

Pionex Investments is registered with the Securities and Exchange Commission ("SEC") as an investment adviser. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### What investment services and advice can you provide me?

We offer investment advisory services to retail investors primarily over the internet. Our services include managed investing portfolios composed of digital assets ("crypto"). As a client, you input information about yourself and your investing goals through our online interface and our software constructs and manages your portfolios based on the information you provide. More detailed information about Pionex's services is available in our Form ADV Part 2A Item 4 and Form ADV Part 2A.

#### 🗣️ CONVERSATION STARTERS

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

Answers to the conversation starters may be found at [support@pionex.investments](mailto:support@pionex.investments).

**Monitoring** As part of all our service offerings, our software monitors your account on an ongoing basis. Our investment process is developed and overseen by our investment advisory personnel.

**Investment Authority** You have the ability to allocate funds to Pionex's Crypto portfolio- Pionex management controls the investments and the strategies of each portfolio.

**Investment Offering** Pionex crypto portfolio strategies are constructed of crypto assets based on market- capitalization, risk-return profiles, and other factors. Crypto portfolios also include a cash allocation.

**Account Minimums and Other Requirements** No minimum account size is required to open or maintain an account. The minimum initial deposit is \$10.

More detailed information about our services is available in Part 2A of our Form ADV, including Items 4, 5, and 6.

### What fees will I pay?

When we are paid based on assets under management. 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. Please make sure you understand what fees and costs you are paying. Additional information about our fees is included in Part 2A of Form ADV, Item 5.

#### 🗣️ CONVERSATION STARTERS

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?
- How might your conflicts of interest affect me, and how will you address them?

What fees will I pay? (Continued)

| Client Type | Trading Fees and Custody | Crypto Annual Fee <sup>1</sup> |
|-------------|--------------------------|--------------------------------|
| Digital     | 0.0075 per 100           | 2.00%                          |
|             |                          |                                |

<sup>1</sup> Our Crypto fee solely covers our advisory services, including discretionary portfolio management. Clients also bear expenses associated with trading and custody charged by our crypto custodian, COBO Ltd. <https://www.cobo.com/>

How do your financial professionals make money?

All employees are paid a base salary and certain employees are eligible for a discretionary bonus. Employees also receive compensation in the form of equity option grants in Pionex’s parent company. No compensation is based on the performance or selection of specific traditional securities or crypto assets Further details regarding incentive compensation is available in Part 2A of Form ADV.

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

*When we act as your investment adviser*, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide to you. Pionex Investments may execute trades on its parent’s exchange, Pionex Inc. Pionex Investments does not receive payment for order flow or any compensation from Pionex. Pionex Investments has a fiduciary responsibility to locate the best prices and executions available at the time.

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

No. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

 CONVERSATION STARTERS

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

Additional information about our services can be found in our Form ADV Part 2A at [support@pionex.investments](#) For answers to the conversation starters or to download a copy of this relationship summary, email us at [support@pionex.investments](mailto:support@pionex.investments)

 CONVERSATION STARTERS

Who is my primary contact person? Are they a representative of an investment-adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?