

Form CRS: Client Relationship Summary

September 15, 2026

TM37 Inc. (“Sterling Labs” or the “Firm,” “We,” “Us,” “Our”) is an investment adviser registered with the Securities and Exchange Commission (the “SEC”). Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. This *Client Relationship Summary* (“Form CRS”) informs you about certain of our investment advisory services and the fees we charge. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about investment advisers, broker-dealers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors through a subscription-based online platform (the “Platform”). Our services include AI-powered research and analytics, investment idea generation and screening tools, portfolio diagnostic tools that analyze risk exposures and performance factors, ongoing monitoring of the holdings in brokerage accounts you choose to link to us, and natural-language investment insights. These tools are designed to help you evaluate publicly traded securities.

We do not manage investment accounts, trade for you, or provide discretionary portfolio management. You make your own investment decisions and you are responsible for placing trades with the brokerage of your choice. We do not monitor your financial situation. For brokerage accounts you choose to link to Sterling Labs, we monitor your linked accounts and the holdings in them; we do not monitor accounts that you do not link to us. Beginning July 20, 2026, the Platform also generates insights automatically, on an ongoing 24/7 basis and without requiring any input or interaction from you, including with respect to the accounts you choose to link. We do not impose account minimums. We offer a seven-day free trial that provides access to all Platform features. During the trial, no fee is charged. At the end of the trial, you must affirmatively opt in and provide payment information to begin a paid subscription. After the trial period, a flat monthly subscription fee applies to all users.

More detailed information about the investment advisory services we provide is located in Item 4 and Item 7 of our Form ADV Part 2A (“Firm Brochure”), which is publicly available if you search our Firm name on the SEC’s Investment Adviser Public Disclosure website and will be provided upon request.

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 licenses, education and other qualifications? What do these qualifications mean?

What fees will I pay?

We offer a seven-day free trial during which no fees are charged. After the trial, if you choose to continue, you will pay a monthly flat fee of \$30, billed in advance. This fee provides access to Sterling Labs’ research tools and Platform features. Because our fee is a fixed subscription, we do not earn more when you trade more or invest more. However, you should understand that you could pay subscription fees even if you rarely use the Platform.

In addition to the flat monthly subscription fee, we offer usage-based pricing. Your \$30 monthly subscription includes a fixed monthly allotment of usage credits. Once you exhaust the monthly credits included with your subscription, features that use credits, including the analyst chatbot, are unavailable to you until your next monthly renewal unless you purchase additional credits. Additional credits you purchase are not refundable. The credits included with your \$30 monthly subscription do not roll over from month to month, while additional credits you purchase do roll over. Additional credits are not based on your assets under management, the investment advice we provide, or any similar measure; they simply allow clients who use more compute on the Platform—by asking a high volume of questions or conducting in-depth research beyond what the \$30 fee supports—to pay for that incremental usage.

You may also pay additional fees to third parties, such as brokerage commissions and transaction fees, custodial fees, ETF or mutual fund expenses, and taxes or regulatory charges. Sterling Labs does not receive any portion of these fees.

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 located in Item 5 of our Firm Brochure, which is publicly available if you search our Firm name on the SEC's Investment Adviser Public Disclosure website and will be provided upon request.

Conversation Starter:

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?

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 certain conflicts of interest. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means: because we charge a recurring subscription fee, we earn more when more people subscribe and remain subscribed, regardless of how often they use the service or how successful our investment advice is. This creates a potential conflict of interest, incentivizing us to prioritize onboarding and retaining users rather than improving the accuracy of the advice produced by the Platform.

We do not sell proprietary products, receive third-party payments, receive revenue sharing, engage in principal trading, receive soft-dollar benefits, recommend or select brokers, or execute trades. Additionally we do not have any relationships or arrangements with other financial services companies that pose material conflicts of interest. Additional information about our conflicts of interest is located in Item 10 of our Firm Brochure, which is publicly available if you search our Firm name on the SEC's Investment Adviser Public Disclosure website and will be provided upon request.

Conversation Starter:

How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our investment professionals receive salaries and standard compensation. They do not receive commissions, product-based compensation, sales-based bonuses, or compensation tied to client assets, trading volume, or the performance of your investments. This reduces conflicts related to investment recommendations.

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

No. None of our investment professionals have any legal or disciplinary history to disclose. Please visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research our Firm and our investment professionals.

Conversation Starter:

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

You can find additional information about our Firm's investment advisory services on the SEC's website at www.adviserinfo.sec.gov. To request a copy of this Form CRS and other up-to-date information, you may contact our Firm by emailing support@sterlinglabs.co.

Conversation Starter:

Who is my primary contact person? Is he or she 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?