

Savvy Advisors, Inc.

Form ADV Part 2A

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This brochure provides information about the qualifications and business practices of Savvy Advisors, Inc. (“Savvy Advisors” or “the Firm”). If you have any questions about the contents of this brochure, please contact us at 1 (833) 745-6789. 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.

Additional information about Savvy Advisors is also available on the SEC’s website at: www.adviserinfo.sec.gov.

REGISTRATION WITH THE SEC AS AN INVESTMENT ADVISER DOES NOT IMPLY THAT Savvy Advisors OR ANY PRINCIPALS OR EMPLOYEES OF Savvy Advisors POSSESS A PARTICULAR LEVEL OF SKILL OR TRAINING IN THE INVESTMENT ADVISORY OR ANY OTHER BUSINESS.

Item 2 - Material Changes

This is the first filing of the Part 2A of Form ADV by Savvy Advisors. In the future, this Item will summarize the material changes, if any, made to this brochure as part of its annual update.

Savvy Advisors' complete Firm Brochure is always available upon request by contacting Ritik Malhotra, Chief Compliance Officer at (833) 745-6789, or compliance@savvywealth.com.

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Item 4 - Advisory Business

Savvy Advisors, Inc. (“Savvy Advisors” or “the Firm”) was founded in 2022 by Savvy Wealth, Inc. and Ritik Malhotra. In March 2022, the Firm registered with the SEC as an investment adviser. The Firm’s principal office is in New York, NY.

Savvy Advisors is an adviser to separately managed accounts (the “Separately Managed Accounts”), (together, the “Clients” or “Client Accounts”). The Firm provides customized investment and wealth management services to high net worth individuals and associated trusts, estates, pension and profit sharing plans, and other legal entities. Savvy Advisors, Inc. generally invests client discretionary assets in domestic and international stocks, bonds, mutual funds, exchange traded funds (“ETFs”), private funds, real estate, and cryptocurrencies. The Firm works with each client to establish an appropriate investment profile outlining the client’s objectives, risk tolerance, liquidity needs, and investment time horizon. Savvy Advisors considers the client’s specific goals and risk tolerance and its capital markets outlook when directing assets to specific investments.

Savvy Advisors’ investment advisory services are provided pursuant to the agreed upon investment guideline terms set forth in the investment management agreement. Clients may impose reasonable mandates, guidelines, or restrictions relating to investments. For example, clients may impose limits on concentration, risk, exposure, and liquidity. Savvy Advisors’ clients own the positions in their separately managed account; therefore, the Client will typically have full, real-time transparency to all transactions and holdings in such account.

Savvy Advisors currently provides advice to Separately Managed Account clients, but reserves the right to provide advice to other types of clients. The Firm does not participate in or offer wrap fee programs to Clients.

Item 5 - Fees and Compensation

The specific manner in which fees are charged by Savvy Advisors is established in each client's written investment advisory agreement. Savvy Advisors' offers two distinct fee models for its investment management and consulting services:

1. Asset-Based Fees

Investment management fees will be based on a percentage of the client's total managed assets. Fees are negotiable and typically range between 0.5%-1.5% per year, billed quarterly in advance based on the previous quarter's end value. Management fees are deducted directly from the client's account. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the number of days that the account(s) was managed.

The market value of assets includes accrued interest and dividends, as well as margin balances (if applicable). Most clients authorize Savvy Advisors to deduct fees automatically from their brokerage accounts, but clients may request that the Firm send quarterly invoices to be paid by check. The custodian of the client's brokerage account is responsible for sending statements at least quarterly indicating, among other things, management fees disbursed from the account. Savvy Advisors may agree to aggregate the assets of multiple separate accounts of a client and other affiliated clients for fee calculation purposes. If a client contributes more than \$100,000 during a quarter Savvy Advisors will prorate the fees on this contribution. Contributions of less than \$100,000 and partial withdrawals of client assets are not pro-rated and will be reflected in Savvy Advisors' fee calculation for the entire quarter.

2. Flat Fee Arrangement

Fees for financial planning and consulting services are billed on a flat rate. Fees are negotiable and determined by the complexity of the services to be provided. The fees are assessed quarterly, and clients can select the billing form- bank account, credit card, or fees may be deducted from a selected brokerage account. In the event your financial planning or consulting agreement is terminated, the fee will be prorated based on the services provided through the date of termination.

The Firm has waived or negotiated lower fees for certain clients, such as charitable organizations or employees' family members.

In addition to Savvy Advisors' investment management and flat fees, clients bear trading costs and custodial fees. To the extent that clients' accounts are invested in mutual funds and ETFs, these funds pay a separate layer of management, trading, and administrative expenses. Savvy Advisors does not receive any portion of third-party custodial fees and investment manager fees. Clients are highly encouraged to read the appropriate prospectus for the mutual funds and ETFs they are or will be invested in.

Item 6 - Performance Based Fees and Side-by-Side Management

Savvy Advisors does not charge performance-based fees or other fees based on a share of capital gains or capital appreciation of client assets. Some investment advisers experience conflicts of interest in connection with the side-by-side management of accounts with different fee structures. However, these conflicts of interest are not applicable to Savvy Advisors.

Retirement Plan Rollovers- Potential for Conflict of Interest

A Client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Savvy Advisors recommends that a client roll over their retirement plan assets into an account to be managed by the Firm, such a recommendation may create a potential conflict of interest since Savvy Advisors will earn new (or increase its current) compensation as a result of the rollover. Savvy Advisors mitigates this potential conflict by analyzing the former employer's plan, considering the client's options, and making a recommendation in the best interest of the client. No client is under any obligation to roll over retirement plan assets to an account managed by Savvy Advisors.

Item 7 -Types of Clients

Savvy Advisors primarily provides customized investment management services to high-net-worth individuals and associated trusts, estates, pension and profit sharing plans, and other legal entities. Savvy Advisors' minimum account size is generally \$1,000,000, but this amount is negotiable.

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

Methods of Analysis and Investment Strategies

Savvy Advisors develops customized investment recommendations for each individual Client based on a variety of factors, including the client's investment objectives, net worth, risk tolerance, tax status, liquidity needs, wealth transfer, and philanthropic goals. The Firm typically meets with the new individual Client at least once before developing an investment plan and recommended asset allocation strategy. The Firm works carefully to understand each individual Client's risk tolerance and investment goals, but Clients should understand that all investing involves the risk of loss.

The Firm primarily invests for relatively long term periods (more than 3 years) using primarily an index-based approach to investing in a broad range of diversified exchange-traded funds (ETFs) and mutual funds. In addition to mutual funds and ETFs, Savvy Advisors provides advice on exchange traded notes (ETNs), bonds, stocks, hedge funds, private equity funds, real estate, restricted stock, private stock, and structured notes. In managing client assets, the Firm seeks to limit risk through diversification among asset classes and, as appropriate for certain clients, will recommend third party sponsored alternative investments.

Savvy Advisors' portfolio management team conducts fundamental analysis on all securities recommended for client accounts. This analysis varies depending on the security in question. For stocks and bonds the analysis generally includes a review of:

- The issuer's management;
- The amount and volatility of past profits or losses;
- The issuer's assets and liabilities, as well as any material changes from historical norms;
- Prospects for the issuer's industry, as well as the issuer's competitive position within that industry; and
- Any other factors considered relevant.

For mutual funds and ETFs the analysis generally includes a review of:

- The fund's management team;
- The fund's historical risk and return characteristics;
- The fund's exposure to sectors and individual issuers;
- The fund's fee structure; and
- Any other factors considered relevant such as liquidity and for index ETFs- Savvy Advisors evaluates the index methodology.

Risks Associated with Specific Types of Securities

Exchange Traded Funds (ETFs)

ETFs are typically investment companies that are legally classified as open-end mutual funds or unit investment trusts. ETFs differ from traditional mutual funds in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and ask price is often referred to as the “spread.” The spread varies over time based on the ETF’s trading volume and market liquidity and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Liquidity risks are higher for ETFs with a large spread. ETFs may be closed and liquidated at the discretion of the issuing company. Clients can find more information regarding the risks associated with a specific ETF in the fund’s prospectus.

Mutual Funds

Mutual funds may invest in different types of securities, such as value or growth stocks, real estate investment trusts, corporate bonds or U.S. government bonds. There are risks associated with each asset class. An investment in a money market fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other governmental agency. Although money market funds seek to preserve the value of your investment at \$1.00 per share, it is possible to lose money by investing in the fund. Redemption is at the current net asset value, which may be more or less than the original cost. Aggressive growth funds are most suitable for investors willing to accept price per share volatility since many companies that demonstrate high growth potential can also be high risk. Income from tax-free mutual funds may be subject to local, state and/or the alternative minimum tax. Because each mutual fund owns different types of investments, performance will be affected by a variety of factors. The value of your investment in a mutual fund will vary from day to day as the values of the underlying investments in a fund vary. Such variations generally reflect changes in interest rates, market conditions and other company and economic news. These risks may become magnified depending on how much a fund invests or uses certain strategies. A fund’s principal market segment(s), such as large-cap, mid-cap or small-cap stocks, or growth or value stocks may underperform other market segments or the equity markets as a whole. Clients can find additional information regarding these risks in the fund’s prospectus.

Alternative Investments

Alternative investments are illiquid investments and do not trade on a national securities exchange. Alternative investments typically include investments in direct participation program securities (partnerships, limited liability companies, business development companies or real estate investment trusts), commodity pools, private equity, private debt, or hedge funds. Alternative investments are subject to various risks, such as illiquidity and property devaluation based on adverse economic and/or real estate market conditions. Alternative investments are not suitable for all investors. Investors considering an investment strategy utilizing alternative investments should understand that alternative investments are generally considered speculative in nature and may involve a high degree of risk, particularly if concentrating investments in one or few alternative investments. These risks are potentially greater and substantially different than those associated with traditional equity or fixed income investments. Additional information regarding these risks can be found in the product’s prospectus or offering documents.

International Investing

The risks of investing in foreign securities include loss of value as a result of political or economic instability; nationalization, expropriation or confiscatory taxation; changes in foreign exchange rates and foreign exchange restrictions; settlement delays; and limited government regulation (including less stringent reporting, accounting, and disclosure standards than are required of U.S. companies). These risks may be greater with investments in emerging markets. Certain investments utilized by the Firm may also contain international securities.

Cash and Cash Equivalents

A portion of your assets may be invested in cash or cash equivalents to achieve your investment objective, provide ongoing distributions, and/or take a defensive position. Cash holdings may result in a loss of market exposure.

Fixed-Income Securities

The return and principal value of bonds fluctuate with changes in market conditions. Fixed-income securities are subject to interest rate risk and credit quality risk. The market value of fixed-income securities generally declines when interest rates rise, and an issuer of fixed-income securities could default on its payment obligations. Changes in interest rates generally have a greater effect on bonds with longer maturities than on those with shorter maturities. If bonds are not held to maturity, they may be worth more or less than their original value. Credit risk refers to the possibility that the issuer of a bond will not be able to make principal and/or interest payments. High yield bonds, also known as “junk bonds,” carry higher risk of loss of principal and income than higher rated investment grade bonds.

Equity Securities

In general, prices of equity securities (common, convertible preferred stocks and other securities whose values are tied to the price of stocks, such as rights, warrants and convertible debt securities) are more volatile than those of fixed-income securities. The prices of equity securities could decline in value if the issuer’s financial condition declines or in response to overall market and economic conditions. Investments in smaller companies and mid-size companies may involve greater risk and price volatility than investments in larger, more mature companies.

Savvy Advisors’ Investment Committee is led by Ritik Malhotra, CEO & CCO. The Investment Committee generally meets quarterly to discuss existing and prospective investments. Investments are evaluated independently, as well as in the context of clients’ existing holdings and sector exposures.

From time to time, the Client Accounts may purchase or sell exchange-traded or over-the-counter securities or derivatives to hedge the portfolio. In addition, the Client Accounts may build cash reserves or enter into swaps in order to facilitate hedging activity.

The Firm is not limited with respect to the types of investment strategies they may employ, the markets or instruments in which they may invest or the percentage of their capital that may be invested in a single security. Depending on the condition of securities markets, the United States economy or international economies, Savvy Advisors may alter its investment strategy and/or employ different techniques that it considers to be appropriate and in the best interest of its clients. Depending on conditions and trends in securities, credit and other markets, the Firm may pursue any strategies or employ any techniques that Savvy Advisors considers appropriate and in the client’s best interest. Savvy Advisors will notify clients of any material change to the firm’s investment strategy as outlined above.

Material Risks

No guarantee or representation is made that the Client Accounts will achieve their investment objective. Investing involves risks. The risks set out below do not purport to be exhaustive. Additional risks and uncertainties that are currently unknown or currently deemed immaterial may become material factors that affect clients. Prospective clients should carefully consider the risks involved in an investment

Reliance On Savvy Advisors. The investment success of a client's account/portfolio depends on the ability of Savvy Advisors to develop and implement investment strategies to achieve the client's investment objectives. The Client Accounts' investment performance could be materially adversely affected if any members of the investment team were to die, become ill or disabled, or otherwise cease to be involved in the active management of the Firm.

General Investment and Trading Risks. An investment involves a high degree of risk, including the risk that the entire amount invested may be lost. The Firm invests in securities and other financial instruments using strategies and investment techniques with significant risk characteristics. No guarantee or representation is made that the Firm's investment strategies will be successful. The Firm's investment strategies may utilize investment techniques including, but not limited to option transactions, margin transactions, short sales, forwards, leverage and derivatives trading, the use of which can, in certain circumstances, maximize the adverse impact to which the Client Accounts may be subject.

Cybersecurity. Savvy Advisors and its service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes and practices designed to protect networks, systems, computers, programs and data from both intentional cyber-attacks and hacking by other computer users as well as unintentional damage or interruption that, in either case, can result in damage or interruption from computer viruses, network failures, computer and telecommunications failures, infiltration by unauthorized persons and security breaches, usage errors by their respective professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes.

A cybersecurity breach could expose Savvy Advisors, its employees and clients to substantial costs (including, without limitation, those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, adverse investor reaction, the dissemination of confidential and proprietary information and reputational damage), civil liability as well as regulatory inquiry and/or action. In addition, any such breach could cause substantial withdrawals from client accounts. While Savvy Advisors has established a business continuity plan in the event of, and risk management strategies, systems, policies and procedures to seek to prevent, cybersecurity breaches, there are inherent limitations in such plans, strategies, systems, policies and procedures including the possibility that certain risks have not been identified. Furthermore, Savvy Advisors cannot control the cybersecurity plans, strategies, systems, policies and procedures put in place by other service providers to the client accounts and/or the issuers in which client assets are invested.

Equity Investments. Savvy Advisors' equity investments may involve substantial risks and may be subject to wide and sudden fluctuations in market value, with a resulting fluctuation in the amount of profits and losses. There are no absolute restrictions in regard to the size or operating experience of the companies in which the Firm may invest (and relatively small companies may lack management depth or the ability to generate internally, or obtain externally, the funds necessary for growth and companies with new products or services could sustain significant losses if projected markets do not materialize). Equity prices are directly

affected by issuer specific events, as well as general market conditions. In addition, in many countries investing in common stocks is subject to heightened regulatory and self-regulatory scrutiny as compared to investing in debt or other financial instruments.

Small- and Mid-Cap Risks. A portion of the Client Accounts' assets may be invested in securities of small-cap and mid-cap issuers. While in Savvy Advisors' opinion the securities of small- and mid-cap issuers may offer the potential for greater capital appreciation than investments in securities of large-cap issuers, securities of small-cap issuers may also present greater risks. For example, some small- and mid-cap issuers often have limited product lines, markets, or financial resources. They may be subject to high volatility in revenues, expenses and earnings. Their securities may be thinly traded, may be followed by fewer investment research analysts and may be subject to wider price swings and thus may create a greater chance of loss than when investing in securities of larger-cap issuers. The market prices of securities of small- and mid-cap issuers generally are more sensitive to changes in earnings expectations, to corporate developments and to market rumors than are the market prices of large-cap issuers. Transaction costs in securities of small- and mid-cap issuers may be higher than in those of large-cap issuers.

Convertible Securities. Convertible securities are bonds, debentures, notes, preferred stocks or other securities that may be converted into or exchanged for a specified amount of common stock of the same or different issuer within a particular period of time at a specified price or formula. A convertible security entitles its holder to receive interest that is generally paid or accrued on debt or a dividend that is paid or accrued on preferred stock until the convertible security matures or is redeemed, converted or exchanged. Convertible securities have unique investment characteristics in that they generally (i) have higher yields than common stocks, but lower yields than comparable non-convertible securities, (ii) are less subject to fluctuation in value than the underlying common stock due to their fixed-income characteristics and (iii) provide the potential for capital appreciation if the market price of the underlying common stock increases. The value of a convertible security is a function of its "investment value" (determined by its yield in comparison with the yields of other securities of comparable maturity and quality that do not have a conversion privilege) and its "conversion value" (the security's worth, at market value, if converted into the underlying common stock). The investment value of a convertible security is influenced by changes in interest rates, with investment value declining as interest rates increase and increasing as interest rates decline. The credit standing of the issuer and other factors may also have an effect on the investment value of convertible securities. The conversion value of a convertible security is determined by the market price of the underlying common stock. If the conversion value is low relative to the investment value, the price of the convertible security is governed principally by its investment value. To the extent the market price of the underlying common stock approaches or exceeds the conversion price, the price of the convertible security will be increasingly influenced by its conversion value. A convertible security generally will sell at a premium over its conversion value by the extent to which investors place value on the right to acquire the underlying common stock while holding a fixed-income security. Generally, the amount of the premium decreases as the convertible security approaches maturity. A convertible security may be subject to redemption at the option of the issuer at a price established in the convertible security's governing instrument. If a convertible security held by the Client's Account is called for redemption, the Firm will be required to permit the issuer to redeem the security, convert it into the underlying common stock or sell it to a third-party. Any of these actions could have an adverse effect on the Client Account's ability to achieve its investment objective.

Debt and Other Income Securities. The Client Accounts may invest in fixed-income and adjustable rate securities. Income securities are subject to interest rate, market and credit risk. Interest rate risk relates to changes in a security's value as a result of changes in interest rates generally. Even though such instruments are investments that may promise a stable stream of income, the prices of such securities are inversely affected by changes in interest rates and, therefore, are subject to the risk of market price fluctuations. In

general, the values of fixed income securities increase when prevailing interest rates fall and decrease when interest rates rise. Because of the resetting of interest rates, adjustable rate securities are less likely than non-adjustable rate securities of comparable quality and maturity to increase or decrease significantly in value when market interest rates fall or rise, respectively. Market risk relates to the changes in the risk or perceived risk of an issuer, industry, country or region. Credit risk relates to the ability of the issuer to make payments of principal and interest. The values of income securities may be affected by changes in the credit rating or financial condition of the issuing entities. Income securities denominated in non-U.S. currencies are also subject to the risk of a decline in the value of the denominating currency relative to the U.S. dollar.

Derivatives and Hedging. Savvy Advisors may invest and trade in a variety of derivative instruments, both to hedge the client's account and for profit. Derivatives are financial instruments or arrangements in which the risk and return are related to changes in the value of other assets, reference rates or indices. The Client Account's ability to profit or avoid risk through investment or trading in derivatives will depend on Savvy Advisors' ability to anticipate changes in the underlying assets, reference rates or indices.

Brokerage Commissions/Transaction Costs. During some periods, Savvy Advisors' activities may involve a high level of trading, and the turnover of its portfolio may generate substantial transaction costs. These costs will be borne by the Client's Account(s) regardless of its profitability.

Currency. The Firm may invest a portion of its assets in instruments denominated in currencies other than the U.S. dollar, the price of which is determined with reference to currencies other than the U.S. dollar. Client Accounts will, however, be valued in U.S. dollars. To the extent unhedged, the value of the assets will fluctuate with U.S. dollar exchange rates as well as the price changes of investments in the various local markets and currencies. Thus, an increase in the value of the U.S. dollar compared to the other currencies will reduce, all other economic factors being constant, the effect of increases and magnify the effect of decreases in the prices of the account's securities in their local markets. Conversely, a decrease in the value of the U.S. dollar will have the opposite effect on non-U.S. dollar securities. To the extent permitted, the Client Account also may, but does not expect to regularly do so, utilize options and forward contracts to hedge against currency fluctuations, but there can be no assurance that such hedging transactions will be effective.

Information Sources. Savvy Advisors selects investments for the Client Accounts based in part on information and data that the issuers of such securities file with various government agencies or make directly available to Savvy Advisors or that Savvy Advisors obtains from other sources. Savvy Advisors is not in a position to confirm the completeness, genuineness or accuracy of such information and data, and in some cases, complete and accurate information is not readily available.

Counterparty Risk. Some of the markets in which the Firm effects its transactions are "over-the-counter" or "interdealer" markets. The participants in such markets are typically not subject to credit evaluation and regulatory oversight as are members of "exchange-based" markets. This exposes the Client Account to the risk that a counterparty will not settle a transaction in accordance with its terms and conditions because of a dispute over the terms of the contract (whether or not bona fide) or because of a credit or liquidity problem, thus causing the client's account to suffer a loss. The Firm is not restricted from dealing with any particular counterparty or from concentrating any or all of its transactions with one counterparty. Moreover, the Firm has no internal credit function that evaluates the creditworthiness of their counterparties. The ability of the Firm to transact business with any one or number of counterparties, the lack of any meaningful and independent evaluation of such counterparties financial capabilities and the absence of a regulated market to facilitate settlement may increase the potential for losses experienced by the client.

Reliance on Quantitative Models. Savvy Advisors employs a quantitative model in part of its investment strategy. Although this quantitative model has been tested, no assurance can be made that such models will perform the same in the future. Model-driven strategies may result in substantial losses in a short period of time.

The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment managed by Savvy Advisors.

Item 9 - Disciplinary Information

Neither Savvy Advisors nor any of its officers, directors, or employees or other management persons, has been involved in any legal or disciplinary events that would require disclosure in response to this Item.

Item 10 - Other Financial Industry Activities and Affiliations

Savvy Advisors and its employees do not have any relationships or arrangements with other financial services companies that pose material conflicts of interest.

Registered Broker-Dealers

No one at Savvy Advisors is registered as a broker-dealer or a registered representative of a broker-dealer.

Registered Futures Commission Merchants, Commodity Pool Operators and Commodity Trading Advisors

No one at Savvy Advisors is registered as a registered futures commission merchant, commodity pool operator or commodity trading advisor.

Selection or Recommendation of Other Advisers

Savvy Advisors does not recommend or select other investment advisers or receive compensation from such advisers in a manner that would create a material conflict of interest. Savvy Advisors does not have other business relationships with other advisers that create a material conflict of interest.

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

As an SEC registered investment adviser, Savvy Advisors has adopted and implemented a written Code of Ethics (“Code” or “the Code”) under Rule 204A-1 of the Investment Advisers Act of 1940 (“Advisers Act”) that is applicable to all employees. Savvy Advisors’ Code describes its fiduciary duties and responsibilities to its clients and sets forth Savvy Advisors’ (i) policies on receipt of gifts by employees and campaign contributions and (ii) practices of reporting and monitoring the personal securities transactions of supervised persons with access to client investment recommendations. Under Savvy Advisors’ Code, all supervised personnel have a duty to act only in the best interests of its clients and all potential conflicts and violations of the Code must be promptly reported to the Chief Compliance Officer (“CCO”). All supervised personnel must acknowledge their receipt and understanding of the terms of the Code annually, or as amended.

Code of Ethics

The Code contains policies and procedures with respect to personal securities transactions by employees and related accounts that are designed to prevent front-running, scalping, the misuse of any material non-public inside information, and other improper activities. Employees must report all personal transactions to the CCO on at least a quarterly basis. Additionally, employees are required seek CCO pre-approval before transacting in Initial Public Offerings (IPOs), private placements, and limited offerings. The CCO monitors all transactions by employees in order to identify any pattern of conduct that may evidence conflicts or potential conflicts with the principles and objectives of the Code, or other inappropriate behavior.

Statement on Insider Trading

Savvy Advisors and/or its employees may, from time to time, come into possession of material non-public or other confidential information which, if disclosed, might affect an investor’s decision to buy, sell, or hold a security. Under applicable law, Savvy Advisors and its employees may be prohibited from improperly disclosing or using such information for their personal benefit or for the benefit of any other third party. Accordingly, should Savvy Advisors and/or its employees come into possession of material non-public or other confidential information with respect to any company, they may be prohibited from communicating such information to, or using such information for the benefit of, Savvy Advisors’s clients and their underlying investors. Savvy Advisors has adopted a Statement on Insider Trading (“Insider Trading Policy”) in accordance with Section 204A under the Advisers Act, which establishes procedures to prevent the misuse of material non-public information by Savvy Advisors and its employees.

A copy of Savvy Advisors’ Code of Ethics is available upon request by contacting Ritik Malhotra at compliance@savvywealth.com.

Statement on Principal and Cross Trades

Section 206(3) of the Advisers Act makes it unlawful for any investment adviser, directly or indirectly, acting as principal for its own account, knowingly to sell any security to or purchase any security from a Client without disclosing to the Client in writing the capacity in which the adviser is acting and obtaining the Client's consent to the transaction. Savvy Advisors does not anticipate engaging in principal transactions with Clients. Should Savvy Advisors decide to engage in a principal transaction with a Client, it will affect the transaction in compliance with Section 206(3) of the Advisers Act.

Item 12 - Brokerage Practices

Savvy Advisors generally recommends that clients arrange for their assets to be held with Charles Schwab, TD Ameritrade, Pershing, and Fidelity Investments (the “Custodians”). The Firm generally executes securities transactions through these institutions where client accounts are held. Savvy Advisors believes that the Custodians mentioned above provide, reliable, quick, responsive and efficient brokerage services.

The Custodians provide Savvy Advisors with access to their institutional trading and operational services, which are typically not available to retail individual investors. Their services also include custody and access to mutual funds and other investments that are otherwise generally available only to institutional investors or that would require a significantly higher minimum initial investment. Additionally, the Custodians generally do not charge clients separately for custody of their investment accounts, but are compensated by account holders through commissions, transaction-related fees or asset-based fees. Clients should be aware that fees, costs, and services may vary between the Custodians.

Best Execution Considerations

Subject to the Clients’ investment management agreements, Savvy Advisors has discretionary authority to determine the type, amount, and price of securities and investments to be bought and sold on behalf of each Client, including the selection of, and commissions paid to, brokers. Savvy Advisors considers a variety of factors in its selection of trading counterparties.

Savvy Advisors seeks to trade with reputable counterparties. In addition to trading costs and listed prices, the Company periodically and systematically evaluates approved counterparties based on factors such as:

- The ability to execute large or difficult transactions;
- The brokers’ or dealers’ facilities;
- The ability to execute quickly when necessary;
- The ability to work orders when necessary;
- The ability to obtain locates for short sales;
- Special execution capabilities;
- Efficiency of execution and error resolution;
- Willingness to execute related or unrelated difficult transactions in the future;
- Custody, recordkeeping and similar services
- The protection of Savvy Advisors’s proprietary trading information;
- Financial responsibility, regulation, and integrity;
- The frequency of trade errors; and
- The responsiveness to Savvy Advisors during trading and settlement.

As Savvy Advisors is newly-formed, it has not acquired any products or services with client brokerage commissions during the last fiscal year. Services constituting “research” under Section 28(e) that Savvy Advisors may receive in connection with Client Accounts’ trading may include, but are not limited to: research reports; financial newsletters and trade journals; attendance at certain seminars and conferences; economic and market information; industry and company comments; technical data; recommendations; information on industries, groups of securities, individual companies, political developments, legal developments affecting portfolio securities and technical market action; statistical information; accounting and legal interpretations relating Client Account transactions; credit analysis; risk measurement analysis, and performance analysis. These research services are received primarily in the form of written reports, calls, and meetings with research analysts. In addition, such research services may be provided in the form of access to computer-generated data and meetings arranged with corporate and industry spokespersons, economists, academicians and/or government representatives. Products and services constituting

“brokerage” under Section 28(e) that the Company may receive in connection with Client Accounts’ trading may include, but are not limited to: services related to the execution, clearing and settlement of securities transactions and functions incidental thereto, such as connectivity services between Savvy Advisors and a broker-dealer and other relevant parties such as custodians; trading software operated by a broker-dealer to route orders; software that provides trade analytics and trading strategies; software used to transmit orders; trade clearance and settlement; electronic communication of allocation instructions; routing of settlement instructions; post-trade matching of trade information; and services required by the SEC or a self-regulatory organization, such as comparison services, electronic confirms or trade affirmations.

Directed Brokerage

Clients generally do not direct the Firm to trade through any particular counterparty. A Client’s insistence on the use of one or more particular counterparties in connection with the trading of its account can have a materially adverse effect on the quality of execution that is available to the client. Among other things, Clients that direct the use of trading counterparties may pay higher transaction costs be excluded from aggregated orders, and trade after other Clients have traded.

Trade Aggregation and Allocation

Trading activities of Client accounts will overlap. While Client accounts invest in the same issuers, the purchase and sale of such investments may be at different times and upon different terms, based on each Client’s overall investment objectives and strategy, legal or regulatory concerns, and/or other relevant considerations.

When Savvy Advisors purchases or sells securities of the same issuer at the same time for the Clients, Savvy Advisors may submit an aggregated trade for execution if Savvy Advisors believes that the use of an aggregated trade reasonably furthers its efforts to seek best execution. Participants in aggregated trades receive the average execution price and incur their pro rata share of the trading costs.

To the extent that partial fills occur, Savvy Advisors will allocate the results of the partially completed trade pro rata between participating Clients based on the initial allocation instructions submitted for execution. Impacted accounts receive the average execution price and incur their pro rata share of the trading costs with respect to the partially completed trade.

Instances in which Client orders may not be aggregated include, but are not limited to, the following: (1) Savvy Advisors determines that the aggregation is not appropriate because of market conditions; (2) Situations where Savvy Advisors must effect the transactions at different times or prices, making aggregation unfeasible; and (3) A determination is made by Savvy Advisors not to aggregate orders because of tax, legal, regulatory or administrative reasons such as typical trading increments or quantities.

Trade Errors

While Savvy Advisors takes the utmost care in making and implementing investment decisions on behalf of Clients, it may make an error while placing a trade for Clients. Savvy Advisors attempts to minimize trade errors by promptly reconciling confirmations with trade tickets, and by reviewing past trade errors to understand the internal control breakdown that caused the errors. If Savvy Advisors makes an error while placing a trade, the Firm will seek to correct the error promptly in a way that mitigates any losses. The cost of errors will be borne by the client unless an error is the result of bad faith, gross negligence, or willful misconduct by Savvy Advisors. Savvy Advisors will generally bear any costs associated with correcting any error for a client’s account subject to the terms of the relevant investment management agreement.

Valuation of Client Assets

Savvy Advisors relies on the Custodians of client accounts to provide accurate valuations of client investments. The Firm does not value investments separately from the values received from the Custodians of the client accounts. However, Savvy Advisors's periodic client investment performance reports may vary slightly from custodial statements received by its clients due to the Firm's reliance on third party portfolio management systems to aggregate client account information. Clients should contact Savvy Advisors if any significant discrepancies or errors are discovered.

Item 13 - Review of Accounts

Savvy Advisors strives to review managed client accounts regularly with clients, but there is no rigid schedule for doing so. However, clients are offered a review on an annual basis. Each client works with an Advisor who is responsible for helping them determine an investment plan, establishing a target allocation percentage and answering any questions the client may have about their specific financial situation.

Savvy Advisors' Advisory and Portfolio Management teams review client accounts periodically to ensure allocation thresholds are being met, and to invest money or withdraw it as necessary given the client's guidelines. Savvy Advisors' investment strategies are reviewed at least semi-annually by the Firm's portfolio management team. Additional or focused reviews can be triggered by factors such as political and economic developments, corporate announcements, and changes in market conditions.

Reports to Clients

Savvy Advisors provides quarterly reports on managed client accounts and balances. Clients also receive regular monthly statements from their custodian(s) for the same accounts which show account transactions and month-end holdings.

Item 14 - Client Referrals and Other Compensation

Savvy Advisors has no arrangements in place with third parties for client referrals.

Item 15 - Custody

When a client establishes a relationship with Savvy Advisors for investment management services, their assets will be maintained by an unaffiliated broker dealer or bank. These institutions are deemed “qualified custodians” by the SEC. The Firm relies on the Custodians to price and value assets, execute and clear transactions, maintain custody of client account assets and perform other custodial functions.

Savvy Advisors can access client accounts through its ability to debit advisory fees. For this reason, the Firm is considered to have custody of client assets. Clients will receive account statements directly from their qualified custodian, who maintains the Clients’ cash and securities assets. Savvy Advisors encourages Clients to compare the account statement received from its custodian to the reporting received from the Firm. Clients should promptly notify Savvy Advisors if they do not receive account statements from their custodian at least quarterly or if they believe the information contained in the statements is inaccurate.

Item 16 - Investment Discretion

Savvy Advisors has investment discretion over most of its clients' accounts. Clients grant the Firm trading discretion through the execution of a limited power of attorney included in Savvy Advisors' investment management agreement. Savvy Advisors also serves client accounts in a non-discretionary investment capacity. In these situations, the Firm is only authorized to transact after the client approves the proposed investment trades.

Clients can place reasonable restrictions on Savvy Advisors' investment discretion. For example, some clients may ask the Firm to not buy securities issued by companies in certain industries, or not to sell certain securities where the client has a particularly low tax basis.

For certain client accounts, Savvy Advisors will work with third party platforms to facilitate management of held away assets, such as defined contribution plan participant accounts with investment discretion. The Firm is not affiliated with the third-party service provider providing the platform and receives no compensation from them for using their platform. Once the client's held away account is connected to the platform, Savvy Advisors will review the current allocations. When deemed necessary, the Firm will rebalance the account considering the client's investment goals and risk tolerance, and any change in the allocation will consider current economic and market trends.

Item 17 - Voting Client Securities

Savvy Advisors does not vote proxy statements on behalf of its clients. The Firm does not have (nor will accept) the authority to vote client securities. Clients will receive their proxy statements or other solicitations directly from their custodian or a transfer agent and are responsible for voting their own proxies. The Firm may alert a client if it becomes aware that the custodian or transfer agent is sending a proxy statement to a client.

Savvy Advisors is not authorized to direct the Clients' participation in class actions.

Item 18 - Financial Information

Savvy Advisors has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to manage Client accounts.

Item 19 – Information for State Registered Advisers

This item is not applicable to Savvy Advisors.