



**Form ADV Part 2A – Firm Brochure
March 10, 2023**

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This brochure provides information about the qualifications and business practices of Springbox Ai. LTD. If clients have any questions about the contents of this brochure, please contact us at +971 50 213-2430 or fayze@springbox.tech. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Springbox Ai. LTD is also available on the SEC's website at www.adviserinfo.sec.gov by searching CRD #312450.

Please note that the use of the term "registered investment adviser" and description of our firm and/or our associates as "registered" does not imply a certain level of skill or training. Clients are encouraged to review this Brochure for our firm's associates who advise clients for more information on the qualifications of our firm and our employees.

Item 2: Material Changes

There are no material changes in this brochure from the last annual updating amendment of Springbox Ai. LTD on 03/31/2022. Material changes relate to Springbox Ai. LTD's policies, practices or conflicts of interests only.

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Item 4: Advisory Business

The Company

Springbox Ai. LTD (“Springbox,” “we” or “us”) is an investment adviser registered with the U.S. Securities and Exchange Commission (the “SEC”). We were organized on March 15, 2019. Our firm is organized under the laws of the United Arab Emirates and is wholly owned by Fayze Bouaoud.

Types of Advisory Services Offered

Our firm provides clients with live trading forecast services. Our firm utilizes proprietary algorithms powered by artificial intelligence technology (“AI”) to generate trading signals on equity securities traded on the New York Stock Exchange (“NYSE”) and Nasdaq currencies traded on the foreign exchange market (“Forex”); and commodity futures. Our AI engine collects and analyzes large amounts of market data and then generates trading signals based on this analysis. The data analyzed by our intelligent system comes from multiple sources, both public and paid ones, such as media content, databases, posts, expert opinions and other related data.

Our clients obtain access to our generated trading signals through a paid subscription service to our mobile application or web-based platform. Our trading signals are impersonal, meaning they are not tailored to any particular client. Rather, our trading signals are general market indicators that each of our clients can use as they choose.

Our firm provides informational advisory services; we do not buy or sell securities for clients or otherwise manage client assets. Clients seeking to execute the purchase or sale of any particular security must work with a financial intermediary to do so.

Clients using our service should be aware of the risks of frequent trading. Frequent trading may result in higher transactional costs and may adversely affect investment performance. Frequent trading may also cause adverse tax consequences for a client. During periods of market volatility, particularly weak markets, clients may receive more trading signals than normal, which may cause the client to more actively re-constitute its investment portfolio. Clients can mitigate the effects of frequency trading by maintaining a diverse portfolio of investments and by seeking the discretionary advice of other investment professionals.

Tailoring of Advisory Services

Springbox does not offer tailored advisory services to its clients.

Participation in Wrap Fee Programs

Springbox does not offer or sponsor a wrap fee program.

Assets Under Management

As of December 2022, Springbox does not have any assets under management.

Item 5: Fees & Compensation

Compensation for Our Advisory Services

Rather than deducting our fees, our firm exclusively offers a subscription service, which grants our clients access to our live trading forecast services. Our clients can either pay in advance for monthly or semi-annual access to our subscription service at the rates listed below:

- Semi-Annual Access: \$239.99 billed to the client once every six months.
- Monthly Access: \$49.99 billed to the client every month.

New clients to our subscription service are offered a 14-day free trial. Our clients are required to provide billing information for this 14-day free trial period and are billed automatically at the end of the free trial period if they do not cancel their selection subscription. Once a client has enrolled in our subscription service, the client can cancel at any time.

Other Types of Fees & Expenses

Our firm does not charge any other types of fees for our services, such as custodian fees, mutual fund expenses, or any transaction or brokerage costs (see Item 12, which discusses our brokerage practices). Clients choosing to trade securities must do so through a broker or agent not affiliated with our firm, and will incur costs in making such trades.

Termination & Refunds

Our clients are offered a 14-day free trial period that allows unlimited access to our service and can be terminated at any time. Following the 14-day free trial period, our clients are billed through their current subscription period but will not be billed for the following period. For example, a client that cancels their monthly subscription on the 15th of a month will maintain access to our trading signal service through the end of that month and will lose access and not be billed for the following month. Our clients pay for our service in advance at the beginning of the applicable service period (i.e., monthly or semi-annual) and no refund is provided.

Item 6: Performance-Based Fees & Side-By-Side Management

Our firm does not charge performance-based fees.

Item 7: Types of Clients & Account Requirements

Our firm's live trading forecast services are offered to all investors that sign up for our subscription service.

Item 8: Methods of Analysis, Investment Strategies & Risk of Loss

Methods of Analysis, Investment Strategies and Associated Risks

Our firm does not provide our clients with any particular investment strategy. Our firm utilizes proprietary algorithms powered by artificial intelligence technology ("AI") to generate trading signals. Our AI engine collects and analyzes large amounts of market data and then generates comprehensible trading signals based on this analysis. The data analyzed by our intelligent system comes from multiple sources, both public and paid, such as media content, databases, posts, expert opinions and other related data.

The trading signals that our algorithms generate are based upon the assumption that the publicly-available sources of information that serve as inputs into the algorithms are accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. While the market may increase and the account(s) could enjoy a gain, it is also possible that the market may decrease and the account(s) could suffer a loss. It is important that clients understand the risks associated with investing and appropriately diversify their investments.

Description of Material Risks

General Equity Market Risk – Overall stock market risks may affect the value of investments in equity strategies. Factors such as U.S. economic growth and market conditions, interest rates, and political events affect the equity markets.

Commodities Futures Risk - Commodity prices may be influenced by unfavorable weather, animal and plant disease, geologic and environmental factors as well as changes in government regulation such as tariffs, embargoes or burdensome production rules and restrictions. Futures are often inherently highly leveraged and can become illiquid due to exchange-imposed price fluctuation limits. Like other leveraged investments, any trade could result in losses in excess of the amount invested.

Currency Trading - When weighing the options to invest in currencies, one must assess the structure and stability of their issuing country. In many developing and third world countries, exchange rates are fixed to a world leader such as the U.S. dollar. In this circumstance, central banks must sustain adequate reserves to maintain a fixed exchange rate. A currency crisis can occur due to frequent balance of payment deficits and result in devaluation of the currency. This can have substantial effects on forex trading and prices.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management.

We have no legal or disciplinary events to report.¹

Item 10: Other Financial Industry Activities & Affiliations

We are obligated to disclose if we, any of our employees and independent contractors, or any of our affiliates are involved in other financial industry activities, such as those of a broker-dealer, commodity pool operator or a futures commission merchant. We are also obligated to disclose if we receive compensation from other advisers for recommending or selecting those advisers.

We do not have any other financial industry activities or affiliations to report. In addition, we do not receive compensation from other advisers for recommending or selecting them.

Item 11: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

We expect our supervised persons to always act in the best interest of our clients, and to place the interests of our clients ahead of their own. We have adopted a Code of Ethics (the "Code") that sets forth the standard of business conduct expected from each member of our team.

The Code restricts trading in any security for which we believe we may be privy to material non-public information. It also restricts personal trading activities to prevent any conflict of interest between personal trading and client trading. The Code limits gifts and entertainment, whether received or given, to avoid conflicts of interests. The Code causes all outside business activities of our team members to be disclosed so that potential conflicts can be detected and addressed. Finally, it limits the political contributions of our managers and employees to prevent any potential conflicts in that area as well. All our managers and employees must accept in writing the terms of the Code upon employment, annually, and as amended.

We will provide a copy of the Code to any client or prospective client upon request by contacting the firm's Chief Compliance Officer at the telephone number or the physical or email address specified on the cover page of this brochure.

¹ We note that registered advisors are required to report, in Part 1A of Form ADV, all disciplinary events regardless of whether they are material. We have no disciplinary events of any kind to report.

Item 12: Brokerage Practices

Our firm does not recommend or select broker-dealers for client transactions, and we do not recommend, request or require that clients execute transactions through a particular broker dealer. Clients wishing to execute trades in securities must do so through a broker or agent not affiliated with our firm, and they will incur transaction costs when they do so.

Item 13: Review of Accounts

As described in Item 4, our firm offers impersonal advisory services. Our firm does not review client accounts or provide reports to clients regarding their accounts.

Item 14: Client Referrals & Other Compensation

Economic Benefits

Our firm does not have any arrangements with any non-client third parties in which the third party provides our firm with an economic benefit for providing investment advice or other advisory services to our clients.

Referral Fees

Our firm does not compensate any person who is not one of our supervised persons for client referrals.

Item 15: Custody

Our firm does not have custody of client funds or securities.

Item 16: Investment Discretion

As described in Item 4, we do not offer discretionary management services. Our firm offers only impersonal investment advisory services.

Item 17: Voting Client Securities

Our firm does not accept the authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, our firm will forward them to the appropriate client and ask the party who sent them to mail them directly to the client in the future. While we do not assist clients with questions about proxy votes, we encourage you to contact your qualified custodian if you have such questions.

Item 18: Financial Information

In certain circumstances, registered investment advisers are required to provide clients or prospective clients with financial information or disclosures about their financial condition. We have no financial commitments that impair our ability to meet our contractual or fiduciary commitments to you, and we have never been the subject of any bankruptcy proceeding.