DISCLOSURE BROCHURE

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ITEM 1 - COVER PAGE

SMArtX Compliance Department
105 S. Narcissus Ave., Ste. 701
West Palm Beach, FL 33401
Tel: (561) 835-8690
Web: SMArtXadvisory.com

This SMArtX brochure provides information about the qualifications and business practices of SMArtX Advisory Solutions LLC dba SMArtX Advisory Solutions (hereinafter "SMArtX"). If you have any questions about the contents of this brochure, please contact us at (561) 835-8690 or compliance@SMArtXadvisory.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Additional information about SMArtX Advisory Solutions is also available on the SEC's website at https://adviserinfo.sec.gov/.

ITEM 2 - MATERIAL CHANGES

This section includes a summary of any material changes since the last annual update on March 31, 2025. These include:

- Items 4, 5, 8, 10, 12 and 14 were updated to (i) clarify types of investment products available through SMArtX; (ii) disclose new revenue sharing arrangements and associated conflicts for certain investment products; and (iii) make conforming updates.

Other changes have been made to this brochure, some of which enhance or update existing disclosures, but we do not consider such changes to be material.

SMArtX will provide a copy of this disclosure brochure without charge to anyone upon request. To request a free copy of this disclosure brochure, please call (561) 835-8690 or send an email to compliance@SMArtXadvisory.com.

Pursuant to SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We will further provide other ongoing disclosure information about material changes as necessary. SMArtX Advisory Solutions has endeavored to make all disclosures of material conflicts of interest as they exist and will be described herein as applicable.

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ITEM 4 - ADVISORY BUSINESS

SMArtX Advisory Solutions ("SMArtX") is an investment management firm and offers a cloud-native managed accounts platform, established in 2018 to provide investment management and investment advisory services through other investment advisory or financial services firms ("Advisors").

SMArtX owns and operates the SMArtX Platform and the Smart Xchange Platform (collectively, the "Platforms") through which SMArtX offers its advisory services to Advisors to use with the Advisors' clients ("Clients"). Through the Platforms, an Advisor can establish and manage unified managed accounts ("UMA") and access a broad range of investment products, strategies, and vehicles (collectively, "Investment Products") that can be implemented within UMAs as model portfolio sleeves (each, a "Model"), manager-traded separately managed account ("SMAs") sleeves, or within Advisor as Portfolio Manager ("APM") sleeves, subject to custodian and account permissions. Advisors (including their respective authorized personnel) are referred to herein as "Users" when interacting with or directing activity through the Platforms. Clients of Advisors are not "Users" and do not have direct access to the Platforms. Users initiate allocations and transactions on behalf of the Advisor's Clients.

Models and Model Managers

Each Model is provided by either SMArtX (including through its outsourced chief investment officer ("OCIO") services team), a traditional asset manager, a hedge fund or alternative investment manager, or an index provider (each, a "Model Manager"). Excluding index providers, Model Managers are registered either with the SEC or one or more state securities regulators, or are affiliated with an appropriately registered investment adviser. Each Model Manager provides SMArtX with securities target weights, and transactional history associated with their Model(s) in order for SMArtX to create and maintain each Model portfolio on the Platforms. Each Model Manager provides additional content ("Model Manager Content"), including but not limited to commentaries on the Model and the underlying investment strategy, general commentaries on the markets and the economy, historical performance, biographical information on relevant members of the Model Manager's team, and descriptions of the investment strategy or strategies utilized in the Model. All Model Manager Content represents the opinions of the Model Manager providing the content, should not be construed as personalized advice, and is subject to change without notice. SMArtX provides access to Model Manager Content, including, a description of the subject Model Manager's investment strategy, profile, related portfolio market reports and analysis, and historical Model performance. While SMArtX requests GIPS compliant performance reports Users should note that historical Model performance is Model Manager provided and is not independently verified by SMArtX.

Users can review the information available on the Platforms and direct SMArtX to implement one or more Models in a UMA. When a User selects a Model for a UMA, the User will provide SMArtX with the amount of funds, either in terms of dollars or as a percent of the account's value, in the UMA to be invested in the Model. When a User allocates a UMA's assets to a Model, SMArtX will implement the positions and trading activity of the Model in proportion to the amount of assets invested.

The Platforms will rebalance UMA positions within each Model sleeve automatically based on the drift parameters to bring the UMA in balance with the existing User selected Model(s). SMArtX does not automatically rebalance the overall UMA allocation across sleeves. The User shall be

responsible for determining whether any Model or any combination of Models are appropriate and suitable for the Advisor's Client. Advisors are responsible for the advisory relationship with their Clients and obtaining any Client consents or approvals required for use of the Platforms and allocations to Models. SMArtX does not interact directly with the Advisor's End Clients. Users are solely responsible to consider the financial situation, investment goals and objectives, time horizon, liquidity, and risk tolerance ("Investment Considerations") of Advisor's Clients to determine if the selected Model(s) are suitable, appropriate, and in the Client's best interests. The User is responsible for reviewing any changes to the Investment Considerations of the Advisors' Clients and making appropriate changes to the selected Model(s).

Advisor as a Portfolio Manager

Through the APM functionality of the Platforms, Users may choose to direct SMArtX to buy or sell individual securities and other eligible investments in the UMA directly rather than through a Model. APM enables the User to directly manage a portion of the Client's assets within the UMA rather than opening a separate account with a custodian.

Investment Products and Considerations; Account Restrictions and Limitations

Users should consider the financial situation, investment goals and objectives, time horizon, liquidity, and risk tolerance ("Investment Considerations") of the Advisor's Clients to determine if the selected Model(s) and Investment Products are appropriate. The User is responsible for reviewing any changes to the Investment Considerations of Client and making appropriate changes to the selected Model(s) and Investment Products in which the UMA invests.

Investment Products currently available through the Platforms include individual equities, fixed income securities, exchange-traded funds ("ETFs"), mutual funds, and, in certain cases, closed-end funds, which may include semi-liquid products such as interval funds and tender offer funds. Investment Products available through the Platform in a particular Model, APM, or otherwise will vary and is subject to account eligibility, custodian support, and product-specific requirements and restrictions. From time to time, SMArtX may make other Investment Products available and certain alternative investments may be accessible via third-party platforms or programs sponsors and can involve separate documentation, fees, and operational processes not administered by SMArtX.

Users may provide instructions to restrict the purchase or sale of certain securities from the UMA. Additionally, Users can provide instructions to harvest taxable gains or losses in the UMA. Users may add or decrease leverage for any selected Model, provided that SMArtX will limit the leverage utilized to the UMA's specified account configuration. For example, if a UMA has Regulation T margin, Users may choose to use leverage up to two times the account value. Certain Models may inherently apply leverage. Finally, if a Model invests in a security or other asset that does not fit with a UMA's account configuration, SMArtX will exclude that investment from the UMA. Any of these customizations that are specific to a UMA may cause material performance differences between the selected Model(s) and the UMA.

Users should understand that Investment Products can differ materially in their structures, fees and expenses, liquidity, valuation methodologies, and risks. Less liquid products, such as interval funds and tender offer funds, may limit redemption opportunities, employ fair-value pricing, or impose early redemption fees and other constraints. Advisors are responsible for determining the suitability of such products for their Clients and for ensuring that applicable investor eligibility and account configuration requirements are met prior to allocation in the Client's UMA.

SMArtY
SMArtX Advisory Solutions LLC has added an extension of its platform services referred to as "SMArtY," which is a manager-sponsored strategist platform that harnesses the power of SMArtX's technology to make available to Advisors a series of professionally managed Models for which no Platform Fee (see Item 5 below for details) is charged. SMArtY is built on the same technology that is offered through the SMArtX platform. Advisors have the same UMA access to leading asset managers participating on the SMArtY portion of the overall platform.

Investment Solutions/Market Research
SMArtX Advisory Solutions LLC has added an **Investment Solutions/ Market Research service** to provide Advisor clients with research for market strategies and third-party money manager "TPM" evaluation services. Under this service, certain principals or employees of an engaged Advisor will have access to SMArtX's research reports created by SMArtX's Chief Investment Officer on a periodic basis.

Third-Party Sponsor Platforms
SMArtX also provides services and solutions to registered broker-dealers, banks, trust companies, and larger registered investment advisers ("Third-Party Sponsors") that want to offer their own third-party platforms ("Third-Party Platforms") to Advisors and Clients. Third-Party Sponsors are responsible for selecting Models and Model Managers to participate on Third- Party Platforms. Third-Party Sponsors can charge different fee schedules than SMArtX to Advisors. Third-Party Sponsors maintain their own custodial accounts and/or custodial relationships and offer execution and clearing services. Third-Party Sponsors can offer additional services and have different requirements and qualifications for participating. Advisors should carefully review a Third-Party Sponsor's Disclosure Brochure to understand the terms and conditions of the Third-Party Platform. Users of Third-Party Platforms are advised that the Models made available on Third-Party Platforms are in some instances comprised, in whole or in part, of mutual funds, exchange traded funds, and/or other investment products which are sponsored by the Third-Party Sponsors of such platforms. Users should consider the conflicts of interest associated with this arrangement, specifically, the financial incentive to Third-Party Sponsors to include proprietary investment products within Models made available on Third-Party Platforms.

SMArtX OCIO Consulting Services
SMArtX makes available OCIO consulting services to its professional Advisors. An Advisor provides its specific instructions for a portfolio construction and our service will provide the Advisor with selections of various asset classes for the Advisor to consider. A conflict of interest exists with SMArtX, which does not generally recommend any strategy, where fees are assessed separately by the individual portfolio manager and SMArtX can receive an overall higher fee from a customized portfolio created under its OCIO service. In such cases, SMArtX has an incentive to recommend the OCIO service over its other services.

Regulatory Assets Under Management ("RAUM")
Assets as of December 31, 2025, SMArtX had approximately $26,993,430,437 regulatory assets under management for which it has discretion. SMArtX has no non-discretionary regulatory assets under management.

Sub-advisor Services

SMArtX acts as a sub-advisor to other investment advisers unaffiliated with SMArtX. These third-party advisers outsource some of their portfolio management services which they offer to their clients to SMArtX. These relationships are memorialized in each contract between SMArtX and the third-party advisers.

SMArtX maintains a limited power of attorney to direct trading of each UMA ("Trading Discretion") to purchase and sell securities in the UMA's selected custodian. Trading Discretion is granted to SMArtX through a Sub-Advisory Agreement with an Advisor ("Advisor Sub-Advisory Agreement"). Custodians may require an additional agreement from each Client to grant Trading Discretion to SMArtX. A User may choose to terminate the relationship with SMArtX and revoke Trading Discretion of SMArtX at any time.

No Wrap Fee Program

SMArtX does not currently offer a "wrap fee program" to Advisors.

ITEM 5 - FEES AND COMPENSATION

Clients utilizing SMArtX pay a fee to SMArtX ("Client Fee") that is charged to the Client's Advisor for access to and use of the Platforms and related services. SMArtX will pay, in cases where Clients utilize Model Managers, a portion of the Client Fee to the selected Model Manager(s). Additionally, a Client's Advisor can use SMArtX to bill the Advisor's fee as well. In such cases, SMArtX will pay the Client's Advisor a portion of the Client Fee. The Client Fee contains the following components: 1) a Platform Fee, 2) a Model Fee and Model Maintenance Fee, and 3) an Advisor Fee (where applicable). The following is a description of these three fees:

Platform Fee and Referral-Related Compensation

SMArtX will charge a fee for the services provided by SMArtX for access to and use of the Platforms and includes the cost of administration of UMAs established for the Advisor's Clients ("**Platform Fee**"). The Platform Fee typically ranges from 0.05% to 0.70% per annum. The Platform Fee will be calculated on the value of the assets held in the UMA less any amounts owed by the UMA ("Net Account Value"). The Platform Fee will vary based on the composition of the Models and APM in the UMA. The Platform Fee will be set forth in the Agreements with each Advisor firm. Platform Fees will be negotiated by Advisors and SMArtX. From time to time, SMArtX may introduce unaffiliated advisory firms to existing clients when SMArtX determines that the unaffiliated firm does not meet SMArtX's minimum criteria for a direct engagement. If the unaffiliated firm affiliates with an existing client and subsequently utilizes the SMArtX platform, SMArtX may receive increased platform fees with respect to the additional assets or accounts serviced. These increased fees are reflected in an addendum to the existing client agreement. Clients should be aware that this fee structure creates a financial incentive for SMArtX to make such introductions.

***Model Fee and Model Maintenance Fee**

SMArtX charges a fee for the services provided by the Model Manager and for SMArtX's administration of the Model ("**Model Fee**"). The Model Fee ranges from 0.00%* to 2.00% per annum. SMArtX retains a portion of the Model Fee for the costs associated with administering the Model (the "**Model Maintenance Fee**"), which ranges between 0.00% and 0.50% per annum. The Model Fee, inclusive of any Model Maintenance Fee, will be calculated on the value of the assets held in the UMA attributable to a particular Model, less any amounts owed by the UMA attributable to that Model ("Net Model Sleeve Value"). The Model Maintenance Fee is not charged separately to Clients and certain managers have elected to factor this into their model pricing, which increases the Model Fee that would otherwise apply without the Model Maintenance Fee. The Model Fee will vary from Model to Model based on the Model Manager and the type of the Model. Users should consult the Platforms to find specific Model Fees. Model Fees are negotiated by Advisors and Model Managers in conjunction with SMArtX.

For Models with a 0.00% Model Fee, the Model Manager is typically receiving compensation from the individual securities held by the Model.

Advisor Fee

An Advisor can engage SMArtX to administer the fees charged by Advisor to the Advisor's Client(s) ("Advisor Fee"). The Advisor Fee covers the services provided by the Advisor to the Client(s). Each Client should consult his, her or its Advisor to understand what services are covered by the Advisor Fee and what, if any, are the additional fees. Each Client should also

review the Advisor's Disclosure Brochure for a more detailed description of the Advisor's Fee. The Advisor Fee will be calculated on the Net Account Value.

Investment Solutions/Market Research Fee

SMArtX charges a Fee for market research agreements with certain Advisors. Such Advisors shall pay SMArtX a negotiated fee on a calendar quarter basis, to be paid in advance.

Fee Calculation

SMArtX uses an average daily balance calculation to calculate the Platform Fee, Model Fee, and typically the Advisor Fee*. The daily balance for each day will reflect the starting assets plus any gains and losses and any additional assets contributed or withdrawn to determine the Net Account Value or the Net Model Sleeve Value. SMArtX will sum the Net Account Values or the Net Model Sleeve Values over the specified period of time ("Measurement Period"). The sum is subsequently divided by the number of days in the Measurement Period to get the daily average balance ("Average Daily Balance"). The Average Daily Balance is multiplied by the appropriate fee which is adjusted for the number of trading days in the Measurement Period and the number of trading days in the calendar year. SMArtX uses the New York Stock Exchange's schedule to determine trading days.

Advisor Fees are calculated on a different methodology as specified by the Advisor. Please consult the Advisor's Disclosure Brochure for more details.

Fee Processing

SMArtX typically calculates fees monthly in arrears. SMArtX typically sends an invoice to the Advisor's custodian(s). Each custodian may have different procedures but will typically debit the fees directly and remit payment to SMArtX automatically. SMArtX modifies its methodology of processing fees based on an Advisor's request. Some Advisors can request that Client Fees be paid in advance. If the relationship with SMArtX is terminated by the Advisor and the Client Fees were paid in advance, SMArtX will use its standard method of calculating Client Fees to calculate the overpaid portion of the Client Fee. SMArtX will calculate the refund, if applicable, and will process the refund, if applicable, upon the Advisor(s) request. If the Client Fee contains an Advisor Fee that is paid to the Advisor, the Client will need to consult the Advisor or review the Advisor's Disclosure Brochure to determine how a refund of the Advisor Fee will be processed. SMArtX also offers its technology and/or services to help advisors who desire to handle their own client billing.

Additional Fees

The Client Fee is not inclusive of all fees charged to a UMA. The following list provides additional fees or expenses charged by third parties ("**Additional Fees**"). Additional Fees are not charged by SMArtX, and SMArtX does not receive, directly or indirectly, any portion of Additional Fees. The Additional Fees typically include:

- Brokerage commissions
- Stock loan fees
- Interest charges
- Transaction fees
- Exchange fees
- SEC fees

- 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 may be incurred

Revenue Share From Fund Managers

From time to time, SMArtX enters into revenue sharing arrangements with certain fund managers that make closed-end funds (including interval funds and tender offer funds) and other Investment Products available on the Platforms. Pursuant to these arrangements (each, a "Revenue Share"), the fund manager will pay SMArtX a portion of the management fee the manager earns for managing its fund(s) to compensate SMArtX for incremental technology, operational, and administrative support to enable and support the administration of the funds on the Platforms. These payments are not paid from fund assets as 12b-1 fees or other distribution fees, are not asset-based sales charges, and SMArtX does not act as a broker-dealer for any Investment Products.

Revenue Share is calculated as a percentage of the fund manager's management fee attributable to assets invested by UMAs through the Platforms in the applicable fund(s). The Revenue Share payable to SMArtX will vary by fund manager and the particular fund [up to 0.40%] per annum of the assets invested in the applicable funds(s) and does not increase the Client Fee that SMArtX charges. However, because fund management fees are an expense of the fund, Clients investing in these funds in their UMAs indirectly bear fund-level management fees as disclosed in the fund's governing documents. Investment Product availability on the Platforms does not depend on the existence of a revenue sharing agreement. Revenue Share does not apply to Models (including model-traded and manager-traded sleeves) and does not affect the Model Fee or Model Maintenance Fee.

Conflicts of Interest and Other Information

Platform Fees and Model Fees charged by SMArtX can be waived or reduced by SMArtX. Such reduction or waiver does not require SMArtX to continue to waive or reduce fees. Fees that have been waived, reduced, or negotiated by an Advisor can cause fees to deviate from the SMArtX standard schedule. Neither SMArtX nor its supervised persons accept any additional types of compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

The receipt of Revenue Share from fund managers creates a conflict of interest, particularly over other similar products without a Revenue Share, because it creates a financial incentive for SMArtX to (i) include, retain, and give greater visibility to participating managers and funds on the Platforms; (ii) support features or tools that facilitate their selection and use; and (iii) overwise favor such fund managers and products. SMArtX addresses these conflicts through disclosure; product and manager due diligence and monitoring processes; and by structuring the Platforms so that Advisors (not SMArtX) determine the suitability and selection of Investment Products for

their Clients. SMArtX does not condition product availability, listing, or search results on the existence of Revenue Share and applies due diligence and onboarding criteria that are independent of Revenue Share status. Advisors can access managers and Investment Products that do not have Revenue Share arrangements with SMArtX, subject to availability and custodian constraints.

A conflict of interest exists with SMArtX, which does not generally recommend any strategy, where fees are assessed separately by the individual portfolio manager and SMArtX can receive an overall higher fee from a customized portfolio created under its OCIO service. In such cases, SMArtX has an incentive to recommend the OCIO service over its other services.

A conflict also exists with respect to certain Model Managers that have a financial incentive to include their own proprietary investment products (e.g., mutual funds and/or exchange traded funds) within their investment Models made available on the Platforms. Advisors and Clients should consider this conflict before investing. Advisors and Clients are advised that in circumstances where a Model Manager or Third-Party Sponsor includes proprietary investment products within their Models made available on the platform, the portion of the Model Fee attributable to such proprietary products is rebated to the Client.

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

SMArtX does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of the UMA). Certain Advisors can choose to charge a performance-based fee as an Advisor Fee. Performance-based fees can only be charged by Advisors of “qualified clients” as defined under applicable securities laws and regulations. SMArtX is not participating in any performance-based fees charged by virtue of making this service available to Advisors. Clients should consult their Advisor or their Advisor’s Disclosure Brochure for more information about fees in general and performance-based fees specifically.

ITEM 7 - TYPES OF CLIENTS

SMArtX provides sub-advisory services to Advisors who use the platform for the benefit of the Advisor’s Clients. Services of SMArtX are offered through other registered investment advisers. Generally, SMArtX requires a minimum of $30,000 to open a UMA (“Account Minimum”). The Account Minimum can be waived by SMArtX in certain cases. References in this Brochure to “Client” generally refer to the Advisor’s Client that is the UMA account holder, unless context requires otherwise.

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

SMArtX provides Advisors with access to a large variety of investment products, strategies, and vehicles (“Investment Products”) through the Platforms as a primary service or offering. The Platforms provide Users with the tools necessary to create and analyze portfolios holistically and implement multiple Investment Products in one or more UMAs held with a number of custodians. An Advisor, on behalf of a Client, assesses the Client’s particular investment needs and objectives (“Investment Objectives”) and picks the appropriate mix of Investment Products for that Client’s

investment portfolio based on those needs.

Methods of Analysis

SMArtX primarily focuses on analyzing Investment Products to ensure Users have the material information necessary to determine whether a particular Investment Product or a particular group

of Investment Products meet a Client's Investment Objectives. Advisors should consult the prospectus for any ETF, mutual fund, or other pooled investment vehicle and the Disclosure Brochure for any Model Manager for more details regarding the method of analysis and the investment strategy offered by any Investment Product. Please consult a SMArtX representative if you need more information on a particular Investment Product.

SMArtX analyzes a Model Manager's background, including reviewing the firm's investment offerings, the firm's operational history, and the firm's regulatory history. SMArtX will further review the backgrounds of key principals, including regulatory history, credit history, in terms of any judgements, liens, and criminal history. The primary objective of the Model Manager due diligence review is to identify any issues that could affect the Model Manager's ability to consistently deliver the same level of investment advice in the future as was provided historically.

After reviewing each Model Manager, SMArtX will analyze each Model independently. The Model analysis determines (i) if a particular Model can be delivered through the Platforms, (ii) which account types and configurations are necessary to implement the Model in a UMA, (iii) which custodians can support both the necessary account configurations and the strategy underlying the Model, and (iv) the minimum investment necessary to effectively implement the Model. Factors used in the analysis of a particular Model include, but are not limited to, the types of securities held in the Model, the number of unique positions held in the Model, and the activity levels of trading in the Model. In certain cases, Advisors if they choose, can request Models from asset managers that have not completed the SMArtX Model Manager due diligence process. SMArtX will make these Models available to the requesting Advisor.

When a User selects a Model for a particular UMA, SMArtX analyzes the UMA's configuration, including margin types, option permissions, registration types and custodian, as well as the funds available for allocation to the selected Model, before approving a Model selection. Users are ultimately responsible for determining whether a particular Model meets the Investment Objectives for the UMA. If the selection of a Model is rejected, the User will need to contact SMArtX for more details.

For each transaction in the UMA attributable to a selected Model, SMArtX will analyze the transaction to compare the benefits of tracking the selected Model as closely as possible to the impact of the inherent transactional costs, which could include brokerage commissions, bid- ask spreads, markups and markdowns, sales loads, redemption penalties, regulatory fees and taxes.

SMArtX does not attempt to do analysis on the investment merits of a security or group of securities. SMArtX relies on the Model Manager to determine whether a particular security is appropriate for a particular Model and on the User to determine whether a particular Model is appropriate for a particular UMA or if a particular security is appropriate for APM in a particular UMA.

Investment Strategies

The most common investment strategies utilized by the Models on SMArtX include fundamental

analysis for securities selection, technical analysis for securities selection, quantitative analysis for securities selection, strategic asset allocation, tactical asset allocation, and global macro analysis.

Fundamental Analysis

Fundamental analysis attempts to identify the intrinsic value of a security by looking at economic and financial factors, including but not limited to the overall economy, industry environment, the financial condition of the company and the management team behind the company, to determine if the security is undervalued, indicating a buying opportunity, or overvalued, indicating a selling opportunity.

Technical Analysis

Technical analysis attempts to utilize historical price and trade data to make predictions about future price movements. Proponents of technical analysis often use charts and pattern recognition to make buy and sell decisions of securities.

Quantitative Analysis

Quantitative analysis attempts to create a mathematical model that utilizes securities data to determine if the security presents a buying opportunity or a selling opportunity. Factors can be based on the same or similar factors to fundamental analysis or on other quantifiable metrics.

Strategic Asset Allocation

Strategic asset allocation attempts to build a portfolio of securities by focusing on broader asset classes. Proponents of strategic asset allocation believe that diversifying across asset classes, investors can achieve a specified risk and return profile, as measured by standard deviation and annualized returns (or similar metrics). Each asset class is given a specific ratio to the portfolio, and the portfolio is rebalanced occasionally to eliminate the impact of deviations for the target weights. Strategic asset allocation is commonly related to “Buy and Hold” strategies.

Tactical Asset Allocation

Tactical Asset Allocation attempts to generate improved risk-adjusted returns by actively changing the portfolio weights of asset classes within a portfolio. Proponents of Tactical Asset Allocation will use discretionary or systematic approaches to rebalancing a portfolio. Discretionary approaches generally look for evidence of market sentiment to choose to remain in a particular portfolio weighting or to rebalance the portfolio. Systematic approaches typically look imbalances between asset classes compared to historical norms to determine whether to rebalance the portfolio or maintain the current weightings.

Global Macro Analysis

Global Macro Analysis attempts to take advantage of economic themes and trends at a very high level. Proponents look to broadly invest in positions that will profit from changes in the industrial landscape, global political environments, or growth rates in particular economies around the world.

In addition to the above investment strategies, many of the Model Managers utilize active trading of securities, long / short portfolio construction, and investment strategies utilizing options in the Models on SMArtX.

Active Trading

Active trading attempts to generate short-term trading profits through price fluctuations over short periods of time. Active trading is highly speculative and requires a very disciplined approach to successfully generate risk-adjusted returns over a longer time horizon.

Long / Short Portfolios

Long / Short portfolio construction allows investors to take advantage of securities that are increasing in value and securities that are decreasing in value. Selling a security short ("Short Selling") involves borrowing the security from a third-party and selling the security in the markets. The investor Short Selling the security will have a liability to the original holder of the security and will eventually buy the security back and deliver the security back to the original holder. Short Selling is highly speculative in nature and losses from Short Selling can be unlimited. Portfolios that balance Short Selling with holding other securities in the portfolio may be able to reduce volatility. Market neutral strategies attempt to blend both long and short positions in relative weightings to reduce or theoretically remove the impact of fluctuations in the overall securities markets from the performance of the portfolio. The degree to which combining Short Selling with a long portfolio can reduce volatility or increase volatility is difficult to determine in advance. A User should carefully evaluate any Model using Long / Short strategies before selecting that Model.

Option Strategies

A variety of option strategies exist, some of which are utilized by the Models available on the Platforms, including buy-write strategies and premium selling strategies. Options are inherently volatile and risky securities. A User should carefully evaluate any Model using option strategies before selecting that Model.

Asset Types

SMArtX currently limits UMAs to only securities appropriately registered in the U.S or exempt from registration. Depending on custodian support and account permissions, the Platforms can implement Investment Products in UMA that include, without limitation: individual equities; fixed income securities; options (where permitted); ETFs; mutual funds; closed-end funds (including interval funds and tender offer funds); and, in certain cases, other alternative investments or structured products available through approved channels.

Equities

Equities, typically in the form of common stock of a C Corporation, represent ownership in an enterprise or company.

Exchange Traded Funds

ETFs are pooled investment vehicles that allow investors to buy shares of one investment to gain exposure to one or more underlying investments. ETFs trade on one or more stock exchanges, allowing investors to enter and exit positions throughout the trading day.

Mutual Funds

Mutual funds are pooled investment vehicles that allow investors to buy shares of one investment to gain exposure to one or more underlying investments. Mutual funds typically allow investors to buy or sell shares at one point during the trading day, allowing investors to enter and exit positions once a day.

Options

Options are securities that give holders of the option contracts the right to either buy a security at

a particular price or sell a security at a particular price. The value of any option contract is based on the asset(s) that is bought or sold by the holder of the contract. An option contract is a derivative asset ("**Derivative**") or an asset where the economic value is derived from another asset.

American Depository Receipts

ADRs are securities traded on US exchanges that represent securities of non-US companies. ADRs transact in US dollars during US market hours on US exchanges to make it easier for US investors to gain exposure to foreign companies.

Fixed Income

Fixed income securities are a type of security where the issuer is borrowing money from the purchaser or holder and agreeing to pay back the loan on a fixed payment schedule. Typical fixed income securities include corporate bonds or bonds issued by companies, municipal bonds or bonds issued by local and state government and agencies, and government bonds, which includes US Treasury Bills, US Treasury Notes, US Treasury Bonds, and government agency bonds.

Risk of Loss

Investing in securities involves a risk of loss, including the loss of principal. Each Client should be prepared to bear this risk of loss when engaging SMArtX and utilizing the Platforms. Typical investment risks include risks that the company or issuer of a security cannot deliver on a set of goals, risks that the capital markets or specific areas of the markets fall out of favor with investors generally, risks that a particular manager or advisor cannot successfully implement one or more chosen investment strategies, or that a particular investment strategy does not work well in specific market environment. All of these types of risk can affect the investments available through SMArtX on the Platforms. The following list of risk factors ("Risk Factors") describes some, but not all, of the risks associated with SMArtX and the Platforms. Each User should understand these risks and the other potential risks that can arise.

Risk Factors

Third-Party Reliance Risk

SMArtX relies on a number of external sources for investment advice, research services, and financial and fundamental data ("Information"), including Advisors, Clients, Model Managers, market data vendors, custodians, brokerage firms, and various service providers ("Data Providers"). SMArtX will use its best efforts to ensure Information provided by Data Providers is reliable and accurate but no assurances can be given that the Information will be reliable and accurate. Inaccurate Information could adversely impact the investment advice and services provided by SMArtX.

Reliance on Past Results

Investing in securities involves making complex predictions about the future for specific issuers, investment managers, and the capital markets. Often, prior history provides relevant data regarding what can be expected in the future. However, no future market environment is exactly like a prior market environment. Therefore, past performance results can mislead investors about the likely future performance results. Model Managers, Advisors, and SMArtX all might be unable to generate the same or similar results in the future that were achieved in the past.

Style-Drift

Model Managers and Advisors, from time to time, could determine that a deviation for a specified strategy or group of strategies may increase returns on a risk-adjusted or absolute basis for Models and/or Clients. In general, when any practitioner deviates from his or her core competency, there is a greater risk of failure. This is certainly the case for Model Managers and Advisors. Model Managers provide the data necessary for SMArtX to maintain the Model Portfolio and can change the behavior of the Model by changing the types of securities or the investment strategies utilized by the Model. Advisors may also change the selected Models in a UMA, including the securities held in APM, to achieve different results in UMA. In either case, Style Drift, or changing the nature of the investment advice provided to someone, can occur and lead to adverse consequences.

Market Risk

Security prices may decrease due in response to direct and indirect events and market conditions, usually caused by factors independent of the specific attributes of the investment security.

Inflation Risk

Rising inflation reduces the purchasing power of the underlying currency, which is the U.S. dollar for U.S. based investments.

Liquidity Risk

Liquidity risk is the financial risk that holders of a security position might not be able to close the position without impacting the current market value of the position. Securities can be inherently less liquid than other securities and not trade in well-established markets. A particular security can experience a particular period of time where there are less market participants ready to buy or sell that security during that period. A security that represents another security or holds a portfolio of other securities may have liquidity risk based on the underlying security or securities held by the original security.

Semi-Liquid/Illiquid Fund Risk

Certain products available through SMArtX will have restrictions on redemptions, transfers, and withdrawals. For example, interval funds and tender offer funds are registered closed-end funds that typically offer to repurchase a limited percentage of outstanding shares at periodic intervals (e.g. quarterly, semi-annually). Transfers, repurchases, or redemptions may be limited, delayed, or unavailable, and repurchases can occur at prices reflecting fair value assessments that differ from anticipated values. These funds can invest in illiquid assets or employ complex valuation methodologies.

Reinvestment Risk

This is the risk that future gains could be reinvested at less favorable (lower) rates of return than currently available.

Interest-Rate Risk

Changes in interest rates can result in fluctuations in the prices of other investment vehicles. For example, when interest rates rise, fixed income securities prices fall.

Currency Risk

Investments in non-U.S. based assets are subject to additional changes in valuation due to changes in currency exchange rates.

Business Risk

This covers risks associated with specific industries or companies within an industry.

Financial Risk

Excessive use of credit (borrowing) to finance a business' operations increases the risk of profitability, because the company must cover its debt obligations in good and bad years.

ITEM 9 - DISCIPLINARY INFORMATION

SMArtX, as a registered investment adviser, is required to disclose all material facts regarding any legal or disciplinary events that would be material for Clients and Advisors evaluating services offered by SMArtX or the management of SMArtX.

SMArtX has no legal or disciplinary actions, which would include criminal or civil actions, administrative enforcement proceedings or any self-regulatory organization enforcement proceedings, to disclose.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Affiliated Companies

SMArtX Advisory Solutions LLC is a wholly owned subsidiary of SMArtX Technology Solutions Inc., and it is under common control with the entity listed herein. Some investors in SMArtX Technology Solutions Inc. are SMArtX clients (e.g., Advisors), but Advisors are not solicited to invest in SMArtX Technology Solutions Inc. SMArtX does not consider such affiliation to create a material conflict of interest for SMArtX or for Advisors of SMArtX. For those entities that are investment related or those that offer services that are utilized by Advisors, a more detailed description of their business models will follow:

HedgeCo Securities LLC

HedgeCo Securities LLC ("**HedgeCo Securities**") is a broker-dealer registered with the SEC and is a member of FINRA. HedgeCo Securities is registered as a Commodity Trading Advisor and is a member of NFA (Currently Inactive). Certain employees of SMArtX are also Registered Representatives of HedgeCo Securities. The management team for SMArtX is substantially the same as the management team for HedgeCo Securities.

Affiliate Conflicts of Interest

HedgeCo Securities can have relationships with one or more Model Managers, where HedgeCo Securities can receive compensation in the form of referral fees, or a percentage of commissions generated by trading volume. In these business relationships, a conflict of interest exists where a Model Manager could seek to encourage SMArtX to direct Advisors to that Model Manager's Model(s) through increased referral fees or trading commission compensation from the Model Manager's proprietary accounts or the accounts of Model Manager's direct clients.

Currently, HedgeCo Securities does not maintain relationships with any Advisor using SMArtX

or the Platforms. In the future, HedgeCo Securities could decide to enter into a relationship with an Advisor to provide certain brokerage services. If this type of relationship arises, there is a potential conflict of interest because SMArtX will be able to generate more brokerage revenue for HedgeCo Securities through increasing transactional activity. This potential conflict of interest is not material because SMArtX bases all trading activity based on the selected Models or APM as opposed to more subjective reasons.

Platform Services

SMArtX does not generally recommend other investment advisers or service providers ("**Third Party Advisors**") to Advisors. However, services offered on the Platforms, including Models, ("**Platform Services**") may be managed by Third Party Advisors. SMArtX can receive more or less compensation based on the Platform Services selected by Users. There is a potential conflict of interest because SMArtX might be able to receive more compensation by recommending certain Platform Services. This potential conflict of interest exists because SMArtX offers OCIO services, on an elected basis, and involves recommendations of one model portfolio over another model as part of this service. In certain cases, unaffiliated investment advisers may affiliate with advisory clients of SMArtX. Although SMArtX does not control, and is not under common ownership with, these advisory firms, SMArtX may receive increased compensation if an affiliation results in additional assets or accounts utilizing the SMArtX platform. These relationships create a conflict of interest because SMArtX has a financial incentive to introduce advisory firms to certain existing clients rather than to other unaffiliated firms or service providers.

Revenue Sharing with Fund Managers

As described in Items 5 and 14, SMArtX receives Revenue Share from certain fund managers in connection with the incremental technology, operational, and administrative support to enable and support the certain funds of the fund manager made available on the Platforms. Under these arrangements, fund managers pay SMArtX from the management fees they earn for managing their fund(s). These payments create a conflict of interest because SMArtX has an incentive to include, retain, or promote participating managers or products. SMArtX addresses these conflicts through disclosure, and by maintaining product onboarding, diligence, and monitoring procedures that are designed to evaluate Investment Products and fund managers based on qualitative and operational criteria (including objectivity of any communications pertain to Investment Products), independent of any Revenue Share. Advisors retain discretion over Investment Product selection and asset allocation to a Client's UMA.

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

SMArtX has adopted a Code of Ethics ("**Code**") that is intended to comply with Rule 204A-1 under the Investment Advisers Act of 1940, which requires every registered investment adviser to adopt a code of ethics setting forth standards of conduct and requiring compliance with federal securities laws. The Code establishes the standard of conduct for all employees of SMArtX ("**Employees**"), which are based on the principles of integrity, duty, fairness, and professionalism. The Code describes the obligations of all employees (i) to act in the best interests of Clients in the discharge of their duties, (ii) to maintain compliance with all applicable laws, rules, and regulations including federal securities laws, (iii) to protect all non-public information regarding Clients, Advisors, and Model Managers, (iv) to comply with the SMArtX personal trading policies and procedures, and (v) to prevent and report any violations or suspected violations of the Code to the Chief Compliance Officer of SMArtX. The Code institutes policies and procedures designed to prevent the misuse of material non-public information by SMArtX or any person or entity associated with SMArtX. To request a copy of the Code, please send an email to compliance@SMArtXadvisory.com or call (561) 835-8690.

Personal Trading Policy

All Employees are permitted to buy and sell securities and maintain brokerage accounts without limitations. Employees may buy and sell the same securities as Clients, Advisors, and Model Managers. SMArtX implements trading activity systematically based on Models and APM. As such, Employees do not typically have advanced notice of trading activity taking place in UMAs. Additionally, Employees typically do not have the authority to direct UMAs to buy or sell securities in which an Employee or related person has a material financial interest. Nonetheless, no Employee is permitted to buy or sell securities for any account in which he or she maintains a direct or indirect beneficial ownership based wholly or partially on information obtained by his or her employment with SMArtX.

Employees with access to nonpublic information about the purchase or sale of any securities or the portfolio holdings of any Advisor, Model Manager, or associated person of SMArtX is deemed to be an "Access Person". In order to prevent the inappropriate conduct by an Access Person, each Access Person is required to report personal securities holdings within ten days of becoming an Access Person and annually thereafter, as well as providing a report of all securities transactions no less than quarterly, if required, for any account in which the Access Person has a direct or indirect beneficial ownership directly to the Chief Compliance Officer for SMArtX. Each Access Person must seek prior approval from the Chief Compliance Officer for SMArtX prior to participating in an initial public offering or limited offering, such as a private placement.

ITEM 12 - BROKERAGE PRACTICES

Brokerage Selection

SMArtX supports UMAs with certain custodians. Advisors may open UMAs with Charles Schwab & Co., Fidelity Institutional Wealth Services, National Financial Services, Pershing, Pershing Advisors Solutions, Axios Clearing, Apex Clearing, and Interactive Brokers ("**Supported Custodians**"). SMArtX adds new custodians to the list of Supported Custodians based on demand from Advisors. SMArtX does not generally recommend a specific Supported Custodian to Clients and Advisors. Typically, an Advisor will select one of the Supported Custodians to open a UMA without input from SMArtX. If an Advisor requests a recommendation for a custodian from SMArtX, SMArtX will work with the Advisor to determine which services offered by custodians are most important to the Advisor and which custodians offer the most cost-effective pricing model given the Models likely to be selected by the Advisor to determine the most appropriate custodian for the Advisor in SMArtX's' professional judgement.

Certain Supported Custodians will offer asset-based pricing ("**ABP**") to Clients in lieu of charging commissions on a per transaction basis. SMArtX generally recommends that Clients select ABP if available at the selected Supported Custodian, which will reduce the economic impact of Models that have many holdings or a high rate of portfolio turnover.

SMArtX will generally execute brokerage transactions on behalf of a Client with the Supported Custodian selected by the Client's Advisor. Advisors are not generally permitted to direct brokerage to a specified broker-dealer other than selecting a Supported Custodian. SMArtX will not direct brokerage in exchange for client referrals from a broker-dealer or other third-party. In certain situations, an Advisor may be affiliated with a broker-dealer that maintains a relationship with one or more of the Supported Custodians or may be affiliated directly with one or more of the Supported Custodians ("**Advisor Brokerage Firm**"). The Advisor may require Clients to contract with the Advisor Brokerage Firm. Clients should consult the disclosure brochure of their Advisor for more information on the Advisor's brokerage practices. In certain situations, a Supported Custodian or a broker-dealer maintaining a relationship with a Supported Custodian may refer Advisors to SMArtX ("**Referring Brokerage Firm**"). SMArtX will not, as a policy, suggest a different Supported Custodian to those Advisors but will make those Advisors aware that maintaining a relationship with the Referring Brokerage Firm is not a precondition to a relationship with SMArtX.

Best Execution

Advisors and Clients are generally responsible for selecting a Supported Custodian for each UMA. As a policy, SMArtX will generally execute securities transactions for a specified UMA directly with the custodian holding the UMA. As such, the UMA may not receive the benefit of the lowest trade price then available for any particular transaction. SMArtX maintains written policies and procedures designed to help evaluate the execution performance ("**Best Execution**") of Supported Custodians and other broker-dealers. SMArtX uses a qualitative approach to measure Best Execution due to the number of factors to evaluate, including but not limited to: (i) prompt execution of orders, (ii) favorable execution prices reasonably obtainable, (iii) access to various capital markets, (iv) clearance and settlement capabilities of the broker/dealer selected, and (v) the reasonableness of the commission or other costs charged by the broker-dealer for services rendered. Because a broker-dealer may compare favorably in certain factors and less favorably

in other factors to comparable broker-dealers, SMArtX uses its best efforts to determine whether a broker-dealer is providing Best Execution to clients. SMArtX will generally route trades directly to the Supported Custodian for each UMA. Occasionally, to obtain Best Execution, SMArtX may route orders to a different broker- dealer than the UMA's custodian for execution ("**Step Out Trades**"). In these situations, the selected broker-dealer will often specialize in executing certain types of orders, such as executing large orders for thinly traded securities. SMArtX may rely on guidance from Model Managers, Advisors, or other third parties in selecting broker-dealers for Step Out Trades. Step Out Trades may include additional commission costs or fees, including markups and markdowns, that could be avoided had the Step Out Trades been routed to the custodian of record. In 2024, Step Out Trades accounted for less than 1% of the SMArtX total order volume.

Block Trading

SMArtX will block trades when possible and beneficial to Clients. Block trading allows a registered investment advisor or other financial firm to aggregate orders for multiple clients ("**Client Orders**") into one or more block orders ("**Block Orders**") to be sent for execution. After the Block Orders are filled, either completely or partially, the shares bought or sold are allocated to original Client Orders on a pro-rata basis. Costs of the Block Orders are shared ratably by Client Orders, and execution prices for Client Orders will equal the average price of the Block Order(s). Block trading allows SMArtX to generally execute orders more efficiently and cost-effectively while treating all Clients as equally as possible. SMArtX will typically aggregate trades among UMAs that can be traded together at a given broker, particularly a Supported Custodian.

Soft Dollar Arrangements

SMArtX does not maintain any formal soft dollar arrangements with any broker-dealers or any other third parties. SMArtX pays directly for any research or data provided to SMArtX to aid SMArtX in the discharge of duties. Supported Custodians and other broker-dealers may provide technology solutions that include data feeds of customer account data and digital connectivity to trading and trading services desks to SMArtX at no cost to SMArtX. Other technology solutions and services may be offered by Supported Custodians and other broker- dealers to Advisors or to Clients with no direct costs to Clients. Supported Custodians and other broker-dealers may permit SMArtX to participate in vendor showcases, roadshows, seminars, and other marketing opportunities ("**Marketing Opportunities**") for no costs or at costs below what would be typically charged for participating in similar Marketing Opportunities. Supported Custodians and other broker-dealers may provide consulting services to SMArtX for no costs or at costs below what would be typically charged for participating in similar consulting services.

These services provided by Supported Custodians or other broker-dealers may present a conflict of interest for SMArtX, where SMArtX may receive services and benefits that benefit SMArtX and not Clients of SMArtX based on fees charged to Clients of SMArtX. SMArtX believes this conflict of interest is not material because Clients of SMArtX are paying the same or substantially similar rates for the same or substantially similar services provided by Supported Custodians and other broker-dealers to other clients not associated with SMArtX. Additionally, Advisors can negotiate rates directly with Supported Custodians for services rendered in conjunction with SMArtX's offering.

ITEM 13 - REVIEW OF ACCOUNTS

SMArtX's Reconciliation team performs daily reconciliation of UMAs on the Platforms, comparing the data provided by custodian of record to the data maintained independently by SMArtX. Exceptions are researched, and corrections are made when necessary. Users are responsible for reviewing financial plans, including the selected Models and APM, to ensure that any UMA is invested within the investment guidelines of the Client and making any changes necessary to meet the investment guidelines.

Advisors receive statements from the custodian at least quarterly. These statements provide a detailed list of holdings, valuations, and activity. Custodians are also responsible for providing confirmation of all securities transactions for UMAs. SMArtX provides limited performance data, analysis, and statistics ("**Performance Data**") to Users via the Platforms for review. Performance Data should be reviewed by Users and compared with custodial statements.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

Referral Arrangements

SMArtX has entered into referral arrangements with third parties that will refer Advisors to SMArtX ("**Referral Arrangement**"). In the event that a referred Advisor enters into an Advisor Sub-Advisory Agreement with SMArtX and has Clients participate on the Platforms, SMArtX will pay a referral fee to a third party based on a percentage of the fees received by SMArtX. Clients are not charged additional fees because of a Referral Arrangement.

SMArtX may compensate Advisors or advisory firms for recommending or referring Clients to the Platforms. While the fee may be paid from the Client Fee, the Client Fee has not been increased to cover the fee paid to those Advisors or advisory firms.

Additionally, SMArtX may, from time to time, refer unaffiliated investment advisers to existing SMArtX clients when SMArtX determines that such advisers do not meet SMArtX's minimum criteria for a direct engagement. If a referred adviser affiliates with an existing client and subsequently uses the SMArtX platform, SMArtX may receive increased platform fees associated with the additional assets or accounts onboarded as a result of the affiliation. This arrangement creates a conflict of interest because SMArtX has a financial incentive to make referrals that result in additional platform usage and increased fees. Clients are not required to accept any referral or affiliation introduced by SMArtX.

Other Compensation from Fund Managers

SMArtX receives Revenue Share from certain fund managers whose funds are made available on the Platforms, including managers of closed-end funds (such as interval funds and tender offer funds). These payments are made by the fund managers from the management fees that the managers earn for managing their funds. These payments are not paid from fund assets as 12b-1 fees or other distribution fees and do not constitute asset-based sales charges. SMArtX does not increase the Client Fee charged to UMAs due to these payments. These payments create a conflict of interest because they can create an incentive for SMArtX to include, retain, or provide greater visibility to participating fund managers or products. SMArtX addresses this conflict through (i) disclosure of the existence and nature of the arrangement; (ii) product onboarding, diligence, and monitoring processes that consider objective criteria; and (iii) a platform design under which Advisors (not SMArtX) select the Investment Products for Clients' UMAs based on the Advisor's

suitability and fiduciary obligations. Advisors can select managers and products with which SMArtX has no Revenue Share arrangements, subject to availability and custodian constraints. See other related disclosures in Items 5, 10, and 14.

ITEM 15 - CUSTODY

SMArtX does not have physical custody of assets for Advisors. As described in Item 5 Fees and Compensation, if provided with authority through billing services, SMArtX does maintain the authority to direct custodians to withdraw Client Fees from UMAs on behalf of SMArtX. Through their Advisor, Clients should receive account statements from the broker-dealer, bank, or other qualified custodian that holds and maintains the Client's assets on a monthly or quarterly basis ("**Custodial Statements**"). Advisors should carefully review Custodial Statements and compare Custodial Statements to the reports and data available on the Platforms. Differences in portfolio values may occur due to various factors, including but not limited to unsettled trades, accrued income or expenses, different prices used to value securities in the portfolio, and dividends earned but not received.

SMArtX reports should not be considered or construed as custodial statements and should not be used in lieu of Custodial Statements.

ITEM 16 - INVESTMENT DISCRETION

SMArtX maintains discretionary authority through a limited power of attorney over UMAs utilizing the Platforms ("**Trading Discretion**"). Trading Discretion is granted to SMArtX through documentation provided by the broker dealer custodian or an Advisor Sub-Advisory Agreement. Trading Discretion is necessary for SMArtX to implement Models and APM in the UMA by allowing SMArtX to determine which securities are bought and sold, the timing of the transactions, and how best to manage the orders without contacting the Advisor. SMArtX's Trading Discretion is inherently limited to selected Models and securities selected through APM. Additionally, Users may provide other limitations through written request.

ITEM 17 - VOTING CLIENT SECURITIES

SMArtX is not responsible for voting proxies on behalf of Advisors. Proxies and other solicitations should be received directly from the custodian or transfer agent unless suppressed by request by the Advisor. SMArtX will not advise or act on behalf of any Advisor in legal proceedings, such as class action lawsuits or bankruptcies, involving companies whose securities are held or were previously held in UMA or any other account, including but not limited to, the filing of "Proofs of Claim" in class action settlements.

ITEM 18 - FINANCIAL INFORMATION

In certain circumstances, registered investment advisers are required to provide financial information or disclosures about their financial condition. SMArtX and SMArtX's parent company, SMArtX Technology Solutions Inc., do not have any financial commitments that impair or would impair SMArtX's ability to meet contractual and fiduciary commitments to Clients. Neither SMArtX nor any principal officer of SMArtX have been the subject of any bankruptcy proceeding.