Form ADV Part 2A

SAVVI Financial LLC

January 2024

Item 1: Cover Page

This brochure provides information about the qualifications and business practices of SAVVI Financial LLC. If you have any questions about the content of this brochure, please contact us at 781-583-7014 or by email at cco@savvifi.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.

SAVVI Financial LLC is registered as an SEC Investment Adviser. Registration as an Investment Adviser does not imply any level of skill or training. Additional information about SAVVI Financial LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for SAVVI Financial LLC is 169196.

Item 2: Summary of Material Changes

This Brochure provides a summary of SAVVI Financial's advisory services, fees, certain business practices and policies, and actual or potential conflicts of interest, among other things. This Item 2 is used to provide Clients with a summary of material changes since the previous version of the Brochure. As of the date of this Brochure SAVVI Financial LLC has no material changes to report.

This Brochure is an annual update which we are required to file within 90 days of our firm's fiscal year end ("FYE") of December 31st and which we are required to deliver to clients within 120 days of our FYE.

Copies of our Brochure are always available by contacting us at 781-583-7014 or by email at cco@savvifi.com.

SAVVI Financial does not have any material changes to report.

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Item 4: Advisory Business

Advisor Description and History

SAVVI Financial LLC ("SAVVI Financial" or "Advisor") provides investment advice primarily through interactive websites which employ computer software-based models and applications to provide investment advice to clients based on personal information provided by each client through the websites. Under the name SAVVI Wealth Partners ("SWP") the Advisor also provides portfolio management services to a limited number of clients. These services are described in a separate brochure. References to "SAVVI Financial" or "Advisor" refer only to SAVVI Financial's internet-based services and not to SWP's activities.

SAVVI Financial was established in September 2013 and currently has 10 employees working in the Advisor's Waltham, MA office. SAVVI Financial is organized as a Massachusetts limited liability company whose members hold 100% of the equity interest in the Advisor, with Dimitris Bertsimas, the Advisor's Chairman of the Board of Directors, holding more than 25%.

The principal owners have 100+ years of combined experience in the financial services industry. For more information about the management team please consult the Brochure Supplement.

Advisory Services

The Advisor is an investment management firm specializing in offering online investment advice and financial advice for the totality of a family's financial situation, using optimization-based computer algorithms.

Overview

SAVVI Financial provides technology-enabled comprehensive financial advisory services, including goal-based financial planning, investment advisory and retirement income solutions. We help individuals make better decisions about their financial life by providing a personalized strategy for spending, saving, investing and protecting what is important to them. They receive a personalized strategy which includes advice on asset location, asset allocation, contributions/withdrawals, Roth conversion, Social Security election, retirement age, debt payoff, required minimum distributions (RMD), across multiple account types, and includes multiple non-retirement related financial goals (such as house acquisition or college funding), as well as financing advice.

Employers may provide access to our service to their eligible employees through an on-line experience customized for the company's employees. This service is intended for citizens or legal residents of the United States or its territories. and is offered through employer benefits programs.

Individuals may also access our service directly through SAVVI Financial's website.

Strategy and Objective

SAVVI Financial's recommendations are customized to the individual needs of the users of its website as reflected in their responses to various questions and their input of basic information including, among other things, their age, income, assets and spending goals. Based on the answers provided, SAVVI Financial provides financial advice that is tailored to the user's profile. The Advisor employs its own proprietary methodology and technology in making its recommendations.

SAVVI Financial does not manage client assets and does not have custody over the assets of any user, does not exercise discretionary authority over any user's account, and does not execute trades for users. Users must make an independent determination of whether to follow any recommendation made by the website and must make their own arrangements to effect any of the website's recommendations.

Although SAVVI Financial systems carefully consider the investment objectives and goals of each client, their investment advice is based on and restricted by the information provided by the client. After clients sign an online contract with the Advisor, they are requested to enter their financial information into the SAVVI Financial automated system. This information is not reviewed for accuracy by any of the Advisor's personnel. Therefore, the burden of providing valid, accurate and complete information lies with the client.

The website's recommendations are not limited to any specific product or service offered by a broker dealer or insurance company.

Clients should be aware of investment risks and other risks, restrictions on withdrawals, and other information relevant to their investments. Additional information on certain investment risks is provided under Item 8, subsection *Market, Security and Regulatory Risks* below.

Tailored Advisory Services

Advisory services recommendations are tailored to the individual needs of the individual client. SAVVI Financial provides investment advice only with respect to limited asset classes and investments in ETFs and mutual funds.

Wrap Fee Programs

Wrap fee programs generally are arrangements where clients are charged a single fee for both advisory services and brokerage commissions. SAVVI Financial does not participate in wrap fee programs.

Assets Under Management

The Advisor does not manage individual client accounts, but rather provides asset allocation advice. Assets under management are $0.

Item 5: Fees and Compensation

Prior to engaging SAVVI Financial, the client will be required to enter into an Investment Advisory Agreement with the Advisor setting forth the terms and conditions of the Advisor's service, including the client's rights and the Advisor's duties.

Fee Schedule

For individual users of the SAVVI Financial service, the current monthly fee schedule (paid in advance) is as follows:

Basic: for $5/month, the client has access to a version of the SAVVI Financial service which will support up to two investment goals. In this version, the user will see advertisements, for which the Advisor receives compensation. (See Item 14 below.)

Premium: for $9/month, the client can input as many as six investment goals. The Premium version also provides users with asset allocation advice. This version is free of advertising.

Personal: for $29/month, the user receives, in addition to the features of the Premium version, support from a personal financial coach. The coach will conduct an initial onboarding call, quarterly check-in calls to review the progress of the client's financial plan, and up to 30 minutes per month of additional phone-based coaching. The client also receives unlimited technical assistance with the SAVVI planning tool.

For employers who offer SAVVI Financial as a benefit to their employees, the fees may be paid by the employee, the employer, or a third-party benefits administrator ("TPA"). If charged to the employee, the fee will range from $6.00 to $8.00 per month. If paid by the employer or the TPA, the fee will typically be charged based on the total number of employees, at the rate of $2.00 to $5.00 per employee per month. SAVVI may offer

promotional deals, volume discounts and cost-sharing arrangements among the parties referenced above.

Notwithstanding its standard fee rates, and subject to applicable laws and regulations, the Advisor reserves the right to change its fee schedules from time to time. Fees may be negotiated or modified at the Advisor's sole discretion. SAVVI Financial may charge different fees to different clients for comparable services, and its fees may be higher or lower than those charged by other advisers for comparable services. SAVVI Financial reserves the right to waive all or a portion of its fee.

Other Expenses Paid by Clients

Due to the nature of the Advisor's service offering there are no brokerage, custody, transactional or similar fees or expenses associated with the operation of the account by SAVVI Financial or use of the product. If users decide to act on the Advisor's recommendations, they may incur such expenses in their investment accounts.

Mutual Fund, Other Pooled Investment Vehicles, and ETF Fees and Expenses

SAVVI Financial may recommend that users consider purchasing ETFs, mutual funds, or other pooled investment vehicles (collectively, "Funds"). Such Funds typically incur expenses that are paid out of the Funds' assets (and thereby affect the investment return), such as investment advisory fees paid to the Fund's adviser, service fees, and in the case of mutual funds, may also include sales loads, redemption fees and distribution expenses. These expenses are in addition to the fee paid by the client to SAVVI Financial. These fees are disclosed in each Fund's prospectus, offering memorandum, or in shareholder reports.

Brokerage and Custodial Fees

If the user implements the Advisor's recommendations, they may also incur transaction, brokerage, and custodial fees. Other transaction fees which be associated with acting on the Advisor's recommendations payable by users may include sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Fees may also include custodial fees, consulting fees, administrative fees, and transfer agency fees charged by third parties in connection with the account.

Account Termination

Individuals account users of SAVVI Financial may terminate without notice as of the last day of the current billing cycle (monthly or annual, as applicable). No portion of the fee will be refunded and access to SAVVI Financial's service will continue until the end of the billing cycle. Employers who enter into an agreement with SAVVI Financial to provide access for their employees may terminate their agreement as shall be provided in the agreement. The agreement will also specify the terms under which any earned, unpaid fees will be due and payable or advanced fees refunded.

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

Performance-based fees are fees based on a share of capital gains on or capital appreciation of the assets of a client. SAVVI Financial does not charge performance-based fees.

Item 7: Types of Clients

As noted in Item 4, SAVVI Financial provides online investment management services to individuals, who may be high net worth individuals. There is no minimum or maximum net worth for the Advisor's services.

To access SAVVI Financial's services the user is required to set up an on-line account so that the Advisor can securely maintain the user's confidential information and can save the user's profile for future visits to the website.

The user is also required to acknowledge agreement with our Terms of Use and Investor Agreement which are available on the website.

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

Quantitative Analysis

Our method of investment management utilizes quantitative methods and optimization for providing long-term multi-period account transfers and asset allocation advice. Quantitative methods and optimization formulations are based on models that we have developed and researched extensively. We use models that we find have produced attractive returns in the past (either on an absolute and/or risk-adjusted basis) to make future asset allocation selections. The models are based on characteristics that have historically indicated strong potential asset classes.

Asset allocation advice should be recalculated periodically, but SAVVI Financial does not do this automatically. It is the client's responsibility to change or add to their profile whenever they believe their situation or prevailing circumstances have changed. Data for SAVVI Financial's models comes from industry leading data providers whom we believe to be reliable, although there can be no guarantee that such data is always free of error.

Investment Strategies

SAVVI Financial's algorithms analyze the cash flow needs and timing for each individual client, combined with the client's specific risk tolerance. Therefore, each of the client's accounts will have a customized asset allocation, based on the anticipated use of the client's assets over a specified time period to cover expenses and achieve financial goals. SAVVI Financial's algorithms utilize several different investment strategies, each associated with a cash flow timing and risk tolerance. Each of these strategies is mapped to a specific asset allocation. The overall goal of this approach is to ensure availability of funds for immediate

cash flows, while trying to maximize the overall sum of available asset value over the lifetime of the plan.

Market, Security and Regulatory Risks

Investments in financial instruments and products are subject to many types of risk that can cause the permanent loss of capital. The asset allocation strategies proposed by SAVVI Financial carry different levels and types of risk. All asset classes include a risk of loss of principal and any profits that have not been realized. The stock and bond markets fluctuate substantially over time and performance of any investment is not guaranteed. As a result, there is a risk of loss of assets, and such a loss may be not have been predicted by our models. We cannot guarantee any level of performance and cannot guarantee that clients will not experience a loss of value in their accounts. In addition, poor investment selection could cause our asset allocation suggestions to underperform other investment accounts or products managed by other firms.

Equity investments are subject to certain risks. Market prices of equity securities may fall rapidly or unpredictably and will rise and fall due to changing economic, political or market conditions or in response to events that affect particular industries or companies. Equity investments generally have greater price volatility than fixed-income investments. Because their prices tend to reflect future investor expectations, growth stocks may be more sensitive to change in current or expected earnings than other types of stocks and tend to be more volatile than the market in general. Growth stocks also may underperform value stocks and other investments during given periods.

As noted above, each of SAVVI Financial's investment suggestions has the potential for client assets to decline in value. Some of the specific risks to which client assets may be susceptible include sector risk, concentration risk, geopolitical risk, and small- mid- and large capitalization company risk.

Market Risks

Investments in securities and other financial instruments and products are subject to many types of risk that can cause the permanent loss of capital. The investment strategies utilized by SAVVI Financial carry different levels and types of risk. In each strategy, all securities include a risk of loss of principal and any profits that have not been realized. We cannot guarantee any level of performance and cannot guarantee that clients will not experience a loss of value in their account. In addition, poor investment selection could cause our investment strategies to underperform other investment accounts or products managed by other firms under similar investment strategies.

Market Volatility. The profitability of the investment strategies substantially depends upon the Adviser correctly assessing the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. SAVVI Financial cannot guarantee that it will be successful in accurately predicting price and interest rate movements.

Sector Risk. Investment strategies focused on or concentrated in a single sector may be affected by particular economic or market events and could be more volatile than a strategy with securities across industry sectors.

Concentration Risk. Concentrated strategies that invest in a relatively small number of securities may have more risk because changes in the value of a single security or the impact of a single economic, political or regulatory occurrence may have a greater adverse impact on the strategy's performance.

Geopolitical Risk. The change in political status of any country can have profound effects on the value of investments exposed to that country.

Large-Cap Stock Risk. Investment strategies focusing on large-cap companies may underperform other equity investment strategies as large-cap companies may not experience sustained periods of growth in the mature product markets in which they operate.

Small- and Mid-Capitalization Company Risk. The stocks of small- and mid-capitalization companies often have greater price volatility, lower trading volume and less liquidity than the stocks of larger, more established companies.

Accuracy of Public Information. The Adviser selects strategies and maps them to asset classes, in part, on the basis of information and data filed by issuers with various government regulators or made directly available by the issuers or through sources other than the issuers. Although the Adviser evaluates all such information and data and sometimes seeks independent corroboration when it's considered appropriate and reasonably available, the Adviser is not in a position to confirm the completeness, genuineness, or accuracy of such information and data. In some cases, complete and accurate information is not available.

Market or Interest Rate Risk. The price of most fixed income securities moves in the opposite direction of the change in interest rates. For example, as interest rates rise, the price of fixed income securities falls. If an account holds a fixed income security to maturity, the change in its price before maturity may have little impact on the account's performance; however, if the client has to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss to the account.

Inflation Risk. Inflation reduces the value of cash flows from a fixed income security. For example, if a client purchases a 5-year bond in which it can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. For all but inflation-linked bonds, adjustable bonds or floating rate bonds, the account is exposed to inflation risk on fixed-income securities because the interest rate the issuer pays is fixed for the life of the security.

Non-U.S. Investments. Investing in the financial instruments of companies (and, from time to time, governments) outside of the United States involves certain considerations not usually associated with investing in financial instruments of U.S. companies or the U.S. Government, including political and economic considerations, such as greater risks of

expropriation, nationalization, confiscatory taxation, imposition of withholding or other taxes on interest, dividends, capital gains, other income or gross sale or disposition proceeds, limitations on the removal of assets, and general social, political and economic instability; the relatively small size of the securities markets in such countries and the low volume of trading, resulting in potential lack of liquidity and in price volatility; the evolving and unsophisticated laws and regulations applicable to the securities and financial services industries of certain countries; fluctuations in the rate of exchange between currencies and costs associated with currency conversion; and certain government policies that may restrict the client's investment opportunities. In addition, accounting and financial reporting standards that prevail outside of the U.S. generally are not as high as U.S. standards and, consequently, less information is typically available concerning companies located outside of the U.S. than for those located in the U.S. As a result, we may be unable to structure strategies to achieve the intended results or to mitigate all risks associated with such markets. It may also be difficult to enforce the client's rights in such markets. For example, financial instruments traded on non-U.S. exchanges and the non-U.S. persons that trade these instruments are not subject to the jurisdiction of the SEC or the securities laws and regulations of the U.S. Accordingly, the protections accorded to the client under such laws and regulations are unavailable for transactions on foreign exchanges and with foreign counterparties.

Risk of Default or Bankruptcy of Third Parties. To implement the suggested strategies, the client may engage in transactions in financial instruments and other assets that involve counterparties. Under certain conditions, the account could suffer losses if a counterparty to a transaction were to default or if the market for certain securities or other financial instruments and/or other assets were to become illiquid.

Regulatory Risks

Strategy Restrictions. Certain client accounts (e.g. employee benefit plan accounts) may be restricted from directly utilizing investment strategies of the type in which the other accounts may engage, e.g., the use of leverage. Clients which may be so restricted should consult their own advisers, counsel, and accountants to determine what restrictions may apply or may be appropriate.

Trading Limitations. For all securities, instruments and/or assets listed on an exchange, including options listed on a public exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject the account to loss. Also, such a suspension could render it impossible for the client to liquidate positions and thereby expose the client's accounts to potential losses.

Security Specific Risks

Liquidity. Liquidity is the ability to readily convert an investment into cash. Securities traded through an exchange are generally more liquid. Securities traded over the counter or that do not have a ready market or are thinly traded are less liquid and may face material discounts in price level in a liquidation situation.

Currency. Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material in the evaluation of adviser or the integrity of the firm's management. SAVVI Financial along with its principal owners and employees have not been disciplined by any governing authority, including any regulatory agency, CFP Board of Standards, or any industry association of which they are licensed and/or are members.

Item 10: Other Financial Industry Activities and Affiliations

Neither SAVVI Financial nor its principal owners are registered or have an application pending to register as a broker-dealer or registered representative of a broker-dealer.

Neither SAVVI Financial nor its principal owners are registered or have an application pending to register as a futures commission merchant, commodity pool operator, commodity trading adviser, or an associated person of the foregoing entities.

SAVVI Financial does not recommend or select other investment advisers for its clients.

Item 11: Code of Ethics, Participation in Client Transactions and Personal Trading

As a registered investment advisor, SAVVI Financial owes a fiduciary duty to its clients. This means that SAVVI Financial has an obligation to place the client's best interest above its own. It must resolve any potential conflicts of interest in the client's favor or fully disclose such conflicts and receive the client's consent. In the case of employee benefit plans and individual retirement accounts, certain conflicts of interest are strictly prohibited.

As part of these obligation, SAVVI Financial has adopted a written Code of Ethics (the "Code") that is applicable to all employees. Each employee will be provided a copy, and is required to acknowledge, in writing, that they have received, read, understand and will abide by, the Code, and SAVVI Financial's Compliance Manual, upon commencement of employment and upon any material change to the Code.

The Code requires that employees act in the Client's best interests and comply with applicable laws and regulations. Employees are expected to avoid any action that is, or could even appear to be, legally or ethically improper. The principles outlined in the Code apply to all conduct, whether or not the conduct is also covered by more specific standards

or procedures set forth in the Code, Compliance Manual, or elsewhere. Employees are required to bring any violations, actual or suspected, of the Code immediately to the attention of SAVVI Financial's Chief Compliance Officer ("CCO"). Failure to comply with the Code may result in disciplinary action or other sanctions including termination of employment.

The Code also places certain restrictions on the personal trading activities of employees and their immediate family members. Employees may generally engage in personal trading subject to certain restrictions which may require obtaining prior approval of the CCO. However, employees may purchase and sell open-end mutual funds, and any other securities not specifically prohibited by the Code without preclearance. Employees are required to disclose their personal securities holdings annually and personal securities transactions quarterly to the CCO. Employees may also participate in limited offerings such as hedge funds, private equity funds, or other types of private offerings, but only with the advance consent of the CCO

A copy of the Code of Ethics shall be provided to any client or prospective client upon request.

Material components of the Code, in summary form, include:

- **Standard of Business Conduct**. It is the responsibility of all employees to ensure that the Adviser conducts its business with the highest level of ethical standards and in keeping with its fiduciary duties. Employees have a duty to place the interest of the Clients first, and to refrain from having outside interests that conflict with the interests of its Client(s).

- **Prohibited Conduct**. The Adviser's employees must avoid any circumstances that might adversely affect or appear to affect their duty of complete loyalty to clients.

- **Privacy of Client Information**. All information relating to Clients' portfolios and activities, and proposed recommendations is strictly confidential. Consideration of a particular purchase or sale may not be disclosed, except to authorized persons.

- **Personal Securities Transactions**. All employees shall comply with the Adviser's personal account trading policy summarized below.

- **Conflicts of Interest**. Employees may not use any confidential information or otherwise take inappropriate advantage of their positions for the purpose of furthering any private interest or as a means of making any personal gain. Employees and their immediate families may not accept any benefit from clients or any person who does business with the Adviser, other than business courtesies and non-cash gifts of nominal value.

- **Service as a Director**. No employee may serve as a director of a publicly-held company without prior approval by the CCO based upon a determination that service as a director would not be adverse to the interest of clients.

- **Reporting of Violations**. Employees are required to promptly report all actual or potential conflicts of interest, violations of any government or regulatory law, rule or regulation, or violations of the Adviser's policies and procedures.

- **Training**. Formal ethics training for all employees will occur on a periodic basis.

- **Review and Enforcement**. The CCO is responsible for ensuring adequate supervision over the activities of all persons who act on the Adviser's behalf in order to prevent and detect violations of the Code by such persons.

- **Participation or Interest in Client Transactions and Personal Securities Trading**. All employees shall comply with the procedures governing personal securities transactions set forth in the Code. Such procedures are designed, among other matters, to assist the CCO in avoiding potential conflicts of interests and detecting and preventing abusive trading practices. Strict compliance with the Adviser's personal trading policy is essential to the Adviser and its reputation. Any violation of the Adviser's personal trading policy can be grounds for immediate dismissal by the Adviser of any employee. Every employee of the Adviser is expected to be familiar with the personal trading policy and the procedures contained therein. These matters can be reviewed with the CCO at any time.

The CCO shall maintain current and accurate records of all personal securities transactions in which employees have a direct or indirect beneficial interest. The following restrictions shall apply to securities transactions by employees of the Adviser and their related persons.

- **Restricted Securities**. The Adviser shall maintain a restricted list of securities for which no trading by employees is allowed, e.g., because the Adviser may have material non-public information.

- **Initial Report**. An employee shall, no later than 10 days after the employee begins its relationship with the Adviser, provide the Adviser with brokerage account statements, which are as of a date that is within 45 days of the date the employee submits them to the Adviser, and complete and submit a list of brokerage accounts.

- **Quarterly Reports**. On a quarterly basis all employees shall submit to the CCO a personal securities transaction report.

- **Annual Report**. Following the completion of each calendar year, employees must resubmit a list of personal brokerage accounts and all securities holdings.

- **Record-Keeping Requirements**. The CCO shall establish a form to record personal securities transactions.

Item 12: Brokerage Practices

SAVVI Financial does not manage, does not have discretion, and does not have custody of any client accounts. Therefore the Advisor does not have any connection with brokers on behalf of its clients.

Research and Soft Dollars

SAVVI Financial does not engage in soft dollar arrangements.

Allocation and Aggregation

SAVVI Financial does not allocate or aggregate trades.

Directed Brokerage

SAVVI Financial does not trade and therefore has no brokerage arrangements.

Item 13: Review of Accounts

SAVVI Financial does not manage, does not have discretion, and does not have custody of any client accounts. Financial Plans are not individually reviewed and there is no active account management. If a user experiences significant changes in his/her financial situation it is the responsibility of the user to input the updated relevant information to receive an updated recommendation.

SAVVI Financial may from time to time send alerts, emails and other notifications to users if its system detects particular conditions that may be relevant to a user based on the user's preferences as indicated to us via the website.

SAVVI Financial technical personnel may review plans to assure quality control but will not review investment recommendations or whether the user has updated all relevant information.

Item 14: Client Referrals and Other Compensation

As noted above, SAVVI Financial directs its marketing efforts to employers to whom it offers to make the service available to its employees. In some cases, the employer pays for the fees and provides the service to employees at no cost. The receipt of fees from the employer rather than the employee-client does not change the advice generated by the SAVVI program.

The Advisor does not pay third parties to solicit end-user clients. It does however have arrangements with third parties to solicit interest among employers and employee benefit plan administrators in making SAVVI Financial's service available to employees. Compensation for such activities may include a percentage of revenue received by SAVVI

Financial pursuant to the solicitor's successful efforts. Such revenue may be based on the number of employees eligible to use the service, the number of actual users, or a combination thereof. While the existence of such third-party arrangements could encourage the Advisor to charge a higher fee for its services, SAVVI Financial believes the effect on the employee clients will be negligible.

The Advisor may post advertisements on its website for financial products and services provided by third parties. The Adviser is paid a fee which generally is based on the number of times users click on the links in the advertisement or utilize the third-party tools available at their websites. SAVVI does not endorse such products or services and disclaims any responsibility for them. The receipt of advertising revenue has no effect on the advice generated by the SAVVI program. SAVVI Financial may enter into licensing or other agreements with other investment advisory firms for the use of its financial planning software. As part of such agreements, the Advisor may provide a customized private-label portal for the adviser.

Item 15: Custody

SAVVI Financial does not manage or have discretionary authority over any client accounts and does not have custody of any client accounts.

Item 16: Investment Discretion

SAVVI Financial does not manage, does not have discretion, and does not have custody of any client accounts.

Item 17: Voting Client Securities

Because SAVVI Financial does not manage client accounts SAVVI Financial has no authority to vote shares of any client securities.

Item 18: Financial Information

The Advisor is not required to provide a balance sheet because the Adviser does not serve as a qualified custodian and does not require prepayment of fees of more than $1,200 and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

The Adviser does not have any financial impairment that will preclude it from meeting contractual commitments to Clients.

Bankruptcy Petition during the Past Ten Years

Not applicable to SAVVI Financial or its principal owners.

Miscellaneous

Privacy

Generally, SAVVI Financial prohibits the disclosure of any client-related non-public personal information as collected by the firm throughout the client/firm relationship. However, SAVVI Financial may make limited disclosure of such information as authorized by the client, or as otherwise provided by law. A copy of SAVVI Financial's Privacy Policy will be provided to each client upon inception of the relationship and annual thereafter.

Business Continuity

SAVVI Financial has made preparations via a planning document to expedite the resumption of business in the event of a major disruption. Among other issues, the plan details how clients may access their accounts in the event of an emergency. A copy of the Business Continuity Plan is available for review by request.