



SoFi Wealth LLC

Brochure

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November 12, 2024

This brochure provides information about the qualifications and business practices of SoFi Wealth LLC (“SoFi Wealth” or the “Firm”). If you have any questions about the contents of this brochure, please contact us at (855) 525-7634. 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. SoFi Wealth is registered with the SEC as an investment adviser. Registration does not imply a certain level of skill or training.

Additional information about SoFi Wealth is also available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Material Changes

This section summarizes the material changes that have been made to the Brochure since the last annual amendment dated March 1, 2024.

Item 4: SoFi Wealth has made material changes to its automated investing service. The description of the new service is set forth in Item 4.

Item 5: SoFi Wealth has updated this Item to describe the advisory fee for the automated investing service.

Item 8: SoFi Wealth has updated this item to reflect current portfolio options and strategies.

SoFi Wealth has also revised language throughout this Wrap Fee Program Brochure. We urge all clients to read this Wrap Fee Program Brochure in its entirety.

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Item 4: Advisory Business

SoFi Wealth LLC is an investment advisor registered with the Securities and Exchange Commission (“SEC”) since 2013. Throughout this Brochure, SoFi Wealth LLC will be called “SoFi Wealth”, or “the firm,” “our,” “we,” or “us.” SoFi Wealth provides investment advice to individual investors utilizing proprietary software, self-service tools, and through an experienced investment team that provides financial planning services and advice on general asset allocation. SoFi Wealth is owned by SoFi Hold Co., a holding company with no direct operations. SoFi Hold Co. is a direct, wholly owned subsidiary of SoFi Technologies, Inc. and under common ownership with Social Finance, LLC (formerly Social Finance, Inc.) (“SoFi”), a Delaware limited liability company, which is also a wholly owned subsidiary of SoFi Technologies, Inc., a Delaware corporation. SoFi Technologies, Inc. is a publicly traded company (NASDAQ: SOFI).

SoFi Wealth offers Robo Investing Services and a Digital Advice tool for the selection of 529 Plans. Clients access these services over the internet and through a mobile application. SoFi Wealth also offers clients access by phone, virtual meetings and electronic messages to financial planning services provided by credentialed financial planners.

SoFi Wealth Robo Investing Service (formerly “Automated Investing”)

SoFi Wealth offers an automated, online investment advisory program designed to help you pursue your investing goals. We collect information about you by asking you to complete an online questionnaire. Based on the information you provide and the program choices you make, we assign your account to a model portfolio that we will manage. The Robo investing program will make the initial investments, invest your subsequent deposits, rebalance your portfolio to ensure that it remains allocated in accordance with the relevant model's targets, and make any updates to your account that are necessary to conform to any changes we make to the model portfolio. You will also be provided with information and periodically contacted about the ongoing management of your account, all online.

This program is designed for clients who are comfortable with online access, want to receive the asset allocation and monitoring services described in this Brochure, are comfortable with the investment choice of a limited set of mutual funds and/or Exchange Traded Funds (“ETFs”) selected based on the profile information the client provides, and are willing to pay an asset-based fee for these services. This program is generally *not* for clients who have more complex needs, who want access to a broader range of investments, or who prefer in-person interactions with their advisors. **You should consider carefully whether this service is appropriate for your investment needs and goals.**

Electronic Accessibility Requirement

As this service is provided exclusively online, you must be able to log in to our website to access important documents, ensure your information is accurate and current, and complete periodic reviews. You will be required to sign documents, including our advisory agreement, electronically. Our agreement and other disclosures and notices will be delivered to you only in electronic format; we will generally not send paper versions unless required by applicable law. You will be responsible for maintaining the security and confidentiality of your account access information, and you will be responsible for all user activity that occurs in your account. You must notify us immediately if you believe your account has been accessed without authorization or if its security has been compromised.

How We Gather Information About You

You will be required to complete an online questionnaire to provide us with important information about you that will be used as the basis for our investment recommendations. It is your responsibility to ensure that the information you provide us is complete and correct, and to update your profile when your information changes. If there are multiple owners on this Account, the information you provide should reflect the views and circumstances of all owners on the Account. If you are the fiduciary of this Account for the benefit of the account owner or account holder (e.g., the trustee for a trust or custodian for an UTMA), please keep in mind that these assets will be invested for the benefit of such account owner or account holder. If you feel any of the questions are unclear or you do not understand why the information is being sought, please contact us.

Be careful when inputting your answers or information. This service relies only on the information you provide. We will not independently verify the information you provide in your profile and we will not consider other information obtained in connection with another account or relationship with us or our affiliates. If you enter inaccurate information, the resulting recommendations might not be right for you.

Your Portfolio Options

We offer three portfolio options:

Classic: a low cost, diversified portfolio of mutual funds and/or ETFs

Classic + Alternatives: the Classic portfolio plus an allocation to ETFs and mutual funds holding alternative investment assets (potentially including REITs, commodities, etc.) and/or strategies (potentially including funds that are actively managed based on the manager's assessments of real-world events that could affect markets or on the manager's assessment of specific market opportunities).

Sustainable Investing: a low cost, diversified portfolio of mutual funds and ETFs based on their holding securities issued by companies with a stated commitment to environmental, social or governance factors, as identified by BlackRock Custom Model Solutions ("BlackRock") as having a high ESG rating.

Clients will be required to select between these portfolio options, which are described more fully in Item 8, below. Clients may change among portfolio options at any time.

SoFi Wealth has developed a model portfolio for each portfolio option, risk profile (as determined from the client's goal, time horizon and risk tolerance) and account type (taxable or IRA). Each model portfolio has a different, diversified asset allocation and asset class mix. SoFi Wealth determines the manner and extent to which portfolio options are made available to clients through the program, including when a portfolio option may change or no longer be offered. As a general matter, we make these decisions based on a variety of factors, including client needs, available investment styles, platform capacity, client demand and the outcome of due diligence and evaluation reviews.

The model portfolios mainly consist of mutual funds and ETFs. The use of funds provides cost effective and professionally managed diversification. Each fund generally holds a substantial number of positions. To develop our model portfolios, SoFi Wealth's Investment Committee determines an appropriate, diversified asset allocation for that model. The Investment Committee then identifies funds that could fit the various asset classes and styles that will comprise that model. The Investment Committee selects the specific funds for inclusion in the model portfolio and monitors the funds and their managers on an ongoing basis to ensure that they continue to meet our guidelines. The Investment Committee primarily

uses research, recommendations and analysis by BlackRock to make its investment management decisions. This process is described in more detail in Item 8, below.

Once you have selected your portfolio option, provided us with the information we need to develop your risk profile, and indicated what type of account it is, we will assign your account to the corresponding model portfolio. The model strategy chosen for your account and the assets comprising your portfolio in the aggregate is designed to align to the designated target asset allocation for the account. At times, your account's actual asset allocation may become misaligned with the strategy allocation because of, for example, market movement, additions and withdrawals of assets from your account, changes in the portfolio option or theme you select or purchases and sales of certain securities in your account. SoFi Wealth's system will monitor the assets in the account continuously and will rebalance the assets to conform to the applicable target asset allocation within certain parameters.

Rebalancing transactions generally will occur if an individual holding drifts more than approximately 5% away from its target allocation, if the cash position is \$50 or more than its target allocation, if the cash position is less than 0.25% of the portfolio, or if there is any position that is not in the target allocation (such as when the model changes). There is a \$1 minimum for all mutual fund trades, as we cannot execute a mutual fund transaction of less than \$1. Thus, when an order includes mutual funds, the transaction must be at least \$1; if a transaction would otherwise be triggered, the system will generate that transaction once the order size would be at least \$1. When a transaction is triggered, it will bring the portfolio back to within the range of the target allocation.

Generally, there is a \$50 trading threshold for cash to be invested, whether on initial deposit or upon any subsequent cash deposits or payments into the account.

When we change the model, client accounts will be adjusted over a period of several weeks. A client's account could be adjusted immediately or up to three weeks later.

Discretionary Asset Management

This program provides investment management only on a discretionary basis, which means that you are required to authorize us to buy and sell securities in your account without consulting with you first. See [Item 16](#) for more details.

Reasonable Investment Restrictions

You may request that we impose reasonable investment restrictions on your account; we will determine whether a restriction request is reasonable and, if so, how to allocate the assets that would have been invested in a particular fund in your account. If we determine that a requested restriction is reasonable, we are permitted to allocate those assets pro-rata across the other strategies or investments in the account, to use one or more replacement securities (which could be other funds or ETFs), and/or to keep those assets in cash or cash equivalents. We reserve the right to determine that any requested restriction is not reasonable and to decline to accept it. If your requested restriction is not accepted, it will not be implemented in your account and you should consider whether to continue using the program.

Advisory Agreement

To obtain the Robo Investing services, clients must accept and enter into an Advisory Agreement with SoFi Wealth. The Advisory Agreement contains important additional details about this program.

Questions about SoFi Wealth's Robo Investing service may be directed to SoFi Wealth at (855) 525-7634.

Information For Current Clients Of SoFi's Robo Investing Service

All clients of SoFi Wealth's robo investing service will be notified of the upcoming changes to the program as they are rolled out.

Clients may terminate their enrollment in robo investing if they do not wish to use the new program. Absent termination, Clients will be asked to provide the elections and information described above so that SoFi Wealth can assign them to the appropriate model portfolio. The accounts of clients who do not provide the updated information needed will be assigned to the Classic portfolio option and their investments will be shifted to investments that match their current allocations and investments.

SoFi Wealth has historically used SoFi-branded ETFs in its model portfolios managed by the robo investing service. As SoFi Wealth implements the new portfolio models described in this Brochure, client portfolios will be shifted to third-party funds that have the intended market exposure and risk profile, but with a lower internal cost. SoFi Wealth will make these changes automatically.

For qualified (non-taxable) accounts, SoFi Wealth will sell the SoFi-branded ETFs, and purchase third-party ETFs, promptly after migration to the new program.

For non-qualified (taxable) accounts, to help offset the impact of capital gains taxes on the sale of the SoFi-branded ETFs, absent client request for immediate sale of the client's holdings of SoFi-branded funds, SoFi Wealth will sell the SoFi-branded ETFs held in clients' non-qualified accounts only when we calculate that the amount of capital gains taxes the client could incur on the sale will be less than the amount by which the internal cost of the SoFi-branded ETFs exceeds the internal cost of the third party funds. We thus anticipate that most clients' holdings of SoFi-branded funds in non-qualified accounts will be sold gradually, potentially over multiple tax years. This is a conflict of interest, as SoFi has a financial interest in keeping client assets invested in its proprietary funds. We believe this approach is in clients' best interest, however, as the system will make the switch when we calculate that it is in the clients' financial interest to do so based on the comparison of the capital gains taxes to be incurred on the sale versus the cost savings and portfolio construction benefits to be realized by investing in the new fund. Clients may call SoFi Wealth at (855) 525-7634 at any time to request the exchange if they do not wish to wait for the automated system to make the switch out of the SoFi-branded funds.

SoFi Wealth 529 Plan Digital Advice

SoFi Wealth makes available an automated tool that assists certain users to identify state-sponsored college savings plans ("529 plans"). This tool helps estimate monthly contributions to save for anticipated college expenses and recommends certain directly-held 529 plan investment options. The tool estimates college expenses in a year in the future, and using that estimate, calculates a monthly investment needed to attain the estimated total expense amount. It uses assumptions for key variables, including product fees and state tax benefits. The tool allows the user to connect to 529 plans to independently establish an account.

SoFi Wealth believes that automated tools offer value to many clients, but all clients must be aware that automated tools have significant limitations. SoFi Wealth's automated tools rely upon the information provided by the user; the usefulness of the results is therefore limited by the information provided by the user. The automated online tools use predefined algorithms based upon common scenarios and

guidance is principles based; therefore, the tool cannot take into account many unique circumstances of the client. **Because of these limitations, this digital advice may not be appropriate for everyone. Some clients have financial situations that mean they would be better served by advice from an in-person advisor.**

To access the digital advice tools described above, all users must accept and enter into a Customer Agreement with SoFi Wealth. The tool is a single-session experience and SoFi Wealth has no ongoing customer relationship with or obligations to the user following use of the tool in a single browser session. Questions about the 529 College Savings tool and the algorithm it uses may be directed to SoFi Wealth at (855) 525-7634.

Financial Planning

All clients of SoFi Wealth may engage with a financial planner in periodic sessions (by phone, email and video call) at no cost for up to 90 days after opening an account with SoFi Wealth. To obtain this Financial Planning service, a client must enter into a Planning Agreement with SoFi Wealth. The objective of the session is to create a limited and targeted financial plan for a specific defined topic, such as managing the client's general household budget, insurance planning, debt management, retirement saving, college saving, home buying, or asset allocation & investment planning. The financial planner will obtain a general understanding of the client's financial situation but will not always obtain a comprehensive view necessary for a full financial plan. The Financial Planning service does not include any tax or legal advice.

If the financial planner determines, in their discretion, that the client's financial situation is complex enough to require a comprehensive financial plan, the planner will make this option available to the client. In these cases, the planner will gather additional data and will use financial planning software to model potential scenarios before delivering recommendations.

SoFi Wealth Financial Planners do not implement any transactions on behalf of clients. SoFi Wealth and its Financial Planners do not engage in active or ongoing management of investments for clients. The client has the sole responsibility to determine whether and how to implement the financial planning recommendations. Financial plans do *not* include any specific recommendations of individual securities.

SoFi Wealth and its Financial Planners do not monitor any client's financial situation or investments. The client has the sole responsibility to monitor his or her own financial situation and to seek input from a Financial Planner if circumstances change or merit additional analysis and planning.

General Information About Our Services

Accuracy Of Client Information: SoFi Wealth's asset management, digital advice and financial planning services are dependent on receiving accurate information from the client. We rely exclusively on the information clients provide about themselves and their goals. We will not independently verify the information clients provide and we will not consider other information obtained in connection with another service, account or relationship with us or our affiliates. If a client provides inaccurate information, our recommendations or services might end up not being right for the client.

Termination Of Advisory Agreement: The Advisory Agreement with SoFi Wealth may be terminated by either party at any time, with or without cause, in accordance with the terms of the agreement. Upon

termination of any agreement, any earned, unpaid fees will be due and payable in accordance with the applicable agreement.

Assets Under Management

SoFi Wealth has \$1,364,638,646 of discretionary assets under management as of September 30, 2024.

Item 5: Fees and Compensation

SoFi Wealth Robo Investing Service

Wrap Fee

This automated asset management service is offered as a "Wrap Program," which means that expenses, including SoFi Wealth's advisory fee, as well as brokerage commissions, management fees, and administrative costs, are "wrapped" into a single charge -- the "wrap fee".

Clients are charged an annual asset-based fee (the "wrap fee") at the rate of 0.25% based on the value of each account enrolled in the program.

This fee is non-negotiable. It is payable monthly, in arrears, and is generally billed and collected on the first trading day of the following month. The fee amount is calculated by multiplying the daily fee amount (the annual fee divided by the number of days in the year) times the average daily invested balance of your account times the number of days for which services were provided in the month. The wrap fee is not charged on the cash allocation, which is generally 1% of the portfolio. Clients are required to agree to authorize SoFi Wealth to deduct the wrap fee from their client accounts. The amount charged to each client each month is shown on the client's monthly account statements issued by the custodian and is also reported in the client's account online.

The wrap fee is subject to change from time to time, upon notice to you. Your continued use of the service will constitute your agreement to any change in the fee. Upon your request, and at no charge, you may contact SoFi Wealth at (855) 525-7634 to request information about the wrap fee charged to your account and how it is calculated.

Additional Fees And Expenses

The wrap fee does not cover:

- transfer taxes
- exchange fees, alternative trading system fees, required SEC fees or similar fees charged by third parties, including issuers
- brokerage account fees for services provided by Apex Clearing such as IRA administration, maintaining inactive accounts, transferring funds or securities to another firm via ACAT, wires, sending paper statements/confirmations, etc.; these fees will change from time to time and can be found at the following website: www.sofi.com/invest/fee-schedule
- fees, expenses and charges charged by mutual funds and ETFs or by the managers or sponsors of funds, including internal fees, expenses and charges of the funds used in the portfolios and themes
- any other charges imposed by law or otherwise agreed to relating to your account.

SoFi Wealth's model portfolios use ETFs and mutual funds, each of which has internal fees and expenses that are specified in the individual fund's Prospectus or offering materials. The fees and expenses are paid by the funds and are borne by all fund shareholders owning the same share class. These fees and expenses can include, but are not limited to, mutual fund servicing fees, sub-accounting fees, management fees, custody fees, portfolio transaction execution costs, administration fees, distribution fees, and shareholder servicing fees. Fees and expenses charged by these funds or institutions are deducted from each fund's net asset value and, as such, are an indirect expense of the client. Actively managed funds generally charge higher fees than passive, non-managed "index" funds. All fees and expenses that are charged directly or indirectly to the client will reduce the client's investment return. Clients should review each funds' Prospectus to understand the total amount of fees paid. Mutual fund and ETF expenses change from time to time at the sole discretion of the issuer. SoFi Wealth does not receive a share of these third party fees.

A single, all-inclusive fee for brokerage, custodial, and recordkeeping services may cost more or less than purchasing these services separately. The primary factor affecting the comprehensive fee is the provision by SoFi Wealth of individualized investment advice and portfolio management services tailored to the needs of each individual.

Revenue To SoFi Affiliates

SoFi Wealth's broker-dealer affiliate, SoFi Securities LLC ("SoFi Securities"), earns revenue in two main ways when clients invest with SoFi Wealth. One way is payment for order flow (PFOF), which is the practice of wholesale market makers paying brokers for routing their clients' orders to the market maker for execution. By acquiring order flow in this way, market makers are able to trade profitably against client orders, while clients potentially benefit from reduced trading costs. SoFi Securities also earns revenue through Apex Clearing by lending clients' ETF shares held in brokerage accounts to short-sellers in an activity commonly called "Share Lending."

SoFi Wealth's Robo Investing clients are also clients of SoFi Securities and will purchase securities through SoFi Securities. This represents a conflict of interest more fully described in [Item 10](#) of this Brochure.

Social Finance, LLC sponsors several ETFs, some of which have historically been used in the Robo Investing program. Investments in these SoFi ETFs from the Robo Investing portfolios make them more commercially viable, which generates marketing benefits and, eventually, revenue for SoFi. For these reasons, SoFi Wealth has a financial incentive to hold SoFi-sponsored ETFs in its portfolios instead of potentially more-favorable alternatives. SoFi-branded ETFs include the SoFi Select 500 ETF, SoFi Next 500 ETF, SoFi Social 50 ETF, and SoFi Enhanced Yield ETF. SoFi-branded ETFs are distributed by Foreside Fund Services, LLC. Not all SoFi-branded ETFs are included in the model portfolios. Neither SoFi Wealth nor its affiliates are affiliated persons of the Funds, the Adviser, the Sub-Adviser, the distributor, or any of their affiliates. The Fund's investment adviser is permitted to waive its Management Fees for the SoFi-branded ETFs used in Automated Investing (SFY and SFYX) at any time, for any period. Please see the Prospectus for each of these ETFs for more details about the fee waiver(s). Absent fee waiver, client holdings will be subject to the management fees, and Social Finance, LLC will earn revenue from these ETFs based on the investments made by SoFi Wealth clients.

SoFi Wealth 529 Plan Digital Advice

SoFi Wealth does not currently charge for this service.

Financial Planning

SoFi Wealth does not currently charge for this service.

Clients who receive financial planning services have the option to purchase investment products through other brokers or agents that are not affiliated with SoFi Wealth.

Item 6: Performance-Based Fees

SoFi Wealth does not receive any performance-based compensation. SoFi Wealth is not compensated based on a share of capital gains upon or capital appreciation of the assets or any portion of the assets of any client.

Item 7: Types of Clients

SoFi Wealth's clients are individual investors, including individuals and high net-worth individuals. There is no minimum account size, but clients should be aware that there is a \$50 threshold for investment of cash.

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

SoFi Wealth Robo Investment Service

SoFi Wealth believes that asset allocation and diversification are important to the long-term success of a portfolio. While historical results are never a guarantee of investment success, and diversification does not guarantee against loss, SoFi Wealth believes that asset allocation and diversification are the best way to optimize the potential returns for a given amount of risk over the long term.

Our Investment Committee, consisting of senior SoFi Technologies, Inc. leaders from various business units, including Invest, Corporate Development, and Investment Strategy, as well as an external, independent member (the "Investment Committee"), drives our portfolio allocation decisions using a combination of backward-looking investment metrics and forward-looking estimates. We also document whether we believe our bias is adding value to the portfolios relative to the static benchmarks for each strategy. We believe this approach will deliver better returns over the long run than holding the same allocation mix with no adjustments for changing economic conditions.

SoFi Wealth, through its Investment Committee, selects the specific investments and target allocations for each portfolio option and theme, and then continuously and regularly monitors each model portfolio and implements changes as it deems appropriate. The Investment Committee primarily uses research, recommendations and analysis by BlackRock to make its investment management decisions.

Portfolio options:

Classic: a low cost, diversified portfolio of mutual funds and ETFs

Classic + Alternatives: the Classic portfolio plus an allocation to ETFs and mutual funds holding alternative investment assets (potentially including REITs, commodities, etc.) and/or strategies (potentially including funds that are actively managed based on the manager's assessments of real-world events that could affect markets or on the manager's assessment of specific market opportunities).

Sustainable Investing: a low cost, diversified portfolio of mutual funds and ETFs based on their holding securities issued by companies with a stated commitment to environmental, social or governance factors, as identified by BlackRock as having a high ESG rating.

Clients are required to select among the portfolio options.

The selection of the model to be used for a client's account depends on the portfolio option, account type and the risk profile information entered by the client. Clients may change their selections at any time. Clients should update their profile information, and in particular, their goals, time horizons and risk tolerances, if their circumstances change.

Once an investor has confirmed an investment strategy, the client opens an account, funds it electronically, and SoFi Wealth implements the plan by investing in the appropriate model strategy. If an automated investing account is funded with a client's existing securities, those holdings will be sold without assessing suitability for the client's financial situation. SoFi Wealth does not recommend selling a client's existing holdings to enroll, nor does SoFi Wealth provide tax advice. Clients must consider that liquidating assets may result in tax consequences that should be discussed with the client's tax advisor.

Portfolios are automatically rebalanced when asset class weightings drift outside of tolerance ranges. This rebalancing could result in capital gains for some clients. The Investment Committee may alter the mix of a given model portfolio from time to time, either by altering the percentages of existing ETFs or replacing one or more ETFs in the portfolio.

The rebalancing algorithms described above and/or a neutral allocation to cash might rebalance client accounts without regard to market conditions and on a high frequency basis, as cash contributed to the account will result in rebalancing. Rebalancing in taxable account types will result in taxable events.

Cash held in SoFi Wealth clients' accounts is not invested and does not earn interest.

BlackRock Fund Advisors ("BlackRock", CRD No. 105247) has granted SoFi Wealth access to its Aladdin® Platform, a portfolio management and risk analytics software system, as well as marketing support at no cost to SoFi Wealth. Investment models generated by the Aladdin® Platform are used by SoFi Wealth in the development and maintenance of the Portfolios. The investment models generated by the Aladdin® Platform predominantly and sometimes exclusively utilize iShares ETFs, which are sponsored, distributed and/or advised by BlackRock. SoFi Wealth's receipt of investment research, models and/or technology from BlackRock creates a conflict of interest for SoFi Wealth because the receipt of these benefits reduces SoFi Wealth's operating costs, which, in turn, creates an incentive for SoFi Wealth to recommend and/or use iShares ETFs and/or other BlackRock products in the investment management of client accounts. BlackRock does not provide and is not responsible for providing investment advice to clients of SoFi Wealth, does not participate in or make any investment decisions on behalf of SoFi Wealth or clients of SoFi Wealth, does not endorse any investment decision or

recommendation made by SoFi Wealth, and has no obligation to continue to provide SoFi Wealth with its investment models and/or access to the Aladdin® Platform.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

SoFi Wealth relies heavily on technology to perform investment management services. SoFi Wealth clients should be aware of the following when utilizing SoFi Wealth's software-based advisory services:

- Clients of SoFi Wealth agree to rely primarily on the SoFi Wealth website for their account information, including, but not limited to, their positions, profits and losses, account value, account performance, statements, and confirmations. Periodic statements and trade confirmations will be provided electronically to the client by the clearing broker-dealer on the SoFi website, or by mail for a fee;
- Clients of SoFi Wealth agree that their risk profile is created through our profiling system during account opening, and this information is used to map clients to their recommended portfolios. We recommend that clients re-evaluate their risk profile and contact customer service if any of their circumstances have changed in a material way.

Investments in the SoFi Wealth Wrap Fee Program are limited to ETFs and mutual funds, and SoFi Wealth focuses on ETFs based on exposure, total cost of ownership, and liquidity. With mutual funds, SoFi Wealth also focuses on manager expected active return net-of-fees.s.

The SoFi Wealth robo investing program entails risk, including the risk of a total loss of principal. There can be no assurance that the investment objectives of the model portfolios will be achieved or that investors will not incur losses. When investing in securities, clients are subject to numerous risks including those that arise as a result of changes in general economic and market conditions, such as interest rates, availability of credit, inflation rates, and economic uncertainty. While the use of diversified investment vehicles, such as exchange traded funds (ETFs), mitigates overall portfolio risk compared to investing in individual securities, it cannot completely eliminate this risk.

- Investment Company Risk: This is the risk that, when a client account is invested in ETFs or other investment companies, its performance will be affected by the performance of those other investment companies. Investments in ETFs and other investment companies are subject to the risks of the investment companies' investments, as well as to the investment companies' expenses. If a client account invests in other investment companies, the client account may recognize taxable gains from transactions in shares of that investment company, which would be taxable when distributed.
- Manager Risk: Poor security selection or focus on securities in a particular sector, category, or group of companies will cause a fund to underperform relevant benchmarks or other funds with a similar investment objective.
- Alternative Strategy Mutual Funds: Certain mutual funds invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes, and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities,

such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry. These types of funds tend to have higher expense ratios than more traditional mutual funds. They also tend to be newer and have less of a track record or performance history.

- ESG Risk: Applicable to the Sustainable Investing portfolio option, ESG risk is the chance that the ETFs and/or mutual funds screened by Blackrock for ESG criteria generally will underperform the market as a whole or, in aggregate, will trail returns of other funds screened for ESG criteria. There are significant differences in interpretations of what it means for a company to meet ESG criteria. Blackrock's assessment of a fund, based on the underlying investments, may differ from that of other funds or of the portfolio manager's or investor's assessment of such fund. As a result, the funds deemed eligible by Blackrock may not reflect the beliefs and values of any particular investor and may not exhibit positive or favorable ESG characteristics.
- Risks specific to ETFs: ETFs invest in individual stocks and bonds that are subject to risks that include industry conditions, laws, governmental regulation, competition, technological developments, and national and international political circumstances. It is possible that these portfolios will lose money. The shorter the holding period one considers, the greater the probability of a loss over that holding period.

ETFs are typically investment companies that are legally classified as open-end mutual funds or Unit Investment Trusts (UITs). ETFs differ from traditional mutual funds, in particular, 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 the 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. Although many ETFs are registered as investment companies under the Investment Company Act of 1940, some ETFs, in particular those that invest in commodities, are not registered as investment companies. ETFs may be closed and liquidated at the discretion of the issuing company.

- Market Risk: This is the risk that the value of securities owned by an investor may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.
- Credit Risk: This is the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- Legislative Risk: This is the risk that regulations or legislation implemented by the government could significantly alter the business prospects of one or more companies.
- Emerging Markets Risk: This is the risk that emerging markets may have unstable, even volatile, governments. Political unrest can cause serious consequences to the economy and investors. These markets often suffer from insufficient labor and raw materials, high inflation or deflation, unregulated markets and unsound monetary policies.

- Interest Rate Risk: This is the risk that fixed income securities will decline in value because of an increase in interest rates (a bond or fixed income fund with a longer duration will be more sensitive to changes in interest rates than those with shorter durations).
- Tax Consequences: Liquidating assets may result in tax consequences that should be discussed with your tax advisor.
- Technology Risk: SoFi Wealth makes no guarantee that an investor's internet provider will be able to access the website or mobile carrier access to the SoFi mobile application. Further, as SoFi Wealth delivers its services entirely through its online platform there is a risk that the software may not perform as designed.

SoFi Wealth manages investments for many clients. The advice SoFi Wealth gives to any client might be different from the advice SoFi Wealth gives to other clients and might be different from the actions SoFi Wealth personnel take in their personal accounts, all of which presents the potential for a conflict of interest. SoFi Wealth is not obligated to buy, sell or recommend to any client any security or other investment that SoFi Wealth may buy, sell or recommend for any other clients or for accounts owned by SoFi Wealth or its personnel.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities to clients in amounts we believe to be appropriate for each client, and to allocate investments among client accounts equitably and consistent with the best interests of all accounts involved. There can be no assurance that a particular investment opportunity that comes to SoFi Wealth's attention will be allocated in any particular manner. If SoFi Wealth or its personnel obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have no obligation to disclose the information to any client or use it for any client's benefit and will not do so.

Item 9: Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events. This advisor has an event to disclose, the details of which are below.

Following SoFi Wealth's April 12, 2019, transition of certain client funds from third-party ETFs to Sofi-branded ETFs, the SEC Staff requested documents and information from SoFi Wealth, investigating and seeking disclosures by SoFi Wealth to clients regarding the transition of funds. SoFi Wealth fully cooperated with the SEC's investigation and elected to make an offer of settlement to the SEC, and based on information that SoFi Wealth provided, the SEC issued an Order Instituting Administrative Cease-and-Desist Proceedings against SoFi Wealth on August 19, 2021 (the "Order"). The SEC alleged that SoFi Wealth failed to provide its clients with full and fair disclosure of its conflicts of interest relating to the transition, including that it (1) had a preference for placing clients into Sofi-branded ETFs rather than third-party ETFs, and SoFi's economic interest in these Sofi-branded ETFs presented a conflict of interest for SoFi Wealth, (2) was investing client assets in these Sofi-branded ETFs to help market the SoFi brand as having a broader array of services and products than previously offered, and (3) intended to use client assets to capitalize the new Sofi-branded ETFs, making the ETFs more liquid and favorable to the market. The SEC alleged that SoFi Wealth violated Sections 206(2) and 206(4) of the Advisers Act and Rule 206(4)-7 promulgated thereunder. The SEC, among other things, censured SoFi Wealth and ordered SoFi Wealth to cease-and-desist from any future violations of Sections 206(2) and 206(4) of the

Advisers Act and Rule 206(4)-7 promulgated thereunder and pay a \$300,000 civil penalty. SoFi Wealth consented to the Order without admitting or denying the SEC's findings (except as to jurisdiction and the subject matter of the action, which was admitted). Prior to the entry of the Order, SoFi Wealth implemented additional remedial measures to address potential conflicts of interests and how they are evaluated. Moreover, prior to the entry of the Order, SoFi Wealth reimbursed clients in the SoFi Invest automated investment program for tax liabilities they potentially incurred as a result of gains realized on the April 12, 2019 sale of the third-party ETFs to buy Sofi-branded ETFs. The SEC's Order can be found at:

<https://www.sec.gov/litigation/admin/2021/ia-5826.pdf>.

Item 10: Other Financial Industry Activities and Affiliations

SoFi Hold Co.

SoFi Wealth is owned by SoFi Hold Co., a holding company with no direct operations. SoFi Hold Co. is a direct, wholly owned subsidiary of SoFi Technologies, Inc. and under common ownership with SoFi.

Social Finance, LLC

SoFi Wealth is under common ownership with SoFi. SoFi was formed with the intention of being a new kind of finance company. We strive to develop innovative lending and wealth management products and tools for faster service and open conversations. Whether our members are looking to buy a home, save money on student loans, or invest in their future, SoFi seeks to provide useful tools, products, and services.

Social Finance is the sponsor of an ETF fund family (currently consisting of four funds which have been filed with the SEC) in partnership with Toroso Investments, LLC ("ETF Advisor") and Tidal ETF services and has a direct economic interest in these funds.

The ETF Advisor serves as investment adviser to the funds and has overall responsibility for the general management and administration of the funds. The ETF Advisor also arranges for sub-advisory, transfer agency, custody, fund administration, and all other related services necessary for the funds to operate. The ETF Advisor has entered into an Agreement with Social Finance, under which SoFi pays many expenses of the funds. Although SoFi has agreed to be responsible for expenses, the ETF Advisor retains the ultimate obligation to the funds to pay such expenses. SoFi will also provide marketing support for the funds, including hosting the funds website and preparing marketing materials related to the funds. For these services and payments, SoFi is entitled to a fee based on the total management fee earned by the ETF Advisor under the Advisory Agreement less certain expenses and start-up costs. SoFi does not make investment decisions, provide investment advice, or otherwise act in the capacity of an investment adviser to the funds.

SoFi Wealth uses, suggests and recommends its own services and products in addition to the services and products of affiliated entities in connection with the SoFi Wealth advisory business. The particular services and products recommended will be dependent upon the particular client and their stated objectives. The arrangements described below can involve compensation arrangements which may take the form of commissions, service fees or other equivalents. SoFi Wealth clients are not entitled to any compensation received by SoFi Wealth affiliates.

Affiliations

SoFi Technologies, Inc. owns or holds investments in multiple operating companies in addition to SoFi Wealth that offer financial services. Firms affiliated with SoFi Wealth include: SoFi Securities LLC, a registered broker-dealer, SoFi Bank, N.A., a national bank, SoFi Digital Assets, LLC, a licensed money transmitter, SoFi Lending Corp., a non-bank consumer lending company, SoFi Credit Corp. LLC, Social Finance Life Insurance Agency, LLC, and SoFi Securities (Hong Kong) Limited, and a service called SoFi at Work, offered through SoFi.

SoFi Wealth delivers to its clients information about and advertisements for products and services offered by its affiliates, as described in detail below. In addition, SoFi Wealth can offer customers access to specific products from marketing arrangements that its affiliates maintain and, as such, SoFi Wealth's affiliates are compensated when customers make purchases, which is a conflict of interest since it could result in increased compensation to our Firm.

Several of the affiliated companies have activities that create interests for SoFi Wealth that conflict with a client's interests. Please note that SoFi Wealth has established a number of policies and procedures that are designed to identify and address potential conflicts of interest between affiliates.

SoFi Securities LLC

SoFi Wealth is under common ownership with SoFi Securities, a full-service introducing broker-dealer registered with the Financial Industry Regulatory Authority ("FINRA") and Securities Investor Protection Corporation ("SIPC"). SoFi Wealth and SoFi Securities share office space, personnel, and resources. Many of the SoFi Wealth advisory personnel are also registered representatives with SoFi Securities. SoFi Securities also provides no commission brokerage services to customers under the SoFi Invest umbrella, called "Active Investing". SoFi Wealth clients are marketed this service and may choose to participate; however, it would be under a separate, direct agreement with SoFi Securities and in a separate SoFi Securities account. SoFi Securities also engages in underwriting activity. Underwritten securities are not recommended to Robo Investing portfolios.

SoFi Wealth clients who purchase securities through the SoFi Wealth platform are required to utilize the brokerage services of SoFi Securities to effect securities transactions for clients. Apex Clearing provides trade execution and clearing services to SoFi Securities and acts as the qualified custodian for SoFi Wealth clients' holdings. SoFi Securities LLC receives fees and other benefits from their role as introducing broker-dealer, including payment for order flow and securities lending which creates a conflict of interest between the firm and the client. Upon account opening, SoFi Wealth clients may choose to enroll into the Securities Lending Program through Apex Clearing Corporation. Members are able to opt in or out of the program in their online profile or by contacting SoFi Wealth at (855) 525-7634. Clients participating in the Securities Lending Program may earn revenue sharing payments from SoFi Securities and Apex. Such payments may be taxed at a higher rate than a dividend payout. When shares are on loan, they are not SIPC insured, and proxy voting rights over those particular securities belong to the borrower. Share lending does not affect a client's ability to sell the securities.

Regarding order flow rebates, third parties execute transactions, and they pay rebates to SoFi Securities for the opportunity to execute these transactions. However, all parties still have an obligation to execute all customer orders in the most advantageous way for the client. We are also limited in investment selection; we can only invest your account in securities which are available on Apex's platform. This causes a conflict of interest, as there may be securities better suited to your financial situation and

objectives available elsewhere that are not available on Apex's platform. Other non-affiliated providers may be available that, among other things, charge lower fees, or offer more competitive interest rates or differentiated features.

SoFi Bank, N.A.

In January 2022, the Office of the Comptroller of the Currency (OCC) and the Board of Governors of the Federal Reserve System approved the applications of SoFi Technologies, Inc. to become a Bank Holding Company through its acquisition of Golden Pacific Bancorp, Inc. (OTCPK: GPBI) and to operate its wholly-owned subsidiary, Golden Pacific Bank, National Association, as SoFi Bank, National Association ("SoFi Bank"), which was completed in February 2022. With this transaction, SoFi Bank is now an affiliate of SoFi Wealth. SoFi Bank offers customers deposit banking accounts and loans and earns revenue when customers select such products. Other non-affiliated providers may be available that, among other things, charge lower fees, or offer more competitive interest rates or differentiated features.

Social Digital Assets, LLC

SoFi Digital Assets, LLC sits under the umbrella of SoFi Invest. SoFi Wealth will not offer investment advice or recommendations with respect to cryptocurrencies.

SoFi Lending Corp.

SoFi Lending Corp. ("SLC") is an affiliate of SoFi Wealth. Through the SoFi website, SLC provides customers information about products and services offered by other companies, such as automobile lenders and lenders making business-purpose loans. SLC enables customers to connect with such other lenders to pursue loan inquiries. SLC receives compensation from such third-party lenders for promoting their products and services. SLC's services are also promoted using the brand "Lantern." You are not required to use any SoFi Lending Corp. products or services to obtain SoFi Wealth services. However, from time to time, SoFi Wealth may present you with a product offered by SoFi Lending Corp. which creates a conflict of interest since our Firm, SoFi, and/or other affiliates described herein would receive increased compensation when a customer (you) obtains a product or service through SoFi Lending Corp. Other non-affiliated providers may be available that, among other things, charge lower fees, or offer more competitive interest rates or differentiated features.

SoFi Credit Corp. LLC

SoFi Credit Corp. LLC is an affiliate of SoFi Wealth. SoFi Credit Cards are issued by SoFi Bank, N.A. pursuant to license by Mastercard® International Incorporated and can be used everywhere Mastercard is accepted. Mastercard is a registered trademark, and the circles design is a trademark of Mastercard International Incorporated. You are not required to use any SoFi Credit products or services to obtain SoFi Wealth services. However, from time to time, SoFi Wealth may recommend that you use a product offered by SoFi Credit which creates a conflict of interest since using the proposed credit services result in increased compensation to our Firm, SoFi, and/or other affiliates described herein. Other non-affiliated providers may be available that, among other things, charge lower fees, or offer more competitive interest rates or differentiated features.

Social Finance Life Insurance Agency LLC

Social Finance Life Insurance Agency LLC ("SoFi Agency") is an affiliate of SoFi Wealth. SoFi Agency offers insurance products to customers. SoFi Agency receives compensation from insurers and issuers

of insurance policies when customers purchase insurance products. You are not required to use any SoFi Agency products or services to obtain SoFi Wealth services. However, from time to time, SoFi Wealth may recommend that you use a product offered by SoFi Agency which creates a conflict of interest since using the proposed insurance services result in increased compensation to our Firm, SoFi, and/or other affiliates described herein. Other non-affiliated providers may be available that, among other things, charge lower fees, or offer more competitive interest rates or differentiated features.

SoFi Securities (Hong Kong) Limited

SoFi Wealth has entered into an agreement to act as a Service Provider to SoFi Securities (Hong Kong) Limited (“SoFi Securities (Hong Kong)”). SoFi Wealth provides advice on three to five model portfolios based on SoFi Securities (Hong Kong)’s portfolio risk requirements, written advice on a set of ETF Model portfolios, suggests specific allocation percentages to funds in order to meet the target asset allocation, and provides well-diversified recommendations. In addition, SoFi Wealth provides advice on the rebalancing of the portfolios on at least a quarterly basis and prepares quarterly gross-of-fee portfolio performance reports, back-testing results and back-testing performance reports. SoFi Securities (Hong Kong) is responsible for final review and approval of all model portfolios and is solely responsible for any advice given to its end clients. A conflict of interest exists based on the fact that the individuals responsible for providing services to SoFi Securities (Hong Kong) also provide similar services for SoFi Wealth. Other non-affiliated providers may be available that, among other things, charge lower fees, or offer more competitive interest rates or differentiated features.

SoFi at Work

SoFi at Work is a program offered by SoFi (an affiliate of SoFi Wealth) which helps employers offer financial well-being benefits to their employees, such as student debt repayment benefits, retirement planning, and savings tools. SoFi receives monthly fees from employers when a user opts to automatically deduct money from their paycheck to contribute to a 529 Plan. SoFi Wealth offers users SoFi Digital Advice tools, including tools to estimate college expenses and select 529 Plans. When SoFi Wealth provides advice to its clients, a conflict of interest exists for SoFi Wealth because SoFi Wealth's affiliate earns income when users choose to participate in SoFi at Work and make contributions through their employer. Other non-affiliated providers may be available that, among other things, charge lower fees, or offer more competitive interest rates or differentiated features.

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

SoFi Wealth has adopted a Code of Ethics expressing its commitment to ethical conduct to comply with applicable securities laws including those relating to employees’ personal trading, insider trading, and restrictions/reporting requirements around giving and receiving gifts and entertainment. SoFi Wealth's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth SoFi Wealth's practice of supervising the personal securities transactions of employees. Individuals associated with SoFi Wealth may buy or sell securities for their personal accounts identical to or different from those recommended to clients of the advisor.

Associated persons may buy or sell specific securities for their own accounts that are not purchased or sold for clients. SoFi Wealth monitors the securities transactions of all associated persons and investigates any unusual patterns that it detects. Neither SoFi Wealth nor any of its associated persons has any material financial interest in client transactions beyond the provision of investment advisory

services as disclosed in this brochure. Note that associated persons do not receive incentive compensation, bonuses or commissions for assets under management, product sale commissions or the recommendation or sale of any products.

To avoid a conflict of interest between SoFi Wealth and its clients, SoFi Wealth prohibits principal securities transactions between SoFi Wealth and any advisory client without first obtaining the prior written approval of the Enterprise Chief Compliance Officer and the written consent of the client. SoFi Wealth will also not cross trades between client accounts. SoFi Wealth will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

Affiliates of the Investment Adviser often provide other services to investors and in these scenarios, will receive fees from the investors in such capacities. Other present and future activities of the SoFi Wealth and other affiliates of SoFi Wealth give rise to additional conflicts of interest. Notwithstanding such conflicts, SoFi Wealth understands that it is a fiduciary to the investors and is committed to implement the obligations stated in its Code of Ethics.

SoFi Wealth's clients or prospective clients may obtain a copy of the firm's Code of Ethics by contacting a SoFi Wealth agent at 855-456-7634, or by utilizing the chat feature on the SoFi mobile application or website.

Item 12: Brokerage Practices

SoFi Wealth clients who purchase securities through the SoFi Wealth platform are required to utilize the brokerage services of our affiliate, SoFi Securities, a member of FINRA and SIPC, which acts as an introducing broker-dealer effecting securities transactions for clients' accounts for which Apex Clearing provides trade execution and clearing services. Apex Clearing is broker-dealer, member FINRA and SIPC.

Not all investment adviser firms require the use of a particular broker/dealer. However, for operational and compliance purposes, we have made the decision to provide all asset management services through one brokerage and custodial platform. You are not required or obligated to utilize our services and therefore you are not required or obligated to open an account with SoFi Securities and Apex Clearing. However, if you do not want to use SoFi Securities or Apex Clearing, we are unable to provide our asset management services to you.

SoFi Wealth seeks the best overall execution of transactions for client accounts. Using an affiliated broker presents a conflict of interest, as it results in additional compensation for the firm. SoFi Wealth obtains information as to the general level of commission rates being charged by the brokerage community from time to time and will periodically evaluate the overall reasonableness of brokerage commissions paid on client transactions by reference to such data to ensure competitive commission rates. "Best execution" means the best overall qualitative execution, not necessarily the lowest possible commission cost. Accordingly, the factors that SoFi Wealth considers when selecting or recommending brokers are matters that directly benefit client accounts and are consistent with obtaining the best execution of their transactions. These factors include speed of execution, price improvement, commission, quality of overall execution services, expertise, financial condition, and skill.

SoFi Securities earns revenue from lending securities in client accounts. Share lending programs benefit SoFi Wealth's affiliated broker-dealer but will only benefit clients to the extent that the revenue is shared with clients.

SoFi Wealth aggregates securities sale and purchase orders for a client with similar orders being made contemporaneously for other client accounts. Using this trading method, the average price of the securities purchased or sold in such a transaction is calculated, and a client charged or credited, as the case may be, the average transaction price. As a result, however, the price may be less favorable to the client than it would be if similar transactions were not being executed concurrently for other accounts. SoFi Securities earns revenue from their role as introducing broker-dealer, including payments for order flow and securities lending. SoFi Securities does not charge commissions on trades.

Item 13: Review of Accounts

SoFi Wealth electronically reviews each client's account when it is opened, and continuously monitors and periodically rebalances each client's portfolio to seek to maintain a client's chosen portfolio allocation. SoFi uses software that tracks portfolio drift from allocations and cash holdings. Drift is managed as a percentage deviation above and below the target allocation, known as tolerance band. When a tolerance band is breached or cash exceeds a maximum or minimum threshold, the portfolio is rebalanced. Investment Committee personnel oversee the model portfolios, but each client's account will not be regularly reviewed by these personnel. SoFi Wealth provides quarterly statements on client accounts that show account balances, account activity and profits (losses) of the accounts. These statements are delivered electronically and are made available through the SoFi Wealth website. Statements may be mailed to clients, at their request, for an additional fee.

The Investment Committee is responsible for model portfolio management, investment selection, and ongoing governance, as well as ensuring that SoFi's portfolio management service comports with fiduciary duties of care and loyalty and acting in clients' best interests and with other relevant regulatory obligations. This includes developing and implementing SoFi Wealth's portfolio management strategy, reviewing investment performance and adherence to that strategy, and serving as an oversight body over Portfolio Manager(s) and all other investment- and portfolio-management-related activities performed by SoFi Wealth. Decisions put to vote by the Committee will only be accepted by unanimous approval of those members participating in that decision, subject to the quorum requirement.

SoFi Wealth contacts each client at least annually to remind the client to review and update the client's account portfolio option selections and financial profile information.

Item 14: Client Referrals and Other Compensation

SoFi Wealth advertises to attract Clients to establish advisory relationships and maintains agreements with other companies to promote SoFi Wealth to prospective and potential clients. SoFi Wealth maintains marketing services agreements with various companies to promote SoFi Wealth to their customers or website users. SoFi Wealth promotions may appear on social media and other websites, sites that host articles about investment products and services (including products and services of SoFi Wealth corporate affiliates disclosed in [Item 10](#)), and other firms with customers or users SoFi Wealth believes might be interested in our services. SoFi Wealth promotions include links to SoFi Wealth.

Promotions offered by these companies may include SoFi offering prospective clients benefits such as reduced advisory fees, additional advisory services, or branded promotional items of nominal value (shirts, hats, etc.) for becoming clients.

Promoters

SoFi Wealth pays marketing services fees to companies that promote SoFi Wealth, which creates a conflict of interest for those companies. The fee is often paid based upon the number of customers who reach SoFi Wealth through the marketing services and register to become SoFi Wealth clients. SoFi Wealth affiliates also pay marketing services fees on a per impression basis. In some cases, SoFi Wealth's fee will be paid only if the client opens an account with a certain minimum initial investment stated in the promoter's agreement. The compensation paid by SoFi Wealth is for the solicitation services provided by the promoter and for referring the potential client to SoFi Wealth. These solicitation services include making introductions and providing information and materials about the advisory services of SoFi Wealth. In no event will such endorsements provide investment advisory services. The compensation paid by SoFi Wealth will not increase the client's fee for advisory services or be passed through to the referred client in any way as a result of a promoter's involvement in the introduction.

Compensation is paid and appropriate disclosures are made in compliance with the SEC Marketing Rule 206(4)-1 under the Investment Advisers Act of 1940, as amended, to the extent required by applicable law.

Item 15: Custody

The qualified custodian that actually holds the assets of SoFi Wealth's clients is Apex Clearing, a member of FINRA and SIPC.

As a regulatory matter, SoFi Wealth is deemed to have custody of client funds and securities because SoFi Wealth is given the authority to have fees deducted directly from client accounts.

Apex Clearing issues account statements at least quarterly to all clients. SoFi Wealth sends clients electronic notification that the statements are available online. SoFi Wealth also notifies clients electronically when transaction confirmations are available. These statements and confirmations may be delivered via mail for an additional fee at the client's request.

SoFi Wealth also provides clients with online reports and data relating to their accounts, transactions and holdings. We urge clients to compare the account statements they receive from the qualified custodian with those they receive from SoFi Wealth. Clients should notify the custodian *and* SoFi Wealth of any discrepancy.

Item 16: Investment Discretion

When providing asset management services, SoFi Wealth requires discretionary authority to determine which securities and the amounts of securities that are bought or sold. This authority is limited by your stated portfolio option, risk profile, and any reasonable investment restrictions that we accept, and by our fiduciary obligation to act in your best interest. Before SoFi Wealth assumes this discretionary authority, the client must agree to the SoFi Wealth advisory agreement, which contains the grant of discretionary authority.

Item 17: Voting Client Securities

SoFi Wealth does not have, and will not accept, the authority to vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities

maintained in client portfolios. Proxies will be forwarded directly to clients' mailing addresses by Apex Clearing.

SoFi Wealth does not advise or act for you in any legal proceedings, including class actions or bankruptcies, involving securities purchased for or held in your account. Clients may contact SoFi Wealth at (855) 525-7634 with questions about a particular solicitation.

Item 18: Financial Information

Advisers that require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, are required to provide certain financial information; as SoFi Wealth does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, it is not required to provide the financial information. In addition, advisers who have discretionary authority or custody of client funds are securities are required to make certain financial disclosures if applicable; SoFi Wealth has no disclosures in response to this item.