Item 1: Cover Page

Savvy

SAVVY ADVISORS, INC.

d/b/a "Savvy"

Form ADV Part 2A

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This brochure provides information about the qualifications and business practices of Savvy Advisors, Inc. ("Savvy" or "the Firm" or "us", "we", "our"). If you have any questions about the contents of this brochure, please contact Savvy's Chief Compliance Officer at compliance@savvywealth.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.

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

Registration with the SEC as an Investment Adviser does not imply that Savvy or any principals or employees of Savvy possess a particular level of skill or training in the investment advisory or any other business.

Use of DBA or Trade Names: Certain Investment Adviser Representatives ("IARs") of Savvy will conduct marketing and branding activities under separate "doing business as" ("DBA") or trade names. These DBA names are used solely for marketing and branding purposes and are not separate legal entities.

Item 2 - Material Changes

This item of the Brochure discusses only specific material changes that are made to the Brochure and provides clients with a summary of such changes. Since our last annual amendment, the following changes have been made:

- Disclosure throughout this Brochure has been enhanced to better reflect the Firm's advisory business.

- Item 4 and Item 8 have been updated to describe Savvy's and its affiliates' use of artificial intelligence and machine-learning tools to support advisory, financial planning, operational, administrative, and client service functions. The disclosure explains the role of human review and oversight, the types of information these tools may use, associated risks and limitations, and Savvy's supervisory controls. These tools support personnel's judgment and do not independently provide investment advice or make final investment decisions.

- Item 10 has been updated to describe Savvy's affiliation with Savvy Wealth Management, LLC ("SWM"), an introducing broker-dealer under common ownership and control, and SWM's clearing arrangement with National Financial Services LLC. The disclosure explains the financial incentive and conflict of interest associated with recommending SWM, and how Savvy addresses this conflict.

- Item 11 has been updated to clarify that Savvy does not engage in principal transactions.

- Item 12 has been updated to clarify that Savvy does not maintain or accept any soft dollar arrangements.

- Item 14 has been updated to disclose that Savvy's affiliated broker-dealer, Savvy Wealth Management, LLC, receives compensation in connection with client accounts it introduces to National Financial Services LLC ("NFS"), and that certain investment adviser representatives may receive higher advisory fee revenue shares on client assets maintained at NFS. The disclosure describes the resulting conflicts of interest, how Savvy addresses them, and that clients are not required to use SWM or NFS to receive advisory services.

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 you with an updated Brochure incorporating such changes as necessary or upon your request. Savvy's complete Firm Brochure is available upon request by contacting Savvy at (833) 745-6789 or compliance@savvywealth.com.

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Item 4 - Advisory Business

About Our Firm

Savvy Advisors, Inc. ("Savvy", "Savvy Advisors" or "the Firm") was founded and became registered in 2022 by its parent company, Savvy Wealth, Inc. ("Savvy Wealth"). Savvy Advisors is wholly owned by Savvy Wealth, a technology company that also owns the software platform used by Savvy Advisors. All investment advisory services are offered through Savvy Advisors.

Type of Services We Offer

Savvy offers a variety of investment advisory and financial planning services to individuals, high-net worth individuals, trusts, businesses and corporations. These services include:

- Investment and wealth management
- Financial planning and consulting
- Fiduciary and non-fiduciary services for plan sponsors

We work with our clients to determine their investment objectives and risk profile and develop a customized investment plan based on their individual needs and goals. Savvy will utilize the financial information provided by the client to analyze and develop strategies and solutions to assist the client in meeting their financial goals.

Investment and Wealth Management Services

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

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

Third-Party Managers

As part of our portfolio management services, we may use one or more independent sub-advisers ("Third-Party Managers") to manage a portion of your account on a discretionary basis. The Third-Party Managers may use one or more of their model portfolios to manage your account. Certain Third-Party Managers engaged by the firm do not require a separate agreement with the client. Other Third-Party

Managers may require a separate agreement directly with the client, and in some cases, services may be governed by a tri-party agreement among the client, the firm, and the Third-Party Manager. We will regularly monitor the performance of your accounts managed by Third-Party Managers, and can hire and fire any Third-Party Manager without your prior approval. You can pay a higher advisory fee as a result of our use of Third-Party Managers.

Savvy has engaged SyntheticFi as a Third-Party Manager to provide specialized portfolio management services for certain client accounts. SyntheticFi utilizes a box spread options strategy designed to provide an alternative to traditional margin loans or securities-based lines of credit. As part of this strategy, SyntheticFi determines the size of the box spread, selects the expiration dates of the options, and executes and rolls option positions as they approach expiration. The structure of the box spread determines the amount of financing provided through the strategy and may be affected by changes in interest rates and market conditions.

In addition to managing the strategy, SyntheticFi provides ongoing monitoring and reporting through its platform, including margin monitoring tools, performance information, and alerts designed to notify clients of potential margin call risks or account value thresholds. Use of this strategy involves risks, including options market risk, interest rate risk, margin requirements, and the potential for losses if market conditions move adversely. Clients should review the applicable agreements and disclosures to fully understand the services and risks associated with the strategy.

Held Away Assets

Savvy also provides clients with investment advice related to held away assets such as 401ks, 529s, and shares in private companies. In providing these services, Savvy may or may not have the ability to transact in the client's account, depending on the platform. Provision of these services is subject to the client's investment advisory agreement with Savvy.

Savvy uses a third-party platform to facilitate the discretionary management of held away assets, such as 401(k) accounts, 529 plans and other assets held at third-party custodians. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once a Client account(s) is connected to the platform, the adviser will review the current account allocations. When deemed necessary, the adviser will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least annually if not more frequently based on client needs and market events etc. and allocation changes will be made as deemed necessary. Generally, the firm includes designated held-away assets in the calculation of advisory fees, as disclosed in the applicable client agreement.

Fiduciary and Non-Fiduciary Services for Plan Sponsors

Savvy provides advisory services to retirement plans subject to the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), including participant-directed defined contribution plans, such as 401(k) plans ("ERISA Plan Clients"). Each ERISA Plan Client is required to enter into an investment advisory agreement with Savvy describing the services that Savvy will perform for the ERISA

plan and its participants. Savvy can provide both ERISA fiduciary services and non-fiduciary services to ERISA Plan Clients. Services will not begin until the applicable agreement is accepted by Savvy.

For participant-directed defined contribution plans, with respect to a plan's investment menu, Savvy provides non-discretionary investment advisory services under Section 3(21)(A)(ii) of ERISA and discretionary investment management services under Section 3(21)(A)(i) of ERISA.

Non-Discretionary Recommendations: On a non-discretionary basis, the ERISA Plan Client retains and exercises final decision-making authority and responsibility for the implementation (or rejection) of Savvy's recommendations or advice. Savvy Advisor's ERISA fiduciary investment advisory services may include assisting the ERISA Plan Client in developing an investment policy statement (IPS), assisting the ERISA Plan client in selecting a broad range of plan investment options consistent with ERISA Section 404(c), assisting the ERISA Plan Client in making decisions about the selection, retention, removal and/or replacement of plan investment options, and if the ERISA Plan Client has determined that the plan should have a qualified default investment alternative (a "QDIA") for participants who fail to make an investment election, assisting in the selection of the investment that will serve as a QDIA. In addition to non-discretionary investment advisory services, the ERISA Plan Client may receive plan program support services or plan consulting services, as described herein.

Discretionary Investment Selection and Monitoring: With respect to discretionary investment management services, the ERISA Plan Client does not retain or exercise final decision-making authority or responsibility for the implementation (or rejection) of Savvy's recommendations. Rather, when providing discretionary investment management services, Savvy Advisor has and exercises final decision-making authority and responsibility for the implementation of recommendations. Savvy will be a "fiduciary" and serve as "investment manager" (as defined in Section 3(38) of ERISA) when providing discretionary investment management services. Savvy Advisor will assist the ERISA Plan Client in the development of an IPS, which establishes the investment policies and objectives for the Plan and sets forth the number of general investment options and sets class categories to be offered under the Plan. When offering 3(38) discretionary services, the Savvy Advisor retains sole discretion for the ongoing and continuous selection, monitoring, and replacement of investment options without the ERISA Plan Client's prior approval, pursuant to the investment advisory agreement between the Savvy Advisor and ERISA Plan Client. Once the Plan is receiving services under the discretionary investment management services agreement, the ERISA Plan Client can no longer make changes to the plan investment menu. In addition to discretionary investment management services, the ERISA Plan Client may receive plan program support services or plan consulting services, as described herein.

In addition to fiduciary services described above, ERISA Plan Clients may also select from a number of non-fiduciary consulting services. Savvy's non-fiduciary services to participant-directed defined contribution plans may include assisting the ERISA Plan Client in monitoring, selecting and supervising plan service vendors, assisting in group enrollment meetings and educating plan participants about general investment principles and the investment options available under the plan. These consulting services do not include any individualized investment advice to ERISA Plan Clients with respect to Plan assets. Savvy Advisor does not act as fiduciaries under ERISA in providing such consulting services.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under the fiduciary standard that requires us to act in your best interest and not put our interests ahead of yours.

Direct Indexing/Concentrated Stock Portfolio

Savvy provides discretionary investment advisory services to Clients through direct indexing strategies based on client input and the Client's securities holdings. Savvy works with Clients to establish the investment objectives, index or benchmark, and any applicable securities or sector exclusions and uses direct indexing models and quantitative tools to develop the recommended portfolio strategy. Savvy and Orion, an unaffiliated third-party investment management platform, use direct indexing models and quantitative tools to develop the recommended portfolio strategy.

For certain legacy direct indexing accounts, Orion is responsible for the day-to-day management, implementation, rebalancing, and trading of the direct indexing strategy in accordance with the investment strategy and parameters established for the Client. For newer direct indexing accounts, Orion provides strategy recommendations and related portfolio guidance based on the Client's investment objectives, applicable index or benchmark, securities holdings, and established restrictions. Savvy is responsible for reviewing and implementing the recommended strategy, including executing trades, rebalancing the portfolio, and otherwise managing the Client's account in accordance with the Client's investment objectives and applicable account parameters.

The objective of the direct indexing strategy is to track a particular index, within a reasonable degree of similarity, without holding each security in the index. Benchmarks may include broad market equity indexes representing domestic and/or foreign companies. Each Client's account may be customized to incorporate the Client's existing positions and/or reflect specific securities or sector exclusions. The specific securities and exclusions may differ among accounts based on factors such as account size, the index against which the Client's portfolio is benchmarked, and the Client's investment objectives and preferences.

Savvy may also construct portfolios that intentionally tilt toward a single factor exposure or multiple factor exposures. When providing direct indexing services, Savvy may also provide proactive tax-loss harvesting services if agreed to by the Client. In these circumstances, Savvy uses quantitative tools to evaluate potential tax benefits and the potential impact of tax-loss harvesting transactions on portfolio tracking error.

ESG (Environmental, Social, Governance)

Savvy can invest on behalf of interested clients in ESG-oriented funds and/or portfolios constructed of individual securities. For individual securities portfolios, Savvy uses a third-party portfolio and model construction tool to create a portfolio customized to the clients' ESG focuses. Through a questionnaire, clients can indicate desired areas of exclusion and the platform then excludes those funds or securities that do not match the clients' focus areas. Savvy will review the output and invest in the funds or securities deemed appropriate for the client.

Covered Calls

Savvy offers covered call option strategies which involves selling ("writing") options on common stock or ETFs and receiving a premium on the contract. This strategy can provide downside protection but may also cap potential gains if the asset's price exceeds the strike price, as well as introduces liquidation risk onto the covered securities.

Financial Planning and Consulting Services

Savvy can provide various financial planning services based on the client's unique needs. Savvy starts with a discovery of a client's family situation which includes assets and liabilities as well as estate, tax, and insurance needs. Savvy utilizes technology to assist with evaluating the client's financial situation and risk tolerance to develop a detailed cash flow analysis and proposed asset allocation. Together, this information is analyzed to design and develop a proposed financial plan, which is to be dynamic in nature, ever-evolving due to life changes resulting from changes in cash flow needs, risk tolerance, time horizon, or investment objectives.

Savvy's financial planning and consulting services may include any or all of the following functions:

Business Planning	Liability Management
Cash Flow Forecasting	Risk Management
Trust and Estate Planning	Charitable Planning
Financial Planning	Distribution Planning
Investment Consulting	Tax Planning
Insurance Planning	Retirement Plan Consulting
Education Planning	Federal Benefits Analysis

While each of these services is available on a stand-alone basis, certain of them may also be rendered in conjunction with investment portfolio management services, as part of a comprehensive wealth management engagement (described in more detail below). In performing these services, Savvy is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants, etc.) and is expressly authorized to rely on such information. Savvy can recommend clients engage the firm for additional related services, or we may recommend other professionals to implement recommendations made by Savvy. Such additional services by Savvy or another professional will be provided for additional compensation, commensurate with nature, extent, complexity, and other characteristics of such services. Clients are advised that a conflict of interest exists because the firm will have an incentive to recommend such additional services based on the compensation to be received, rather than solely based on the client's needs, and in some cases, based on the prospect of cross-referrals of advisory clients from the other professional or his or her firm.

Savvy also provides advice in the form of financial consultations. This service consists of consultations based on specific investment and financial concerns of the client. Consulting services may include, for example, assistance with establishing and implementing a retirement plan, preparation or review of an investment policy statement, the compilation of reports on various investment accounts, and asset allocation recommendations. The scope and depth of the consultation varies depending on the client's particular circumstances and needs.

Clients are under no obligation to act upon any recommendations made by Savvy under a financial planning or consulting engagement or to engage the services of a third-party professional. Clients retain the absolute right to decide whether or not to act on such recommendations, and if they choose to act on such recommendations, whether to engage Savvy or such professional for such services or to engage another investment adviser or professional of their choosing, which may charge less (or more) for such services. Should a client choose to implement the recommendations contained in the plan, Savvy suggests the client work closely with his/her attorney, accountant and/or insurance agent.

Implementation of financial plan recommendations is entirely at the client's discretion. Financial planning recommendations are of a generic nature and are not limited to any specific product or service offered by a broker dealer or insurance company.

Additional Tax Preparation and Estate Planning Services

Savvy can offer additional services in the areas of tax preparation ("Savvy Tax") and estate planning. These services are facilitated through third-party, unaffiliated software platforms or service providers utilized by Savvy's investment adviser representatives to assist in the preparation and analysis of tax or estate-related information.

Savvy is not a law firm or accounting firm and does not provide legal or accounting advice. Any tax preparation or estate planning information generated through third-party platforms is provided for informational and planning purposes only. Clients are encouraged to consult with their independent legal, tax, and accounting professionals regarding the accuracy, completeness, and suitability of any information or documents prepared through such platforms.

The Firm does not control the operation of unaffiliated third-party platforms and is not responsible for the accuracy, security, functionality, or performance of those services. Use of such platforms may involve certain risks, including data security, system limitations, or reliance on information provided by the client.

Use of Artificial Intelligence

Savvy and its affiliates utilize proprietary and third-party technology, including artificial intelligence and machine-learning enabled tools, to support certain advisory, planning, operational, administrative, and client service functions. These tools may assist Savvy personnel with gathering and organizing client information, preparing for client meetings, summarizing client-related information, modeling financial planning scenarios, identifying planning considerations, generating draft communications or reports, and supporting internal workflows.

Savvy's use of artificial intelligence tools is intended to augment, and not replace, the judgment of Savvy's investment adviser representatives and other personnel. Artificial intelligence tools do not independently provide investment advice to clients, make final investment decisions, or interact directly with clients as a substitute for a Savvy adviser. Savvy personnel remain responsible for reviewing AI-generated or AI-assisted output, determining whether recommendations are appropriate for a client's facts and circumstances, and ensuring that advisory services are provided in accordance with Savvy's fiduciary duty.

Artificial intelligence tools may rely on client information, account data, financial planning assumptions, tax information, meeting notes, CRM information, market data, custodial data, and other information available to Savvy. The quality, accuracy, and usefulness of AI-generated output depends on the accuracy, completeness, timeliness, and availability of the information used by the tool, as well as the assumptions and prompts provided by Savvy personnel. Clients should understand that AI-generated or AI-assisted output may be incomplete, inaccurate, outdated, or based on assumptions that do not fully reflect the Client's personal circumstances. Clients are encouraged to keep their information up to date with their advisor and promptly notify their advisor in the event of changes to their financial situation.

Savvy maintains policies and procedures reasonably designed to supervise the use of artificial intelligence tools, including review of AI-generated output, limitations on use, vendor oversight,

information security controls, and restrictions on the use of client information. However, no technology system is error-free, and the use of artificial intelligence may involve risks, including errors in output, incomplete or inaccurate analysis, overreliance on technology, data security or confidentiality risks, system outages, model limitations, or the potential that outputs may not fully account for all relevant legal, tax, investment, or personal considerations.

Clients should discuss recommendations, assumptions, and planning considerations with their Savvy adviser and, as appropriate, with their independent legal, tax, accounting, or other professional advisers.

Assets Under Management

As of December 31, 2025, Savvy has approximately $5,001,044,474 in assets under management ("AUM"), of which $4,968,537,191 is managed on a discretionary basis and $32,507,284 is managed on a non-discretionary basis. In addition, Savvy has $129,935,084 in assets under advisement ("AUA").

Item 5 - Fees and Compensation

The specific manner in which fees are charged by Savvy is established in each client's written investment advisory agreement. Savvy offers varying fee models for its investment management and consulting services, which may be blended or independently structured. The Firm can waive or negotiate lower fees for certain clients, such as charitable organizations or employees' family members.

Asset-Based Fees

Investment management fees will be based on a percentage of the client's total managed assets. Fees are negotiable, and typically range between 0.30%-1.9% per year, depending on the size and complexity of the client account, among other factors. Savvy can aggregate/household the assets of multiple separate accounts of a client and other affiliated clients for fee calculation purposes.

Advisory fees may be charged using a blended fee schedule, a flat fee, or a combination of these fee structures, depending on the services provided and the terms agreed upon with the client. The specific fee arrangement, including the applicable fee schedule, rates, and methodology for calculating fees, is set forth in the Investment Management Agreement ("IMA") entered into between Savvy Advisors, Inc. and the client.

Fees are billed either quarterly or monthly, in arrears or in advance, based on the ending value (of the previous quarter or month) or average daily balance during the billing cycle, as agreed upon by Savvy, and the client. Savvy generally requires a $500,000 minimum account size, however, each investment advisor representative in their sole discretion may negotiate a different minimum account size. Advisors may also implement a minimum account fee for accounts that fall below their required minimum account size. Clients are encouraged to carefully review their Investment Advisory Agreement ("IAA") to understand their specific fee schedule, including any applicable minimum fees, account size requirements, or other terms that may apply to their advisory relationship.

In some cases, investment management fees will be based on a percentage of the client's net worth. In this type of arrangement, fees are negotiable and typically range between 0.10%-0.40%. Some

investment adviser representatives may also apply a minimum annual fee to Clients engaged under a net-worth-based fee arrangement; the minimum fee will apply until the client's calculated net-worth-based fee exceeds that minimum. Net worth is established at the onset of the relationship and will be reevaluated annually thereafter, using mutually agreed-upon year-end asset values. Fees are calculated once a year on net worth value and billed quarterly, in advance, in equal installments.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the number of days that the account(s) was managed. In the event an account is billed in advance and terminated during the billing cycle, unearned fees will be assessed and returned to the client.

The market value of assets includes accrued interest and dividends, as well as margin balances (if applicable). Most clients authorize Savvy to deduct fees automatically from their brokerage accounts, but clients may request that the Firm send invoices to be paid by check or ACH. The custodian of the client's brokerage account is responsible for sending statements at least quarterly indicating, among other things, management fees disbursed from the account.

Net-Worth Billing

For clients whose advisory fees are calculated in whole or in part based on Total Client Net Worth (as described in Item 5), the fee debited from a client's custodial account may be calculated using asset and liability values that include assets held outside of that custodial account, including held-away or externally held assets not custodied by the qualified custodian debiting the fee. Clients should review both (i) the account statements received from their qualified custodian and (ii) the net worth values used to calculate their fee, which are reevaluated annually and mutually agreed upon by the client and Savvy, to ensure fees are calculated and debited accurately. Clients should promptly notify Savvy of any questions or discrepancies regarding either their account statements or the net worth values used in their fee calculation.

Fixed Fees

Clients can be charged an annual fixed fee for investment management services. Annual fixed fees are negotiated based on the size and complexity of the relationship and charged based on the frequency stated in the agreement with the client.

Private Investment Fee Arrangements

When clients invest in third-party private funds or other private investments, advisory fee arrangements may vary depending on the adviser and the client's engagement terms. Advisory fees associated with private investments are structured in one of the following ways, as agreed upon with the client:

- **Asset-Based Fee:** Some advisers charge an ongoing asset-based (AUM) fee on the value of the private investment, which is included in the client's total assets for billing purposes.

- **Flat Household Fee:** Some advisers charge a flat annual fee covering the client's entire household relationship, which may include advice and oversight related to private investments.

- **Reporting-Only (No Advisory Fee):** In certain cases, the firm does not charge an advisory fee on the private investment and instead provides administrative support or consolidated performance reporting only.

The specific fee arrangement applicable to each client is detailed in the client's advisory agreement. Clients should also be aware that third-party private funds generally charge their own management fees, performance-based compensation, and other expenses, which are separate from and in addition to any advisory fees charged by the firm.

Fee for Services to ERISA Participant-Directed Plans

Savvy is a fiduciary under ERISA and the Internal Revenue Code (the "IRC") in providing investment advisory services to ERISA Plan Clients (described in Item 4). As such, Savvy is subject to specific duties and obligations under ERISA and the IRC that include, among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Savvy may only charge fees for investment advice about products for which Savvy and/or its affiliates do not receive any commission, 12b-1 fees or other compensation.

The annual fee for Savvy Advisor's investment advisory services to ERISA Plan Clients is set forth in the investment advisory agreement and is based upon a percentage (%) of included plan assets as reported by the plan custodian or record-keeper. Included plan assets are the plan assets for which Savvy provides services as described in the investment advisory agreement.

The fee is payable quarterly in advance or in arrears (the "Fee Period"). The ERISA Plan is obligated to pay Savvy Advisor's fee. As agreed to under the investment advisory agreement between Savvy and the ERISA Plan Client, the ERISA Plan Client may authorize the plan custodian to automatically deduct the fee from the plan or the plan sponsor of the ERISA Plan Client may choose to pay the fee.

Either Savvy or the ERISA Plan Client can terminate the investment advisory agreement at any time, without penalty, by sending the other party 30 days prior written notice. Both parties remain responsible for obligations arising under any transactions initiated before the agreement was terminated. If the agreement is terminated prior to the end of a Fee Period, fees will be prorated for the number of days in the Fee Period prior to the effective date of termination.

Financial Planning and Consulting Services

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

Tax Planning Services

Savvy charges a flat fee of $895 for the tax preparation services noted in Item 4 (Savvy Tax). This fee is separate from and in addition to the asset-based fees noted above.

Direct Indexing/Concentrated Stock Portfolio

Clients can be charged an additional fee of 0.39% for direct indexing. This fee is in addition to the advisory fee stated above. All fees will be disclosed and agreed upon in the agreement between the client and Savvy Advisors and may be waived at the Savvy's discretion.

Third-Party Managers

As noted in Item 4, Savvy can also recommend client's assets be managed by unaffiliated Third-Party Managers. Fees for assets managed by a Third-Party Manager will vary based on the Third-Party Manager's fee schedule. The qualified custodian allows Third-Party Managers to deduct their own fee directly from the client's assets separately from Savvy's fee. Clients should refer to the Third-Party Manager's Form ADV Part 2A Brochure for information on their fees and compensation.

Compensation for the Sale of Securities or Other Investment Products

Savvy is not a registered broker/dealer, however Savvy does have an affiliated broker/dealer. Some investment adviser representatives of Savvy are also registered representatives ("RRs") with unaffiliated third-party broker/dealers ("Unaffiliated Broker/Dealers"). All Unaffiliated Broker/Dealers are registered with the SEC and are members of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In their capacity as RRs, these persons receive compensation in connection with the purchase and sale of securities and/or other investment products, including asset-based sales charges, service fees, transaction-based fees (i.e. commission) or 12b-1 fees, for the sale or holding of mutual funds. Compensation earned by these persons in their capacities as RRs is separate from and in addition to the investment advisory fees you pay to Savvy.

This arrangement with Unaffiliated Broker/Dealers (often referred to as "dually registered RRs") presents a conflict of interest because persons who are dually registered RRs have an incentive to recommend the sale or purchase of securities products and/or investment products offered by Unaffiliated Broker/Dealers based on the compensation they receive from these products rather than solely based on an evaluation of your needs. Persons providing investment advice on behalf of the Firm may recommend mutual fund share classes that pay 12b-1 fees when such share classes are suitable for the client and consistent with the client's best interest, even if lower-cost share classes of the same fund may be available. When the Firm or its investment adviser representatives ("IARs") recommend mutual fund share classes that pay 12b-1 fees, a conflict of interest exists. The Firm addresses this conflict by adhering to its fiduciary duty, maintaining policies and procedures designed to ensure recommendations are in the client's best interest, evaluating available share classes, and providing full disclosure of compensation practices. Clients should carefully review fund prospectuses and discuss share class options with their adviser. You are under no obligation, contractually or otherwise, to purchase securities products and/or investment products from RRs who receive compensation described above.

Savvy is not an insurance broker, nor does Savvy have an affiliated insurance agency. However, some investment adviser representatives of our firm are licensed as independent insurance agents ("Insurance Agents") with unaffiliated insurance brokers ("Unaffiliated Insurance Agencies"). These Insurance Agents will earn transaction-based (i.e. commission) compensation for selling insurance products, including insurance products they sell to you. Commissions earned on insurance products by Insurance Agents are separate and in addition to advisory fees you pay to Savvy. This arrangement with Unaffiliated Insurance Agencies presents a conflict of interest because Insurance Agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

To learn more about your Savvy financial professional and any outside business activities, compensation or unaffiliated arrangements they may have, please refer to their Form ADV Part 2B ("Brochure Supplement").

Custodian Fees and Other Expenses

Fees paid to Savvy for investment advisory services are separate and distinct from the fees and expenses charged by underlying pooled investments such as mutual funds and exchange traded funds. In the case of mutual funds, these fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and possible distribution fee. As a general rule, Savvy does not use mutual funds that charge sales charges or distribution fees. Expenses of a fund, including management fees payable to the mutual fund manager and other expenses, will not appear as transaction fees on a client's Savvy statement, as they are deducted from the value of the fund shares by the mutual fund service provider.

Clients will incur certain charges imposed by financial institutions and other third parties such as custodial fees, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, clients can incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to the Savvy asset-based fee. For information relating to custodial fees and expenses, please refer to the applicable custodial agreement or contact the applicable custodian.

Margin Interest

Clients may choose to employ margin strategies in eligible accounts. This use of leverage, or investing with borrowed funds, is generally not recommended or permitted within Savvy's programs; however, it may be approved on an exception basis when requested specifically by the Client, or for use in specialized strategies. Employing margin strategies in Separately Managed Accounts is a more aggressive, higher risk approach to pursuing investment objectives. Clients should carefully consider whether the additional risks are affordable prior to employing margin strategies due to the potential to experience significantly greater losses than if not employing margin strategies. The risks associated with investing, as well as costs, may be increased when employing margin strategies, and depending upon the return achieved, may make investment objectives more difficult to realize.

Clients pay interest on the outstanding loan balance of their original margin loan. Fees are calculated as a percentage of assets under management; therefore, employing margin strategies to buy securities in Client accounts generally increases the amount of, but not the percentage of, fees. This can result in additional compensation to Savvy because the amount of the margin loan is not deducted from the total value of the investments when determining account value for purposes of calculating the fee.

Covered Calls

Clients may be charged an additional fee for covered calls strategies. This fee is in addition to the investment advisory fee noted above. All fees will be disclosed and agreed upon in the agreement between the client and Savvy and may be waived at the advisor's discretion.

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

Savvy does not charge performance-based fees or other fees based on a share of capital gains or capital appreciation of client assets.

Item 7 -Types of Clients

Savvy primarily provides customized investment management services to individuals, high-net-worth individuals, associated trusts, estates, pension and profit-sharing plans, charitable organizations, foundations, corporations and other business entities. Savvy's minimum account size is generally $500,000 but this amount is negotiable at the advisor's discretion.

Certain Third-Party Managers may impose more respective account requirements and varying billing practices than Savvy. In such instances, Savvy may alter its corresponding account requirements and/or billing practices to accommodate those of the Third-Party Manager.

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

Methods of Analysis and Investment Strategies

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

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

Individual Stock Portfolios

Savvy offers individual stock portfolios to clients with an appetite to own individual stocks rather than ETFs or Mutual Funds. Savvy offers both active and passive individual stock portfolios. Savvy's Actively Managed Portfolios use a systematic and quantitative approach for equity valuation and portfolio construction. These portfolios are typically refreshed and rebalanced on a quarterly basis as fundamentals in the market change. Savvy's Passive Stock Portfolios aim to closely track indices or ETFs by optimizing portfolios for minimal tracking error. Passive stock portfolios are typically rebalanced on a quarterly basis.

Direct Indexing

Direct indexing is an approach to index investing that involves buying individual stocks that make up an index, in the same weights as the index, subject to client constraints. Savvy uses mathematical models and software to manage certain client accounts that employ direct indexing. These accounts are typically customized to client specifications and have a defined benchmark and can have a set of client defined restrictions/targets. The number of stocks in these accounts can vary depending on the referenced benchmark, strategy, and client constraints. For taxable clients, portfolios are rebalanced

using a tax- efficient approach to maximize loss harvesting and minimize capital gains. Savvy's direct indexing methodologies consider portfolio risk, transaction costs, and taxes when making investment decisions.

ESG

Savvy may invest on behalf of interested clients in ESG-oriented funds and/or portfolios constructed of individual securities. For individual securities portfolios, Savvy uses a third party portfolio and model construction tool to create a portfolio customized to the clients' ESG focuses. Through a questionnaire, Clients can indicate desired areas of exclusion. The platform excludes funds or securities that do not match the clients' focus areas. Savvy will review the output and invest in the funds or securities deemed appropriate for the client.

Covered Calls

The primary risk is missing out on profits if the underlying asset's price rises significantly above the strike price, as the option contract limits potential gains. Furthermore, if the price of the underlying asset falls, there is a potential to experience net losses, including negative offset of any premiums earned on the contract.

Use of Margin

The decision to leverage the account is the sole decision of Clients and should only be made if Clients understand the risks associated with employing margin strategies, the impact the use of borrowed funds may have on Client accounts, and how investment objectives may be negatively affected. Specifically, Clients may lose more than their original investments. Likewise, a positive or negative performance, net of interest charges and fees, is magnified. Gains or losses are greater than would be the case in accounts that do not employ margin strategies. Clients may not benefit from employing margin strategies if the performance of individual accounts does not exceed interest expenses on the loan plus fees incurred as a result of depositing the proceeds of the loan. Certain eligibility requirements must be met, and documentation must be completed prior to using leverage in Client accounts. Specifically, Clients are required to execute separate margin agreements.

Artificial Intelligence and Technology Risk

Savvy uses artificial intelligence, machine learning, automation, and other technology tools to support certain aspects of its advisory, financial planning, reporting, operational, and client service functions. These tools may assist with organizing client information, modeling planning scenarios, identifying potential planning opportunities, summarizing information, preparing draft reports or communications, and supporting internal workflows.

The use of artificial intelligence and related technology involves risks. AI-generated or AI-assisted output may be inaccurate, incomplete, outdated, biased, or based on incorrect assumptions or incomplete data. These tools may not identify all relevant risks, opportunities, conflicts, tax considerations, legal considerations, or client-specific facts. Technology systems may also be unavailable, experience errors, rely on inaccurate third-party data, or be subject to cybersecurity, confidentiality, vendor, or operational risks.

Savvy seeks to mitigate these risks through vendor oversight, information security controls, and policies and procedures governing technology use. However, these controls cannot eliminate all risks. Savvy

personnel remain responsible for reviewing AI-generated or AI-assisted output before using it in connection with client service or recommendations. Clients should understand that artificial intelligence tools are intended to support, not replace, the professional judgment of Savvy personnel.

Risk of Loss

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

Market Risks

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of our recommendations and/or investment decisions depends, to a great extent, upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. There can be no assurance that we will be able to predict those price movements accurately or capitalize on any such assumptions.

General Investment and Trading Risks

An investment involves a high degree of risk, including the risk that the entire amount invested may be lost. The Firm invests in securities and other financial instruments using strategies and investment techniques with significant risk characteristics. No guarantee or representation is made that the Firm's investment strategies will be successful.

Cybersecurity

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

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

client assets are invested.

Small- and Mid-Cap Risks

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

Liquidity Risk

A client portfolio is exposed to liquidity risk when trading volume, lack of a market maker or trading partner, large position size, market conditions, or legal restrictions impair its ability to sell particular investments or to sell them at advantageous market prices. Consequently, the client portfolio may have to accept a lower price to sell an investment or continue to hold it or keep the position open, sell other investments to raise cash or give up an investment opportunity, any of which could have a negative effect on the portfolio's performance. These effects may be exacerbated during times of financial or political stress.

Convertible Securities

Convertible securities are bonds, notes, debentures, or preferred stocks that may be converted into common stock of the issuer at a specified price and time. They typically pay interest or dividends and have characteristics of both debt and equity securities. Convertible securities generally offer higher yields than common stock but lower yields than comparable non-convertible debt. Their value is influenced by interest rates, the credit quality of the issuer, and the market price of the underlying common stock. As interest rates rise, the value of the fixed-income component may decline. As the price of the underlying stock increases, the value of the conversion feature may increase.

Convertible securities may trade at a premium to their conversion value and are subject to market risk, credit risk, interest rate risk, and liquidity risk. In addition, issuers may redeem convertible securities prior to maturity, which could adversely affect the Client's investment and limit potential upside.

Debt and Other Income Securities

The Client Accounts may invest in fixed-income and adjustable rate securities. Income securities are subject to interest rate, market and credit risk. Interest rate risk relates to changes in a security's value as a result of changes in interest rates generally. Even though such instruments are investments that may promise a stable stream of income, the prices of such securities are inversely affected by changes in interest rates and, therefore, are subject to the risk of market price fluctuations. In general, the values of fixed income securities increase when prevailing interest rates fall and decrease when interest rates rise. Because of the resetting of interest rates, adjustable rate securities are less likely than non-

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

Derivatives and Hedging

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

Brokerage Commissions/Transaction Costs

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

Currency

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

Counterparty Risk

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

experienced by the client.

Reliance on Quantitative Models

Savvy may employ quantitative models as part of its investment strategy. Although these quantitative models have been tested, no assurance can be made that such models will perform the same in the future. Model driven strategies may result in substantial losses in a short period of time.

Third-Party Managers

The use of Third-Party Managers in investment programs involves additional risks. The success of the third party manager depends on the capabilities of its investment management personnel and infrastructure, all of which may be adversely impacted by the departure of key employees and other events. The future results of the third-party manager may differ significantly from the third-party manager's past performance. While Savvy intends to employ reasonable diligence in evaluating and monitoring third-party managers, no amount of diligence can eliminate the possibility that a third-party manager may provide misleading, incomplete or false information or representations, or engage in improper or fraudulent conduct, including unauthorized changes in investment strategy, insider trading, misappropriation of assets and unsupportable valuations of portfolio securities.

Tax-Managed Investing Risk

Investment strategies that seek to enhance after-tax performance may be unable to fully realize strategic gains or harvest losses due to various factors. Market conditions may limit the ability to generate tax losses. A tax-managed strategy may cause a client portfolio to hold a security in order to achieve more favorable tax treatment or to sell a security in order to create tax losses. A tax loss realized by a U.S. investor after selling a security will be negated if the investor purchases the security within thirty days. Although Savvy avoids "wash sales" whenever possible and temporarily restricts securities it has sold at a loss to prevent them, a wash sale can occur inadvertently because of trading by a client in portfolios not managed by Savvy.

Tax Risk

The tax treatment of investments held in a client portfolio may be adversely affected by future tax legislation, Treasury Regulations and/or guidance issued by the Internal Revenue Service that could affect the character, timing, and/or amount of taxable income or gains attributable to an account. Income from tax-exempt municipal obligations could be declared taxable because of unfavorable changes in tax laws, adverse interpretations by the Internal Revenue Service or non-compliant conduct of a bond issuer.

Tax-Straddle Risk

Investment strategies that utilize off-setting positions on a security or a portfolio of securities must adhere to specific rules and provisions under the Internal Revenue Code in order to avoid negative tax consequences. These provisions apply to an investor's entire investment portfolio including accounts not managed by Savvy. While Savvy seeks to avoid "tax straddles", an investor's ability to realize tax benefits (e.g., defer gains, deduct interest, convert short term gains into long term gains) may be negated by transactions and holdings of which Savvy is not aware.

Tracking Error Risk

Tracking error risk refers to the risk that the performance of a client portfolio may not match or correlate to that of the index it attempts to track, either on a daily or aggregate basis. Factors such as fees and trading expenses, client-imposed restrictions, imperfect correlation between the portfolio's investments and the index, changes to the composition of the index, regulatory policies, high portfolio turnover and the use of leverage all contribute to tracking error. Tracking error risk may cause the performance of a client portfolio to be less or more than expected.

Risks Associated with Specific Types of Securities

Equity Securities

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

Exchange Traded Funds (ETFs)

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

Mutual Funds

Mutual funds may invest in different types of securities, such as value or growth stocks, real estate investment trusts, corporate bonds or U.S. government bonds. There are risks associated with each asset class. An investment in a money market fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other governmental agency. Although money market funds seek to preserve the value of your investment at $1.00 per share, it is possible to lose money by investing in the fund. Redemption is at the current net asset value, which may be more or less than the original cost. Aggressive growth funds are most suitable for investors willing to accept price per share volatility since many companies that demonstrate high growth potential can also be high risk. Income from tax-free mutual funds may be subject to local, state and/or the alternative minimum tax.

Because each mutual fund owns different types of investments, performance will be affected by a variety of factors. The value of your investment in a mutual fund will vary from day to day as the values of the underlying investments in a fund vary. Such variations generally reflect changes in interest rates, market conditions and other company and economic news. These risks may become magnified

depending on how much a fund invests or uses certain strategies. A fund's principal market segment(s), such as large-cap, mid-cap or small-cap stocks, or growth or value stocks may underperform other market segments or the equity markets as a whole. Clients can find additional information regarding these risks in the fund's prospectus.

Alternative Investments

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

International Investing

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

Cash and Cash Equivalents

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

Fixed-Income Securities

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

Structured Products

A structured product, also known as a market-linked product, is generally a pre-packaged investment strategy based on derivatives, such as a single security, a basket of securities, options, indices, commodities, debt issuances, and/or foreign currencies, and to a lesser extent, swaps. Structured products are usually issued by investment banks or affiliates thereof. They have a fixed maturity and have two components: a note and a derivative. The derivative component is often an option. The note provides for periodic interest payments to the investor at a predetermined rate, and the derivative component provides for the payment at maturity. Some products use the derivative component as a put option written by the investor that gives the buyer of the put option the right to sell to the investor the security or securities at a predetermined price. Other products use the derivative component to provide for a call option written by the investor that gives the buyer of the call option the right to buy the security or securities from the investor at a predetermined price. A feature of some structured products is a "principal guarantee" function, which offers protection of principal if held to maturity. However, these products are not always Federal Deposit Insurance Corporation insured; they may only be insured by the issuer, and thus have the potential for loss of principal in the case of a liquidity crisis, or other solvency problems with the issuing company. Investing in structured products involves a number of risks including but not limited to: fluctuations in the price, level or yield of underlying instruments, interest rates, currency values and credit quality; substantial loss of principal; limits on participation in any appreciation of the underlying instrument; limited liquidity; credit risk of the issuer; conflicts of interest; and, other events that are difficult to predict.

ESG (Environmental, Social and Governance) Investing Risk

Stocks screened by the third-party portfolio and model construction tool for ESG criteria may underperform the stock market as a whole or particular stock selected will, in the aggregate, trail returns of other investment strategies screened for ESG criteria. Incorporation of ESG factors may affect the client's exposure to certain companies, sectors, regions, countries or types of investments, which could negatively impact the client account's performance depending on whether such investments are in or out of favor. Applying impact investing goals to investment decisions is qualitative and subjective by nature, and there is no guarantee that the criteria utilized by the third-party provider will reflect the beliefs or values of any particular investor. In evaluating potential ESG investments, the third-party provider is dependent upon information and data obtained through voluntary or third-party reporting that may be incomplete, inaccurate or unavailable, which could cause the third-party provider to incorrectly assess a company's ESG practices and/or related risks and opportunities. ESG-related practices differ by region, industry and issue and are evolving accordingly, and a company's ESG-related practices or the assessment of such practices may change over time.

Cryptocurrency Risks

Using cryptocurrency is only appropriate for persons that understand and are willing to assume the risks involved. Cryptocurrency markets and exchanges are not currently regulated with the same controls, nor customer protections available in equity, option, futures, or foreign exchange investing. There is no assurance that a person who accepts a cryptocurrency as a form of payment today will continue to do so in the future. The features, functions, characteristics, operation, use and other properties of cryptocurrencies may be complex, technical, or difficult to understand or evaluate. Cryptocurrency trading requires knowledge of cryptocurrency markets. Having appropriate knowledge and experience before engaging in cryptocurrency trading is in the best interest of the investor. Below are some risks

associated with investing in cryptocurrencies:

- Volatility - The value of cryptocurrency can rapidly increase or decrease at any time (and may even fall to zero). Cryptocurrency can be volatile, with large swings in value over short periods of time, which may create liquidity issues.
- Exchange rate - Exchange rates fluctuate regularly and the rate used for purchasing your cryptocurrency may not be the same rate that applies when converting back into the same currency.
- Speculative - Crypto asset trading is speculative and involves a high degree of risk. The crypto asset market is relatively new and unproven. The use of crypto assets in the retail and commercial marketplace is very limited compared with the relatively large market for speculators, which contributes to price volatility that could adversely affect the value of your crypto assets.
- Fraud - Transactions in crypto assets may be irreversible, and, accordingly, losses due to fraudulent or accidental transactions may not be recoverable. The nature of crypto assets may lead to an increased risk of fraud or cyber-attack.
- Technology Risk- The nature of crypto assets means that any technological difficulties experienced may prevent the access of use of your crypto assets.

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

Item 9 - Disciplinary Information

One or more members of Savvy have disciplinary events that require an affirmative response to Item 11 of Form ADV Part 1. For additional information regarding these matters, including the individuals involved and the nature and circumstances of the events, please refer to Item 11 of Form ADV Part 1.

Item 10 - Other Financial Industry Activities and Affiliations

Savvy Wealth Management, LLC

Savvy Advisors and Savvy Wealth Management, LLC ("SWM") are under common ownership and control because each is a subsidiary of Savvy Wealth, Inc. SWM is a broker-dealer registered with the Securities and Exchange Commission and a member of the Financial Industry Regulatory Authority. SWM operates as an introducing broker-dealer and does not hold client funds or securities or clear client transactions. Accounts introduced by SWM are carried and cleared by National Financial Services LLC ("NFS") pursuant to a fully disclosed clearing agreement.

Savvy may recommend that clients open or transfer brokerage accounts to SWM. Because Savvy and SWM share a common parent, Savvy Wealth, Inc. has a financial interest in the success and profitability of SWM. This creates a conflict of interest and an incentive for Savvy to recommend SWM over an unaffiliated broker-dealer or custodian.

Clients are not required to establish or maintain an account with SWM or transfer their accounts to SWM to receive advisory services from Savvy. Savvy addresses this conflict by disclosing the affiliated relationship and financial incentive, providing clients with a choice of available brokerage and custodial arrangements, and evaluating its brokerage recommendations based on factors such as the services provided, execution quality, costs, operational capabilities, and the client's particular needs. Additional information concerning Savvy's brokerage practices is provided in Item 12 of this Brochure and disclosure pertaining to the conflicts of interest related to this arrangement are detailed in Item 14.

Additional information about SWM is available through FINRA BrokerCheck.

Unaffiliated Investment Advisers

Some persons providing investment advice on behalf of our firm are also separately registered as investment adviser representatives of other unaffiliated third-party investment advisory firms and/or may be deemed Supervised Persons of outside third-party investment advisory firms. These unaffiliated advisory firms are not under common ownership or control with Savvy. This creates a conflict of interest because separate compensation arrangements typically exist that create a financial incentive for the investment advisor representatives to recommend products or services outside of Savvy. Savvy Clients are under no obligation to purchase products, engage in transactions and/or accept services being made available or recommended via outside third-party advisory firms. Please review the Form ADV Part 2B Brochure Supplements provided to you about the investment adviser representative at Savvy whom are providing you with investment advice to understand their specific arrangements and conflicts of interest.

Use of DBA or Trade Names

Certain Investment Adviser Representatives ("IARs") of Savvy may conduct marketing and branding activities under separate "doing business as" ("DBA") or trade names. These DBA names are used solely for marketing and branding purposes and are not separate legal entities.

Such DBAs are not affiliates, subsidiaries, or related advisory firms of Savvy. All investment advisory services are provided exclusively through Savvy, and all advisory activities conducted under a DBA name remain subject to the Firm's supervision, compliance policies, and regulatory oversight. Clients should understand that any advisory relationship is with Savvy and not with the DBA under which the IAR may market services.

Registered Broker-Dealers

Some persons providing investment advice on behalf of our firm are registered representatives with various unaffiliated third-party broker-dealers, which are members of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). These entities are not affiliated with Savvy, nor any of Savvy's affiliate. See the ***Fees and Compensation*** section (Item 5) in this brochure for more information on the compensation received by IARs who are also registered representatives of third-party broker-dealers. In their capacity as a registered representative, these IARs may purchase specific securities which they are entitled to receive commission or other compensation.

Licensed Insurance Agents

Some persons providing investment advice on behalf of Savvy are licensed insurance agents. See the Fees and Compensation section in this brochure for more information on the compensation received by

licensed insurance agents who are affiliated with our firm.

Outside Management Roles and Related Conflicts of Interest

Certain IARs of Savvy serve in outside roles, including as a general partner, manager, or in a similar capacity for unaffiliated private funds or exchange-traded fund ("ETF") vehicles. In these roles, the IARs may receive compensation separate from and in addition to their compensation from Savvy.

These arrangements create a conflict of interest, as the IARs have a financial incentives to recommend such investment vehicles to clients in an effort to receive additional compensation. These private funds or ETF strategies are generally not offered to Savvy clients and may be made available only to clients who have a direct relationship with the applicable IAR. Clients are encouraged to review their IAR's Form ADV Part 2B Brochure Supplement for additional information regarding the individual's outside business activities, affiliations, compensation, and related conflicts of interest.

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

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

Selection or Recommendation of Other Advisers

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

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

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

Code of Ethics

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

limited offerings. The CCO monitors transactions by employees in order to identify any pattern of conduct that may evidence conflicts or potential conflicts with the principles and objectives of the Code, or other inappropriate behavior.

Statement on Insider Trading

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

Statement on Principal and Cross Trades

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

Item 12 - Brokerage Practices

Savvy generally recommends that clients arrange for their assets to be held with NFS, Fidelity Institutional Wealth Services ("Fidelity"), Interactive Brokers, and/or Charles Schwab & Company, Inc. ("Schwab") (herein "Custodians"). The Firm generally executes securities transactions through the institution where client accounts are held. Savvy believes that its Custodians provide reliable, quick, responsive and efficient brokerage services.

In addition to the above third-party custodians, Savvy will also recommend that client assets be managed through its affiliated introducing broker, Savvy Wealth Management, LLC ("SWM"). SWM is Savvy's affiliated introducing broker-dealer which receives compensation in connection with client accounts introduced by SWM and custodied through National Financial Services LLC ("NFS"). See Item 14 for further disclosure related to SWM and associated conflicts of interest.

Our Custodians provide Savvy with access to their institutional trading and operational services, which are typically not available to retail individual investors. Their services also include custody and access to mutual funds and other investments that are otherwise generally available only to institutional investors or that would require a significantly higher minimum initial investment. Additionally, our Custodians generally do not charge clients separately for custody of their investment accounts, but do receive compensation from account holders through transaction-related fees (i.e. commissions or trading fees) or some asset-based fees.

Best Execution Considerations

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

Savvy seeks to trade with reputable counterparties. As a fiduciary, Savvy has a duty to act in their clients' best interests, which includes diligently researching and selecting brokers and venues that provide "best execution" for their clients' orders.

Soft Dollars

Savvy does not currently have any soft dollar arrangements and does not acquire research or other products and services using client brokerage commissions.

Savvy may receive certain services from custodians, broker-dealers, technology providers, or other service providers in connection with the services it provides to clients. These services may include, for example, access to trading, custody, reporting, research, market data, technology, practice management, compliance, operational, or other support services. Unless otherwise disclosed, Savvy does not treat these services as soft dollar benefits because they are not obtained through client brokerage commissions.

Additional Benefits

In addition to the above platform benefits and research, Fidelity provides Savvy with indirect compensation by covering certain qualifying expenses associated with transition assistance for investment adviser representatives. These expenses may cover custodial integration, technology setup, compliance costs and other services permitted under Section 28(e) of the Securities Exchange Act of 1934. This arrangement creates a conflict of interest because it provides Savvy with a financial incentive to continue to use and expand its use of services and reliance on Fidelity.

Directed Brokerage

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

Trade Aggregation and Allocation

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

When Savvy purchases or sells securities of the same issuer at the same time for the Clients, Savvy can submit an aggregated/block trade for execution if Savvy believes that the use of an aggregated trade reasonably furthers its efforts to seek best execution. Participants in aggregated trades receive the

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

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

Trade Errors

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

Valuation of Client Assets

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

Item 13 - Review of Accounts

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

Savvy reviews client accounts periodically to ensure allocation thresholds are being met, and to rebalance portfolios as necessary given the client's investment guidelines. Additional or focused reviews can be triggered by factors such as political and economic developments, corporate announcements, and changes in market conditions.

Reports to Clients

Savvy provides quarterly reports to Separately Managed Accounts. Clients also receive regular monthly/quarterly statements from their Custodian(s) for the same accounts which show account transactions and month-end holdings. Clients should review their custodial statements and contact Savvy Advisors if any significant discrepancies or errors are discovered.

Financial planning clients receive reports generated based on the information provided and the specific assumptions reflected in the client's financial plan at the time it is prepared. These reports are intended to illustrate planning outcomes under those assumptions. Clients may request updates or revisions to their financial plan, and updated reports will be provided as appropriate based on revised information, assumptions, or objectives.

Item 14 - Client Referrals and Other Compensation

We receive an economic benefit from Fidelity and Schwab in the form of the research, support, products and services which it makes available to us and other independent investment advisors that custody client assets with them. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). Our access to the Custodian's products and services is not conditioned upon providing specific investment advice or directing client transactions to that Custodian.

Entity Solicitor Programs

Savvy participates in referral programs through various third parties to which Savvy pays a solicitation fee in connection with participation in the referral program (described more specifically in the respective program solicitation disclosures presented to referral program clients).

The amount and level of fees charged by Savvy to clients referred to it through a referral program will not be higher than the fees charged, and the level or quality of services provided will not be inferior to the level or quality of services provided, to a client of Savvy's for which Savvy does not have to pay a referral fee to a third party and which client receives comparable services for a comparably sized account.

A client's participation in a referral program does not reduce or eliminate Savvy's fiduciary duty to obtain best execution when selecting brokers to execute securities transactions on behalf of clients. While conflicts of interest may arise through Savvy's participation in the referral programs, Savvy will make every effort to ensure that all recommendations are in the client's best interests. Savvy is not affiliated with any referral program sponsoring entity.

Savvy will pay investment adviser representatives supervised by Savvy special additional compensation in connection with the recommendation or use of certain of the Firm's strategies. This additional compensation, calculated as a portion [ten (10) percent] of the advisory fee charged by Savvy to the client in connection with client assets employing the Firm's strategies, creates an incentive for the investment adviser representative to recommend those strategies over other strategies which may be employed for the client.

Additional Compensation Related to NFS Accounts

Savvy Wealth Management, LLC ("SWM"), Savvy's affiliated introducing broker-dealer, receives compensation in connection with client accounts introduced by SWM and custodied through National Financial Services LLC ("NFS"). In addition, certain investment adviser representatives supervised by Savvy may receive additional compensation under their negotiated compensation arrangements with Savvy when client assets are transferred to and maintained at NFS. This additional compensation may take the form of a higher revenue share of the advisory fees Savvy receives with respect to those client assets, and advisory fees waived for certain model portfolios administered by Savvy Advisors.

These arrangements create conflicts of interest. Savvy and SWM share a common parent, Savvy Wealth, Inc., which has a financial interest in SWM's success and profitability. Accordingly, Savvy has an incentive to recommend accounts introduced by SWM and custodied at NFS over unaffiliated brokerage or custodial arrangements. Participating investment adviser representatives also have a personal financial incentive to recommend transferring or maintaining client assets at NFS because doing so may increase their compensation.

Clients are not required to establish accounts with SWM or transfer assets to NFS to receive advisory services from Savvy. Savvy addresses these conflicts by disclosing the affiliated relationship and compensation incentives, providing clients with a choice of available brokerage and custodial arrangements, and requiring that recommendations concerning brokerage arrangements, custodians, or asset transfers be based on the client's best interests, including the services provided, costs, execution quality, operational capabilities, and the client's particular needs and circumstances. Additional information is provided in Items 10 and 12 of this Brochure.

Paid Endorsements through Third-Party Promotors

Savvy has entered into written agreements with FinanceHQ, AgouraGrowth, Datalign, WiserAdvisor and Masterworks (collectively referred to as "Promoters" or "Solicitors"), to provide marketing services and generate client referrals ("endorsements") on behalf of Savvy. In addition, some of Savvy's investment adviser representatives hold separate agreements with individuals who also serve as Promoters. Savvy provides compensation to each Promoter pursuant to a written agreement with each. The compensation can vary by Promoter, but is generally in the form of membership fees, flat rate fees, per-lead fees, fees based on AUM and/or appointment setting fees. All fees incurred by Savvy under these arrangements are covered fully by Savvy and/or by investment advisor representatives of Savvy – none of the fees are passed to Savvy's clients and therefore do not impact the fees clients pay to Savvy for advisory services. Nonetheless, this arrangement creates a conflict of interest because each Promoter is financially incentivized to endorse Savvy solely based on the compensation they are entitled to receive. None of the Promoters are affiliated or related to Savvy, nor are they clients of Savvy.

Item 15 - Custody

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

Savvy can access client accounts through its ability to debit advisory fees. For this reason, the Firm is

considered to have custody of client assets. Clients will receive account statements directly from their qualified custodian, who maintains the Clients' cash and securities assets. Savvy encourages Clients to compare the account statement received from its custodian to the reporting received from the Firm. Clients should promptly notify Savvy if they do not receive account statements from their custodian at least quarterly or if they believe the information contained in the statements is inaccurate.

Savvy is deemed to have custody of client funds or securities in certain circumstances, including, but not limited to, when clients authorize us, through trustee positions or bill-pay authority, to direct funds to third parties from their custodial accounts. Custody may also arise from other forms of authority, access, or arrangements that provide Savvy with the ability to transfer, or direct client funds or securities, depending on the specific facts and circumstances of the arrangement. As a result, Savvy will be subject to an annual surprise custody examination.

Item 16 - Investment Discretion

Generally, Savvy has investment discretion over client accounts to select the identity and amount of securities to be bought or sold within the client's account or to identify Third Party Managers to do the same. Through the Savvy Master Client Agreement, Clients grant Savvy investment discretion through the execution of a limited power of attorney. Where discretion has been granted, Savvy or the designated Third-Party Manager, has authority to manage the client's account and make investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives/goals of the client and/or financial plan created for each client.

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

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

Non-Discretionary Financial Planning Engagements. Savvy does not exercise investment discretion in connection with financial planning and consulting services provided on a stand-alone, advice-only basis, and has no authority to execute, place, or confirm the execution of any trade in a client's account in that context. Implementation of any recommendation made in connection with such services is entirely at the client's discretion, and the client retains sole responsibility for determining whether, and how, to act on Savvy's advice. Savvy's role in these engagements is limited to providing recommendations regarding assets disclosed to Savvy by the client; Savvy does not advise on, and has no responsibility for, any asset or investment not disclosed to it in writing.

Item 17 - Voting Client Securities

Savvy does not vote proxies or monitor or act on security class actions on behalf of client securities, unless otherwise instructed and accepted by us (see below). Clients maintain exclusive responsibility for: (i) directing the manner in which proxies solicited by issuers of securities they beneficially own will be voted, and (ii) making all elections relative to mergers, acquisitions, tender offers, bankruptcy proceedings, corporate actions, or other types of events pertaining to the client's investments.

We do not render advice to or take any actions on behalf of clients with respect to any legal proceedings, including bankruptcies and shareholder litigation, to which any securities or other investments held in client accounts, or the issuers thereof, become subject, and do not initiate or pursue legal proceedings, including without limitation shareholder litigation, on behalf of clients with respect to transactions, securities or other investments held in client accounts. The right to take any actions with respect to legal proceedings, including shareholder litigation, with respect to transactions, securities or other investments held in a client account is expressly reserved to the client.

Item 18 - Financial Information

Savvy is required to disclose certain information to clients regarding financial matters of the firm.

- Savvy does not require or solicit prepayment of more than $1,200 in fees per client for investment advisory services expected or scheduled to be delivered more than six months after such prepayment.
- Savvy has no financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.
- Savvy has not been subject to a bankruptcy petition at any time.