Form ADV Part 2A

Savvy Labs Client Brochure

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Item 1 – Cover Page

This brochure (the "Brochure") provides information about the qualifications and business practices of Savvy Labs Inc. ("Savvy Labs"), a registered investment adviser. Registration does not imply any level of skill or training, but only indicates that Savvy Labs has registered its business with the United States Securities and Exchange Commission (the "SEC"). If you have any questions about the contents of this Brochure, please contact us at (888) 401-5517 or hello@savvylabs.com. The information in this Brochure has not been approved or verified by the SEC or by any state securities authority.

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

Item 2 – Material Changes

Since its last filing of its last Form ADV Part 2A brochure, dated December 1, 2025, Savvy Labs has amended its Form ADV Part 2A to reflect updates and changes pertinent to its business. More specifically, Item 4 was updated to reflect (i) the additional offering of a White-Label Service, (ii) a limited scenario in which Savvy Labs may be the Strategy Provider in connection with asset transfers to the Platform, and (iii) other minor updates to more accurately reflect the enhancements in functionality of the Platform as it has been further built out. Item 5 has been updated to address applicable fees in the limited scenario in which Savvy Labs is the Strategy Provider, fees applicable to White-Label Blueprints, and a one-time implementation fee that may be charged to Adviser Users in connection with the White-Label Service. Item 8 has been updated to reflect the differences between Savvy Labs' diligence process for SAVVY Blueprints and White-Label Blueprints. Item 11 has been updated to disclose potential conflicts of interest associated with the limited scenario in which Savvy Labs acts as a Strategy Provider. Items 12 and 15 have been updated to include the names of the third party custodians and third party broker dealers with which Savvy Labs is integrated.

Savvy Labs will update its brochure (i) each year at the time it files its annual updating amendment and (ii) promptly whenever the material within its brochure becomes materially inaccurate. Savvy Labs will plan to either (i) provide its investors with an updated brochure that includes a summary of material changes within 120 days of the end of its fiscal year or (ii) provide each of its clients a summary of material changes that includes an offer to provide a copy of the updated brochure and information on how a client may obtain the brochure, in each case on an annual basis.

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Item 4 – Advisory Business

A. General Description of the Company

Savvy Labs is a corporation organized in the State of Delaware, with its principal office located at 4 World Trade Center, 29th Floor, New York, NY 10007. Savvy Labs was formed in August 2021 and David Mike and Stephen McGuinness are its principal owners. Savvy Labs currently has one subsidiary, Savvy Idea Labs, which is used by the adviser to test the infrastructure underlying and related to the Platform, defined below. As of March 2, 2026, Savvy Labs managed $118,915,059.57.

All employees at Savvy Labs are currently considered to be supervised persons, and they cover material functions such as investment advisory services, business operations, and compliance/risk functions.

B. Types of Advisory Services

This Brochure is meant to help you understand the scope and nature of the advisory services offered by Savvy Labs, whether the advisory services offered by Savvy Labs are right for you, and the potential conflicts of interest associated with Savvy Labs' services. You should review it carefully.

The Platform

Savvy Labs uses proprietary technology (a website and marketplace known as the "Platform") and experienced investment professionals to provide its advisory services to institutional investors, including but not limited to corporations, partnerships, trusts, family offices, foundations ("Institutional Users") and registered investment advisers ("Adviser Users," and together with the Institutional Users, "Users"). Through the Platform's offerings, Users are able to directly own securities that allow for customization of risks, exposures, and strategies provided by a variety of different institutional asset managers, index providers, research firms, brokers, or family offices (hereinafter referred to as "Strategy Providers"). This allows Users to better meet their specific investment objectives in an efficient and cost effective way that may not be possible in traditional pooled investment vehicles and mass-marketed fund products.

Savvy Labs reduces costs and increases transparency for Users through its portfolio management, compliance, operational, and reporting services. Instead of Users opening multiple accounts directly with different Strategy Providers, incurring the expense and time to establish and maintain these accounts, Savvy Labs' Users are able to get the exact investment exposure they want across various asset classes, strategies, and Strategy Providers, all with just one account, requiring one onboarding process through Savvy Labs and its proprietary Platform. Users will be able to access additional functionalities offered through the Platform such as customization of strategies across different accounts.

SAVVY Blueprints

Upon establishing an account on the Platform, Users are able to filter for SAVVY Blueprints that align with their investment objectives and goals. Users are also able to receive investment advice directly through conversations with Savvy Labs' investment professionals who are able to recommend SAVVY Blueprints and customization strategies.

Designed by a Strategy Provider, a SAVVY Blueprint is an investment strategy, which may include certain risk or exposure characteristics, based on a market thesis, along with a corresponding design of implementation. SAVVY Blueprints detail the securities holdings and their respective weightings for purchase needed to achieve the investment objective of the SAVVY Blueprint. Certain SAVVY Blueprints include rules-based methodologies for re-weighting of the composition of securities.

Unlike generic, broad, market-based portfolios or models, specific factors or market conditions may drive Blueprint creations, including but not limited to the shape of the yield curves, fundamental data, economic releases, and other market factors. A SAVVY Blueprint may also contain rules detailing the parameters needed for the thesis to be considered complete or no longer viable or feasible in the market. Savvy Labs investment professionals can help to advise Users with respect to which of these parameters meet a User's investment objectives.

In general, SAVVY Blueprints are dynamic and evolving, and are not based on static or generic, broad, market exposure or allocations. Savvy Labs advises Users through its search functionality and technology tools on its Platform as well as through direct conversations with Users to help Users select and customize a SAVVY Blueprint that best meets the User's investment objectives. Additionally, in order to ensure the recommendations continue to remain suitable, Users will be asked to reaffirm or update investment objectives information regularly or to confirm that there have been no changes in these regards.

Implementation of SAVVY Blueprints

Savvy Labs places orders with designated third-party broker-dealers in order to implement SAVVY Blueprints on behalf of the User, regardless of whether the Blueprints are customized or not. The executed portfolio of positions, known as a "SAVVY," is then held in a separate, segregated account, or unified investment account ("UIA") owned solely by the User. Savvy Labs, as an adviser to the User, uses its proprietary software to continuously manage each User's SAVVYs and UIA. Savvy Labs uses its discretion to manage the intended SAVVY Blueprint's allocation percentages across assets, taking into account any customization(s) selected by the User, and directs the third-party broker-dealer to buy and sell securities in order to keep the SAVVY in line with its User-selected SAVVY Blueprint. All broker-dealers used will have had to go through Savvy Labs' third-party vendor due diligence process and have been approved by the respective Savvy Labs internal risk committee, its Investment Committee. The decision as to which broker dealer the order will be routed to will depend largely on which custodian the User's assets are held with.

Each User will have a unique set of securities in its UIA based on the SAVVY the User owns. A User implementing a SAVVY Blueprint at a given time on a given day may have different weightings and securities than another User implementing at a different time, even if on the same day, as market prices are constantly changing and affecting the required allocation weights. As a result, it is generally expected that no two SAVVYs will contain an identical set of underlying securities and weightings or achieve the same performance, unless two Users instruct Savvy Labs to implement the same SAVVY Blueprint at the exact same time, in the exact same amount, and without customization.

Strategy Provider Vetting Advisory Services

Savvy Labs performs due diligence on each prospective Strategy Provider by reviewing various aspects of the Strategy Provider's business which may include, the Strategy Provider's licensing, credentials, and market standing and assessing the Strategy Provider's area of expertise, historical risk/return characteristics, assets under management or advisement, years of business, reputation in the industry, or, where applicable, regulatory history. In addition, Savvy Labs assesses a Strategy Provider's business operations for operational risk and screens for negative news regarding the Strategy Provider.

Once Savvy Labs has vetted a Strategy Provider and found the Strategy Provider to be an acceptable participant on the Platform, the Strategy Provider will be able to propose SAVVY Blueprints and certain supplemental content to Savvy Labs for publication on the Platform. Strategy Provider- provided supplemental content includes but is not limited to commentaries on the Strategy Provider's SAVVY Blueprints and their underlying strategy, general commentary on markets, the economy, historical performance and biographical information about the relevant personnel at the Strategy Provider ("Strategy Provider Content"). The Strategy Provider can do this either by directly sending its Strategy Provider Content to the Platform, or can also upload it directly to the Platform for further review and processing before it is made available to the Users. The Strategy Provider may also access additional Strategy Provider tools on the Platform which allow it to analyze data and enable it to provide strategies onto the Platform.

A Strategy Provider will provide SAVVY Blueprints and Strategy Provider Content pursuant to a contractual arrangement between Savvy Labs and the Strategy Provider. Strategy Providers and their individual employees will not, based on the aforementioned contracts, become employees of Savvy Labs.

Because Savvy Labs, rather than the Strategy Providers, acts as an adviser to the Users with respect to content made available to the Users through the Platform, and because Users will not establish an advisory or contractual relationship with Strategy Providers solely by virtue of Users' usage of SAVVY Blueprints and consumption of Strategy Provider Content through the Platform, SAVVY Blueprints and Strategy Provider Content will contain prominent disclosures explaining that: (i) the creation and publication of a SAVVY Blueprint or piece of Strategy Provider Content does not establish an investment adviser relationship between a User and the Strategy Provider that devised the SAVVY Blueprint or Strategy Provider Content and (ii) as published in the first instance, the SAVVY Blueprint

or Strategy Provider Content does not constitute investment advice and has not been tailored by a Strategy Provider to the needs or preferences of any User. Each SAVVY Blueprint will also contain a disclosure explaining that the Strategy Provider makes no statement, representation or recommendation to any User regarding the likely success of any SAVVY Blueprint or the suitability of such SAVVY Blueprint for any particular User. The foregoing disclosures apply to SAVVY Blueprints published on the standard Platform and do not apply to White-Label Blueprints. (See "White-Label Service" below).

Savvy Labs will continue to monitor Strategy Providers throughout the relationship to ensure they remain suitable Platform participants.

Savvy Labs as Strategy Provider (Transitional Blueprints)

In limited circumstances, Savvy Labs may itself act as a Strategy Provider when a User is transferring existing assets from another financial institution (such as another registered investment adviser or custodian) to the Platform. In these situations, Savvy Labs will create a transitional SAVVY Blueprint or Blueprints (each, a "Transitional Blueprint") designed to reflect the User's existing investment objectives for purposes of ongoing monitoring and portfolio management on the Platform. These Transitional Blueprints will only be made available to specific User(s) whose existing assets are being transferred to the Platform and are not generally made available to other Users on the Platform for ongoing investment. As the Strategy Provider of the Transitional Blueprint, Savvy Labs has an economic interest in designing and providing such Transitional Blueprints in these limited circumstances. However, Transitional Blueprints are created solely to facilitate continuity of the User's existing investment objectives and asset allocations in connection with an asset transfer and are not intended as a permanent strategy offering. (See Item 11, "Code of Ethics, Participation or Interest in Client Transactions and Personal Trading" for additional information regarding this conflict).

SAVVY Blueprint Advisory Services

Prior to publication of a particular SAVVY Blueprint to the Platform, Savvy Labs reviews the SAVVY Blueprint to confirm that the SAVVY Blueprint does not materially conflict with the description provided by its Strategy Provider. During the review process, Savvy Labs assesses certain data points and submits each SAVVY Blueprint to the Savvy Labs Investment Committee for final approval. If approved, Savvy Labs will include the SAVVY Blueprint on the Platform. Thereafter, Savvy Labs may recommend the SAVVY Blueprint to certain Users based on Savvy Labs' interactions with and information received from Users about the type of risks, exposures, or strategies that the Users wish to implement to meet their investment objectives. Savvy Labs also conducts due diligence prior to posting additional Strategy Provider Content on the Platform and will not publish the Strategy Provider Content if it is deemed inaccurate or misleading. All published SAVVY Blueprints continue to be reviewed on an ongoing basis to confirm that they continue to stay materially consistent with Strategy Provider's strategy description and remain as viable investment options in light of changing market conditions. In the event a SAVVY Blueprint is no longer a viable means of pursuing an investment thesis (as determined by the Strategy Provider),

Savvy Labs will remove the SAVVY Blueprint from the Platform and will advise existing investors with SAVVYs that track the removed SAVVY Blueprint so they may decide whether they would like to reallocate their investments. The foregoing review and Investment Committee approval process applies to SAVVY Blueprints published on the standard Platform. Savvy Labs does not conduct this review process for White-Label Blueprints. (See "White-Label Service" below for further information regarding the limited review applicable to White-Label Blueprints.)

SAVVY Investment Management Advisory Services

Once a SAVVY Blueprint is implemented by Savvy Labs, that investment portfolio becomes known as a ("SAVVY"). All underlying securities in that SAVVY are held directly by the User, in a separate and segregated UIA. A User may hold one or multiple SAVVYs in their UIA.

Savvy Labs provides continuous and regular supervisory and management services over its Users' SAVVYs and the securities in the Users' UIAs. In connection with these services, Savvy Labs uses its proprietary technology to assess whether the proportional allocation of the securities within a User's UIA continues to be in line with the allocations set forth in a User's chosen SAVVY Blueprint. In the event it is not, Savvy Labs will have the discretion to manage a User's portfolio by directing the purchase and sale of securities to bring a SAVVY in line with the investment allocation strategy established by a SAVVY Blueprint and, ultimately, a User's investment objectives.

Although Savvy Labs provides continuous supervisory and management services over all current portfolios in Users' accounts, Users who invest in the same SAVVY Blueprint are not expected to have the same returns or results due to a variety of reasons including the timing of initial investment and other customization considerations. As the market moves, the weightings of each of the underlying securities for the Savvy Blueprint will shift, and, therefore, the subsequent managing activity conducted by Savvy Labs will also vary between different Users' accounts.

White-Label Service

Certain Adviser Users may also engage Savvy Labs to license a white-label version of the Platform (the "White-Label Platform") to be operated by the Adviser User for use with its own end clients (the "White-Label Service"). Persons and entities that access the Adviser User's White-Label Platform are referred to collectively as "White-Label Users," comprising (a) the Adviser User's own advisory clients ("White-Label Client Users") and (b) the Adviser User's internal authorized employees or agents ("White-Label Employee Users"). For purposes of this Brochure, White-Label Users are not "Users" of Savvy Labs or the Platform. The Adviser User remains the adviser of record to its end clients (who are not clients of Savvy Labs), and Savvy Labs acts as a sub-adviser pursuant to its agreement with the Adviser User for the White-Label Service. Savvy Labs does not provide support services directly to or communicate or otherwise interact directly with the Adviser User's end clients.

In the White-Label Service, the Adviser User can design one or more investment strategies to be used in the White-Label Platform, which may include certain risk or exposure characteristics, based on a market thesis, along with a corresponding design of implementation (each a "White-Label Blueprint"). White-Label Users will generally have access to the Adviser User's White-Label Blueprints. An Adviser User may also request that Savvy Labs make SAVVY Blueprints available on the White-Label Platform, in which case such a request must be made directly with Savvy Labs. Any such SAVVY Blueprints made available on the White-Label Platform will have undergone Savvy Labs' standard review and approval process. If an Adviser User separately onboards as a Strategy Provider on the standard Platform, any strategies it publishes on the standard Platform would be SAVVY Blueprints subject to Savvy Labs' standard vetting, review, and Investment Committee approval process. For White-Label Blueprints, Savvy Labs will perform a more limited operational and compliance review to confirm that a White-Label Blueprint is compatible with the Platform's systems, tradability and implementation requirements, and other controls, and to verify that the content does not materially conflict with the Adviser User's description of the strategy. This limited review does not constitute an endorsement of the investment merits or expected performance of any White-Label Blueprint. The Adviser User is solely responsible for the investment thesis, suitability determinations, strategy selection, and client communications with respect to its end clients and White-Label Blueprints.

Summary of Savvy Labs Advisory Services:

- **Vetting of Strategy Providers**: Savvy Labs conducts a due diligence review of each potential Strategy Provider, including to ensure that it has the proper licensing, credentials, and market standing and is well suited to publish materials on the Platform. For example, Savvy Labs reviews a potential Strategy Provider's assets under management and performance history, among other data points, and screens for negative news regarding the potential Strategy Provider to ensure that the Strategy Providers who are permitted to craft and publish SAVVY Blueprints and Strategy Provider Content on the Platform are appropriate and sound. Only potential Strategy Providers who have been reviewed and approved by Savvy Labs will be allowed to publish to the Platform, and unsatisfactory potential Strategy Providers will not be granted access. Onboarded Strategy Providers are also continuously monitored to ensure that they remain appropriate for the Platform.

- **Due Diligence of SAVVY Blueprints and Strategy Provider Content**: Savvy Labs will review and vet all received SAVVY Blueprint and Strategy Provider Content using Savvy Labs' due diligence and approval process. During this process, Savvy Labs reviews a range of information, with considerations including but not limited to, whether the proposed security allocations of the Blueprints are reflective of the Blueprint strategy and Strategy Provider Content or whether there are securities proposed which Savvy Labs has restricted for trading due to regulatory purposes, etc. Savvy Labs endeavors to ensure that each proposed SAVVY Blueprint is materially consistent with the Strategy Provider's investment thesis description

and reasonable in structure for recommendation to Platform Users. Savvy Labs submits each SAVVY Blueprint to the Savvy Labs Investment Committee for final approval. The foregoing review, vetting, and approval process applies to SAVVY Blueprints and Strategy Provider Content published on the standard Platform and does not apply to White-Label Blueprints.

- **Individualized Recommendations to Users**: Based on information received from a User, including through the use of investment objective-related filters and from conversations between Users and Savvy Labs' investment professionals, Savvy Labs' proprietary technology will provide individualized recommendations to Users. These recommendations will comprise a curated list of SAVVY Blueprints that may fit the User's investment goals and objectives. Savvy Labs investment professionals are also available to provide recommendations with respect to SAVVY Blueprints that suit a User's investment objectives and goals. A User is able to have further conversations with Savvy Labs directly to discuss strategies, recommendations, or customizations of SAVVY Blueprints. Once a SAVVY Blueprint has been selected and customized if necessary, Savvy Labs will implement the SAVVY Blueprint by directing a broker-dealer to purchase the underlying securities. In order to ensure the recommendations continue to remain suitable, Users will be asked to update their identified investment objectives regularly or confirm that there have been no changes in these regards.

- **Ongoing portfolio management services**: Savvy Labs' proprietary technology allows for the continuous and efficient management and monitoring of each portfolio. When Savvy Labs identifies that a SAVVY has departed from allocation parameters established by a SAVVY Blueprint, Savvy Labs will purchase and sell the securities and assets using approved third-party broker-dealers to bring the SAVVY back in-line.

- **White-Label Service:** Certain Adviser Users may engage Savvy Labs to license a white-label version of the Platform through which the Adviser User delivers its proprietary investment strategies (White-Label Blueprints) to its end clients. White-Label Blueprints are not SAVVY Blueprints and are subject to different parameters. (See "White-Label Service" above for further information)..

Additional Services

Savvy Labs is in the process of developing potential additional business lines and will amend this Brochure with a description of such additional services as appropriate. Any material changes to the information contained herein will be provided in an updated Brochure, which will be filed with the SEC.

Savvy Labs does not provide financial planning services or tax advice to Users.

Item 5 – Fees and Compensation

Users pay three types of fees to Savvy Labs (each a "User Fee") in connection with use of the Platform and investments in SAVVYs. The types of User Fees are: 1) a Platform Fee, 2) a SAVVY Fee, and 3) a Customization Fee. In addition, Strategy Providers will pay Savvy Labs a fee for hosting SAVVY Blueprints on the Platform ("Blueprint Fee").

Platform Fee
Savvy Labs charges Users a Platform Fee in exchange for access to the Platform. This fee will also cover maintenance and operation expenses of the Platform. Platform fees will be negotiated between Users and Savvy Labs and will typically range from 0.02% to 0.25% per annum, based on the value of the assets held in the UIA or accounts on which Savvy Labs provides investment advisory services, and may vary based on the composition of a User's SAVVYs, the asset classes held in custody, or other related factors. Platform Fees are subject to a quarterly minimum of $250, and Savvy Labs retains the right to waive this fee.

SAVVY Fee
Savvy Labs charges Users a SAVVY Fee for the implementation of a SAVVY Blueprint, in addition to other advisory services provided by Savvy Labs to the User, such as investment recommendations, ongoing monitoring and portfolio management of a UIA and its SAVVYs on a User's behalf. Savvy Labs will administer a User's UIA, which includes services such as the arrangement of custodial, reporting and tax services, and the provision of line-by-line transparency of the portfolios in the User's account. The SAVVY Fee typically ranges from 0.05% to 2.50% per annum and will be calculated on the value of the assets held in the UIA in respect of a particular SAVVY. In addition, the SAVVY Fee will vary between SAVVYs based on the Strategy Provider Content, the underlying asset classes or securities, and the type or complexity of the SAVVY Blueprint which would ultimately drive the level of effort and proprietary technology solutions needed to create and maintain the SAVVY Blueprint. Part of the SAVVY Fee collected by Savvy Labs will be provided to the respective Strategy Provider for their creation of the SAVVY Blueprints, which may offset their Blueprint Fee, as defined and discussed further below. The amount of the SAVVY Fee paid to the Strategy Provider for SAVVY Blueprint creations will depend on various factors such as the complexity of the SAVVY Blueprints.

Savvy Labs charges a SAVVY Fee in connection with the implementation and ongoing management of White-Label Blueprints on a White-Label Platform, reflecting the substantially similar implementation, integration, portfolio management, and technology services that Savvy Labs performs for White-Label Blueprints as it does for SAVVY Blueprints on the standard Platform. However, because the Adviser User (not a third-party Strategy Provider) designs the White-Label Blueprint, no portion of the SAVVY Fee is shared with or paid to the Adviser User, and the Blueprint Fee does not apply to White-Label Blueprints. As a result, the total fee structure for a White-Label Blueprint will differ from the total fee structure for a SAVVY Blueprint created by a third-party Strategy Provider. The specific SAVVY Fee applicable to White-Label Blueprints is negotiated

between Savvy Labs and the Adviser User pursuant to their White-Label Service agreement. To the extent a SAVVY Blueprint is included on a White-Label Platform, the SAVVY Fee will incorporate the fee structure applicable to SAVVY Blueprints discussed above. (See "White-Label Service" under Item 4 for further information regarding White-Label Blueprints).

In limited situations, Savvy Labs may itself act as the Strategy Provider when a User is transferring existing assets from another financial institution (such as another registered investment adviser or a custodian) to the Platform. In these situations, Savvy Labs will create a Transitional Blueprint made available only to the transferring User. As Savvy Labs is the Strategy Provider of such Transitional Blueprints, the User will not be charged the portion of the SAVVY Fee that would otherwise be paid to a third-party Strategy Provider, and such Users will only pay the Savvy Labs portion of the SAVVY Fee and applicable Platform Fees and Customization Fees, if any, with respect to a Transitional Blueprint. As a result, the total fee charged to the User in a Transitional Blueprint is expected to be lower than the total fee that would be charged if a third-party Strategy Provider had designed the strategy. (See Item 11 for additional information regarding the conflict of interest associated with this arrangement).

Customization Fee
Savvy Labs charges Users a Customization Fee for alterations to a SAVVY Blueprint. The Customization Fee ranges from 0.05% to 0.15%, on an annualized basis, based on the value of the assets for each corresponding customized SAVVY Blueprint, held in the UIA. The Customization Fees charged to various Users will vary based on the complexity and level of customization made to the SAVVY Blueprint, as determined in accordance with the Users' specifications that are communicated to Savvy Labs. Savvy Labs retains the right to waive the Customization Fee at its sole discretion.

Blueprint Fee
Savvy Labs charges Strategy Providers an administrative and onboarding fee for each SAVVY Blueprint the Strategy Provider develops and is maintained by the Platform (together, the "Blueprint Fee"). The initial onboarding fee is a flat fee which may range between $500 to $10,000 per SAVVY Blueprint. In addition, each Strategy Provider will pay an ongoing administrative maintenance fee of $1,000 per month for each blueprint maintained on the Platform. Savvy Labs reserves the right to waive the Blueprint Fee (in whole or in part) at its sole discretion. In the event that the Blueprint Fee has been waived, this will be disclosed on the Platform, along with any potential conflicts of interests. Additional information regarding the treatment of conflicts of interest is included below. (See Item 11, "Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.")

White-Label Implementation Fee
In connection with certain White-Label Service arrangements, Savvy Labs may charge the

applicable Adviser User a one-time implementation fee to cover integration, configuration, branding, reporting, and related platform buildout or enablement work (the "White-Label Implementation Fee"). The White-Label Implementation Fee is separately negotiated based on the scope and complexity of the requested implementation and is billed directly to the Adviser User. Unless otherwise disclosed and agreed, the White-Label Implementation Fee is not charged to or deducted from the Adviser User's end client accounts.

Fee Calculation
Savvy Labs uses an average daily balance calculation to calculate the Platform Fee, SAVVY Fee and the Customization Fee on a daily basis.

Fee Processing
Unless otherwise agreed, to facilitate the collection of fees, Users are required to maintain a "fee reserve" cash position in their account that is not less than one (1) percent of the assets in the User's account. If the User's account holds in cash less than one (1) percent of the assets in the User's account, Savvy Labs may rebalance the User's account to ensure that the required minimum balance in the cash reserve is met. Savvy Labs sends an invoice to the Users' UIA custodian and each custodian may have different procedures but will typically earmark the UIA directly and generally remit payment to Savvy Labs automatically on a monthly basis. More specifically, fees are earmarked within the "fee reserve" portion of the UIA. There may be certain scenarios where the clients will request for Savvy Labs to invoice them for the fee payment and they will pay Savvy Labs directly. These requests will need to be approved by Savvy Labs.

Wrap Fees
Savvy Labs does not participate in wrap fee programs or charge its customers wrap fees.

Additional Fees
The User Fees are not inclusive of all fees charged to a UIA. The following list provides additional fees or expenses which may be charged and administered by third parties ("Additional Fees"). Additional Fees are not charged by Savvy Labs, but may be charged to Savvy Labs by the third party, for further collection from the User. It is important to note that there may be differences in the fees charged by different third parties. The Additional Fees may include:

- Brokerage commissions
- Stock loan fees
- Interest charges
- Transaction fees
- Exchange fees
- SEC fees
- Advisory fees charged by Adviser Users to their clients
- Advisory fees, management fees, or administrative fees charged by mutual funds or exchange traded funds ("ETFs")
- Early redemption fees and penalties

- Custodial fees
- Deferred sales charges
- Transfer fees, including wire fees and electronic fund processing fees
- Taxes
- Markups or markdowns on security transactions
- Processing fees and other fees charged by custodians
- Other additional fees that are to be incurred

Any material changes to this information will be provided in an updated Brochure which will be filed with the SEC.

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

Savvy Labs and its supervised persons do not charge performance-based fees.

Item 7 – Types of Clients

As indicated above, Savvy Labs' clients will include Institutional Users and Adviser Users. Each group of clients is discussed in greater detail below.

As a general matter, each User must initially invest a minimum of $50,000 to open an account with Savvy Labs. This minimum can be waived by Savvy Labs in limited cases, such as when a User has multiple SAVVYs, in which case Savvy Labs may decide to lower or waive the minimum to accommodate cross-SAVVY allocations. Any waiving or lowering of this minimum will need to follow the predetermined fee schedule which will be applied to all Users.

It is important to note that while Users may decide to terminate their relationship with Savvy Labs in accordance with the terms of their agreements with SAVVY Labs, there may be certain situations in which Savvy Labs will initiate account closures for User accounts. This would generally be due to regulatory or compliance concerns. Savvy Labs may also be notified by a regulator to freeze, suspend, or close an account.

Client interactions with Savvy Labs can occur directly through the Platform, via email, verbally, or in person. All information collected from and about Clients will be maintained confidentially, with strict controls in place. Policies, such as the Savvy Labs Privacy Policy, which can be found on Savvy Labs' website, and Savvy Labs' internal Client Confidentiality Policy, Written Communications Policy, and Code of Ethics, as well as email surveillance and training, ensure that Savvy Labs' employees and contractors are all complying with this requirement.

Savvy Labs' discretionary investment authority relates to buying, selling and managing the allocation of securities within a User's SAVVYs. All Users are offered the same services and will have the same set of SAVVY Blueprints made available to them. White-Label Users may have access to the Adviser User's White-Label Blueprints and, if requested by the Adviser User, certain SAVVY Blueprints (see "White-Label Service" under Item 4). Recommendations with respect to SAVVY Blueprints will be determined based on the information a User inputs into the search tool.

Savvy Labs' Advisory Clients

Institutional Users
Institutional Users are sophisticated institutional investors such as corporations, partnerships, trusts, family offices, foundations, etc. Institutional Users identify, select and customize SAVVY Blueprints that meet specific criteria relating to their own investment objectives.

Adviser Users
Adviser Users are other registered investment advisers who are investing in SAVVY Blueprints on behalf of their own end clients. Adviser Users identify, select and customize

SAVVY Blueprints that meet specific criteria relating to the investment objectives as determined by the Adviser User on behalf of its clients. An Adviser User may manage many UIAs on behalf of its clients and will need to select and customize, as necessary, SAVVY Blueprints which are appropriate for its clients. Each Adviser User will search for SAVVY Blueprints based on its clients' investment objectives and goals.

End clients of an Adviser User investing through White-Label Blueprints are also not clients of Savvy Labs. The Adviser User is solely responsible for the selection and suitability determination of White-Label Blueprints deployed through a White-Label Platform (see the "White-Label Service" section in Item 4 for further information).

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

A. Methods of Analysis and Investment Strategies

Savvy Labs recommends to its Users SAVVY Blueprints that represent a large variety of investment strategies involving a variety of asset classes. These SAVVY Blueprints are formulated and submitted to the Platform by Strategy Providers.

Savvy Labs performs due diligence on prospective Strategy Providers by reviewing various aspects of their business, including, but not limited to, a Strategy Provider's area of expertise, historical risk/return characteristics, assets under management or advisement, years of business reputation in the industry, and, where applicable, regulatory history. In addition, Savvy Labs will assess a Strategy Provider's business operations for operational risk. (See Item 4, "Advisory Business.")

Prior to publication of a particular SAVVY Blueprint to the Platform, Savvy Labs will perform due diligence on the SAVVY Blueprint to confirm that the SAVVY Blueprint does not materially conflict with the investment thesis described by the Strategy Provider and seems reasonably likely to meet the investment objectives set forth by the Strategy Provider. During the diligence process, Savvy Labs will assess key statistical metrics and data points and submit each SAVVY Blueprint to the Savvy Labs Investment Committee for final approval. Given that each SAVVY Blueprint takes various factors into consideration, such as the shape of the yield curve, fundamental data, economic releases, and other factors to determine how a strategy, risk, or exposure is expected to evolve over time, each due diligence review may involve the assessment of different data points, although the overall objective due diligence standards will remain the same. The foregoing due diligence and Investment Committee approval process applies to SAVVY Blueprints and does not apply to White-Label Blueprints (see the "White-Label Service" section in Item 4 for further information).

Prior to recommending a SAVVY Blueprint to a User, Savvy Labs will assess each SAVVY Blueprint to determine its investment category and strategy. Recommendations to Users will be based on the search criteria that the Users input into the Platform, which enables the recommendations to be responsive to Users' investment objectives. Users' specifications around investment goals and objectives are captured both through their onboarding application, which Users will be prompted regularly to update and make current, and also through the search functionality on the platform by selecting the relevant filters for their investment goals. Recommendations and advice will be provided directly from the Platform, and can also be discussed in direct communication between the Users and Savvy Labs' experienced investment professionals. (See Item 4, "Advisory Business.")

Savvy Labs provides its Users investment recommendations regarding suitable SAVVY Blueprints. Once a User has selected a SAVVY Blueprint and identified any customizations needed, Savvy Labs will direct the purchase of securities in order to implement the selected strategy through a third-party broker-dealer. Once the securities are included in a User's

UIA, Savvy Labs will provide ongoing portfolio monitoring and will adjust the securities within a User's UIA on a discretionary basis to align the UIA with the strategy established by a SAVVY Blueprint. Savvy Labs will recommend new SAVVY Blueprints to Users based on a review of any changes in their investment objectives.

Additionally, through the Platform, Savvy Labs provides Users with various content and tools necessary to analyze SAVVY Blueprints in deciding whether to follow the Savvy Labs recommendation (such as Strategy Provider Content), as well as analytical data on the implemented SAVVYs, allowing Users to more easily access their investment position information across one or more SAVVYs implemented in one or more UIAs, with one or more custodians ("Approved Custodians"). This level of information transparency allows Users timely access to updated information about the positions of their investments made through Savvy Labs.

B. Material Risks

Savvy Labs cannot guarantee any level of performance or that any User will avoid a loss of assets when investing capital in a SAVVY. To the extent a User requests customization of a SAVVY Blueprint that includes different securities or a different degree of exposure than recommended by Savvy Labs, the User understands and agrees that such investments may be inconsistent with the User's preferred SAVVY Blueprint and Savvy Labs' recommendations as they relate to the User's investment goals and objectives. If the User does not provide sufficient, timely or accurate information to Savvy Labs, or if the User chooses not to follow Savvy Labs' recommendations and advice, the User's investments may not perform in accordance with the User's present investment objectives.

An investment in a SAVVY involves substantial risks, including, but not limited to, those described herein. There can be no assurance that a SAVVY will achieve an associated SAVVY Blueprint's investment objective or that there will be any return of capital, and investment results may vary substantially on a monthly, quarterly or annual basis. **Any investment in securities, including those contained within a SAVVY, involves the possibility of financial loss that a User should be prepared to bear.**

Prospective investors should consider carefully, among other factors, the risks described below. Such risk factors are not meant to be an exhaustive listing of all potential risks associated with an investment in a SAVVY on the Platform. Additional risks and uncertainties that we are unaware of, or deem immaterial, may also become important factors that adversely impact Savvy Labs' business or User investments.

General Market Risks. All securities investments, including investments in securities reflected in a SAVVY, present a risk of loss of capital. Volatile financial markets increase that risk. Market declines, such as a recession or other prolonged downturns in investment markets, may adversely affect Users' investment performance.

Investment Advice Risk. Savvy Labs does not guarantee the results of any investment advice given to clients. All investing involves risk, and Savvy Labs makes no assurances that the

investment objectives of any offered SAVVY Blueprint will be achieved. Although SAVVY Blueprints and associated SAVVYs offer diversified portfolio strategies, there is no guarantee that any particular asset allocation or mix of investments will provide a specified return or meet Users' investment objectives. Furthermore, Savvy Labs bases its investment advice on information self-reported by clients. As such, Savvy Labs' services are highly dependent on receiving accurate information from clients, and Savvy Labs does not independently verify the accuracy or completeness of client-provided information on the client's investment objectives and goals. If clients provide Savvy Labs with inaccurate information or fail to promptly update information provided to Savvy Labs when it changes, the quality of Savvy Labs' advisory services and the applicability of Savvy Labs' recommendations to a User's present circumstances could be adversely impacted.

Investment Performance Risk. If a Strategy Provider's evaluation of an investment opportunity should prove incorrect, the investment could experience losses as a result of a decline in the market value of securities in which the SAVVY Blueprint directs a long position or an increase in the value of securities in which the SAVVY Blueprint directs a short position. SAVVY Blueprints may call for such investment techniques as margin transactions and short sales, and will use leverage, which practices can involve substantial volatility and can, in certain circumstances, substantially increase the adverse impact to which the investment may be subject. The risk management techniques that may be contemplated by a SAVVY Blueprint do not provide any assurance that the related investments will not be exposed to a risk of significant investment losses. No guarantee or representation is made that a SAVVY or SAVVY Blueprint will be successful or achieve its targeted returns, or that there will be any return to Users of capital invested in a SAVVY. In addition, investment results may vary substantially over time.

Investment Judgment. The profitability of a SAVVY Blueprint depends to a great extent upon correctly assessing the future course of the price movements of securities and other investments as well as the timing of the investments. There can be no assurance that a Strategy Provider will be able to predict these price movements accurately. It is possible that different Users who invest in the same SAVVY Blueprint, even without any customization, may achieve different financial results, based on a difference in the timing of investments made. Because Strategy Providers may have different strategies for how to achieve a particular investment thesis, Users who allocate assets to different Savvy Blueprints, based on Savvy Labs' recommendations, may have different performance results. In each instance, the investment recommendation will relate to a SAVVY Blueprint that underwent Savvy Labs' due diligence process and that Savvy Labs has reviewed for material consistency with the Strategy Provider's described investment thesis. The foregoing due diligence process does not apply to White-Label Blueprints (see the "White-Label Service" section in Item 4 for further information).

Software Risk. Savvy Labs delivers its services primarily through software. Consequently, Savvy Labs rigorously designs, develops and tests its software extensively before putting such software into production with actual client accounts and assets and periodically monitors the behaviors of such software after its deployment. Notwithstanding this rigorous design, development, testing and monitoring, it is possible that such software may not

always perform exactly as intended, especially in certain combinations of unusual circumstances. For example, there may be occasions where User UIAs may not be realigned to the initial target allocation for extended periods of time, due to certain errors in the deployment of the software. Savvy Labs continuously strives to monitor, detect and correct any software that does not perform as expected or as disclosed.

Cybersecurity Risks. With the increased use of technologies such as the internet and the dependence on computer systems to perform necessary business functions, investment platforms such as the Platform and its service providers may be prone to operational and information security risks resulting from cyberattacks. In general, cyberattacks result from deliberate attacks, but unintentional events may have effects similar to those caused by cyberattacks. Cyberattacks include, among other behaviors, stealing or corrupting data maintained online or digitally, denial-of-service attacks on websites, the unauthorized release of confidential information and causing operational disruption. Successful cyberattacks against, or security breakdowns of, a User's UIA, a Strategy Provider, Savvy Labs, or other third-party service providers may adversely impact the securities in a User's UIA.

Equity Securities. A SAVVY Blueprint may direct investments in equity and equity-related securities, including, without limitation, equity investments acquired in connection with restructured debt securities or instruments, or in connection with reorganizations and/or restructurings of debt securities, equity securities or other obligations and assets of undervalued, operationally challenged and/or financially troubled companies or institutions. A risk of investing in a SAVVY is that equity securities directed by the SAVVY may decline in value. Equity securities fluctuate in value in response to many factors, including the activities and financial condition of individual companies, the business market in which individual companies compete, industry market conditions, interest rates and general economic environments.

Fixed-Income Investments. A SAVVY Blueprint may direct investments in fixed-income financial instruments. The value of fixed-income financial instruments will change as the general levels of volatility and interest rates fluctuate. When interest rates decline, the value of fixed-income financial instruments can be expected to rise. Conversely, when interest rates rise, the value of such financial instruments can be expected to decline. To the extent that interest rates move in a direction contrary to the direction anticipated by the Adviser, the overall investment performance of a SAVVY Blueprint may be affected.

Fixed income securities are subject to various other risks, including shifts in interest rates, credit quality changes, market valuations, liquidity constraints, prepayments, early redemptions, corporate actions, tax implications, and other economic conditions. Additionally, certain Treasuries may have lower liquidity compared to other investments.

The corporate and municipal bond markets are also subject to various market forces that may impact the value of fixed-income securities. Interest rate fluctuations can cause bond prices to decline, with longer-duration bonds being more sensitive to rate changes. Credit risk may arise if an issuer experiences financial difficulties, potentially leading to default or

credit rating downgrades. Liquidity risk may affect the ability to sell bonds at a desirable price, particularly in periods of market stress. Additionally, economic, regulatory, and geopolitical developments may impact specific issuers, sectors, or the broader bond market.

Derivative Instruments. A SAVVY Blueprint may potentially call for the utilization of leverage via the use of instruments such as options and other derivative instruments. The value of a derivative depends largely upon price movements in the underlying asset; hence many of the risks applicable to trading the underlying asset are also applicable to the derivatives of such an asset. In addition, there are a number of other risks associated with derivatives trading, such as increased exposure for the SAVVY, exposure to liquidity risks and counterparty risks. A SAVVY Blueprint may direct investments in options, which can provide a greater potential for profit or loss than an equivalent investment in the underlying asset and may involve different risks than investing directly in the underlying asset.

Futures Contracts. The value of futures depends upon the price of the instruments, such as commodities, underlying them. Futures contracts may be called for by a SAVVY Blueprint to manage currency and general market risk. The prices of futures contracts are highly volatile, and price movements of futures contracts can be influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, as well as national and international political and economic events and policies. In addition, investments in futures contracts are also subject to the risk of the failure of any of the exchanges on which a SAVVY's positions trade or of its clearinghouses or counterparties. Futures positions may be illiquid because certain exchanges limit fluctuations in certain futures contract prices during a single day by regulations referred to as "daily price fluctuation limits" or "daily limits." Under such daily limits, during a single trading day, no trades may be executed at prices beyond the daily limits. Once the price of a particular futures contract has increased or decreased by an amount equal to the daily limit, positions in that contract can neither be taken nor liquidated unless traders are willing to effect trades at or within the limit. This could prevent Savvy Labs from promptly liquidating unfavorable positions in a User's SAVVY and subject the User to substantial losses or prevent Savvy Labs from entering into desired trades on the User's behalf. In extraordinary circumstances, a futures exchange could suspend trading in a particular futures contract, or order liquidation or settlement of all open positions in such a contract.

Forward Trading. Forward contracts and options thereon, unlike futures contracts, are not traded on exchanges and are not standardized; rather, banks and dealers act as principals in these markets, negotiating each transaction on an individual basis. Forward and "cash" trading is substantially unregulated; there is no limitation on daily price movements and speculative position limits are not applicable. For example, there are no requirements with respect to record-keeping, financial responsibility or segregation of customer funds or positions.

In contrast to exchange-traded futures contracts, interbank traded instruments rely on the dealer or counterparty being contracted with to fulfill its contract. As a result, trading in interbank foreign exchange contracts may be subject to more risks than futures or options

trading on regulated exchanges, including, but not limited to, the risk of default due to the failure of a counterparty with which a User has a forward contract. Failure by a counterparty to fulfill its contractual obligation could expose a User to unanticipated losses. The principals who deal in the forward markets are not required to continue to make markets in the currencies or commodities they trade, and these markets can experience periods of illiquidity, sometimes of significant duration. There have been periods during which certain participants in these markets have refused to quote prices for certain currencies or commodities or have quoted prices with unusually wide spreads between the prices at which they were prepared to buy and those at which they were prepared to sell. Disruptions can occur in forward markets due to unusually high trading volume, political intervention or other factors. The imposition of controls by governmental authorities might also limit such forward (and futures) trading to a lower volume than that which a SAVVY Blueprint would otherwise recommend, to the possible detriment of a User. Market illiquidity or disruption could result in significant losses to a User.

Diversification Risk. A SAVVY may contain a limited number of positions (both long and short) at any given time. As a result of such lack of diversification, a significant loss in any one position may have a material adverse effect on the net asset value of the SAVVY and the SAVVY's rate of return. A SAVVY investment portfolio may become concentrated in one industry, sector, strategy, country or geographic region, and such concentration of risk may increase the losses suffered by the SAVVY. It could also become concentrated in a limited number or types of financial instruments, which could expose the SAVVY to losses disproportionate to market movements in general if there are disproportionately greater adverse price movements in those financial instruments.

Hedging. A SAVVY Blueprint may include a strategy for engaging in hedging. This would require Savvy Labs to engage in a variety of hedging transactions on a User's behalf, including those with derivatives, inverse ETFs, options and swaps. Hedges can be more difficult to implement than many other types of transactions, and the possibilities for errors may be greater than for other transactions. Additionally, there is no guarantee that these hedging transactions will prevent losses to a User. The success of a SAVVY Blueprint's hedging strategy will be subject to the Strategy Provider's ability to correctly assess the degree of correlation between the performance of the instruments used in the hedging strategy and the performance of the investments in the portfolio being hedged. Since the characteristics of many securities change as markets change or time passes, the success of a SAVVY Blueprint's hedging strategy will also be subject to Savvy Labs' ability to continually recalculate, readjust and execute hedges in an efficient and timely manner. In addition, hedging transactions may result in poorer overall performance for a User than if no such hedging transactions were executed. Moreover, Savvy Labs may determine not to hedge against, or may not anticipate, certain risks. Finally, a SAVVY Blueprint may expose an investor to certain risks that cannot be hedged, such as credit risk (relating both to particular investments and counterparties).

Short Sales. Short selling involves selling securities that may or may not be owned and borrowing the same securities for delivery to the purchaser, with an obligation to replace the borrowed securities at a later date. Short selling allows the investor to profit from a

decline in market prices to the extent such decline exceeds the transaction costs and the costs of borrowing the securities. However, since the borrowed securities must be replaced by purchases at market prices in order to close out the short position, any appreciation in the price of the borrowed securities would result in a loss. A short sale involves the risk of a theoretically unlimited increase in the market price of the security. Purchasing securities to close out the short position can itself cause the price of the securities to rise further, thereby exacerbating the loss. As a SAVVY Blueprint may call for Savvy Labs to utilize borrowed money with respect to a User's account as part of its strategy, the User also could be forced to close out a short sale prematurely as a result of an increase in margin requirements, coupled with an inability to provide the required additional margin on short notice. In addition, short sellers are subject to the risk of a "short squeeze." A short squeeze is a situation in which the short seller is prematurely forced out of a short position. The lender of a security used to cover a short generally has the right to demand the return of the security that has been loaned at any time. If a lender were to demand the return of securities that Savvy Labs borrowed on a User's behalf, Savvy Labs, acting on a User's account, would be required to replace the borrowed securities by borrowing identical securities from another lender. If Savvy Labs was unable to replace the borrowed securities on the User's behalf, it would be required to close out the short sale by buying identical securities in the market in order to make delivery. In such an event, a User could incur significant losses if the securities sold short had increased in value.

Leverage/Interest Rate Risks. A SAVVY Blueprint may require the use of leverage in its investment strategy. The use of leverage can substantially increase the market exposure (and market risk) to which a User's portfolio may be subject. Trading on leverage will result in interest charges or costs and, depending on the amount of leverage, such charges or costs could be substantial. The level of interest rates generally, and the rates at which Savvy Labs can leverage a User's account in particular, can affect the operating results of the strategy. A SAVVY Blueprint's anticipated use of short-term margin borrowings results in certain additional risks to Users. For example, should the securities pledged to brokers to secure an investor's margin accounts decline in value, such account could be subject to a "margin call," pursuant to which Savvy Labs, on the User's behalf, would be required either to deposit additional funds with the broker or to suffer mandatory liquidation of the pledged securities to compensate for the decline in value. In the event of a sudden precipitous drop in the value of a User's UIA assets, then Savvy Labs, acting on behalf of the User, might not be able to liquidate assets quickly enough to pay off the User's margin debt. This may lead to losses in the User's account.

Dependence on Occurrence of Events. The ability to realize a profit on certain SAVVYs may be dependent upon the occurrence of certain events, for example, the bankruptcy, sale, or successful reorganization of a company. If the event that the applicable SAVVY Blueprint is expecting to occur does not occur, a User may sustain a significant loss.

Institutional Risks. The Approved Custodian will have custody of the Users' assets. Certain assets held by the Approved Custodian will be exposed to the credit risk of the dealers, brokers and exchanges through which the Approved Custodian deals, whether the Approved Custodian engages in exchange-traded or off-exchange transactions. These firms

and/or financial institutions, regardless of how large or well-capitalized, may encounter financial difficulties that impair the operating capabilities or the capital position of a User's account. If the Approved Custodian were to become bankrupt or insolvent, it is possible that a User's account would be able to recover only a portion, or in certain circumstances, none of its assets held by such a bankrupt or insolvent entity.

To the extent that Savvy Labs invests in swaps, derivative or synthetic instruments, or other over-the-counter transactions, including forward contracts, or, in certain circumstances, non-U.S. securities, on a User's behalf, the User may be exposed to credit risk with respect to the parties with whom Savvy Labs trades and may bear the risk of settlement default. These risks may differ materially from those entailed in exchange-traded transactions, which generally are backed by clearing organization guarantees, daily marking-to-market and settlement, and segregation and minimum capital requirements applicable to intermediaries. Transactions entered into directly between two counterparties generally do not benefit from such protections and expose the parties to the risk of counterparty default.

Convergence Risk/Relative Value Strategy Risk. A SAVVY Blueprint may call for the pursuit of relative value strategies by taking long positions in securities believed to be undervalued and short positions in securities believed to be overvalued. In the event that the perceived mispricing underlying a SAVVY's trading positions were to fail to converge toward, or were to diverge further from, relationships expected by the Strategy Provider, a User may incur a loss.

Price and Liquidity Fluctuations of Investments. It is expected that SAVVYs are composed of investments that have a daily tradable market. However, the market value of a User's SAVVYs may fluctuate with, among other things, changes in prevailing interest rates, general economic conditions, the condition of financial markets, developments or trends in the securities markets and the financial condition of the issuers of the securities in which a User, through Savvy Labs, invests. During periods of limited liquidity and higher price volatility, Savvy Labs' ability to acquire or dispose of securities in a User's UIA at an advantageous price and time may be impaired. As a result, in periods of rising market prices, Savvy Labs, on a User's behalf, may be unable to participate in price increases fully to the extent that it is unable to acquire the desired positions quickly. Savvy Labs' inability to dispose fully and promptly of positions in declining markets may cause a User's net asset value to decline as the value of unsold positions is marked to lower prices.

Stock Market Volatility. Stock markets are volatile and may decline significantly in response to adverse issuer, political, regulatory, market or economic developments. Different parts of the market and different types of equity securities may react differently to these developments. For example, small cap stocks may react differently than large cap stocks. Issuer, political or economic developments may affect a single issuer, issuers within an industry, sector or geographic region, or the market as a whole.

Risk of Operations/Liquidity Risks. Although the securities that Savvy Labs may acquire on a User's behalf will in many cases be traded on public exchanges, each exchange typically has the right to suspend or limit trading in all securities that it lists. Such a suspension could

render it difficult or impossible for Savvy Labs to liquidate a User's positions and would thereby expose the User to losses. In addition, some of the securities in which Savvy Labs may invest on a User's behalf may be thinly traded, potentially making it difficult for Savvy Labs to dispose of a position at the time or price desired. Moreover, in periods of extreme market volatility, the bid/ask spreads for some securities that ordinarily are liquid may widen, making it difficult or undesirable to sell the securities. Furthermore, if a User elected to withdraw a substantial amount from their capital accounts as of the end of a given fiscal year, Savvy Labs might be forced to close out existing positions at a time when it was disadvantageous to do so. There can be no assurance that the trading markets will remain liquid enough for a User to close out existing positions at any time there is a need to do so. Additionally, there are inherent risks to the algorithms used by Strategy Providers to construct a SAVVY Blueprint as well as the software Savvy Labs uses to rebalance SAVVYs which could result in loss of capital.

Options. Investing in options can provide a greater potential for profit or loss than an equivalent investment in the underlying asset. The value of an option may decline because of a change in the value of the underlying asset relative to the strike price, the passage of time, changes in the market's perception as to the future price behavior of the underlying asset, or any combination thereof.

No Operating History. Savvy Labs is newly formed and hence does not presently have any operating history or proven technology. The SAVVY Blueprints offered on the Platform may consist of new products that have no performance history. Savvy Labs may also face intense competition, often from established companies.

Reliance on Strategy Providers. The Strategy Providers exercise control over how SAVVY Blueprints should be constructed. The success of a SAVVY will thus, to a large degree, be dependent upon the expertise of each SAVVY Blueprint's respective Strategy Provider.

There can be no assurance that a User's investment objective will be obtained, and no representation to the contrary is made by Savvy Labs herein or elsewhere. Prior to entering into an agreement with Savvy Labs, a User should carefully consider: (1) committing to management only those assets that the User believes will not be needed for current purposes and that can be invested on a long-term basis; (2) that volatility from investing in the stock market can occur; and (3) that over time, the value of the User's assets can fluctuate and at any time be worth more or less than the amount invested.

THE FOREGOING LIST OF RISK FACTORS DOES NOT PURPORT TO BE A COMPLETE ENUMERATION OR EXPLANATION OF THE RISKS ASSOCIATED WITH AN INVESTMENT IN SECURITIES COMPRISING A SAVVY. SUBSTANTIAL ADDITIONAL RISKS MAY BE PRESENT IN CONNECTION WITH AN INVESTMENT IN THOSE SECURITIES COMPRISING A SAVVY. AN INVESTMENT IN THE SECURITIES COMPRISING A SAVVY COULD RESULT IN A COMPLETE AND TOTAL LOSS. PROSPECTIVE CLIENTS OF ADVISER USERS SHOULD CONSULT WITH THEIR OWN ADVISERS BEFORE DECIDING WHETHER TO INVEST IN THE SECURITIES COMPRISING A

SAVVY.

Item 9 – Disciplinary Information

Savvy Labs and its management personnel have not been involved in any legal or disciplinary events in the past 10 years that would be material to a client's or prospective client's evaluation of Savvy Labs' advisory business or the integrity of Savvy Labs' management.

Item 10 – Other Financial Industry Activities and Affiliations

Savvy Labs is not registered, and does not have an application pending to register, as a broker-dealer or registered representative of a broker-dealer. Currently, no employees of Savvy Labs are registered representatives of a broker-dealer.

Neither Savvy Labs nor any of its management persons are registered, or have an application pending to register as a futures commission merchant, commodity pool operator, commodity trading adviser, or an associated person of the foregoing entities.

Other than those relationships described herein, there are no relationships or arrangements that are material to Savvy Labs' advisory business.

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

Code of Ethics. Savvy Labs has adopted a Code of Ethics (the "Code") which is reasonably designed to ensure it meets its fiduciary obligations to Users and to detect and prevent any violations of securities laws. The Code sets forth a standard of business conduct and compliance with federal securities laws by Savvy Labs' employees as required under Rule 204A-1 of the Investment Advisers Act of 1940, as amended. The Code includes general requirements that all employees comply with their fiduciary obligations to Users and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest, and confidentiality of client information. All Savvy Labs employees receive a copy of the Code upon hire and are provided subsequent amendments to the Code. Employees must attest to having reviewed Savvy's compliance manual, which includes the Code, at the start of employment, annually, and whenever a material change occurs. Users and prospective Users may request a copy of the Code by contacting Savvy Labs at the address or telephone number listed on the first page of this document.

Investments by Savvy Labs employees in SAVVY Blueprints. Savvy Labs' employees are generally permitted to invest in accordance with any SAVVY Blueprint offered on the Platform, subject to restricted trading lists. Savvy Labs requires periodic reporting of employees' personal securities transactions and holdings, pre-clearance of personal trades in certain circumstances, including an IPO, or a new private placement, and prompt internal reporting of Code violations to the Chief Compliance Officer. Employee investments in SAVVY Blueprints will generally be on terms substantially similar to those offered to Users.

Blackout Periods. As Savvy Labs conducts due diligence reviews of Strategy Providers' proposed SAVVY Blueprints before they are available on the Platform, all employees are subject to restrictive trading prohibitions. This includes restrictive trading activities, ongoing monitoring to ensure that employees are not acting on the information they have received through their employment at Savvy Labs.

Material Non-Public Information. Savvy Labs has established policies and procedures to prevent the abuse of material, non-public information ("MNPI"), which include, among other things, the prohibition to purchase single name common stock securities (registered under Section 12(b) of the Securities Exchange Act of 1934) and requirement of pre-approval for the sale of existing positions in single name common stock securities. Because Savvy Labs' internal structure would make information barriers impractical, Savvy Labs has not imposed information barriers to restrict the internal flow of possible MNPI. Thus Savvy Labs' employees are deemed to be in receipt of MNPI in all instances where any employee has received MNPI, and, therefore, may not trade on the basis of that information.

Potential Conflicts Relating to Advisory Services

Savvy Labs may engage in a broad range of activities. In the ordinary course of conducting its activities, the interests of a User may conflict with the interests of Savvy Labs, other Users or their respective affiliates. Savvy Labs, as a fiduciary to its clients, carefully manages any perceived or actual conflicts of interest that may arise in relation to its advisory services. Certain of these conflicts of interest, as well a description of how Savvy Labs addresses such conflicts of interest, can be found below.

In the case of all conflicts of interest, Savvy Labs' determination as to which factors are relevant, and the resolution of such conflicts, will be made in Savvy Labs' best judgment and in its sole discretion. In resolving conflicts, Savvy Labs will consider various factors, including the interests of its Users with respect to the immediate issue and/or with respect to their longer-term courses of dealing.

Investment Positions. We manage each Savvy in accordance with each User's investment objectives and goals. The results of our investment activities for each User may differ significantly from the results of other Users. The advice Savvy Labs provides with respect to each User may compete or conflict with the advice provided to another User due to the fact that SAVVY Blueprint recommendations are based on individualized investment goals and objectives or because SAVVY Blueprints developed by different Strategy Providers may feature different theses related to the same investment objectives. For example, we may buy or sell positions for one User while we undertake the same or different, including potentially opposite, strategy or position for another. The purchase, holding or sale of assets in a Savvy by one User may enhance or reduce the profitability of another User's SAVVY.

The implementation of different SAVVY Blueprints, customization of SAVVY Blueprints or the necessity of reallocating a SAVVY pursuant to a SAVVY Blueprint may adversely impact, or in some instances may benefit, one or more affected Users, including Users which pay us higher fees. For example, a User may buy a security and another User may establish a short position in that same security. The subsequent short sale may result in a decrease in the price of the security that the other User holds. Similarly, transactions or investments by one or more Users may have the effect of disadvantaging the values, prices or investment strategies of another User.

When we implement for one User a SAVVY Blueprint ahead of, or contemporaneously with, a similar SAVVY Blueprint for another User, market impact or other factors could result in one or more Users receiving less favorable trading results, the costs of implementing such SAVVY Blueprint could be affected, or such Users could otherwise be disadvantaged.

Fees. There are instances in which Savvy Labs pays certain Strategy Providers a lower fee. For example, an Adviser User may also be a Strategy Provider and, therefore, the fees it pays as a User are partially or fully offset by the fees it receives from Savvy Labs for its role as a Strategy Provider Similarly, Savvy Labs receives fees from Strategy Providers related to supporting the management of their SAVVY Blueprints on the Platform, but it also pays fees to Strategy Providers for the Strategy Provider Content and SAVVY Blueprints. These arrangements may create conflicts of interest with respect to Users.

Specifically, Savvy Labs may have an incentive to recommend a SAVVY Blueprint to a User where Savvy Labs pays a lower fee to the Strategy Provider and thereby retains a larger portion of the SAVVY fee. This arrangement can create a financial incentive for Savvy Labs to recommend certain Strategy Providers or specific SAVVY Blueprints over others that may be more suited to a User's needs and goals. Savvy Labs will address this conflict by recommending SAVVY Blueprints based on the search selections provided by the User. More specifically, the recommendations provided by the Platform will be based solely on the search requirements input by the Users based on its investment strategy. (See Item 5, "Fees and Compensation, under SAVVY Fee and Blueprint Fee.")

Savvy Labs may waive or reduce the fees collected from its User and Strategy Providers. A potential conflict of interest may arise based on giving more preferable rates solely based on relationship or other financial interests Savvy Labs may have with the User or Strategy Provider. However, this is addressed by Savvy Labs maintaining an objective fee schedule which will be applied across Strategy Providers and Users, which will only consider objective measures, including for fee waivers. Additionally, all conflicts will continue to be disclosed appropriately in Savvy Labs' ADV Brochure.

Savvy Labs as Strategy Provider. In limited circumstances described in Item 4, Savvy Labs may itself act as a Strategy Provider by creating Transitional Blueprints for Users transferring existing assets to the Platform. In this scenario, Savvy Labs has an economic interest because it both creates and implements the SAVVY Blueprint, and it may retain a larger portion of the total fees because no third-party Strategy Provider fee is paid. Savvy Labs mitigates this conflict by limiting Transitional Blueprints to asset transfer scenarios only, making Transitional Blueprints available only to the specific transferring User(s), and not making such Transitional Blueprints generally available for ongoing investment by other Users on the Platform. In addition, the decision to use a Transitional Blueprint is directed by the Adviser User (in the case of sub-advisory arrangements) or by the Institutional User (in the case of direct advisory arrangements), each of whom retains the ability to select a SAVVY Blueprint created by a third-party Strategy Provider instead.

Third-Party and Vendor Relationships. As the senior management team at Savvy Labs is largely composed of individuals with many years of financial services experience, the selection of third-party vendors and business partners, such as banks and Approved Custodians, as well as broker-dealers, may be based on prior business relationships including investments in Savvy Labs. Therefore, there is a potential conflict of interest in that Savvy Labs may select third parties with whom management has preexisting relationships. This could impede Savvy Labs' ability to provide the best investment advice and execution to its Users.

Any material changes to this information will be provided in an updated Brochure, which will be filed with the SEC.

Item 12 – Brokerage Practices

Savvy Labs either directs User transactions directly to an Approved Custodian that both executes the User's transactions as well as custodies the settled positions or Savvy Labs may also direct the User's transactions to a third-party broker-dealer firm. Those transactions will be settled into the User's account at its custodian. In both cases, the broker-dealer will be determined by Savvy Labs depending on the asset class of the transactions and is selected from a list of approved third-party broker-dealer firms, namely the "Approved Brokers". The current list of Approved Brokers include Apex Clearing Corporation, The Northern Trust Company, (NTSI), and Pershing LLC. Savvy Labs has conducted due diligence review and approved each broker-dealer firm in which it directs User transactions to. Factors considered in the due diligence process include the financial strength and stability of the broker-dealer, as well as its quality of execution, overall costs of a trade, error correction capabilities, responsiveness to requests, block trading and block positioning capabilities, as well as any conflicts identified between Savvy Labs and the broker-dealer firm. The Approved Custodians are similarly reviewed and approved by Savvy Labs before being made available for the User to select to use to hold its settled transactions. In other words, while Savvy Labs chooses the broker-dealer from a list of approved firms, the User will be able to select the custodian of their choice from the list of Approved Custodians approved by Savvy Labs. The reasonableness of commissions or commission equivalents for non-User-directed trade execution is evaluated by Savvy Labs on an ongoing basis based on many factors, including the general level of compensation paid. In cases where Savvy Labs is selecting the broker-dealer, there may be limited situations where users may decide to use Savvy Labs' investment advisory services first to manage their assets before moving the actual assets into an account held at an Approved Custodian. In these limited situations, the broker used to effect the transactions would be the client's existing broker and the assets would continue to be held at the client's existing custodian.

Savvy Labs will, by policy, seek to obtain "best execution" on behalf of its Users. As an additional control measure, Savvy Labs maintains policies and procedures to review the quality of trade executions, including periodic review of the Approved Brokers' execution capabilities. Savvy Labs may consider a number of factors as part of its review, including, for example, net price or spread, financial strength and stability, volume/capacity, market access, efficiency of execution and error resolution, and the size of the transaction. If an Approved Broker's best execution capabilities no longer meet the quality of best execution consistently, Savvy Labs will remove the third-party broker-dealer firm from its Approved Broker list.

In using Approved Custodians to effect transactions, it should be noted that Users may pay transaction costs in an amount greater than would be incurred if another broker-dealer were used.

In general (and when applicable), Savvy Labs attempts to aggregate multiple orders for the purchase or sale of the same instrument into block transactions, subject to the overall obligation to achieve the best price and execution for Users.

Savvy Labs currently has no third-party soft dollar or revenue sharing arrangements in place with any broker-dealers to receive research or brokerage services. Savvy Labs does not seek or receive client referrals from any broker-dealers and does not consider client referrals in selecting or recommending broker-dealers, nor does it intend to do so for the foreseeable future.

Item 13 – Review of Accounts

Savvy Labs conducts reviews of User accounts on a continuous basis to manage securities within a SAVVY along with any customizations in a User's SAVVY Blueprint. In addition, a review of a User's account may be triggered by any suspicious or unusual activity or special circumstances.

Savvy Labs provides Users with continuous access to the Platform regarding information about account status, Strategy Provider Content (including information from Strategy Providers regarding the ongoing viability of a previously published SAVVY Blueprint), securities transactions, portfolio allocations, securities positions, and balances. At any point in time, Users can review the performance status of their SAVVY investments on the Platform and determine if the SAVVYs are meeting the User's investment objectives. Users can also have direct conversations with Savvy Labs about investment strategies.

Savvy Labs will remind Users to keep their investment profile up to date. Users are required to update their investment profile at least on an annual basis and they will also need to input their investment strategies and goals into the search tool in order for the Platform to generate the appropriate recommendations for SAVVY Blueprints.

For White-Label Service arrangements, account reviews, reporting, and client communications may be delivered through or coordinated with the Adviser User. Savvy Labs does not provide support services directly to, or communicate or otherwise interact directly with, White-Label Users, even though Savvy Labs performs the underlying monitoring and rebalancing functions. The Adviser User, as adviser of record to its end clients, is responsible for client-facing communications regarding the appropriateness and ongoing suitability of the strategies selected for its clients.

Item 14 – Client Referrals and Other Compensation

Savvy Labs and its related persons do not receive any economic benefit, including sales awards or prizes, from any third party for providing advisory services to Users.

Savvy Labs compensates third parties (through cash or non-cash compensation) that refer clients to Savvy Labs or endorse Savvy Labs' advisory services to potential Savvy Labs clients. Such arrangements comply with the Advisers Act Rule 206(4)(1), (the "Marketing Rule") and its requirements for third party endorsements and solicitations, and such endorsements or solicitations contain the disclosures required by the Marketing Rule. Clients are not charged additional fees due to these endorsements or referral arrangements.

Some of the third parties who refer clients to Savvy Labs or endorse Savvy Labs' advisory services to potential clients may be related parties of clients while not a client themselves. They may also be business advisors or clients of Savvy Labs. Business advisors of Savvy Labs may be compensated with cash or equity compensation, which would be separate from the compensation received for the advisors' solicitation services. Any such relationship will be disclosed to such potential clients as required by the Marketing Rule.

Item 15 – Custody

Savvy Labs may be deemed to have custody under SEC rule 206(4)-2 (the "Custody Rule") over certain User accounts because of its ability to deduct advisory fees from such accounts. User assets will be maintained with a qualified custodian that is not affiliated with Savvy Labs. Currently, Savvy Labs maintains client assets with three third party qualified custodians: Apex Clearing Corporation, The Northern Trust Company (NTSI), and Pershing LLC. To the extent that Savvy Labs exercises discretion with respect to rebalancing a User's SAVVY, Savvy Labs will do so pursuant to an authorized trading arrangement that does not permit Savvy Labs to obtain possession over, or otherwise have custody with respect to, such User's funds or securities. Users are encouraged to carefully review such statements and to compare such official custodial records to the records that are available on the platform. Users will receive an account statement at least quarterly from the custodian. The data on the Platform will allow Users to see their positions, number of SAVVYs, transactional history, and other material information for each account. Additionally, custodian-generated account and tax statements, along with trade confirmations, if applicable, can also all be accessed directly from the Platform by Users of accounts held at certain custodians, in addition to being sent by the custodian to the Users. This functionality is made available for the ease of Users to be able to access these documents all from the Platform. Users with access to such information on the platform are encouraged to carefully review such statements and to compare such official custodial records to those that are available on the Platform. For other custodians, the custodian-generated account and tax statements will be provided directly to the Users from the custodians only, and will not be made available on the Platform at this time.

Item 16 – Investment Discretion

Savvy Labs provides discretionary advisory services to Users pursuant to an advisory agreement. Such services include the recommendation of relevant SAVVY Blueprints based on the Users' investment objectives and investment goals. Through the continuous monitoring of User accounts, Savvy Labs may use its discretionary authority to determine when rebalancing is necessary to achieve allocations specified by a User-selected SAVVY Blueprint. The trades of securities within a SAVVY to achieve realignment of asset allocations are effected by placing orders through third-party broker-dealers, all with the use of its proprietary technology for automated order routing. Users may revoke the discretionary authority they have provided to Savvy Labs at any time.

Item 17 – Voting Client Securities

Savvy Labs will not accept authority to and will not vote proxies on behalf of its Users. In addition, Savvy Labs will not provide any advice or recommendations regarding how the proxies should be voted. Users will receive proxies and other solicitations directly from the custodian of the Users' accounts and may respond to them as they see fit.

Item 18 – Financial Information

Savvy Labs does not require or solicit prepayment of advisory fees six months or more in advance.

Savvy Labs does not believe it has any financial condition that is reasonably likely to impair its ability to meet its contractual obligations and commitments to its Users.

Savvy Labs has not been the subject of a bankruptcy petition at any time during the past 10 years.