



# Davivienda Investment Advisor USA LLC d/b/a Davivienda Advisors

## Form ADV – Part 2A “Brochure”

**Date of Brochure: December 23, 2025**

1110 Brickell Avenue, Suite 900B  
Miami, FL 33131  
Tel: (601) 2413444 Colombia  
<https://www.daviviendaadvisors.com/>  
[support@daviviendaadvisors.com](mailto:support@daviviendaadvisors.com)

**This Form ADV Part 2A (“Brochure”) provides information about Davivienda Advisors' qualifications and business practices. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority. Additional information about Davivienda Advisors is available on the SEC’s website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).**

Davivienda Advisors (“Davivienda,” “Advisor,” “us,” “we,” “our”) is an SEC-registered investment Advisor. Registration as an Investment Advisor does not imply any level of skill or training.

If you (“your,” “client,” “clients”) have any questions about the contents of this Brochure, please feel free to contact support at (601) 2413444 or via email at [support@daviviendaadvisors.com](mailto:support@daviviendaadvisors.com). Davivienda Advisors' CRD number is 319755.

## Item 2 – Material Changes

We initially provide you with a copy of our Brochure when we enter into an agreement with you. You will receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year, December 31 of each year. We will provide you with a new Brochure as necessary based on changes or new information at any time, without charge. Our Brochure may be requested by contacting support at 011-57-6012413444 or [support@daviviendaadvisors.com](mailto:support@daviviendaadvisors.com).

Since the last update of this brochure, the following material changes have been made:

1. **Ownership Structure Update:** Davivienda Advisors is now owned by **Corredores Davivienda S.A. Comisionista de Bolsa (67.7%)** and **Davivienda Global S.A. (32.3%)**, formerly known as **Holding Davivienda International, S.A.**
2. The model portfolio offering has been expanded to include 2 portfolios managed by Davivienda and an expanded non-discretionary customized portfolio offering with approved investment product lists.
3. **Fee Schedule Update:** Effective December 23, 2025, Davivienda Advisors has revised its annual management fee schedule for advisory accounts. The updated tiered fee structure is as follows:
  - a. Up to \$100,000: 1.40% (previously 1.60%)
  - b. \$100,001 to \$500,000: 1.25% (previously 1.40%)
  - c. \$500,001 to \$1,000,000: 1.00% (previously 1.20%)
  - d. Over \$1,000,000: 0.80% (previously 1.00%)

These changes reflect a reduction in advisory fees across all asset tiers. The revised fee schedule applies to both new and existing clients as of the effective date and is reflected in Item 5 of this Brochure.

## Item 3 - Table of Contents

<b>Item 2 – Material Changes</b>	<b>2</b>
<b>Item 3 - Table of Contents</b>	<b>3</b>
<b>Item 4 – Advisory Services</b>	<b>4</b>
<b>Item 5 – Fees and Compensation</b>	<b>8</b>
<b>Item 6 - Performance-Based Fees and side-by-side management</b>	<b>10</b>
<b>Item 7 - Types of Clients</b>	<b>10</b>
<b>Item 8 - Methods of Analysis, Investment Strategies, and Risk of Loss</b>	<b>10</b>
<b>Item 9 - Disciplinary Information</b>	<b>16</b>
<b>Item 10 - Other Financial Industry Activities and Affiliations</b>	<b>16</b>
<b>Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>	<b>17</b>
<b>Item 12 - Brokerage Practices</b>	<b>22</b>
<b>Item 13 - Review of Accounts</b>	<b>23</b>
<b>Item 14 - Client Referrals and Other Compensation</b>	<b>23</b>
<b>Item 15 - Custody</b>	<b>24</b>
<b>Item 16 - Investment Discretion</b>	<b>24</b>
<b>Item 17 - Voting Client Securities</b>	<b>24</b>
<b>Item 18 - Financial Information</b>	<b>25</b>

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## Item 4 – Advisory Services

### General

As a client of Davivienda Advisors, you benefit from our fiduciary commitment to putting your interests first. We deliver personalized investment advice designed to help you achieve your financial goals through transparent, disciplined investment strategies. Davivienda Advisors is now owned by Corredores Davivienda S.A. Comisionista de Bolsa (67.7%) and Davivienda Global S.A. (32.3%), formerly known as Holding Davivienda International, S.A. Corredores Davivienda S.A. Comisionista de Bolsa is a broker-dealer established in 1980, supervised by the Colombian Financial Superintendence, with its headquarters in Bogotá, Colombia, and additional branches across Cali, Bucaramanga, Medellín, Cartagena, and Barranquilla. For detailed information, Part 1 of our Form ADV is accessible at [www.Advisorinfo.sec.gov](http://www.Advisorinfo.sec.gov).

### Description of Advisory Services

As a fiduciary, Davivienda Advisors delivers investment advice, prioritizes client interests above all else, and adheres to strict ethical standards. The firm's services are tailored to meet each client's unique goals and risk profiles, ensuring personalized and effective investment strategies. Whether through direct management or leveraging third-party sub-advisors, Davivienda Advisors is committed to transparency, consistency, and the highest service levels across all its advisory offerings.

### Wrap Fee Program - Digital Platform

Davivienda Advisors' digital platform uses technology to match clients with optimal investment options based on their goals and risk tolerance. The platform assesses financial objectives through a questionnaire, generating an investment profile score that aligns with appropriate Model Portfolios. These portfolios include both Model Portfolios managed by BlackRock, one of the world's largest asset management firms, and proprietary portfolios managed by Davivienda Advisors. The firm has introduced two additional model portfolios for conservative and moderate risk profiles, constructed with shorter-duration fixed-income ETFs to manage interest-rate risk. When constructing your portfolio, we reserve a 2% cash allocation to ensure seamless fee coverage.

The digital service is delivered through a partnership with BCP Advisors LLC (d/b/a BCP Global) as a sub-advisor, utilizing their proprietary platform for customer onboarding, account services, and investment management. BCP Global operates the platform, while Davivienda Advisors provides client access via an interactive website and mobile application.

Interactive Brokers LLC (member FINRA/SIPC) provides execution, clearing, and custody services. Clients open cash accounts with Interactive Brokers to access this advisory service. A single, comprehensive fee covers all aspects of the service, including access to globally diversified portfolios and professional management. Please

see our Wrap Fee Brochure for more information on our digital platform offering.

## Wrap Fee Program - Non-Digital Advisory Services

Davivienda Advisors offers non-digital investment advisory services through various discretionary and non-discretionary accounts. The process begins with creating an investor profile based on each client’s objectives, goals, and risk tolerance. Investment activities focus on various assets and securities across markets, tailored to fit the client’s profile. Davivienda offers these investment advisory services in a wrap-fee format. That is, when you engage Davivienda to provide its investment advisory services, you will pay a single fee that will cover a series of costs associated with the management of your relationship. Please see our Wrap Fee Brochure for more information.

### SERVICE COMPARISON

Digital Platform Services	Non-Digital Advisory Services
<b>Access:</b> 24/7 through the website and mobile app	Direct relationship with an investment advisor
<b>Portfolio Selection:</b> Algorithm-recommended based on questionnaire	Customized approach based on comprehensive consultation
<b>Management Style:</b> Primarily model portfolios with automatic rebalancing	Tailored discretionary or non-discretionary management
<b>Communication:</b> Digital tools, email support	Personal meetings, calls, and digital communication
<b>Minimum Investment:</b> \$20,000 recommended	Varies based on service level
<b>Fee Structure:</b> Based on a tiered AUM schedule. Negotiated based on service complexity and assets.	Negotiated based on service complexity and assets

Both service types benefit from our fiduciary commitment, investment expertise, and disciplined investment process.

### Customized Discretionary Portfolios

Discretionary portfolios are customized to each client, focusing on specific or broad-based investments across asset classes and markets. Clients can place targets and restrictions on these accounts, which must be outlined in writing. Davivienda Advisors constructs an allocation mix and investment strategy it believes is in the client’s best interest. The investment strategy may include, but will not be limited to, optimal asset allocation, specific investments, specific investment managers, and other strategy considerations. Contrary to the non-discretionary mandates, in a discretionary

mandate, Davivienda Advisors does not need to seek client approval (pre- or post-approval) for the implementation of the strategy or the rebalancing of the investment strategy. The relationship is governed by the investment management contract and mandate given to Davivienda Advisors by the client.

For discretionary accounts, Davivienda Advisors may utilize the services of a third-party sub-advisor to enhance portfolio management. Please see our Wrap Fee Brochure for more information on our non-digital, discretionary offering.

## **Non-Discretionary Portfolios**

These services are provided to all clients under a non-discretionary advisory agreement. Davivienda Advisors offers recommendations, but clients retain ultimate decision-making power regarding investment recommendations. For non-discretionary accounts, Davivienda Advisors may also utilize the services of a third-party sub-advisor to provide additional expertise and management capabilities.

Non-discretionary customized portfolios are constructed from a curated list of approved investment products, reviewed and approved by the firm's Research and Investment Committee. These portfolios are limited to investment products authorized by the Research and Investment Committee. Clients may exercise limited discretion by allocating up to 5% of their portfolio value to products outside the approved list, provided such selections are reviewed for suitability and documented appropriately.

Both digital and non-digital services are tailored to individual client needs, with strategies customized based on various factors outlined in the investment advisory process. Please see our Wrap Fee Brochure for more information on our non-digital, non-discretionary offering.

When entering into a non-digital advisory service relationship, Davivienda Advisors will discuss each client's investment objectives, risk tolerance, financial situation, and any specific preferences or restrictions. This evaluation ensures that investment strategies and recommendations align with the client's goals and needs, providing a personalized approach to managing their portfolio.

## **Sub-Advisory Services**

**Services Provided:** As mentioned previously, we offer certain advisory services through a digital platform in conjunction with BCP Global. Davivienda Advisors leverages BCP Global's technology to offer online advisory services through a white-label platform. As the appointed sub-advisor, BCP Global brings fintech capabilities to our investment management services. BCP Global's technological infrastructure powers our client's onboarding process, enabling new and existing clients to easily open and manage their accounts through our website or mobile application. BCP Global's platform supports client activities, including account opening, depositing funds, withdrawing money, and engaging with investment options.

In addition, Davivienda may engage other sub-advisors who provide expertise in

different strategies. When this occurs, Davivienda will inform the client.

**Investment Management and Model Portfolios:** BCP Global facilitates access to our investment strategies. Once clients complete the Know Your Customer (KYC) process, they are presented with a model portfolio option that aligns with their investment objectives and risk tolerance. Clients can choose between BlackRock-managed Model Portfolios and Davivienda Advisors' proprietary Model Portfolios. Davivienda Advisors has introduced two additional discretionary model portfolios designed for conservative and moderate risk profiles. These portfolios maintain the same investment philosophy and ETF lineup as across existing models but emphasize shorter-duration bond holdings to reduce interest-rate sensitivity. These portfolios primarily utilize ETFs, including UCITS ETFs, which can provide tax efficiency for Latin American clients. However, clients should consult their tax accountant for specific tax consequences related to their investments.

**Custodian Information:** All client accounts managed under the guidance of BCP Global are custodied at Interactive Brokers, which provides comprehensive brokerage and custody services. This ensures secure and efficient custody of assets.

## **Non-Digital Investment Advisory Services and Sub-Advisor Engagement**

In our commitment to providing comprehensive investment advisory services tailored to each client's unique needs, Davivienda Advisors may consider engaging third-party sub-advisors to supplement our offerings for certain non-digital investment advisory services.

### **Role of the Advisor and Sub-Advisor Engagement Process:**

The Advisor, acting as the ultimate portfolio manager, reserves the right to engage a sub-advisor to provide specialized sub-advisory services to enhance our clients' investment outcomes. This decision is made in the client's best interests and reflects their stated investment objectives.

The Advisor undertakes a selection process upon determining the need for a sub-advisor. This involves evaluating the client's financial situation, investment goals, and any specific investment criteria, including but not limited to target allocations, risk tolerance, and any restrictions or limits on account management. This holistic understanding ensures that a sub-advisor can be identified and selected whose expertise and investment strategies closely align with the client's objectives.

### **Sub-Advisor's Role and Benefits:**

The engaged sub-advisor's primary role is to provide expert advice to Davivienda Advisors concerning the investment strategies to be implemented for our clients. They are tasked with making their proprietary portfolio strategies and models available, which have been designed to meet diverse investment needs and objectives. Sub-advisors can significantly benefit clients by providing access to specialized expertise, unique

investment strategies, and potentially broader market opportunities that may not be available through our in-house resources alone.

It is important to note that while the sub-advisor contributes valuable insights and strategies, the ultimate investment decisions rest with the Advisor. Exercising discretionary authority, the Advisor will decide on the client's behalf whether to adopt the sub-advisor's recommendations while managing the client's account(s).

### **Client Communication:**

When a sub-advisor is engaged for a client's account, Davivienda Advisors will promptly inform the client in writing. This communication will include details about the sub-advisor's role, their expertise, and how their involvement will benefit the client's investment strategy. Clients will also be provided with information on any changes to fee structures or account management processes resulting from the sub-advisor's engagement.

### **Monitoring and Review:**

To ensure the continued alignment of investment strategies with our client's objectives, the Advisor commits to an ongoing review and monitoring of the sub-advisor's performance. This includes assessing the effectiveness of the implemented strategies in meeting the client's investment goals and adjusting as necessary. The Advisor maintains a proactive stance in overseeing the performance of the client's accounts under the sub-advisor's management, ensuring transparency, accountability, and the pursuit of the client's best interests at all times.

Through this integrated approach, we combine the Advisor's oversight with the specialized expertise of selected sub-advisors, aiming to deliver superior investment management services responsive to our clients' evolving needs and objectives. We consider engaging third-party sub-advisors to supplement our offerings for certain non-digital investment advisory services.

### **Other Services**

Regarding non-digital investment advisory services, the Advisor may provide additional services for clients from time to time as agreed between the client and the Advisor.

### **Additional General Information**

Davivienda Advisors investment agreements may not be assigned without client consent. Davivienda Advisors currently participates in the Wrap Fee Program structure, which is solely related to its digital advisory accounts and services. Please see the Advisor's Separate Wrap Program Brochure for further details.

### **Assets Under Management**

As of December 31, 2024, Davivienda Advisors manages regulatory assets under management (“RAUM”) of \$14,229,715 on a discretionary basis and \$94,925,488 on a non-discretionary basis.

## Item 5 – Fees and Compensation

### Basic fee schedule:

#### Digital Investment Advisory Services

The management fees charged by Davivienda Advisors are established in each client’s written agreement.

For digital advisory services, Davivienda Advisors bundles, or “wraps,” investment advisory, portfolio management, and most brokerage, custody, clearing, settlement, and other administrative services into a single fee. For more information, please see Davivienda’s Wrap Fee Brochure. Management fees may be flat, fixed, or mixed upon negotiation. However, generally, and pursuant to the contract, fees for managing accounts will be based upon a percentage of the total assets in the account. Davivienda Advisors typically charges an annual management fee as per the table below:

Up to \$100,000,	1.40% of the AUM (Assets under Management)
\$100,001 to \$500,000	1.25% of the AUM
\$500,001 to \$1,000,000	1.00% of the AUM
Over \$1,000,000**	.80% of the AUM

For example, if you invest \$150,000, the annual fee would be \$2,025, calculated as 1.4% of the first \$100,000 (\$1,400) plus 1.25% of the next \$50,000 (\$625). That works out to be about \$168.75 per month. This fee will be automatically deducted from your account on a monthly basis.

\*\*Management fees for AUM over \$1,000,000 are negotiable. No management fees are assessed on zero-balance accounts.

#### Non-Digital Investment Advisory Services:

For non-digital services, Davivienda Advisors bundles, or “wraps,” investment advisory, portfolio management, and most brokerage, custody, clearing, settlement, and other administrative services charge a single fee. The fee structure is also established in each client’s written agreement. Typically, fees are based on a percentage of the account’s total assets, including margined assets, and follow the same tiered schedule unless negotiated. These fees are negotiable based on the

services provided.

### **Sub-Advisory Arrangements:**

Clients with sub-advisory arrangements will not incur separate fees from the third-party sub-advisor. As specified in the Investment Advisory Agreement, a portion of the advisory fee received by Davivienda Advisors will be forwarded to the sub-advisor.

### **Calculation and Deduction of Advisory Fees:**

For digital platform accounts, clients must establish a brokerage account with Interactive Brokers and authorize Davivienda Advisors to deduct advisory fees monthly. If services are provided for less than one calendar month, the fee will be prorated based on the number of business days services were provided. In cases where automatic fee deduction is not arranged, clients will be billed directly. Under normal circumstances, fees will be charged from your portfolio's 2% cash allocation.

Clients generally authorize Davivienda Advisors or Interactive Brokers to debit management fees monthly in arrears for non-digital accounts. Fees may also be billed as required by the agreement. Clients may pay different fees depending on their circumstances, such as account size, service levels, or negotiated terms. These factors may cause fees to be higher or lower than the standard rates.

Clients can terminate their contracts without penalty for a full refund within five business days of signing the advisory agreement. Advisory fees are withdrawn directly from the client's accounts with written authorization.

### **Additional Fee Information:**

For non-digital advisory services, clients must establish a brokerage account with Interactive Brokers and authorize Davivienda Advisors to deduct advisory fees monthly. Management fees are prorated for each capital contribution and withdrawal during the applicable calendar month. Accounts initiated or terminated during a month will be charged a prorated fee.

Please note that when we charge fees based on assets under management, such as the ones described above, we have a conflict of interest with our clients. This is because Davivienda Advisors will generate more revenue with increased assets; therefore, we are incentivized to request that clients place more assets to be managed by us as we increase our fees. Davivienda Advisors mitigates this conflict by fully disclosing our fee practices and the fees we charge clients, and only recommending our advisory services when it's in the client's best interest.

### **Termination of the Agreement**

Although an agreement between Davivienda Advisors and its clients is ongoing and requires ongoing adjustments, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an agreement by

written notice to the other party with (30) thirty days' advance notice, or as agreed otherwise between the client and the Advisor.

If an agreement is terminated during a period in which the client has already paid Davivienda Advisors its advisory fees in advance, then the Advisor will reimburse, on a pro-rated basis, the remaining advisory fees collected for any service not rendered; these fees will be sent to the client's address of record, unless otherwise directed by the client, within (30) days of termination of the agreement.

## **Item 6 - Performance-Based Fees and side-by-side management**

Davivienda does not charge performance fees.

## **Item 7 - Types of Clients**

Davivienda Advisors provides investment advisory services to institutions, individuals, high-net-worth individuals, trusts, and corporations, as well as banking or thrift institutions located in the states where we operate and a select list of countries. The minimum dollar amount to establish an Account is generally \$20,000. Investments of a lesser amount may be accepted at the Advisor's discretion.

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

### **General Investment Strategies and Methods of Analysis**

Davivienda Advisors offers a comprehensive investment management service that combines proprietary Model Portfolios with access to global investment opportunities. The firm has partnered with BCP Global as a sub-advisor to enhance operational efficiencies and portfolio management, aiming to provide clients with a superior digital and mobile investing experience.

The investment process begins with clients responding to personal and investment-related queries on a digital platform. This information is used to tailor allocations among available portfolios within the program, acknowledging that all securities investments carry the risk of loss, which clients must be prepared to accept.

Davivienda Advisors utilizes model portfolios designed by BlackRock, one of the

world's largest asset management firms. BlackRock's extensive team of analysts, portfolio managers, and strategists leverages advanced tools for market analysis and risk assessment. This collaboration provides access to global model portfolios that optimize overall performance. BlackRock's offerings, including a wide array of ETFs and UCITS, are recognized for their efficiency.

As an investment advisor and fiduciary, Davivienda Advisors oversees and refines the investment questionnaire, sets guidelines for the algorithm that generates portfolio recommendations, and monitors the entire investment management process, including portfolio rebalancing. In discretionary accounts, Davivienda Advisors select the securities to be traded, while in non-discretionary accounts, recommendations are based on client interviews, with final investment decisions resting with the client.

Davivienda Advisors employs duration targeting as an investment strategy variation in certain model portfolios. The two new model portfolios utilize shorter-duration bond ETFs compared to existing models to manage interest rate sensitivity differently.

The firm offers a wrap-fee program through its digital platform and non-digital services. To fully understand the program, clients are encouraged to review the detailed information in the Wrap Brochure.

Davivienda Advisors aims to put clients' money where opportunities are, offering professionally designed and managed portfolios. The firm provides access to advanced investment techniques and strategies, allowing clients to efficiently access global markets through ETFs that provide instant diversification at reasonable costs.

For traditional (non-digital) investment advisory services, the Advisor conducts client interviews to discuss investment objectives and financial circumstances, with the aim of providing personalized portfolio recommendations.

Davivienda Advisors' strategy focuses on asset preservation and capital growth by tailoring asset allocations and selecting investment vehicles aligned with clients' risk-return profiles, considering long- and short-term objectives. The Advisor analyzes forecasts and expectations for asset-class allocations and invests in various financial instruments, including equities, fixed income, mutual funds, and ETFs. Investment selections are based on historical performance and potential risk-return profiles, ensuring suitability for client needs and considering potential fees and expenses.

Additionally, the Advisor can collaborate with third-party service providers and Sub-Advisors for macroeconomic analyses and other insights. These partners contribute research reports on securities and asset allocation models, as well as administrative support. While these resources are valuable, the Advisor conducts research and due diligence on investment opportunities and Advisors. Investment decisions are tailored to each client's objectives and risk tolerance under the guidance of the assigned portfolio manager. These third-party providers do not influence the specific investment decisions made for clients.

Investment in securities carries an inherent risk of capital loss, which clients should be fully prepared to withstand. It is crucial to review the Investment Risks section carefully for a detailed understanding.

### **Material Risks for Significant Investment Strategies**

Please see the ADV Part 2 Wrap brochure for complete details of the risks in that program. While the Advisor intends to implement strategies designed to minimize potential losses suffered by its client, there can be no assurance that such strategies will be successful. A client may lose a substantial proportion or all of its assets in connection with investment decisions made by the Advisor. The following discusses typical risks for the Advisor's clients. Still, it does not purport to explain the risks of the Advisor's investment strategies.

There is no guarantee that in any time period, particularly in the short term, a client's portfolio will achieve appreciation in terms of capital growth or that the Advisor's recommendations will meet a client's investment objective.

The value of the securities Advisor invests on behalf of its clients may be volatile. Price movements may result from factors affecting individual companies, sectors, or industries that may influence specific strategies or the securities market as a whole. Furthermore, a client will be subject to the risk that inflation, economic recession, changes in the general level of interest rates, or other market conditions over which the Advisor will have no control may adversely affect investment results. Advisor notes that while Advisor's management of accounts may not involve direct leveraging or other risk factors discussed below, the underlying funds and other investments that comprise client accounts may engage in practices that can materially impact the performance of such funds or investment, which in turn may materially affect the value of Advisor's clients' portfolios.

### **Market Risk**

Market risks affect the value of the investment portfolio. They are usually broad-based and include adverse developments deriving from political, regulatory, market, or economic events that affect issuers, sectors, industries, segments, or regions.

### **Investment Style or Asset Class Risks**

Different stages of the business and economic cycle may negatively affect certain investment styles (for example, growth, value, large-cap, or small-cap stocks) or asset classes (for example, emerging markets debt, real estate). These negative return periods could last several years.

### **Growth Company Risks**

Growth companies derive their valuations, for the most part, from future earnings and cash flow growth. Economic slowdowns may disproportionately affect their valuations.

### **Small- and Mid-Cap Company Risks**

Smaller-sized companies have narrower customer bases, heightened reliance on suppliers, less access to financing, and, in general, a higher level of exposure to changes in the business environment.

### **Sector Risks**

Issuers belonging to similar sectors or industries may be affected by the same events or developments.

### **High Yield Risks**

Bond issuers with a credit rating below investment grade are more susceptible to changes in business and economic conditions, increases in interest rates, and restrictions on their access to financing.

### **Credit Risks**

These risks refer to issuers and counterparties being unable or unwilling to pay their obligations. A less robust financial condition, especially regarding access to funds or liquidity, tends to increase credit risk.

### **Interest Rate Risks**

These risks refer to the loss of value in fixed-income investments, including preferred shares, as interest rates rise, and prices adjust to reflect higher required yields.

Duration risk specifically relates to the sensitivity of fixed-income securities to interest rate changes. Securities with shorter durations typically experience less price volatility when interest rates change compared to securities with longer durations. However, shorter-duration securities may provide lower yields in stable or declining interest rate environments.

### **Currency Risks**

These risks refer to the possibility that the value of a currency in which the investor has a long exposure becomes less valuable relative to the investor's base currency.

### **Liquidity Risks**

Liquidity relates to the ability to sell an investment in a timely manner. The market for relatively illiquid securities tends to be more volatile. Investments in relatively illiquid

securities may restrict a fund or portfolio manager's ability to dispose of investments at the price and time it wishes.

The risk of illiquidity also arises in the case of over-the-counter transactions as there is no regulated market, and the bid and offer prices will be established solely by dealers in these contracts.

### **Settlement Risks**

Execution may expose a client to the credit risk of parties with whom the Advisor, on behalf of the client and through the Broker-Dealer, trades and to the risk of settlement default. Clearing, settlement, and registration systems in emerging markets are less developed and may provide increased risks.

### **Short Selling Risks**

We typically will not directly engage in short selling in client accounts. However, we may invest in funds and other securities on behalf of clients that may sell securities short. Short selling by a fund manager can significantly impact the value and volatility of a fund held in a client's account. The possible losses from selling short differ from losses incurred from a cash investment; the former may be unlimited, whereas the latter can only equal the total amount of the cash investment. Short-selling activities are also subject to restrictions imposed by the various national and regional securities exchanges.

### **Emerging Markets Risks**

Investment strategies may include direct and indirect investments in securities in emerging markets, which involve special considerations and risks. These include the possibility of nationalization, expropriation or confiscatory taxation, foreign exchange control, political changes, government regulation, social instability, or diplomatic developments which could adversely affect the economies of such countries or the value of a client's investments and the risks of investing in countries with smaller capital markets, such as limited liquidity, price volatility, restrictions on foreign investment and repatriation of capital, and the risks associated with emerging economies, including high inflation and interest rates and political and social uncertainties. In addition, obtaining and enforcing a judgment in a court in an emerging country may be difficult. Investments in products of emerging markets may also become illiquid, which may constrain our ability to liquidate some or all of a client's portfolio holdings. Accounting standards in emerging market countries may not be as stringent as accounting standards in developed countries.

### **Hedging transactions may increase the risks of capital losses.**

Advisors can utilize hedging strategies primarily to protect and preserve capital and yield enhancement. Investment products in which an Advisor invests clients' accounts

may use a variety of financial instruments, such as options, for risk management purposes. While hedging transactions may seek to reduce risk, they may result in a worse overall performance. Certain risks, such as credit risk, cannot be hedged relating to particular securities and counterparties. Advisors will not always invest in funds or other investment vehicles that utilize hedging strategies.

## **Leverage**

Advisor can utilize and employ leverage under their current strategies. Such strategies may include borrowing and short-selling securities, bonds, foreign exchange, and acquiring and disposing of specific derivative securities and instruments, such as swaps, futures, and options. While leveraging creates an opportunity for greater total returns, it also exposes a client to a greater risk of loss arising from adverse price changes. Where leverage is indirect (e.g., used by a fund manager for a fund in which an Advisor's client is invested), a sharp decrease in the value of the investment can significantly impact a client's portfolio.

## **Foreign currency markets**

An advisor's investment strategies can expose a client to fluctuations in currency exchange rates, where the investor invests directly or indirectly in securities denominated in currencies other than U.S. dollars. Advisor does not engage in direct foreign currency trading. However, underlying funds and other investment vehicles may trade directly in foreign currency. The markets in which foreign exchange transactions are affected are highly volatile, specialized, and technical. Significant changes, including changes in liquidity and prices, can occur in such markets within very short periods, often within minutes. Foreign exchange trading risks include, but are not limited to, exchange rate risk, interest rate risk, and potential interference by foreign governments through regulation of local exchange markets, foreign investment, or particular transactions in foreign currency.

## **Investment Concentration**

Some client accounts may have a high concentration in one sector, industry, issuer, or security, which may subject them to a greater risk of loss in the event such investments take an economic downturn.

## **ETF Risks, including Net Asset Valuation and Tracking Error**

ETF performance may not precisely match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) specific securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares

to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Specific ETF strategies may, from time to time, include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than generally charged for exchange-traded equity securities and for which market quotations or valuation may be limited or inaccurate. Clients should be aware that to the extent they invest in ETF securities, they will pay two levels of advisory compensation – advisory fees charged by the Advisor plus any management fees charged by the sponsor of the ETF. An ETF typically includes embedded expenses that may reduce the fund's net asset value and, therefore, directly affect the fund's performance and indirectly affect a client's portfolio performance or an index comparison. Fund expenses may include investment management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF sponsor. ETF tracking errors and expenses may vary.

### **Material Risks for Particular Types of Securities**

For the 14 permitted traditional accounts, the advisor does not invest primarily in a specific security or type of security, while the internet advisor uses almost exclusively ETFs. The material risks involved with investing are described above.

## **Item 9 - Disciplinary Information**

Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an Advisor or the integrity of the Advisor's management. Advisor has no information applicable to this Item. Please visit [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov) at any time to view Davivienda Advisors' registration information and any applicable disciplinary action.

## **Item 10 - Other Financial Industry Activities and**

### **Affiliations**

#### **Broker-Dealer Registration**

Davivienda Advisors is not registered with the SEC or FINRA as a broker-dealer, and none of its management persons are registered and/or associated with another US broker-dealer.

Some of our registered Portfolio Managers may have additional associations with

Corredores Davivienda S.A. in Colombia and with Corredores Davivienda Panama S.A. Our Code of Ethics and Compliance Program, as well as our supervisory and operating procedures, will address any actual or potential conflict of interest.

As part of a large financial group, we have affiliated companies operating in banking, brokerage, and insurance in the US and other countries. We are controlled by Corredores Davivienda S.A. Comisionista de Bolsa, which is a broker-dealer incorporated in Colombia under the supervision of the Colombian Financial Superintendency. Our managers include individuals with roles in Corredores Davivienda S.A. and Banco Davivienda S.A.

For our operations, we rely on services provided by affiliates that are documented and compensated through service agreements.

For our business development efforts, we rely on the relationship managers and customer-facing staff at our affiliates. These joint marketing and promotional efforts are documented through correspondent agreements, legal representation agreements, and solicitation agreements, all in compliance with rules and regulations and required approvals from each jurisdiction.

Davivienda Advisors does not participate in other financial activities or maintain other financial licenses.

### **Commodity Pool Operator, Commodity Trading Advisor, Futures Commission Merchant Registration**

Neither Advisor nor its management persons or associated persons are registered or associated with the Commodity Futures Trading Commission (“CFTC”) as a futures commission merchant (“FCM”), a commodity pool operator (“CPO”), or a commodity trading advisor (“CTA”) or an associated person of the foregoing entities.

### **Other – Financial Affiliates**

Davivienda has no affiliations with the financial industry other than the ones described previously.

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

### **Code of Ethics and Personal Trading Policies**

Davivienda Advisors has adopted a Code of Ethics (“Code”) pursuant to Rule 204A-1 of the Advisors Act to prevent violations of federal securities laws. Advisor expects all employees to act with honesty, integrity, and professionalism and to adhere to federal

securities laws.

All advisor officers, managers, and employees are subject to the Advisor's control and supervision (collectively referred to as "Supervised Persons") and are required to adhere to the Code.

### **Prevention of Insider Trading**

Davivienda Advisors has adopted policies designed to prevent insider trading, which are more fully described in the Code. The advisor's policy on insider trading applies to securities trading and information handling by all Supervised Persons (including spouses, minor children, adult members of their households, and any other relative of a Supervised Person on whose behalf the Supervised Person is acting) for their own account or the account of any client of the Advisor.

Advisor takes its obligation to detect and prevent insider trading with the utmost seriousness. Advisors may impose penalties for breaches of the policies and procedures contained in the Code, even in the absence of any indication of insider trading. Depending on the nature of the breach, penalties may include a letter of censure, profit "give-ups," fines, referrals to regulatory and self-regulatory bodies, and dismissal.

### **Personal Securities Transactions**

#### ***Periodic Reports***

As more fully described in the Code, "access persons" are required to submit reports detailing their personal securities holdings to the Chief Compliance Officer or designee on an initial basis and thereafter quarterly and annually.

As an alternative to submitting quarterly transaction reports, Advisor requires "access persons" to submit brokerage statements or trade confirmations as long as such documents contain the information required under Rule 204A-1(b)(2)(i)(A)-(E) under the Advisors Act.

### **Initial Public Offerings and Limited Public Offerings**

Access Persons must obtain prior written approval from the Chief Compliance Officer or designee before investing in initial public offerings ("IPOs") or limited offerings (i.e., private placements).

### **Review of Personal Securities Reports**

The Chief Compliance Officer (or designee) is responsible for reviewing the Access Person's Quarterly Transaction Reports, the Initial Holdings Report, and the Annual Holdings Report as part of the Advisor's duty to maintain and enforce its Code.

## **Outside Business Activities and Private Investments of Employees**

Unless otherwise consented to by the Chief Compliance Officer or designee, all employees are required to devote their full time and efforts to the Advisor's business. As such, no person may make use of either his or her position as an employee or information acquired during employment or make personal investments in a manner that may create a conflict, or the appearance of a conflict, between the employee's personal interests and the Advisor's interests. Accordingly, every employee must complete a disclosure form and have the form approved by the Chief Compliance Officer or designee before serving in any of the capacities or making any investments more fully described in the Code.

## **Reporting Violations**

All Supervised Persons (any officer, director, partner, and employee of Advisor) must promptly report actual or known violations or suspected violations of the Advisor's Code to the Chief Compliance Officer or his designee.

Any report of a violation or suspected violation of the Code will be treated as confidential to the extent permitted by law. As part of the Advisor's obligations to conduct an annual review of all of its policies and procedures pursuant to Rule 206(4)-7 of the Advisors Act, the Chief Compliance Officer or designee shall review on an annual basis the adequacy of the Code and the effectiveness of its implementation.

## **Acknowledgment of the Code**

Each employee will execute a written statement certifying that the employee has (i) received a copy of the Advisor's Code, (ii) read and understands the importance of strict adherence to such policies and procedures, and (iii) agreed to comply with the Code.

## **Training and Education**

All Supervised Persons, i.e., all employees, are to receive training on complying with the Code on an annual basis as part of the Advisor's annual employee compliance review meeting to ensure that all employees fully understand their duties and obligations and how to comply with the Policy's procedures.

## **Copies of Advisor's Code**

A copy of the Advisor's Code is available upon request. To request a copy, don't hesitate to contact support at 011-57-6012413444 or via email at [support@daviviendaadvisors.com](mailto:support@daviviendaadvisors.com).

## **Participation or Interest in Client Transactions and Associated Conflicts of Interest**

Advisor may recommend or invest in securities, including funds, issued or managed by its affiliates (or where the affiliate acts as general partner) in which its affiliates have a material financial interest. Advisor has policies requiring personnel who develop advice and recommendations for clients to render only disinterested and impartial advice to clients and comply with other fiduciary obligations, including having an adequate basis for all recommendations and an obligation to recommend only investments suitable for each client.

#### Important Conflicts of Interest To Consider:

- **Asset-Based Fee Structure:** When we charge fees based on assets under management, we have a financial incentive to recommend that you place more assets with us.
- **Affiliated Entities:** Our relationship with affiliated companies may create conflicts when we recommend their services or products.
- **Portfolio Manager Compensation:** Our portfolio managers may receive compensation that could influence their investment recommendations.

The Code generally governs the potential conflicts of interest involved in any such transactions. Pursuant to its stipulations, the Advisor or a related person may buy or sell securities for itself that it also recommends to clients. The Code establishes sanctions if its requirements are violated and requires that the Advisor and employees place the interests of the Advisor's clients above their own.

#### **Investments in Securities by Advisor and its Personnel**

The Advisor's personnel or a related person may invest in the same or similar securities and investments as those recommended to or entered into on behalf of Advisor's clients. The results of the investment activities of the Advisor's personnel or its related persons for their accounts may differ from the results achieved by or for client accounts managed by Advisor. The conflicts raised by these circumstances are discussed below.

An advisor may recommend or affect the purchase or sale of securities in which its related persons or an affiliate, directly or indirectly, has a position or interest or of which a related or affiliated person buys or sells for itself. Such transactions may also include trading in securities inconsistent with advice from the Advisor's clients.

Activities and transactions for client accounts may be impaired or affected at prices or terms that may be less favorable than would otherwise have been the case if the Advisor or related persons had not pursued a particular course of action with respect to the issuer of the securities.

Transactions undertaken by the Advisor's clients may also adversely impact one or more client accounts. Other clients of the Advisor may have, as a result of receiving reports or otherwise, access to information regarding the Advisor's transactions or views that may affect their transactions outside of accounts controlled by the Advisor, and such transactions may negatively impact on other clients' accounts. These effects can be more pronounced in less liquid markets.

The investment activities of a client's account may differ significantly from the results achieved by the Advisor's related persons and from the results achieved by the Advisor for other client accounts.

As described above, the Advisor has adopted a Code of Ethics. Such Code of Ethics, together with Advisor's policies and procedures, restrict the ability of certain officers and employees of the Advisor from engaging in securities transactions in any securities that its clients have purchased, sold, or considered for purchase or sale for an appropriate "blackout" period. The Advisor's procedures and Code of Ethics include other restrictions and reporting requirements to minimize or eliminate conflicts of interest.

### **Trading Alongside by Advisor and its Personnel**

Client accounts managed by the Advisor may trade in the same or similar securities at or at about the same time as accounts managed or advised by Advisor affiliates. Investments by Advisor's affiliates and clients may dilute or otherwise disadvantage a client's account's values, prices, or investment strategies, particularly in small capitalization, emerging markets, or less liquid strategies. This may occur when portfolio decisions regarding a client's account are based on research or other information used to support portfolio decisions for Advisor's affiliates. If a portfolio decision or strategy for Advisor's affiliates' accounts or the accounts of clients of affiliates is implemented ahead of, or contemporaneously with, similar portfolio decisions or strategy for the Advisor's client's account, market impact, liquidity constraints, or other factors could result in the account receiving less favorable trading results and the costs of implementing such portfolio decisions or strategies could be increased.

### **Errors**

Errors may occur from time to time in transactions for client accounts. The Advisor will typically correct errors that are the fault of the Advisor or an affiliate at no cost to the client other than costs that the Advisor deems immaterial. To the extent that the subsequent sale of such securities generates a profit to the Advisor, the Advisor may retain such profits and may, but is not required to, use such profits to offset errors in the future or pay other client-related expenses. The Advisor will not be responsible for errors that are not the Advisor's or any affiliate's fault.

### **Privacy Policy**

Advisor considers your privacy our utmost concern. Advisor does not share any information of clients with nonaffiliated third parties, except such information may be disclosed as necessary to process a transaction an investor has requested, to the extent the investor specifically authorized the disclosure, to service providers or joint marketers who agree to limit their use of such information, and to the extent required or expressly permitted by law or reasonably necessary to prevent fraud, unauthorized transactions or liability.

When Advisor discloses non-public personal information of clients to a non-affiliated third party that provides services to Advisor or engages in joint marketing, Advisor shall notify investors of the possibility of such disclosure and enter into a contractual agreement with the third party that prohibits the third party from disclosing or using the investors' information other than to carry out the purposes for which the information was disclosed to the third party.

In particular, in compliance with the above conditions, Advisor may enter into an agreement with a non-affiliated third party to store the records of Advisor clients and investors, including electronic and e-mail records.

For more information about Advisor's privacy policies or to request a brochure describing them, contact support at (601) 2413444 or via email at [support@daviviendaadvisors.com](mailto:support@daviviendaadvisors.com).

## **Item 12 - Brokerage Practices**

Clients must open an Interactive Brokers account. The Wrap brochure provides a more detailed disclosure of this information.

In the Advisor's decision to require the use of Interactive Brokers, Davivienda Advisors followed the following methodology. Davivienda Advisors will generally seek the best combination of services provided and associated expenses. Relevant factors used in evaluating "execution quality" include historical net prices, the execution, clearance, and settlement and error correction capabilities of the broker or dealer generally and in connection with securities of the type and in the amounts to be bought or sold; the broker's or dealer's willingness to commit capital; reliability and financial stability; the size of the transaction; availability of securities to borrow for short sales; and the market for the security.

In addition to a broker-dealer's ability to provide "execution quality," the Advisor's selection criteria may include the value of various services or products the broker-dealer provides. For example, Davivienda Advisors may acquire research reports on or other information about particular companies, sectors, or industries; economic surveys and analyses; recommendations as to specific securities; electronic market quotations; non-mass-marketed financial publications; portfolio evaluation

services; performance measurement services; market, economic and financial studies, and forecasts; data on pricing and availability of securities; specific financial database software and services; and other products or services that may enhance its investment decision making. However, Davivienda Advisors does not engage in any “soft dollar” practices involving the receipt of research or other brokerage service in relation to client commission money, nor do we receive any research or other products in connection with client transactions. Further, the Advisor’s policy is not to enter into soft dollar arrangements, and the Advisor currently has no formal soft dollar arrangements.

On occasion, clients might require having their account held in custody and trades executed at a broker-dealer of their choice, which may or may not cost more to the client. In such instances, clients can sometimes pay commissions higher than those obtainable from other brokers for the services rendered by other broker-dealers recommended to the client by Davivienda Advisors.

To ensure favorable pricing for all clients, Davivienda Advisors can aggregate sale and purchase orders of securities held by a client with similar orders being made simultaneously for other client accounts or entities if, in the reasonable judgment of Davivienda Advisors, such aggregation is reasonably likely to result in an overall economic benefit to clients based on an evaluation that the clients will benefit from relatively better purchase or sale prices, lower commission expenses or beneficial timing of transactions, or a combination of these and other factors. In general, the average price of all securities purchased or sold in such transactions will be determined, and a client will be charged or credited, as the case may be, the average transaction price. Although, in any given case, this practice could have a detrimental or beneficial effect on the price or value of the security for any client account, Davivienda Advisors believes that such practice benefits clients. While Davivienda Advisors believes this is beneficial and fair on an overall basis with respect to all Davivienda Advisors accounts, there can be no assurance that on a trade-by-trade or overall basis, any particular client will not be treated more or less favorably than another client.

### **Brokerage for Client Referrals**

The Advisor does not direct brokerage to particular brokers in consideration of client referrals.

## **Item 13 - Review of Accounts**

The Chief Compliance Officer or designee typically reviews accounts on a periodic basis or as needed due to market conditions or transactional activity, among other things. The Chief Compliance Officer or designee typically reviews transactions periodically entered into for investment advisory clients to determine that correct entries have been made for all client records.

## **Client Reports**

Clients will receive statements from Interactive Brokers regarding the internet advisor at least quarterly. The Wrap brochure provides additional details.

With regard to non-digital investment advisory services, advisor clients receive at least quarterly reports from Interactive Brokers. The Advisor will provide a consolidated/performance report as agreed between the Advisor and the client but no less than on a quarterly basis. The Advisor's report typically includes a listing of owned securities, a description of their account allocation, and performance measurements. The Advisor urges clients to compare the statements received from Interactive Brokers with any consolidated report provided by the Advisor. Clients should immediately inform the Advisor of any discrepancy noted between the custodian records and the reports clients received from the Advisor.

## **Item 14 - Client Referrals and Other Compensation**

Currently, the Advisor maintains client referral or promoter arrangements with CORREDORES DAVIVIENDA S.A. COMISIONISTA DE BOLSA. When a client is introduced to Davivienda Advisors by a promoter, we pay that promoter a referral fee in accordance with applicable state securities laws and in full compliance with requirements of amended Rule 206(4)-1 under the Advisors Act. Such a referral fee is paid solely from Davivienda Advisors' investment management fee and does not result in any additional charge to the client. Please note that this is a conflict of interest as our promoters will favor Davivienda Advisors over other advisors.

The Advisor will ensure each prospective client receives a copy of the Advisor's Form ADV Part 2 and a disclosure document outlining any conflicts of interest, where applicable. Cash payments to the promoter corresponding to referral fees will be structured to comply fully with the requirements of Rule 206(4)-1 under the Advisors Act.

## **Item 15 – Custody**

Davivienda Advisors does not maintain custody of any client funds or securities. All assets are held by Interactive Brokers, which means Interactive Brokers provide account statements directly to clients at their address of record. Clients receive monthly or quarterly statements from Interactive Brokers who hold and maintain the client's investment assets. Each client should carefully review the information provided by Interactive Brokers and compare it with the information provided by Davivienda Advisors when evaluating account performance, securities holdings, and transactions.

The client should alert Davivienda Advisors of any discrepancies noted, as applicable.

## Item 16 - Investment Discretion

At the outset of an advisory relationship, the advisor receives discretionary authority, as applicable, from the client to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion must be exercised consistently with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Advisor observes the investment policies, limitations, and restrictions of the clients it advises. Investment guidelines and restrictions must be provided to Advisor in writing.

For non-discretionary customized portfolios, Davivienda Advisors constructs portfolios from an approved list of investment products authorized by the Research and Investment Committee. Clients may exercise limited discretion by allocating up to **5% to conservative, 6% to moderate, and 7% to risk-tolerant portfolios** for products outside the approved list, provided such selections are reviewed for suitability and documented appropriately. The advisor does not require pre- or post-approval for trades within the approved product list, but client authorization is required for implementation.

## Item 17 - Voting Client Securities

As a matter of policy and practice, Davivienda Advisors does not accept or maintain authority to vote for proxies on behalf of advisory clients. Clients will receive proxy statements through our custodian. Clients are responsible for receiving and voting proxies for all securities maintained in client portfolios. Davivienda Advisors does not provide advice to clients regarding the clients' voting of proxies.

## Item 18 - Financial Information

The Advisor has no financial commitments that impair its ability to meet client contractual and fiduciary commitments. It has also not been the subject of bankruptcy proceedings.