

FORM ADV: PART 2A

Firm Brochure



This brochure provides information about the qualifications and business practices of W2B Inc. If you have any questions about the contents of this brochure, please contact us at +1 (205) 953-6526 or via email at info@wealth2b.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

W2B Inc. is registered with the Securities and Exchange Commission as an investment adviser. Registration does not imply a certain level of skill or training. Additional information about W2B Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The firm's CRD# is 331220.

ITEM 2. MATERIAL CHANGES

On January 20, 2025, Item 4 was updated to reflect the start of Wealth2B's business activities.

TABLE OF CONTENTS

Form ADV: Part 2A	1
Item 2. Material Changes.....	2
Item 4: Advisory Business.....	5
Firm Overview	5
Advisory Services Offered	5
Client Customization and Platform Limitations.....	5
Advisory Process and Monitoring.....	6
Model Limitations	6
Assets under management.....	6
Item 5: Fees and Expenses.....	7
Types of Fees and Compensation.....	7
Fee Structure	7
Billing Method	7
Alternative Model with Partners.....	7
Minimum Fees.....	7
Commissions for Selling Products or Referrals.....	7
Other Fees and Costs.....	7
Participation in Wrap Fee Programs.....	8
Changes in Fee Structure.....	8
Item 6: Performance-Based Fees and Side-by-Side Management	9
Performance-Based Fees.....	9
Item 7: Types of Clients	10
Types of Clients	10
No Specific Account Requirements or Investment Minimums.....	10
Adaptation of Services.....	10
Communication with Clients	10
Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss.....	11
Investment Philosophy.....	11
Client Risk Profiling.....	11
Methods of Analysis	11
Investment Strategies	12
Risk of Loss	13
Item 9: Disciplinary Information.....	15
Item 10: Other Financial Industry Activities and Affiliations	16
Item 11: Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading	17
W2B Code of Ethics and Commitment	17
Monitoring of Personal Investment Activities.....	17
Participation in Client Transactions and Personal Trading	17

Compliance Measures and Training	17
Item 12: Brokerage Practices	18
Best Execution and Due Diligence	18
Custodian Recommendation	18
Aggregated Transactions	18
Item 13: Review of Accounts	19
Review Process	19
Monitoring and Performance Evaluation	19
Reporting to Clients	20
COMMUNICATION, Interaction and limitations	20
Item 14: Client Referrals and Other Compensation	21
Client Referrals and Compensations	21
Compensation Agreements with Partners	21
Policies to Ensure Impartiality	21
Item 15: Custody	22
No Direct Custody by W2B	22
Transparent Communication with Clients	22
External Audits and Review of Custody Practices	22
Item 16: Investment Discretion	23
Client-Imposed Limitations	23
Procedures Before Assuming Discretionary Authority	23
Tailoring of Discretionary Services	23
Item 17: Voting Client Securities	24
Item 18: Financial Information	25
Prepayment of Fees	25
Financial Stability and Capacity	25
Bankruptcy Disclosure	25

ITEM 4: ADVISORY BUSINESS

FIRM OVERVIEW

W2B Inc., also known as Wealth2B, is an investment advisory firm established in Puerto Rico and founded in 2024. It is entirely owned by the individuals comprising the management team, who are listed in Schedule A of Part 1A of Form ADV. Wealth2B specializes in providing advanced robo-advisor services exclusively through its proprietary Platform. The "Platform" refers to our comprehensive digital infrastructure, including algorithms, user interfaces, and APIs, designed to facilitate all our investment advisory services.

ADVISORY SERVICES OFFERED

Wealth2B exclusively offers its investment advisory services through the listed automated services on our Platform, available only to clients who engage with these services. No other channels or unlisted services are available, ensuring focused and specialized investment management strictly via our Platform.

- **FDIC Bank Sweep and Automatic U.S. Treasuries:** These services provide automated, low-risk investment management options with varying terms on a discretionary basis.
- **Global Portfolio:** Utilizes a diversified, low-cost ETF strategy to automatically manage long-term investments based on the client's Risk Tolerance on a discretionary basis.
- **Thematic Investment:** Allows clients to diversify their portfolios with sector-specific investments, automatically managed through our Platform to align with their other Wealth2B investments and Risk Tolerance on a discretionary basis.
- **Trading:** Offers real-time trading capabilities within defined risk parameters. Unlike our other services, Trading operates on a non-discretionary basis. Wealth2B continuously monitors the account to evaluate performance and generate automated recommendations aligned with our investment philosophy aimed at improving client performance.

CLIENT CUSTOMIZATION AND PLATFORM LIMITATIONS

Wealth2B customizes investment advisory services based on the individual Risk Tolerance of our clients. Our Platform performs an initial and ongoing risk assessment through an interactive questionnaire, which determines each client's Risk Tolerance. Based on this profiling:

- Clients gain access to investment products and services that align with their Risk Tolerance.
- Within each service, clients can set predefined limitations through the Platform, tailoring their investment to match their preferences.
- Except for our Trading service, Wealth2B operates primarily on a fully discretionary basis, allowing us to execute transactions without prior client consultation to align investments with each client's established risk profile and financial objectives.

ADVISORY PROCESS AND MONITORING

Each advisory service is continuously and automatically monitored and reviewed to ensure alignment with the client's financial goals and Risk Tolerance. This automated supervision includes:

- Regular adjustments and rebalancing of portfolios in response to market changes and shifts in the client's financial circumstances.
- In the Trading service, Wealth2B provides automated recommendations to guide clients within the established investment framework.

For more detailed information about the services offered, methodologies applied, and how we manage and review accounts, clients are invited to review Items 8, 13, and 16 of this brochure.

MODEL LIMITATIONS

The automated nature of our robo-advisor model involves certain limitations. While our algorithms are designed to maximize efficiency and accuracy, they rely on historical data, the information provided by clients and may not instantly adjust to unregistered personal changes or complex financial scenarios. This limitation underscores the importance of clients regularly updating their profiles to ensure that our advice remains aligned with their current financial situations.

ASSETS UNDER MANAGEMENT

As of January 20, 2025, Wealth2B manages a total of \$196,330.37 on a discretionary basis. At this time, no client assets are managed on a non-discretionary basis.

ITEM 5: FEES AND EXPENSES

TYPES OF FEES AND COMPENSATION

W2B Inc. structures its fees primarily based on a percentage of assets under management, applied directly to clients' investment accounts.

FEE STRUCTURE

Fees are determined as a percentage of the account's Net Liquidation Value, reflecting the total value in the event of a complete liquidation at the current market price. The applied rate varies between 0.4% and 2% annually, depending on the specific investment service chosen by the client.

BILLING METHOD

The billing of these fees is carried out monthly, applying a daily proportional calculation to the Net Liquidation Value at market close, accumulating the total at the end of the month for collection. W2B does not charge fees in advance.

ALTERNATIVE MODEL WITH PARTNERS

There are special agreements with Partners who make W2B's services available to their clients where they may decide to cover all or part of the management costs on behalf these clients, allowing the latter to pay a reduced fee or no fee. In these cases, a monthly invoice is issued to the Partner for the agreed costs, and only any applicable remainder is charged to the client.

MINIMUM FEES

W2B does not establish a minimum fee for clients directly, although minimum monthly fees can be defined directly to Partners.

COMMISSIONS FOR SELLING PRODUCTS OR REFERRALS

The firm does not receive commissions or compensation for the sale of specific products or for referring clients to third parties.

OTHER FEES AND COSTS

In addition to management fees, clients may incur costs associated with the Broker/Dealer, which are directly passed on to the investment account. If a Partner assumes these, the applicable costs will be included in the monthly invoice.

PARTICIPATION IN WRAP FEE PROGRAMS

W2B clarifies that it does not participate in "Wrap Fee Programs".

CHANGES IN FEE STRUCTURE

Any adjustments to the fee structure are communicated timely and transparently through the established digital channels with the client, ensuring their right to be fully informed or to terminate the agreement and move assets well in advance of the new pricing policy's application.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

PERFORMANCE-BASED FEES

W2B explicitly states that it does not charge performance-based fees on client accounts.

Regulatory guidelines limit an advisor's ability to charge performance-based fees to certain types of clients due to the inherent conflict of interest that such fees could introduce. Specifically, an advisor might be incentivized to assume greater risks than necessary or appropriate for the client's profile, with the prospect that higher investment performance could result in increased fees for the advisor. Conversely, should such risky investments result in losses, the advisor would not face a cost. This regulatory stance is designed to ensure that investment decisions are made with the client's best interests and Risk Tolerance as the paramount considerations.

ITEM 7: TYPES OF CLIENTS

W2B serves individuals and high net worth individuals without investment minimums, specializing in digital advisory services for investors interested in the U.S. market, promoting effective management and constant communication through our Platform.

TYPES OF CLIENTS

- **Individuals:** Our services are designed to cater to natural persons interested in accessing public markets of the U.S., regardless of their level of experience or net worth. We do not discriminate based on the size of assets, allowing us to serve both individuals with modest investments and those of high net worth.
- **High Net Worth Individuals:** Our investment solutions allow us to serve the needs and investment objectives of clients with significantly high net worth, providing strategies aimed at optimizing risk-adjusted returns.

NO SPECIFIC ACCOUNT REQUIREMENTS OR INVESTMENT MINIMUMS

W2B does not establish minimum account requirements to start investing. However, it's important to note that specific criteria for their clients, including investment minimums, may be defined by a new Partner, always communicated clearly and transparently to the client before they start investing with W2B.

ADAPTATION OF SERVICES

Through the use of the Platform, W2B personalizes investment services to meet the needs and risk profiles of each client. The investor profile assessment, whether directly or through integration and collaboration with a Partner, allows us to determine the most suitable range of services for each client.

COMMUNICATION WITH CLIENTS

All interaction with our clients is conducted through our Platform, either by notifications delivered through the Platform or by email if the client configures this option.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

Wealth2B employs data-driven methods of analysis and investment strategies to manage client assets. Our technology-driven approach allows us to offer investment advice through our Platform, ensuring that our clients receive strategies that are aligned with their individual financial goals and Risk Tolerances.

INVESTMENT PHILOSOPHY

Wealth2B's investment philosophy emphasizes prudent risk management and long-term wealth accumulation through several key principles that guide our automated investment advisory services:

- **Risk and Return Linkage:** Our philosophy is based on the idea that returns are inherently linked to risks—higher returns come with higher risks. We focus on defining each client's Risk Tolerance and adjusting our recommendations to it.
- **Long-Term Investment Focus:** Our strategies promote stability by emphasizing long-term investments, reducing the impact of short-term market volatility.
- **Diversification:** We advocate for broad diversification across asset classes, sectors, and regions to optimize the return-risk ratio.
- **Avoidance of Short-Term Speculation:** Our approach discourages speculation on short-term market movements, focusing instead on long-term growth.
- **Wealth Creation through Savings:** We emphasize building wealth through consistent saving and strategic investing.

CLIENT RISK PROFILING

Our investment advisory approach begins with a risk profiling of each client, utilizing an online questionnaire to assess "Risk Tolerance" and "Risk Category." Risk Tolerance refers to the degree of variability in returns that a client is willing and able to withstand, considering their financial situation and investment objectives and it's measured as a percentage value representing targeted annualized standard deviation of the portfolio.

Based on the Risk Tolerance, each client is assigned a Risk Category—Conservative, Moderate, or Aggressive—which dictates the types of investment products and services available to them through our platform.

METHODS OF ANALYSIS

At Wealth2B, our investment decisions are driven by proprietary algorithms that ensure precision and adherence to our clients' Risk Tolerance. Our approach leverages detailed data analysis and market evaluation to provide tailored investment solutions across various services.

Algorithm-Based Analysis

Key applications include:

- **Automatic U.S. Treasuries:** This service utilizes an algorithm to scan the bond market, identifying U.S. Treasury Bills, Notes, and Bonds that match the client's investment criteria, such as preferred terms and rates.
- **Global Portfolio and Thematic Investment:** Our algorithms calculate clients' Risk Tolerance and generate portfolios that maximize potential returns while managing risk through diversified, global asset allocation.
- **Trading:** For the Trading service, algorithms are used to monitor the client's portfolio performance, comparing it with the "W2B Index" to provide data-driven recommendations that enhance trading strategies based on actual performance metrics.

INVESTMENT STRATEGIES

Automatic U.S. Treasuries

Minimum Risk Category required: Conservative

Focuses on capital preservation for clients with short investment horizons. Utilizing a proprietary algorithm, it selects Treasury Bills, Notes, and Bonds from the secondary market based on market depth liquidity. The algorithm presents clients with available options of investment terms, rates, and minimum amounts, allowing them to choose according to their preferences. Wealth2B maintains discretion over the final selection and management of these instruments, including handling all necessary reinvestments.

Global Portfolio

Minimum Risk Category required: Moderate

Designed for capital growth, the Global Portfolio targets medium to very long investment horizons. It features a diverse mix of low-cost ETFs covering international equities, bonds, US real estate, and commodities. Utilizing a risk parity optimization model, the service adjusts investments based on the client's Risk Tolerance. Wealth2B exercises discretionary authority over ETF selection, investment percentages, and the timing of trades, ensuring the portfolio is continuously aligned with market conditions and client goals.

Thematic Investment

Minimum Risk Category required: Aggressive

It is aimed at clients seeking speculative opportunities over long to very long horizons. This service provides access to niche market sectors with growth potential, offering a curated list of sectors and corresponding ETFs or stocks that accurately track sector indices. After clients select a sector, the Platform automatically calculates and customizes portfolios based on their preferences and Risk Tolerance. Wealth2B manages the selection of instruments and the timing of rebalancing, and clients cannot influence the availability or composition of sectors.

Trading

Minimum Risk Category required: Aggressive

Employs sophisticated algorithms designed to perform continuous analysis of each client's portfolio performance. These algorithms track the daily and historical performance data of the client's investments and compare it with the "W2B Index," which consists of a curated selection of low-cost, passively managed, globally diversified ETFs. This index serves as a benchmark to gauge the effectiveness of the client's active management strategies. By analyzing key performance metrics, such as the Sharpe Ratio and Sortino Ratio, the algorithms assess the performance of the portfolio, providing insights into how well the active management is performing relative to a passive investment strategy.

The system calculates these metrics quarterly. Based on these insights, the Platform automatically generates a quarterly report for each client that highlights differences in risk-adjusted returns and costs between the portfolio and the W2B Index. These reports are designed to be educational, offering clients clear guidance derived from their own performance data. The guidance provided is impersonal and based on a wide array of articles, videos, and other multimedia content that is general in nature and in line with Wealth2B's investment philosophy.

RISK OF LOSS

Investing in securities involves risks, including the risk of loss of principal. It's crucial for clients to understand that investment strategies and analysis methods cannot guarantee future performance or protect against loss due to market fluctuations or declines in investment values. Below are some specific risks associated with our investment strategies:

- **Market Risk:** All investments are subject to market fluctuation risks and potential losses. This risk means that the value of investments can decrease due to economic, political, or market factors, affecting both the market as a whole and individual investments.
- **Diversification and Risk Parity Risk:** Although our strategy seeks to minimize risks through mathematically balanced diversification, there is no guarantee that this approach will fully protect against loss. Quantitative models and assumptions about asset correlation may not predict future events or unexpected market changes.
- **Specific Strategy Risks:** Each of our investment strategies, from FDIC Bank Sweep to Thematic Investment, carries its own risks. For example, investments in ETFs and mutual funds may incur additional costs and reflect the risks of the underlying assets. Bond investments are subject to credit risk and interest rate changes, which can affect their value.
- **Discretionary Management Risk:** In accounts where W2B has the discretion to make investment decisions, there is a risk that the decisions made may not achieve the expected results. The firm implements policies to mitigate this risk but cannot guarantee the performance of investments.
- **Liquidity Risk and Concentration Risk:** Investing in certain products may offer less liquidity, making it difficult to sell without affecting the market price. Concentration in a limited number of investments or sectors can also increase the risk of losses.
- **Software and Algorithm Risk:** Robo-advisors rely on software and algorithms, which inherently entail risks. Despite rigorous design, development, and testing, there's a constant risk that the

software might malfunction, leading to unintended consequences. Algorithmic errors or malfunctions can significantly affect investment recommendations and portfolio management, particularly if the algorithms fail to respond effectively to market changes or if based on inaccurate data.

- **Other risks:** There are additional risks and uncertainties an investor should consider, including but not limited to: credit risk, emerging market risk, operational risk, and brand and reputational risk. There also may be risks that we may be unaware of or that we currently see as immaterial but may impact your investment.

It's fundamental for clients to understand that all investments carry some degree of risk and that past performance is not indicative of future results. W2B commits to providing expert advice and working diligently to manage risks, but it cannot guarantee that its investment strategies will be successful at all times. Clients should be prepared to accept the risk of loss as part of the investment process.

ITEM 9: DISCIPLINARY INFORMATION

Over the past 10 years, neither W2B nor any of its employees or executives have been subject to any disciplinary events.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

W2B, Inc. has an affiliation with another registered investment adviser due to having a common control person. However, both firms have implemented strict policies and procedures to ensure full regulatory compliance and to address any potential conflicts of interest.

W2B, Inc. offers its investment products through agreements with third-party institutions. These institutions integrate W2B's investment advisory services into their own product offerings. The affiliated adviser operates in a different market segment with a distinct client base.

Due to the distinct nature of both businesses, there are no client referral agreements, business arrangements, or any type of commercial agreement between W2B, Inc. and the affiliated investment adviser. As a result, no material conflicts of interest have been identified that could impact W2B's clients. Further details regarding related persons can be found in Section 7.A. of Schedule D of the Form ADV.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, AND PERSONAL TRADING

W2B CODE OF ETHICS AND COMMITMENT

At W2B, we adhere to a strict code of ethics that underscores our dedication to integrity, transparency, and the duty of loyalty to our clients. This code not only guides our employees in their ethical duties but also sets clear rules for their personal securities transactions, ensuring alignment with our clients' best interests. We commit to adhering not just to the code's specific provisions but also to the general principles that guide it.

MONITORING OF PERSONAL INVESTMENT ACTIVITIES

In line with our code of ethics, W2B requires employees, and certain contractors and suppliers to report their personal investments in securities traded on public markets. This reporting process allows the firm to monitor and analyze these activities to prevent conflicts of interest and ensure that the decisions made by employees do not adversely impact the interests of clients.

PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING

W2B's policies regarding the firm's or its associates' participation in transactions in which a client is involved are designed to ensure transparency and minimize conflicts of interest.

These policies specify that investment decisions are based on strategies approved by the company's board and configured into W2B's Platform, eliminating individual employee discretion over which products are recommended to clients. This approach ensures that no W2B employee can make discretionary investment recommendations to clients, mitigating potential conflicts of interest.

COMPLIANCE MEASURES AND TRAINING

W2B implements rigorous internal control measures and conducts an annual compliance training program for all employees, and some contractors and suppliers. This training and compliance approach ensures that all team members not only understand and adhere to the firm's code of ethics but also implement corrective measures if necessary.

ITEM 12: BROKERAGE PRACTICES

W2B adopts a meticulous and principled approach to selecting brokers that execute our clients' transactions. We understand the importance of transaction execution not just in terms of cost, but also quality, reliability, and security. Therefore, our selection of brokers is based on a comprehensive evaluation that includes:

- **Execution Capabilities:** We value the broker's market experience, the efficiency, reliability, and timeliness of order execution, as well as their integration with our existing systems and the ability to monitor investments.
- **Products and Services Offered:** We consider the range of investment programs, back-office services, technology, regulatory compliance assistance, and analytical and research services the broker may offer.
- **Financial Strength, Stability, and Accountability:** It is crucial that the broker demonstrates financial strength, thereby offering security and protection to our clients' accounts, preferably backed by SIPC or FDIC.
- **Reputation and Integrity:** The broker's market reputation and integrity are fundamental to our selection, ensuring that our clients receive the best possible service.
- **Confidentiality:** The broker's ability to maintain the confidentiality of transactions and client information is imperative.

BEST EXECUTION AND DUE DILIGENCE

We exercise due diligence to ensure that all transactions are executed in a manner that achieves the best possible execution for our clients, considering the back-office services, technology, and the cost of services offered by the broker.

CUSTODIAN RECOMMENDATION

Given that W2B's services are exclusively provided through our Platform, it is necessary for W2B's systems to be integrated with those of custodians. Therefore, clients only have the option to choose among custodians that W2B has selected and with which it has integrated.

AGGREGATED TRANSACTIONS

W2B may bundle buy or sell orders for two or more clients into a single large order and execute it through a single broker or dealer for execution (block trading). This practice seeks fairness and the overall best interest of all accounts involved, providing average prices and proportionally sharing transaction costs.

ITEM 13: REVIEW OF ACCOUNTS

At Wealth2B, every client account, whether managed on a discretionary or non-discretionary basis, undergoes systematic monitoring to ensure that investment decisions align with each client's established Risk Tolerance. The type of monitoring and actions taken depend on the service contracted by the client.

The Investment Management Team at Wealth2B designs investment strategies and configures the algorithms used by our automated Platform, which conducts all reviews and account management autonomously without human intervention. They conduct quarterly reviews of algorithms to ensure that all procedures comply with best practices and regulatory standards.

REVIEW PROCESS

All client portfolios are reviewed periodically within the framework dictated by their Risk Category. This ensures that clients have access to financial products that correspond to their capacity and willingness to handle risk:

- **Conservative:** Access low-risk services such as FDIC Bank Sweep and Automatic US Treasuries.
- **Moderate:** Enjoy additional access to the Global Portfolio.
- **Aggressive:** Have full access, including Thematic Investment and Trading.

Client risk categories and tolerances are automatically updated at account opening and annually. Clients can also impose or modify investment restrictions based on the services and customization options each service offers. For more details on the limitations clients can set for each service, refer to ITEM 16: INVESTMENT DISCRETION.

MONITORING AND PERFORMANCE EVALUATION

- **Discretionary Management:** Our automated systems continuously evaluate portfolio volatility in relation to the client's Risk Tolerance. Adjustments are automatically made when deviations occur, with automatic rebalancing every quarter, upon new deposits, and before withdrawal executions to maintain a coherent investment strategy.
- **Non-Discretionary Advice:** For non-discretionary services, investment performance is assessed by comparing it to the "W2B Index," a composite of passive management ETFs and global diversification. Risk adjusted return metrics, calculated from historical daily returns, are utilized to evaluate investment performance. Recommendations are automatically generated on a quarterly basis, incorporating analysis from previous quarters to ensure comprehensive performance assessment and timely guidance if the current quarter's performance falls below the index.

REPORTING TO CLIENTS

Wealth2B engages clients with:

- **Notification of Account Movements:** Clients receive notifications by the end of the day when transactions occur.
- **Monthly Statements:** Summaries of all account activities are generated monthly and made available through our platform.
- **Quarterly Reminders:** Wealth2B sends automated quarterly reminders to clients, encouraging them to review and update their personal and financial information if it has changed.
- **Annual Mandatory Updates:** Each client at Wealth2B is required to complete mandatory updates annually.
- **Trading Service Performance Reports:** Quarterly, clients in the Trading service receive an automatically generated summary report detailing their account's performance against the W2B Index and tailored recommendations from a centralized knowledge base to optimize their investments.

COMMUNICATION, INTERACTION AND LIMITATIONS

All client interactions, including the management of accounts and communication about account reviews, are conducted exclusively through Wealth2B's Platform. Notifications, whether delivered through the Platform or via email (if configured by the client), are generated automatically.

Model Limitations

The accuracy of our Risk Tolerance model is dependent on the quality of client data. Regular updates are crucial for maintaining the effectiveness of our robo-advisor systems, which may not instantly adjust to unregistered personal changes, potentially impacting investment customization under complex or volatile financial scenarios.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

CLIENT REFERRALS AND COMPENSATIONS

W2B does not receive compensation, such as commissions, fees, or non-monetary benefits, for referring clients to third parties or for receiving referrals from third parties. This policy ensures that our priority is to provide investment advice and management based exclusively on the needs and objectives of our clients, without external influences due to potential incentives.

COMPENSATION AGREEMENTS WITH PARTNERS

W2B establishes compensation agreements with specific Partners who facilitate the integration of our investment services into their client base. In these cases, Partners may receive compensation for referring clients to W2B. These agreements are managed with the utmost transparency and with a focus on integrity, ensuring they do not compromise the impartiality of our advice.

POLICIES TO ENSURE IMPARTIALITY

To ensure that these agreements do not affect the quality and impartiality of our services, W2B implements rigorous due diligence policies for each new Partner. This process includes a comprehensive assessment of potential conflicts of interest and the implementation of control measures to minimize them.

The decision-making regarding these agreements is carefully documented and subject to periodic review, always maintaining our commitment to our fiduciary duties to our clients. This process ensures that, regardless of any compensation agreement, the needs and objectives of our clients remain our absolute priority.

ITEM 15: CUSTODY

At W2B, the security and protection of our clients' assets are of paramount importance. Aligning with the highest industry standards and complying with applicable regulations, we adopt meticulous practices in the custody management of assets.

NO DIRECT CUSTODY BY W2B

It is essential to clarify that W2B does not maintain custody of client funds or securities. Instead, we structure our services so that all client accounts are under the custody of third parties, specifically regulated and recognized financial institutions. This separation ensures an additional layer of security, as these institutions offer protection through SIPC for securities and FDIC for cash deposits, depending on the type of account selected by the client.

TRANSPARENT COMMUNICATION WITH CLIENTS

Transparency is a fundamental pillar of our operation. We proactively inform our clients about the custody details of their assets, including the selected custodial institution, the protections available, and the procedures implemented to secure their assets. This information is provided in detail at the account opening and through regular communications.

EXTERNAL AUDITS AND REVIEW OF CUSTODY PRACTICES

Although W2B does not have direct custody and is therefore not directly subject to audits of its custody practices, we partner exclusively with custodial institutions that are subject to the highest regulatory standards and audits by competent entities. This collaboration ensures that our clients' assets are adequately protected.

ITEM 16: INVESTMENT DISCRETION

At Wealth2B, we manage certain client accounts on a discretionary basis, where we have the authority to execute securities transactions, including the selection and timing of trades without requiring client approval for each transaction. This discretionary control is strictly for accounts under services that require such management, as detailed and agreed upon in the advisory contract. Clients do not retain control over individual trade decisions in these discretionary accounts.

CLIENT-IMPOSED LIMITATIONS

For services operated on a discretionary basis, clients may impose only the specific limitations listed below. No other limitations can be applied to these discretionary services:

- **Automatic U.S. Treasuries:** Clients may specify investment terms such as maturity and amount, however, specific instrument selection within agreed parameters remains under Advisor control.
- **Global Portfolio:** Clients can only modify their Risk Tolerance, which directly impacts the composition of their recommended portfolio. This profile can be updated at any time and is recalibrated at least annually to align with their current financial situation and objectives.
- **Thematic Investment:** Clients select from predefined sectors and allocate amounts to invest, but do not influence the underlying sector availability or detailed portfolio composition.

PROCEDURES BEFORE ASSUMING DISCRETIONARY AUTHORITY

Discretionary authority is established at the outset of the client relationship when the client completes a detailed Risk Tolerance questionnaire and digitally signs the advisory agreement.

TAILORING OF DISCRETIONARY SERVICES

Our Platform meticulously tailors discretionary services according to the specific limitations and preferences set forth in each contracted service. The scope of the customization for each service is detailed in Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss.

ITEM 17: VOTING CLIENT SECURITIES

W2B does not participate in the voting of securities on behalf of our clients.

The responsibility to vote lies directly with the clients, who receive the necessary information to exercise this right through W2B's system notifications. It is important to us that clients are informed and exercise their voting rights in accordance with their own convictions and interests.

ITEM 18: FINANCIAL INFORMATION

W2B Inc. is committed to maintaining financial transparency and ensuring our clients' confidence in our ability to manage their investments securely and efficiently. Below are the key aspects related to our financial situation and the policies implemented to ensure stability and the protection of our clients' assets.

PREPAYMENT OF FEES

W2B does not request or require the prepayment of more than \$1200 in fees per client six months or more in advance.

FINANCIAL STABILITY AND CAPACITY

At no point has our firm been subject to insolvency or bankruptcy proceedings, nor have we encountered financial conditions that could jeopardize our ability to fulfill our contractual commitments to our clients.

BANKRUPTCY DISCLOSURE

W2B Inc. has not been the subject of a bankruptcy petition at any time during the past ten years.