



## FORM CRS – CUSTOMER RELATIONSHIP SUMMARY

March 31, 2026

### INTRODUCTION

Andina Capital Management is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free tools are available to research firms and financial professionals at [www.Investor.gov/CRS](http://www.Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We offer investment advisory services to retail investors, including financial planning and investment management. When you engage us to provide investment management services, we will monitor on an ongoing basis the investments in the accounts over which we have authority. Our investment management services often utilize model portfolio allocations comprised of specific investment securities and products; however, we also provide customized portfolio management to certain clients upon request. We do not limit the scope of our services to proprietary products or a limited group or type of investment. Further, when engaged on a discretionary basis, we will have the authority to buy, sell, trade and allocate investments within your accounts, consistent with your investment objectives, without prior consultation with you. You may impose restrictions on our discretionary authority. We also offer non-discretionary investment management services, where we will recommend investments to you, but you will retain the authority to decide whether or not to accept the recommendations. We typically require a minimum portfolio of \$50,000 for investment management services but reserve the right lower or waive this amount.

We offer comprehensive financial planning services, which include the development of a financial plan and reviewing it on an agreed upon basis, as well as individual services which may be one-time or ongoing. Your specific agreed-upon services will be set forth in your agreement with us.

**Additional information** about our services can be found on Part 2A of our Form ADV, which is available at <https://adviserinfo.sec.gov/firm/summary/CRD#>.

**Conversation Starters.** Ask your financial professional—

- **Given my financial situation, should I choose an investment advisory service? Why or why not?**
- **How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**

### WHAT FEES WILL I PAY?

You will pay fees based on the types of services you select. These fees will be stated in your agreement with us. Investment management fees are negotiable and typically based on assets under management. Fees are negotiable but will not exceed 2.00% annually. Fees are typically charged quarterly in advance, based on account values at the start of each quarter. Our firm's compensation from fees increases as client accounts grow, so we have an incentive to encourage our clients to increase the amount of assets in the accounts that are under our management. Financial planning fees are negotiable and typically are charged as an asset-based or flat fee. Flat fee schedules include an option to pay up front or on a quarterly basis in advance and are reviewed annually. Financial planning fees start at \$500 per year. This is a summary only, and additional information about our firm's fees are included in Item 5 of Part 2A of Form ADV, available at <https://adviserinfo.sec.gov/firm/summary/CRD#>.

**Other fees and costs:** In addition to our investment management or financial planning fees, you will generally pay commissions or transaction fees when we buy or sell investments, wire transfer fees and other fees charged by your custodian, and when applicable, management fees charged by independent portfolio managers and management fees and other operating expenses associated with private fund investments. Additionally, ETFs and mutual funds and certain annuities carry internal management, transaction, and administrative fees and other expenses, which are indirectly borne by investors, and are disclosed in the product's prospectus or disclosure document.

**You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.**



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**Conversation Starter.** Ask your financial professional—

- **Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?**

### WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISER? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

*When we act as your investment adviser*, we have to act in your best interest and put your interest ahead of ours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- We typically recommend a particular custodian to custody your assets, and we receive support services and/or products from that same custodian, certain of which assist us to better monitor and service your account, while a portion may be for the benefit of our firm.
- Certain Andina financial professionals licensed insurance agents who sell insurance products for a commission. As a result, there is an incentive to recommend insurance products to you in order to receive additional income.
- Certain Andina financial professionals are separately engaged to provide consulting and investment committee services to certain private funds that are recommended to Clients. These financial professionals receive compensation from those funds for providing these services that is based on a percentage of the performance-based fees earned by those funds (also referred to as “carried interest”). As a result, these financial professionals have an incentive to recommend that you invest in these private funds.

**Conversation Starter.** Ask your financial professional—

- **How might your conflicts of interest affect me, and how will you address them?**

**Additional information** about our conflicts of interest is contained in our Form ADV Part 2A brochure, which is available at <https://adviserinfo.sec.gov/firm/summary/CRD#>.

### HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professionals are compensated based on a percentage of the fees earned by Andina for each client, receive non-cash compensation in the form of an employee benefits package, and discretionary bonus that is based on the financial results of the firm and individual job performance. Financial professionals with corporate responsibilities also receive a salary.

### DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

Yes. We encourage you to visit [www.Investor.gov/CRS](http://www.Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

**Conversation Starter.** Ask your financial professional—

- **As a financial professional, do you have any disciplinary history? For what type of conduct?**

### ADDITIONAL INFORMATION

**Additional information about our services** can be found at <https://adviserinfo.sec.gov/firm/summary/CRD#>. If you have any questions about the contents of this brochure or would like to request a copy of this relationship summary, please contact us at [compliance@andinaadvisors.com](mailto:compliance@andinaadvisors.com) or 801-653-0564.

**Conversation Starter.** Ask your financial professional—

- **Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?**