the Firm nor any of its supervised persons accept performance-based fees. Performance-based fees are fees based on a share of capital gains on, or capital appreciation of the assets of the client.

B. SIDE-BY-SIDE MANAGEMENT

Neither the Firm nor any of its supervised persons participate in side-by-side management. Side-by-side managements refers to the practice of managing accounts that are charged a performance-based fee as well as charged another type of fee, such as a flat fee, hourly fee, or an asset-based fee.

ITEM 7 TYPES OF CLIENTS

Our Firm provides services to individuals who are U.S. citizens, or lawful residents located in the United States. Our clients are individuals and families from all walks of life and all levels of investment expertise. Our Firm does not require a minimum account size. Our goal is to help individuals attain financial independence by creating an environment in which they can thrive.

ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. METHODS OF ANALYSIS

The Firm may utilize one or more of the following methods of analysis when providing investment advice to its clients:

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. It involves analyzing its financial statements and health, its management and competitive advantages and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives: to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. It attempts to predict a future stock price or direction based on market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall. Technical analysis methods employ software and other financial data management tools to assess various aspects of the marketplace. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that markets react in cyclical patterns which, once identified, can be leveraged to provide performance. Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class or an individual company's profits. Cyclical analysis is a time-

based assessment which incorporates past and present performance to determine future value. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. The risks of this strategy are two-fold: (1) the markets do not always repeat cyclical patterns; and (2) if too many investors begin to implement this strategy, it changes the very cycles of which they are trying to take advantage.

B. INVESTMENT STRATEGIES

The Firm will provide a description of the model portfolios on the Wizest online platform. Model portfolios can be created by Wizest or be created by an unaffiliated third-party (Investment Influencer or Investment Expert) and licensed for use by Wizest. Each third-party is compensated for the use of their portfolios.

Within each model portfolio description, the Firm will include the investment strategy or approach most appropriate for the portfolio to yield the best results. The model portfolios are structured based on strategy, risk tolerance and time horizon. For example, a portfolio with a longer time horizon, with a more traditionally moderate to aggressive strategy is an option that will be available to the end-user. A portfolio with a shorter time horizon and a traditionally conservative investment strategy will also be available to the end-user. It is then the responsibility of the end-user to choose a portfolio most appropriate for their needs and aligns best with their risk tolerance and time horizon. For an end-user that has shared their investment preferences with the platform, the end-user would receive recommendations to invest in multiple model portfolios with similar time horizons, and risk levels to select from.

The primary difference between the investment strategies utilized by the Firm is the percentage of equity and/or fixed income allocations in each portfolio and the underlying holdings.

C. RISK OF LOSS

Clients need to be aware that investing in securities involves risk of loss of the principal. Every method of analysis has its own inherent risks. To perform an accurate market analysis, the Firm must have access to current/new market information. The Firm has no control over the dissemination rate of market information; therefore, certain analyses may be compiled with outdated market information, severely limiting the value of the Firm's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Clients must also be aware that when they select an Investment Influencer's model portfolio, they are selecting the portfolio of a person who is not licensed, who does not have the experience, education or designations that would otherwise allow them to provide financial advice to clients. Rather, they are

investing enthusiasts that trade their own accounts and allow clients on the Wizest platform access to their portfolio holdings. Clients will adopt an Investment Influencer's portfolio on a non-discretionary basis, and at their own risk.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Firm) will be profitable or equal any specific performance level(s). The Firm does not represent, warrant, or imply that its services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. Notwithstanding the Firm's method of analysis or investment strategy, the assets within the client's portfolio are subject to the risk of devaluation or loss. The client should be aware that many different events can affect the value of the client's assets or portfolio including, but not limited to, changes in the financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.

Inflation Risk: When any type of inflation is present, a dollar will be worth more today than a dollar next year, because purchasing power is eroding at the rate of inflation.

Prepayment Risk: The returns on the collateral for the deal can change dramatically at times if the debtors prepay the loans earlier than scheduled.

Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.

Business Risk: This risk is associated with a particular industry or a particular company within an industry.

Liquidity Risk: Liquidity is the ability to convert an investment into cash readily. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

Risk Factors relevant to specific securities utilized include:

Equity Securities: The value of the equity securities are subject to market risk, including changes in economic conditions, growth rates, profits, interest rates and the market's perception of these securities. While offering greater potential for long-term growth, equity securities are more volatile and riskier than some other forms of investment.

Exchange Traded Funds ("ETF"): ETFs represent an interest in a passively managed portfolio of securities selected to replicate a securities index, such as the S&P 500 Index or the Dow Jones Industrial Average, or to represent exposure to a particular industry or sector. Unlike open-end mutual funds, the shares of ETFs are not purchased and redeemed by investors directly with the fund, but instead, are purchased and sold through broker-dealers in transactions on a stock exchange. Because ETFs are traded on an exchange, they may trade at a discount from or a premium to the net asset value per share of the underlying portfolio of securities. In addition to bearing the risks related to investments in equity securities, investors in ETFs intended to replicate a securities index bear the risk that the ETF's performance may not correctly replicate the performance of the index. Investors in ETFs, closed-end funds and other investment companies bear a proportionate share of the expenses of those funds, including management fees, custodial and accounting costs, and other expenses. Trading in ETFs also entails payment of brokerage commissions and other transaction costs.

Mutual Fund Shares: Some of the risks of investing in mutual fund shares include: (i) the price to invest in mutual fund shares is the fund's per share net asset value (NAV) plus any shareholder fees that the fund imposes at the time of purchase (such as sales loads), (ii) investors must pay sales charges, annual fees, and other expenses regardless of how the fund performs, and (iii) investors typically cannot ascertain the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.

Fixed Income Securities: Prices of fixed income securities tend to move inversely with changes in interest rates. Typically, a rise in rates will adversely affect fixed-income security prices. The longer the effective maturity and duration of the client's portfolio, the more the portfolio's value is likely to react to interest rates. For example, securities with longer maturities sometimes offer higher yields but are subject to greater price shifts as a result of interest rate changes than debt securities with shorter maturities. Some fixed income securities give the issuer the option to call, or redeem, the securities before their maturity dates. If

an issuer calls its security during a time of declining interest rates, we might have to reinvest the proceeds in an investment offering a lower yield, and therefore might not benefit from any increase in value because of declining interest rates. During periods of market illiquidity or rising interest rates, prices of callable issues are subject to increased price fluctuation.

Performance of Underlying Managers: We select the mutual funds and ETFs in a client's portfolio based on a variety of criteria. However, we depend on the manager of such funds to select individual investments in accordance with their stated investment strategy. Should a fund manager deviate from such norms, or do a poor job of selecting investments, a given investment might underperform or face enhanced risk.

While this information provides a synopsis of the events that may affect a client's investments, this listing is not exhaustive. Although the Firm's methods of analysis and investment strategies do not present any significant or unusual risks, all investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Clients should understand that there are inherent risks associated with investing and depending on the risk occurrence; CLIENTS MAY SUFFER LOSS OF ALL OR PART OF THE CLIENT'S PRINCIPAL INVESTMENT.

D. RECOMMENDATION OF SPECIFIC TYPES OF SECURITIES

The Firm's investment strategies primarily rely on low cost, highly liquid ETFs, mutual funds. Investments may include but are not limited to; ETFs, equity securities, bonds and fixed-income securities.

ITEM 9 DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. FINANCIAL INDUSTRY ACTIVITIES

The Firm is not a registered broker-dealer and does not have an application pending to register as a broker-dealer. Furthermore, none of the Firm's management or supervised persons is a registered representative of, nor has an application pending to register as a representative of, a broker-dealer.

B. FINANCIAL INDUSTRY AFFILIATIONS

The Firm is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, the Firm's management and supervised persons are not registered as and do not have an application pending to register as an associated person of the foregoing entities.

C. OTHER MATERIAL RELATIONSHIPS

The Firm does not have any arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships other than those already disclosed herein.

D. OTHER INVESTMENT ADVISORS

As mentioned previously in Item 4, the Firm's platform provides model portfolios, some of which Wizest has licensed for use. The licensed model portfolios are created by unaffiliated Investment Experts or Influencers. Investment Experts are investment advisor representatives unaffiliated with Wizest. Investment Influencers are not affiliated with Wizest or any registered investment adviser.

The Firm compensates these Investment Experts and Influencers for sharing their model portfolios. The compensation is based on the aggregate volume of accounts replicating their model portfolio and is variable depending on the risk level of the share model and other user reviews. Models with higher user satisfaction receive greater compensation. The Firm encourages the Investment Experts and Investment Influencers admitted to the platform to share model portfolios with the lowest possible risk level. Models with higher risk levels receive a lower compensation.

The Firm evaluates all model portfolios prior to accepting them onto the platform and reviews all portfolio changes prior to publishing on the change or communication to the platform. Clients subscribed to the platform can view background information on the suggested portfolio including information about the Investment Expert or Influencer who created the model. For more information on the arrangement and due diligence conducted on Financial Experts and Influencers please see the section called Additional Information.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. DESCRIPTION OF CODE OF ETHICS

All employees of the Firm must act in an ethical and professional manner. In view of the foregoing and applicable provisions of relevant law, the Firm has adopted a Code of Ethics in its Employee Policies and Procedures Manual to specify and prohibit certain types of transactions deemed to create conflicts of interest (or the potential for or the appearance of such conflicts), and to establish reporting requirements and enforcement procedures relating to personal trading by the Firm's personnel. The Firm's Code of Ethics in its Employee Policies and Procedures Manual, which specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

B. PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

The Firm does not recommend or effect transactions in securities in which any related person may have material financial interest.

C. PROPRIETARY / SIMULTANEOUS TRADING

The Firm's affiliated persons may buy or sell securities in their own accounts that it has also recommended to clients. However, any purchase or sale of a security by a related person will be subject to the Firm's fiduciary duty to client accounts. From Representatives of the Firm may buy or sell securities for themselves at or around the same time as the Firm's client accounts. In any instance where similar securities are bought or sold, the Firm's representatives will uphold its fiduciary duty by always transacting on behalf of the client before transacting for their own benefit. The Firm will always document any transactions that could be construed as conflicts of interest. To mitigate or remedy any conflicts of interest or perceived conflicts of interest, the Firm will monitor its representatives personal trading reports for adherence to its Code of Ethics.

ITEM 12 BROKERAGE PRACTICES

A. SELECTION AND RECOMMENDATION

As part of obtaining services from Wizest, clients must open and maintain an account at a qualified custodian, generally a broker-dealer. The Firm seeks to recommend a custodian/broker who will hold client

assets and execute transactions on terms that, overall, are most advantageous when compared to other available providers and their services.

We consider a wide range of factors in selecting a custodian/broker including, among others the following:

- Timeliness of execution
- Clearance and settlement capabilities
- Ability to place trades in difficult market environments
- Timeliness and accuracy of trade confirmations
- Quality of account statements
- Research, execution facilitation, record keeping, custody and other “value-added” services provided
- Frequency and correction of trading errors
- Financial condition and willingness to commit capital
- Business reputation and integrity.

To this end, Wizest has established a custodian relationship with Apex Clearing. Apex Clearing will hold client assets in a brokerage account and buy and sell securities when the Firm instructs them to. Wizest is independently owned and operated and is not affiliated with Apex Clearing. Wizest has determined that having Apex Clearing execute trades is consistent with its duty to seek “best execution” of client trades.

B. RESEARCH AND OTHER SOFT DOLLAR BENEFITS

The Firm does not currently receive “soft dollars.”

Under “soft dollar” arrangements, one or more of the brokerage firms would provide or pay the costs of certain services, equipment, or other items. These soft dollar benefits are attributed to the investment advisor by reducing its expenses; however, the amount of the fee paid to the investment advisor by the client would not be reduced. Making allocations to brokerage businesses with soft dollar arrangements could enhance the ability to obtain research, optimal execution and other benefits on behalf of clients.

C. BROKERAGE FOR CLIENT REFERRALS

The Firm does not receive client referrals from third parties for recommending the use of specific custodial or brokerage services.

D. DIRECTED BROKERAGE

Clients who purchase securities through the Wizest platform are required to utilize our custodian Apex Clearing, broker dealer, member FINRA and SIPC. Not all investment adviser firms require the use of a

particular broker/dealer. However, for operational, compliance, and efficiency purposes we have made the decision to provide all asset management services through one custodian. By requiring clients to use the specific custodian in which the Firm has approved, the Firm seeks to achieve “best execution” of client transactions.

The Firm does not permit clients to direct the use of a particular brokerage firm.

E. ASSET AGGREGATION

The intention of the Firm is to aggregate sale and purchase orders of securities (“block trading”) in model portfolios with similar orders in order to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the client. The Firm may aggregate or “bunch” transactions for securities in a particular model portfolio with securities in another model portfolio in an effort to obtain the best execution under the circumstances.

ITEM 13 REVIEW OF ACCOUNTS

A. PERIODIC REVIEWS

Wizest reviews model portfolios that undergo a change to ensure the portfolio composition remains consistent with the identified risk profile assigned and remains suitable for retail investors. These reviews are conducted when a change is made, or, if no changes have been made, at least annually. The platform conducts an automated review of all portfolios and generates recommendations or notices for clients that are invested in a manner that is inconsistent with their stated risk profile. The client, as the end user of the platform, will be making their own determinations of which portfolio is most suitable for them.

B. INTERMITTENT REVIEW FACTORS

Intermittent reviews may be triggered by substantial market fluctuation, material changes in the market, economic or political events, or health crises such as the pandemic. The Firm will review the model portfolios and determine if the composition of the portfolios requires modification. Clients are notified of any modifications to the model portfolios they have elected to replicate.

C. REPORTS

Clients may receive confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information. Confirmations and statements are prepared and delivered by the custodian.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

A. ECONOMIC BENEFITS FROM OTHERS

The Firm does not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice or other advisory services to its clients.

The Firm's advisers may attend events hosted by third parties with whom the Firm may or may not do business with, including fund managers, portfolio managers and others. These third parties may cover the cost of travel, lodging and meals for the advisers who travel to these events. The Firm ensures any potential conflict of interest is mitigated by requiring approval for such events and that such events must be educational in purpose. The Firm and its advisers do not accept any other economic benefits from these third parties.

B. COMPENSATION TO UNAFFILIATED THIRD PARTIES

The Firm may compensate clients, Investment Experts, Investment Influencers, corporations, and other organizations (altogether, "Solicitors") for client referrals. The compensation paid to clients is typically in the form of discounts, periodic fee-waiving, or credits that can be used to offset the cost of the monthly subscription. The compensation paid to Investment Experts, Influencers, corporations, and other organizations is typically in the form of a fixed referral fee. All referral arrangements will be in accordance with Rule 206 (4)-1 of the Investment Advisers Act of 1940 and applicable state and federal laws. These referral arrangements will not result in higher costs to the referred clients, and clients referred to the Firm under these arrangements are given a full written disclosure describing the terms and fee arrangements between the Firm and Solicitor.

Currently, the Firm does not have any solicitation arrangements.

ITEM 15 CUSTODY

A. CUSTODIAN OF ASSETS

Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them.

The Firm has custody due to its authority to deduct subscription fees from client accounts and because it can, subject to a standing letter of authorization, dispose of client funds or securities. The Firm will not

maintain physical possession of client funds and securities. Instead, client's funds and securities are held by the Firm's preferred, qualified custodian Apex Clearing.

While the Firm does not have physical custody of client funds or securities, payment of subscription fees may be paid by the custodian from the custodial brokerage account that holds client funds pursuant to the client's account application. Prior to permitting direct debit of fees, each client provides written authorization permitting fees to be paid directly from the custodian.

B. ACCOUNT STATEMENTS

Although the Firm is the client's adviser, the client's statements will be made available electronically by the custodian/broker. When the client receives these statements, they should be reviewed carefully. Clients should compare asset values, holdings, and fees on the statement to that in the account statement issued the previous period.

ITEM 16 INVESTMENT DISCRETION

The Firm manages client's accounts of a discretionary or non-discretionary basis dependent on what type of model portfolio is replicated or if the client imposes restrictions on their account. Clients grant this authority upon execution of the Firm's IMA. Discretionary authority is for the purpose of rebalancing and updating the model portfolio without the client's prior consultation. All investment decisions are made in accordance with the client's risk profile. Clients who elect to enroll in non-discretionary services will be provided investment recommendations in accordance with their risk profile, but no recommendation will be implemented with the client's expressed consent on the platform.

Other than subscription fees due to the Firm, which the Firm may receive directly from the custodian, the Firm's discretionary and non-discretionary authority does not give authority to take or have possession of any assets in the client's account or to direct delivery of any securities or payment of any funds held in the account to the Firm. Furthermore, the Firm's discretionary and non-discretionary authority by agreement does not allow it to direct the disposition of such securities or funds to anyone except the account owner.

ITEM 17 VOTING CLIENT SECURITIES

The Firm will not vote proxies which are solicited for securities held in client accounts. The Firm will not be required to render any advice with respect to the voting of proxies solicited by or with respect to the issuers of securities in which assets of the client's account may be invested in occasionally. Furthermore,

The Firm will not take any action or render any advice with respect to any securities held in any client's accounts that are named in or subject to class action lawsuits. The Firm will however, forward to the client any information received by The Firm regarding class action legal matters involving any security held in the client's account.

ITEM 18 FINANCIAL INFORMATION

A. BALANCE SHEET REQUIREMENT

The Firm is not the qualified custodian for client funds or securities and does not require prepayment of fees.

B. FINANCIAL CONDITION

The Firm does not have any financial impairment that would preclude the Firm from meeting contractual commitments to clients.

C. BANKRUPTCY PETITION

The Firm has not been the subject of a bankruptcy petition at any time during the last 10 years.

ADDITIONAL INFORMATION

A. INVESTMENT EXPERTS AND INFLUENCERS

Wizest does not create all portfolios shared on the platform. In some situations, the portfolios shared on the platform have been created by unaffiliated Investment Experts and Investment Influencers and licensed for use by Wizest. Each licensed portfolio is reviewed and approved by Wizest prior to being listed on the platform. Wizest conducts due diligence on all Financial Experts and Influencers accepted onto the platform.

Investment Experts

Each Model Portfolio hosted on the site that is available for discretionary management has either been created by a Wizest or by an outside Investment Expert and licensed for use on the Wizest platform.

Wizest defines an Investment Expert as someone who has experience in professional investment management and is currently employed by another registered investment advisor to do so. Investment Experts must apply to be admitted to the platform.

Investment Experts who are not employees nor contractors of the Firm are not supervised by the Firm. Wizest compensates each unaffiliated Investment Expert for use of their managed portfolios with the platform and their continued engagement on the platform. Wizest requires each unaffiliated Investment Expert to enter into an agreement with the Firm and undergo due diligence initially and no less than annually thereafter to maintain access to the platform. As part of the due diligence process, Wizest determines whether each applicant is licensed to provide investment recommendations, has a background in investment management, maintains an active registration with registered investment advisor, and ascertains whether the individual has any disclosures, complaints or other adverse regulatory history. Wizest also evaluates each candidate's investment methodology and portfolio management processes. Individuals with unsatisfactory investment methodologies and regulatory disclosures related to their ethical conduct and investment recommendations will not be admitted to the platform.

Investment Experts are also required to have and maintain an active registration as an investment advisor representative with a series 65/66, CFA or other recognized designation to be admitted onto the platform. Information about the Investment Expert, their background, and investment philosophy and methodology will be included in their bio on the platform. All unaffiliated Investment Expert's ADV Part 2A can be made available upon request within the platform.

Investment Influencers

Subscribers of the site may elect to follow Investment Influencers and replicate their shared portfolio allocation on a non-discretionary basis. These portfolios have been created by a Investment Influencer and licensed for use on the Wizest platform. Wizest defines a Investment Influencer as someone who has several years of experience investing but is not a registered investment adviser representative. Financial Influencers must apply to be admitted onto the platform.

Investment Influencers are not employees nor contractors of the Firm and thus are not supervised by the Firm. Wizest compensates each Investment Influencer for the use of their portfolio. Wizest requires each Investment Influencer to enter into an agreement with the Firm and undergo due diligence initially and no less than annually thereafter to maintain access to the platform. As part of the due diligence process, Wizest determines whether each applicant has a background in portfolio management or proven track record for investing, and has any disclosures, complaints, or other adverse regulatory history.

Compensation

More specifically, Investment Experts and Investment Influencers are paid as follows:

1. Upon completion of the due diligence process and acceptance on Wizest's platform, the Industry Expert or Industry Influencer will be paid a base compensation which decreases progressively over a period of fifteen (15) months. Generally, the base salary would be between \$1000 and \$1500 per month at month one, and then progress to \$0 by month fifteen.
2. The Industry Expert or Industry Influencer will be paid based on the following three variables:
 - a. the number of followers they have
 - b. user satisfaction ratings
 - c. risk rating of their portfolios
3. The Industry Expert or Industry Influencer will be paid for referring users. For each user that is active and stays on the platform for a pre-determined amount of time, the Industry Expert or Industry Influencer will be paid \$10.