

ZERO LABS, INC.

Form CRS - Client Relationship Summary

August 2026

Zero Labs, Inc., (“Zero”, “We” or the “Firm”) is an investment adviser registered with the Securities and Exchange Commission that provides investment advisory accounts and services via the internet. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. This document is a summary of the services we offer to clients and the fees we charge for these services. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Zero offers portfolio advisory services to retail investors (“you”) on a discretionary basis exclusively through our interactive website. We use artificial intelligence agents (“AI Agents”) to generate recommendations and insights based on data that you provide to us.

As part of our ongoing portfolio management process, Zero utilizes an automated software system that incorporates algorithmic and rules-based technology to assist in monitoring and rebalancing client portfolios. The Firm continuously monitors each client's portfolio against the target asset allocation established for that client's investment strategy and risk profile. It compares current holdings to target weightings on [a continuous / daily / periodic] basis.

When portfolio drift exceeds predetermined thresholds set by the client, the rebalancing process may generate trade recommendations designed to bring the portfolio back into alignment with its target allocation. In generating these recommendations, the system considers factors including asset class weightings, tax-lot information, transaction costs, cash flows, and tolerance bands as configured by the Firm.

For certain client accounts, Zero may offer a direct indexing strategy in which, rather than purchasing a pooled investment vehicle that tracks a target index. This approach is designed to replicate the risk/return characteristics of the target index while providing the Client with the ability to customize and manage individual tax lots and positions at the security level.

Index composition, and other factors, the Firm may purchase all constituent securities of the target index or use an optimization process to select a representative subset of securities designed to track the index's characteristics while reducing the number of individual holdings.

As clients provide modifications to their data, including their preferences, goals, personal information, income, expenses, etc., Zero’s system will automatically adjust the insights and recommendations it gives to those users. We generally do not have a minimum account size to invest with us. More detailed information is available in Zero’s Form ADV Part 2A, in particular Items 4 and 7.

Key Questions to Ask

- **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?**

What Fees Will I Pay?

Our fee is \$500 per year. Clients may terminate their advisory agreement at any time by providing written notice. Our fees are exclusive of brokerage commissions, transaction fees and other related costs and expenses that may be incurred by the client. Clients may incur certain charges imposed by their custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer or electronic fund fees and other fees and taxes on brokerage accounts and securities transactions.

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.

Key Questions to Ask

- **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 some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means. As we charge a subscription fee regardless of your assets under management, we do not benefit financially from your portfolio growth, which could cause us not to recommend strategies that could lead to higher returns. Similarly, a subscription fee is an incentive to provide less service, as we receive the same fee regardless of effort spent providing you with advice. More detailed information is available in Zero's Form ADV Part 2A, in particular Items 10, 11 and 14.

Key Questions to Ask

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

How Do Your Financial Professionals Make Money?

Our professionals are compensated by fixed salary, bonuses, stock options, restricted and unrestricted stocks.

Do You or Your Financial Professionals Have Legal or Disciplinary History?

No. Visit <http://www.investor.gov/CRS> for a free and simple search tool to research Zero and our financial professionals.

Key Questions to Ask

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

Additional Information

You can find additional information about our investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching CRD #343612. If you would like additional, up to date information or an updated copy of this relationship summary, please go to **www.Zero.tax** or call 650-761-1821.

Key Questions to Ask:

- **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?**