

Composer Technologies Inc.

January 18, 2021

Introduction	<p>Composer Technologies Inc. <i>doing business as</i> Invest Composer (“Invest Composer” “we” or “our”) the information in this Customer Relationship Summary has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Invest Composer is being registered as a registered investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.</p>
What investment services and advice can you provide me?	<p>Invest Composer offers automated investment advisory services to retail investors (“Clients”) in the U.S. through a Subscription program available on our interactive website. We assist clients with developing an investment strategy by obtaining information on each client’s investment goals via a questionnaire and recommending a model portfolio based on such questionnaire. Clients must complete the questionnaire, maintain an account and open an account with an approved broker-dealer to utilize our services. Model portfolios are primarily comprised of a concentrated basket of stocks along with possible hedging to protect against market downturns. Although Invest Composer recommends a model portfolio based on the questionnaire, Clients are able to choose the model portfolio that they wish to use, even if it is contrary to the suggested portfolio. Clients are also given the opportunity to swap out, replace or remove securities from any recommended model portfolio, whether recommended or independently chosen at their own discretion. There is no account minimum.</p> <p>Invest Composer has discretionary authority over client accounts, which means that we are allowed to buy and sell investments for clients, without asking in advance. This authority is ongoing and may be triggered by changes to client investor profiles and/or changes in the market. Invest Composer monitors client accounts on a regular basis and periodically rebalances client portfolios to maintain each client’s risk tolerance and investment objectives. While Invest Composer recommends a volatility threshold for a Client’s portfolio, Clients are also given the ability to stray from the advice of Invest Composer and manually increase or decrease the volatility of their portfolio. Should they desire, Invest Composer allows Clients to manually swap, replace or eliminate equity securities and ETF’s from the selected model portfolio at their own discretion. Clients may also choose to manually pick how often the account is rebalanced at their own discretion. Invest Composer conducts reviews when material changes occur in client portfolios or investment objectives.</p> <p>Invest Composer selects equity and fixed-income exchange traded funds (“ETFs”) as well as equity securities of companies to build model portfolios recommended to Clients based upon the Client questionnaire. The Client questionnaire recommends which model portfolio is suitable for the Client’s age, the amount they expect to invest, investment time horizon, financial information, financial goals and type of income. Clients may choose a different model portfolio than the one recommended by Invest Composer at their own discretion.</p> <p>For additional information regarding our service, please see Invest Composer’s Form ADV, Part 2A, which is available at InvestComposer.com/brochure and on the SEC’s IAPD database at adviserinfo.sec.gov.</p> <p>CONVERSATION STARTERS: <i>Ask your financial professional:</i></p> <ul style="list-style-type: none"><input type="checkbox"/> <i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i><input type="checkbox"/> <i>How will you choose investments to recommend to me?</i><input type="checkbox"/> <i>What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?</i>

<p><i>What fees will I pay?</i></p>	<p>Invest Composer charges a monthly subscription fee. The subscription fee includes Invest Composer’s advisory services. The subscription fee for the services is \$30 per month. We may waive some or all the fees at our discretion. Fees are not negotiable.</p> <p>You would authorize Invest Composer through our Advisory Agreement to charge your credit card monthly. Note: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Invest Composer in our sole discretion may from time to time offer lower fees through promotions, referrals and other discounts to some accounts that differ from the fees stated above.</p> <p>Invest Composer also gives Clients the opportunity to test out model portfolios for free without using actual funds. Clients may test Model Portfolios to see how they would have performed had they invested with actual funds.</p> <p>You may incur certain charges imposed by custodians and other third parties, including transfer fees, administrative fees and other fees and taxes on brokerage accounts and securities transactions. The issuer of some of the securities or products purchased for clients, such as ETFs or other similar financial products, may charge product fees that affect clients.</p> <p>For additional information regarding our fees, please see Invest Composer’s Form ADV, Part 2A, which is available at InvestComposer.com/brochure and adviserinfo.sec.gov.</p> <p>CONVERSATION STARTER: Ask your financial professional: <i>Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?</i></p>
<p><i>What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?</i></p>	<p><u>When we act as your investment adviser</u>, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money can create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. An example to help you understand what this means includes that the way we make money, a subscription fee, is not tied to your overall performance.</p> <p>CONVERSATION STARTER: Ask your financial professional: <i>How might your conflicts of interest affect me, and how will you address them?</i></p> <p>For additional information regarding our conflicts of interest, please see Invest Composer’s Form ADV, Part 2A, which is available at InvestComposer.com/brochure and adviserinfo.sec.gov.</p>
<p><i>How do your financial professionals make money?</i></p>	<p>Our financial professionals receive a salary and bonus from Invest Composer based on their job performance and the performance of Invest Composer.</p>
<p><i>Do you or your financial professionals have legal or disciplinary history?</i></p>	<p>No. Neither Invest Composer nor its financial professionals have reportable legal or disciplinary events. Visit Investor.gov/CRS for a free and simple search tool to research Invest Composer and our financial professionals.</p> <p>CONVERSATION STARTER: Ask your financial professional: <i>As a financial professional, do you have any disciplinary history? For what type of conduct?</i></p>
<p><i>Additional Information</i></p>	<p>For additional information about our investment advisory services, please see Invest Composer’s Form ADV, Part 2A, which is available at InvestComposer.com and adviserinfo.sec.gov. If you would like additional, up- to-date information or a copy of this relationship summary, please email support@InvestComposer.com or call (647)-879-7373.</p> <p>CONVERSATION STARTER: Ask your financial professional: <i>Who is my primary contact person? Is he or she an investment adviser representative? Who can I talk to if I have concerns about how this person is treating me?</i></p>

