Hespera Investment Advisory Disclosure

Hespera Capital Assets / Hespera ETFs · Last reviewed September 03, 2026 · Effective March 27, 2026

1. Overview

This Investment Advisory Disclosure describes Hespera Guided, Managed Portfolios, Personalized Investment Management, Separately Managed Sleeves, and related advisory-style features. It supplements the Account Customer Agreement.

2. Services

- Goal and risk questionnaires.
- ETF plan mix recommendations using rules-based and AI-assisted tooling with human oversight policies.
- Optional ongoing monitoring and suggested rebalances for managed enrollments.
- Educational content; not a substitute for your own judgment or independent advice.

3. Fees

Self-service investing does not itself charge an advisory wrap fee. Guided and Managed enrollments may charge asset-based or flat advisory fees disclosed in your enrollment flow. Underlying ETF plans have their own stated economics. You will see fee language before you confirm.

4. Suitability and limitations

Recommendations depend on information you provide. If that information is incomplete or outdated, suggestions may be less appropriate. Hespera does not guarantee performance. Crypto-linked sleeves carry additional risks described in the Cryptocurrency Risk Disclosure.

5. Custody and trading

Assets are recorded on the Hespera platform ledgers associated with your account. Trading/allocation instructions may be entered by you or, for managed services, by authorized systems/personnel under the mandate you accept.

6. Termination

You may stop Guided/Managed features subject to plan lockups or settlement rules on underlying investments. Advisory fees accrue through the effective termination date disclosed in your enrollment terms.

7. Brochure-style supplemental topics

Methods of analysis

We combine diversification principles, category research, risk banding, and systematic screens. AI Advisor outputs are assistive and monitored under internal policies.

Disciplinary and other disclosures

Material legal or regulatory events, if any, will be summarized in updates to this disclosure or in notices to affected clients.

Code of ethics / personal trading

Personnel are subject to confidentiality and conflicts policies. Preferential treatment that harms clients is prohibited.

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