

Form ADV Part 2A

**105 College Rd.
East
Princeton NJ 08540
December 25, 2021**

Pionex Investments Inc. is a registered investment adviser. Registration does not imply a certain level of skill or training but only indicates that Pionex has registered its business with federal regulatory authorities, including the United States Securities and Exchange Commission ("SEC"). If you have any questions about the contents of this brochure, please contact us at Pionex support@pionex.com. The information in this brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about Pionex Investments is available on the SEC's website at www.adviserinfo.sec.gov.

Item 1: Summary of Material Changes

The most recent annual update for Pionex Investments Inc. Date:03/11/2022



Item 4: ADVISORY BUSINESS

Pionex Investments is 100% owned by Pionex UK Ltd. which is incorporated under the Companies Act 2006 as a private company, that the company is registered in England and Wales. Pionex Investments Inc is a newly formed company registered in Delaware U.S. Pionex Investments develops trading bots that execute a wide range of common trading strategies for digital assets: such as Bitcoin. The use of its trading bots may be considered investment advice under the The Investment Advisers Act of 1940. <https://www.govinfo.gov/content/pkg/COMPS-1878/pdf/COMPS-1878.pdf>

Item 5: FEES and COMPENSATION

Retail Clients

Pionex Investments has no retail clients and only offers its technology directly to exchanges. The use of these services may constitute investment advice.

Digital Asset Exchanges

Pionex Investments has one institutional client. Each contract is negotiated.

Item 6: PERFORMANCE-BASED FEES and SIDE-BY-SIDE MANAGEMENT

Pionex Investments does not have performance based or management fees.

Item 7: TYPES of CLIENTS

Pionex will service digital asset exchanges and ATS (alternative trading systems).

Item 8: METHODS of ANALYSIS, INVESTMENT STRATEGIES and RISK of LOSS

Trading Bots:

Trading bot is a trading program in which users can automatically set their parameters to attempt to buy low and sell high in a specific price range through the program. In the volatile digital asset market, the use of trading bots can avoid erroneous trading decisions caused by human factors to a greater extent. The trading bots can assist the user in strictly implementing their own setting of low-buy-high-sell trading strategies.

Grid Trading Bot

Place buy and sell orders within a price range fixed by the user. Grid Trading profits from the ups and downs of the market. You set a Price Range for the bot, adjust how many Grids you want and if the price stays within your set range, the bot will always sell a portion when the price goes a bit up and buy a portion when it goes a bit down. It will be perfect on a fluctuated sideways market. Grid Trading makes it easy to gain a stable, passive profit with minimal risk in the volatile digital asset market. By using the Grid Trading Bot, you may avoid all the emotional decisions and lockup small profits in a timely fashion, while the price keeps fluctuating.

Grid Trading Bot Example

Use Pionex Grid Trading Bot to make profit in the fluctuated sideways-market with the BTC/USDT Trading-Pair. Set the parameters like this:

Upper Limit Price: 8000 USDT

Lower Limit Price: 5000 USDT

Grid Quantity: 10

Quantity Per Grid: 1 BTC

After the bot has been created, it will slice the range from 5000 to 8000 into 10 sections (Grids) and place orders in each of these sections. As the price fluctuates, it will keep executing the buy orders whenever the price goes a bit down and the sell orders whenever the price goes a bit up, as long as the price stays within the range of 5000–8000. It can earn you a small profit for every set of buy and sell order that has been triggered.

If you set a Stop-loss Price for the Grid Trading Bot, it will cancel itself and all the base currency will be sold to the quote currency once the price drops below it. If you ran the Bot on BTC/USDT pair for example, the bot would sell your BTC to USDT and close the bot once the price reaches your stop-loss price.

Customized Parameters for Grid Bot

If you choose “Set Myself,” you will need to input the following parameters

Upper Limit Price

Lower Limit Price

Number of Grids

Total Investment for the Bot

(Optional) Trigger Price

(Optional) Stop loss Price

(Optional) Take Profit Price

AI Strategy for Grid Bot

If you choose “Use AI Strategy,” Pionex AI Advisor will suggest a set of parameters for you. The parameters were calculated from back testing the last 7-Days. You will see the recommended Price Range and Profit Per Grid as preview. All you will need to do, is to use the slider to choose how much of your funds you want to use. For the Grid Trading Bot. Once you have done that simply click CREATE and the bot can start trading and generating a passive income.

Infinity Grid Bot

Place buy and sell orders with no limit to the price range, and for an unlimited period.

Smart Trade

User buys a digital asset at a specified price or market price and specifies a “take profit price” and “Stop loss price” for when the trade should close out by selling the DPT at either the “Take profit price” or “Stop loss price.”

Trailing sell

Help users sell when the digital asset price rally starts to pull back according to the specified range that the user creates.

Trailing buy

Help users buy when the digital asset price decline starts to buy in back according to the specified

range user set.

DCA (Dollar-Cost-Averaging)

User buys a digital asset in batches according by setting an equal amount of funds to buy the digital at the relevant market price at regular intervals can help balance the buying risk.

TWAP (Time Weighted Average Price)

Place an order according to the user's set period every ten minutes

Pionex Martingale Bot

Pionex Martingale Bot is developed and designed with the traditional martingale strategy core idea, which is a strategy of laddering-buy, selling all at once. And it will use more funds to buy for each dip to significantly reduce the average holding cost.

Pionex Martingale Bot will buy unequal amounts of coins after every price drop with a fixed percentage. If you create a Pionex Martingale Bot, the bot will calculate with the parameters you set up and evenly divide investment into several shares. Then the bot will buy coins with a pattern as such; 1 share, 1 share, 2 shares, 4 shares, 8 shares, 16 shares

If the price drops by 1 %, the bot will buy several coins. So, the bot will buy the dips when the price drops to 99%, 98%, 97%, 96%, 95% ... When it drops by 5%, The average price is 95.97% of the initial price, at this time, if the current price increase by 1.02%, it will recover the cost, which reduces the risk. However, Grid Trading Bot strategy needs to rise to about 99% of the initial price to recover its costs, and Pionex Martingale Bot only needs to rise 4.2%.

Therefore, how to make profits with Pionex Martingale Bot? The first is to choose solid assets. If these assets have good liquidity, the price will not drop to zero in the long term, and the Martingale Bot can help to make profits; Secondly, the timing to get started is also much easier. Most Pionex Martingale Bots will make profits unless the price keeps going down without returns after getting started.

Pionex Martingale Bot does not use leverage and can freely set the percentage of decline for buying the dips. So, it is a safer strategy. If the selected assets are good, even if there is a short-term drawdown, it can be profitable right away if the price rebounds.

Martingale also has two methods -AI strategy and Manual setting like Grid Trading bot. AI strategy offers two types: conservative and balanced. The conservative type can reduce the max drawdown of the strategy, but the profit may also be slightly reduced. Balanced will make the profits and risks both in a more balanced state.

The Risks of Trading Bots

1. If the price falls below the lower limit price of the interval, the order will not continue. When the price returns above the lower limit price of the interval, the order will continue. If the

user sets the stop price, and the stop price is triggered. The grid strategy will be terminated.

2. If the price exceeds the highest price of the interval, the order will not continue. When the price falls below the highest price of the interval, the order will continue. If the user sets the take profit price, and the take profit price is triggered. The grid strategy will be terminated. However, due to strategic reasons, you will miss the trading opportunities in this rising market of not having any positions.

3. The use of funds is not efficient, because the grid strategy will place orders based on the price range and the number of grids set by the user. If the user sets the number of grids too small, and the price fluctuates at the two points (which two points are far away from each other's) set by the user, the system will not automatically place orders.

4. During the operation of the grid strategy, if the currency encounters unpredictable circumstances such as suspension or delisting of the currency, the grid strategy will be automatically suspended.

5. All digital assets pose considerable risk, including losing all your assets.

9 Item: DISCIPLINARY INFORMATION

Pionex Investments Inc has not legal or disciplinary issues outstanding or pending.

- A. There are no criminal or civil issues domestically or foreign.
- B. There are no administrative proceedings currently with the SEC or any regulatory agency.
- C. There are no regulatory proceedings or pending issues with any state regulatory office or with FINRA or the SEC.

10 Item: OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS

Robert Morris is registered with Pionex Prime Inc. a pending FINRA broker-dealer CRD# 1194506. Pionex Prime Inc. is an affiliate of Pionex Investments Inc. and a pending broker-dealer CRD#318436. Pionex Prime Inc's main line of business are private placements and should have no conflicts of interest for clients of Pionex Investments Inc. Robert Morris is on the Board of Directors for both companies but receives no compensation for his duties as a director. Mr. Morris does receive compensation for his role as the Chief of Compliance for Pionex Prime Inc. but receives not commissions or sales income from either company.

11 Item: CODE of ETHICS

Pionex Investments Inc is a registered Investment Adviser and has adopted a code of ethics pursuant to SEC rule 204A-1. The firm will provide a copy of the code of ethics to any client or prospective client upon request. bobmorris@pionex.com

12 Item: BROKERAGE PRACTICES

- A. Pionex Investments Inc does not receive commissions.
- B. Pionex does not provide research, nor does it have any soft dollar arrangements.
- C. Pionex does not charge a maker or taker fee.
- D. There are no mark-ups or mark-downs at Pionex Investments Inc.
- E. Pionex US will use trading bots from Pionex Investments Inc on its own exchange but does not foresee any conflict of interest.

13 Item: REVIEW of ACCOUNTS

Pionex Bot software can be reviewed 24/7 and individual reports can be run.

14 Item: CLIENT REFERRALS and OTHER COMPENSATION

Pionex Investments receives no additional source of client-based compensation. The does not solicit its clients, nor sell their information. The firm does not offer and rewards or prizes to its employees.

15 Item: CUSTODY

The firm does not custody client funds or securities.

16. Item: INVESTMENT DISCRETION

Pionex Investments does not manage or have discretionary authority or client funds or accounts.

17. Item: VOTING CLIENT SECURITIES

Pionex Investments does not hold client securities nor does it vote on behalf of clients.

18. FINANCIAL INFORMATION

To the best of Pionex's knowledge, we are not aware of any financial condition that is likely to impair Pionex's ability to meet its contractual commitments to its clients or vendors.

Pionex Investments has not been subject to any bankruptcy petitions.

SEE BELOW

PIONEX INVESTMENTS INC
(Incorporated in the Delaware)

STATEMENT OF FINANCIAL POSITION AT 30 NOVEMBER 2021

	2021.11.30 USD (Unaudited)
<u>ASSETS</u>	
<u>Current Assets</u>	
Cash and cash equivalents	550,000
Total Current Assets	550,000
Total Assets	550,000
<u>EQUITY AND LIABILITIES</u>	
<u>Equity</u>	
Share capital	-
Retained earnings	0
Total Equity	550,000
<u>Current liabilities</u>	
Amount due to related parties	-
Total Current Liabilities	-
Total Equity and Liabilities	550,000
	-

TRAINING EVENTS

Periodically Pionex participates in Pionex hosted or third-party hosted training and educational conferences, seminars, trade shows, booth events or similar events (“TrainingEvents”). Our participation in Training Events is subject to our Code of Ethics and Pionex does not recommend products or services of third parties based on their involvement in Training Events.

BUSINESS DISRUPTION

There is a risk that a disaster outside of Pionex’s control leads to a business disruption. Pionex maintains a business continuity plan designed to allow us to maintain or resume operations as quickly as possible after a business disruption, given its scope and severity.

PRIVACY POLICY

Pionex is committed to protecting our clients’ private information. Pionex has instituted policies and procedures to ensure that customer information is kept private and secure. Pionex does not disclose any non-public personal information about its customers or former customers to any

non-affiliated third parties except as required by, permitted by law, or agreed to by the client or as otherwise disclosed in Pionex's Privacy Policy. Currently Pionex has only ONE client.

A copy of the Pionex's Privacy Policy is available on the Pionex website at <https://www.Pionex.com/security/privacypolicy/>.

SUBJECT TO CHANGE

From time-to-time Pionex may adjust its pricing structure for its services.

WRAP PROGRAM

Pionex Investments has NO wrap programs.

Form ADV Part 2B CLIENT BROCHURE SUPPLEMENT

Form ADV Part 2B

CLIENT BROCHURE SUPPLEMENT

Pionex

105 College Road East

Princeton NJ 08540

January 1, 2022

This Brochure Supplement provides information about certain Pionex employees listed below: If you have any questions about the contents of this brochure, please contact us at support@Pionex.com. Additional information about Pionex is available on the SEC's website at

www.adviserinfo.sec.gov.

Pionex's discretionary investment technology is formulated by Robert Morris its Chief of Compliance

CEO/CCO/COO/CFO Director Robert Morris

Education

MARS HILL COLLEGE, MARS HILL, NC
BA 1978-1982 Graduated

Disciplinary Information:

Robert Morris has no disciplinary events

<https://brokercheck.finra.org/individual/summary/1194506>

Other Business Activities:

Robert Morris is an active FINRA arbitrator.

Mr. Morris serves as the Global Chief of Compliance for Pionex Inc and Pionex Prime Inc.

Mr. Morris is the owner of Sussex Securities LLC a compliance out-sourcing firm.

Mr. Morris does not receive compensation for investment products or advice.

Supervision:

Robert Morris has the sole responsibility to maintain compliance at Pionex Investments Inc. under the Investment Advisers Act of 1940' <https://www.govinfo.gov/content/pkg/COMPS-1878/pdf/COMPS-1878.pdf>

Bob is an expert in a firm's fiduciary responsibilities, as a founder and owner of Sussex Securities LLC and as a FINRA arbitrator, Bob's knowledge and experience is valued amongst top tier Wall Street veterans.

Bob has consulted financial regulatory compliance programs at over a dozen financial institutions, both domestically and internationally, across multiple product lines and business units. In addition, Bob founded his own Broker-Dealer and has led numerous other trading firms. At Thomson McKinnon (1984-1986) Bob reviewed offering documents for misstatements and omissions. He also audited the tombstone for all required compliance. During the offering, Bob would monitor the syndicate bid and retail order flow.

Bob during (1986-1990) reviewed Initial Offerings and private placements for proper disclosures and financial projections. Review of the PPM and the operating agreement, in addition the marketing materials was reviewed for any non-compliant graphs or projections. Bob also was a retail liaison to the trading desk for all offerings.

Since 2010 Bob has been involved in the digital asset space, ranging from a consultant to Square and Circle, to forming his second broker-dealer (Apify Prime). Bob has also helped create blockchain payment providers and digital asset exchanges. As a CEO of numerous blockchain companies Bob has developed a huge depth of industry knowledge.