

Davivienda Investment Advisor USA, LLC

Client Relationship Summary

May 25, 2026

Item 1 — Introduction

Davivienda Investment Advisor USA, LLC (“we,” “Davivienda Advisors,” or “the Adviser”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free, simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials on broker-dealers, investment advisers, and investing.

Item 2 — Relationships and Services

What investment services and advice can you provide me?

We offer investment advisory services to retail investors, including both discretionary and non-discretionary portfolio management. These services are delivered through digital and traditional platforms.

- **Monitoring:** We monitor your investments on a continuous and ongoing basis as part of our standard services, including periodic rebalancing where appropriate.

Material Limitations: Our monitoring is limited to assets held within your managed account and does not include client-initiated transactions or assets outside your managed account in our non-discretionary offering.
- **Investment Authority:** For discretionary accounts, we manage your investments based on your goals, risk profile, and time horizon. In non-discretionary accounts, we provide recommendations, but **you make the ultimate decision regarding the purchase or sale of investments.**
- **Limited Investment Offerings:** We offer Davivienda Advisors proprietary model portfolios and BlackRock-supported model portfolios. For customized non-discretionary portfolios, we use a list of approved investment products, though you may deviate from this list (typically 5% to 7%), subject to suitability review.
- **Account Minimums:** We generally require a \$20,000 minimum investment to open an account, though we may waive this in certain cases. We recommend that clients maintain a minimum account size of \$15,000.

For more detailed information, please see our Form ADV Part 2A Brochure and Part 2A Appendix 1 (the Wrap Fee Program Brochure).

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

Item 3 — Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

We primarily charge an asset-based wrap fee. Fees may vary based on the client’s written agreement, account size, service level, and negotiated terms. The wrap fee covers investment advisory services, transaction costs, custody, and account administration.

- **Frequency:** Fees are calculated as a percentage of assets under management and are assessed and deducted from your account monthly in arrears.
- **Fee Schedule:** Our tiered annual fee schedule ranges from 1.40% for the first \$100,000 to 0.80% for assets over \$1,000,000 (negotiable). For non-digital advisory services, flat or fixed fees may apply as established in your written agreement.

- **Other Fees and Costs:** You will pay other fees and costs related to our services and investments directly or indirectly, including custodian fees (such as wire transfer or paper statement fees), account maintenance fees, and internal expenses of underlying investments like ETFs and UCITS.

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

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

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money, and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- **Asset-Based Fee Conflict:** Because we charge an asset-based fee, we have an incentive to encourage you to increase the assets in your account.
- **Affiliate Referral Conflict:** We pay referral fees to affiliates, such as Corredores Davivienda S.A. Comisionista de Bolsa and Banco Davivienda S.A., which creates an incentive for them to refer clients to us. These referral fees are paid from Davivienda Advisors' advisory fee revenue and do not result in additional charges to you.
- **Platform and Implementation Conflict:** Xendia Wealth LLC receives contractual compensation from the advisory or wrap fee for platform, onboarding, account-servicing, trade-execution, allocation, rebalancing, and implementation services. This creates a business and operational incentive for us to continue using Xendia's platform and services.

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

Additional Information: Please see Items 10, 11, and 14 of Form ADV Part 2A (Brochure) and Item 9 of Part 2A Appendix 1 (the Wrap Fee Program Brochure) for more detailed information about our conflicts of interest and how we address them.

How do your financial professionals make money?

Our professionals receive a set salary and may receive a discretionary bonus based on individual and company performance. Bonuses are not tied to the sale of specific products or the acquisition of new client accounts.

Item 4 — Disciplinary History

Do you or your financial professionals have a legal or disciplinary history?

No. Neither the firm nor our financial professionals have a legal or disciplinary history. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research us.

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

Item 5 — Additional Information

For additional information about our services or to request a copy of this relationship summary, please contact us at (601) 241-3444 or via email at support@daviviendaadvisors.com. You may also find additional information, including a copy of this Form CRS, at <https://adviserinfo.sec.gov/firm/summary/319755>.

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