Form ADV Part 2A

Firm Brochure

Conviction

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This brochure provides information about the qualifications and business practices of Parachute Inc., which conducts business as Conviction (the “Firm,” “we,” “our,” or “Conviction”). Questions about this brochure may be directed to support@convictiontrade.ai. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Parachute Inc. is registered or has applied for registration as an investment adviser with the SEC in reliance on the Internet Adviser Exemption under Rule 203A-2(e). Registration as an investment adviser does not imply a certain level of skill or training.

Additional information about the Firm will be available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov after the Firm’s filing is accepted.

Item 2. Material Changes

This is the Firm's initial brochure. Accordingly, there are no material changes from a prior annual update to report.

In future annual updates, this section will summarize material changes made since the Firm's last annual brochure. The Firm may update this brochure at other times and provide clients with either the amended brochure or a summary of material changes accompanied by an offer to provide the complete brochure.

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Item 4. Advisory Business

A. Description of the Firm

Parachute Inc. is a Delaware corporation formed in May 2025 and conducts its advisory and financial-technology business under the name Conviction. Its principal office is located at 95 Third Street, Suite 2, San Francisco, CA 94103. The Firm is registered or has applied for registration with the SEC in reliance on the Internet Adviser Exemption under Rule 203A-2(e). The Firm provides digital investment advisory services at all times exclusively through its operational interactive website at convictiontrade.ai and related mobile applications, as required under Rule 203A-2(e).

The Firm's principal owners are Aria Narayan Vikram, Chief Executive Officer and Chief Compliance Officer, and Tony Yamin, President and Chief Technology Officer.

The Firm's primary business is financial technology software. The Conviction platform includes strategy creation, research, historical backtesting, stress testing, simulated or paper trading, market-data and analytics tools, risk controls, and connectivity to unaffiliated broker-dealers.

B. Advisory Services Offered

Conviction is an internet-based platform through which individual clients can describe an investment strategy in natural language, convert that strategy into explicit trading rules, evaluate the strategy using historical and simulated data, and, where available, connect the strategy to an account at a supported unaffiliated broker-dealer.

The client generally supplies the strategy thesis and core instructions, including the securities or investment universe, entry and exit conditions, position-sizing parameters, holding period, and risk limits. Conviction may ask clarifying questions, translate the client's instructions into executable rules, identify inconsistencies, present backtest diagnostics and risk warnings, and suggest parameter changes for the client's review. The client must approve the final strategy and any material change before deployment.

Conviction's investment advice is generated by the platform's software-based models, algorithms, and applications based on personal information each client supplies through the interactive website, consistent with the requirements of the Internet Adviser Exemption. No human-directed, client-specific investment advice is provided outside of the platform.

The Firm limits its current advisory services to publicly traded equity securities, exchange-traded funds, and cash or cash-equivalent positions supported by the platform and the client's broker-dealer. The Firm does not currently provide advice regarding options, futures, private funds, direct digital assets, fixed-income securities, municipal securities, variable annuities, or other derivatives.

The Firm does not provide holistic financial planning, tax preparation, legal advice, estate planning, insurance advice, or retirement-plan consulting. Conviction does not independently evaluate all of a client's assets or liabilities unless the client provides that information through the platform.

C. How Services Are Tailored to Clients

At or before account activation, the Firm expects clients to provide information concerning their investment objective, time horizon, risk tolerance, investment experience, liquidity needs, financial circumstances, and any investment restrictions. Clients also define or approve strategy-specific parameters through the Conviction interface.

Depending on the available features and the client's selections, restrictions and guardrails may include allowed securities, maximum position size, maximum portfolio or sector exposure, daily loss limits, stop-loss and take-profit levels, holding-period limits, trading frequency, cooldown periods, event or earnings blackouts, whether short sales or leverage are permitted, and whether each order requires client approval before submission.

Conviction's analysis is limited by the information the client provides. The Firm does not ordinarily consider a client's outside holdings, tax lots, employee stock compensation, household assets, retirement accounts, debt, insurance coverage, estate plan, or tax situation unless those facts are supplied and incorporated into the strategy. Clients are responsible for keeping their information and restrictions current.

D. Wrap Fee Programs

The Firm does not sponsor, manage, or participate in a wrap fee program.

Item 5. Fees and Compensation

A. Fee Schedule

At launch, the Firm expects to charge monthly subscription fees ranging from approximately $[X] to $[Y] per month depending on the service tier selected. The exact fee schedule will be disclosed to each client before enrollment and in the client advisory agreement. The Firm will update this brochure promptly upon finalizing its fee schedule. Applicable billing terms and any promotional, cancellation, or refund terms will also be disclosed to each client before enrollment and in the client advisory agreement. At launch, the Firm will not charge a percentage of assets under management, hourly fees, commissions, or performance-based fees.

B. Fee Collection

Monthly subscription fees will be paid separately from assets held in the client's brokerage account through the payment method made available on the Conviction platform. The Firm does not have the authority to deduct advisory fees from client brokerage accounts and will not deduct subscription fees from client assets held by any broker-dealer or custodian.

C. Other Fees and Expenses

The Firm's subscription fee is separate from charges imposed by broker-dealers, custodians, exchanges, funds, market-data providers, banks, or tax authorities. Depending on the account and the client's activity, a client may pay brokerage commissions, regulatory or transaction fees, bid-ask spreads, margin interest, wire or transfer fees, exchange or data fees, taxes, and the internal expenses of ETFs or other investment products. These charges are not paid to the Firm unless specifically disclosed in writing.

D. Prepaid Fees and Refunds

The Firm does not require or solicit the prepayment of more than $1,200 in fees six months or more in advance. Any prepaid subscription fee and refund rights will be governed by the client agreement and disclosed before the client subscribes.

E. Compensation for Sales of Securities

Neither the Firm nor its personnel receive commissions or other compensation for the sale of securities or other investment products.

Item 6. Performance-Based Fees and Side-by-Side Management

The Firm does not charge fees based on a share of capital gains or capital appreciation and does not engage in side-by-side management of performance-fee and non-performance-fee accounts.

Item 7. Types of Clients

The Firm's services are designed primarily for natural persons, including retail investors, who use the Conviction platform and, when applicable, connect an account maintained at a supported unaffiliated broker-dealer. The Firm does not currently offer advisory services to investment companies, pooled investment vehicles, pension plans, charitable organizations, government entities, other investment advisers, insurance companies, banks, or institutional clients.

The Firm generally requires a minimum of $10 to open a live managed account through the platform, although a client's broker-dealer or custodian, or a particular strategy may independently require a minimum amount of funds. Any additional Firm-imposed minimum, minimum trade size, or other requirement will be disclosed before enrollment.

Item 8. Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis and Investment Strategies

Conviction uses software, statistical techniques, machine-learning models, and large language models to translate client instructions into strategy rules and to analyze investment ideas. Depending on the client's strategy, the platform may use daily or intraday price and volume data; technical indicators; company fundamentals; earnings information; news; SEC filings such as Forms 8-K, 10-K, and 10-Q; insider transactions reported on Form 4; institutional holdings reported on Form 13F; and market-regime measures.

The Firm uses artificial intelligence, including large language models ("LLMs"), to interpret client instructions, generate strategy rules, and analyze market data. These models may produce outputs that are inaccurate, biased,

incomplete, or difficult to explain. The Firm does not guarantee the accuracy of any AI-generated output and clients should carefully review all strategy parameters before deployment.

The platform may calculate or use indicators such as moving averages, relative strength index, moving average convergence/divergence, Bollinger Bands, momentum, rate of change, volatility, volume, VWAP, and opening-range measures. It may also evaluate qualitative events such as earnings surprises, management or governance changes, material agreements, acquisitions, financial distress, capital actions, auditor changes, and other public disclosures.

Strategies may be quantitative, qualitative, event-driven, momentum-oriented, mean-reverting, trend-following, fundamental, or a combination of these methods. The client determines or approves the strategy logic. Conviction may screen or rank securities within a client-approved universe and may use backtesting, stress testing, regime comparisons, and diagnostics to evaluate the strategy.

Historical backtests are simulations. They may incorporate assumptions concerning data availability, order timing, fill prices, transaction costs, slippage, corporate actions, liquidity, and market hours. Paper trading is also simulated and does not establish how a strategy will perform with real money. The Firm does not represent or guarantee that any strategy will be profitable, that risk controls will prevent losses, or that historical or simulated results will be repeated.

Investing involves risk of loss, including the possible loss of the entire amount invested. Clients should be prepared to bear that loss.

B. Material Risks

The following risks are material to the Firm's services. This list is not exhaustive, and several risks may occur at the same time.

- **Market Risk.** Security prices and the market as a whole may decline rapidly or remain depressed for extended periods. Market movements may be caused by economic conditions, interest rates, inflation, geopolitical events, regulatory changes, issuer-specific developments, or events that are not readily explainable.
- **Loss of Principal.** A client can lose some or all of the money committed to a strategy. Stop-losses, diversification, and other controls do not eliminate this risk.
- **Concentration Risk.** A strategy focused on a small number of securities, an industry, a factor, a theme, or a market event may be more volatile and may suffer larger losses than a diversified portfolio.
- **Liquidity and Volatility Risk.** A security may be difficult to buy or sell at the expected price, particularly during volatile markets, outside normal market hours, or when trading volume is low. Small- and mid-cap securities may present greater liquidity and volatility risk.
- **Issuer and Business Risk.** An issuer may experience operational, financial, competitive, governance, accounting, litigation, or regulatory problems that reduce the value of its securities.
- **Timing and Gap Risk.** Prices may move between the time a signal is generated and the time an order is submitted or executed. A security may open or trade through a stop level, causing a loss larger than the intended limit.
- **Frequent-Trading Risk.** High turnover can increase transaction costs, taxes, spreads, and execution errors and can reduce or eliminate returns.
- **Tax Risk.** Trading can create taxable gains, short-term gains, wash sales, and other tax consequences. Conviction does not provide tax advice and may not know about transactions in outside accounts.
- **Regulatory Risk.** Changes in securities, brokerage, data, privacy, artificial-intelligence, or other laws and rules may affect the availability, cost, or operation of the service or a strategy.

Technology, AI, Data, and Trading-System Risks

- **Client Instruction and Prompt Risk.** Natural-language instructions can be incomplete, ambiguous, internally inconsistent, or misunderstood. The strategy produced by the platform may not reflect the client's actual intent.
- **AI and Model Risk.** Machine-learning and large language models can generate inaccurate, biased, incomplete, or unsupported outputs. A model may misclassify an event, misread a filing, select an inappropriate parameter, or fail in a market condition not represented in its training or test data.
- **Translation and Code Risk.** Errors can occur when a client's strategy is converted into executable rules or code. A defect may cause an order to be missed, duplicated, delayed, or submitted with an incorrect symbol, side, quantity, price, or timing.

- **Data Quality and Availability Risk.** Third-party data may be incorrect, incomplete, stale, delayed, adjusted improperly, or unavailable. News, filings, fundamentals, prices, corporate actions, and timestamps can contain errors or arrive after a trading decision should have been made.
- **Backtesting and Overfitting Risk.** A strategy may appear successful because it was fitted to historical noise, tested repeatedly, or evaluated using information that would not have been available at the time. Look-ahead bias, survivorship bias, selection bias, data snooping, and unrealistic execution assumptions can materially overstate results.
- **Hypothetical-Performance Risk.** Backtested, stressed, and paper-trading results do not reflect actual trading, market impact, emotions, liquidity constraints, taxes, or all transaction costs. Hypothetical results generally benefit from hindsight.
- **Regime-Change Risk.** Relationships observed historically may break down. A strategy designed for one volatility, interest-rate, liquidity, or economic regime may fail when conditions change.
- **Execution, Slippage, and Latency Risk.** Orders may execute at prices that differ from model assumptions because of market movement, latency, partial fills, spreads, queue position, halts, or broker order-handling practices.
- **Broker and API Dependency Risk.** Live or paper trading depends on unaffiliated broker-dealers, clearing firms, exchanges, data vendors, internet connectivity, and application programming interfaces. Outages, rate limits, maintenance, rejected orders, account restrictions, or changes to third-party systems can prevent or delay trading.
- **Risk-Control Failure.** Position limits, stop-losses, take-profits, drawdown controls, earnings blackouts, cooldowns, and other guardrails can be configured incorrectly, fail to trigger, trigger late, or be unavailable during an outage or market gap.
- Trade-Workflow Risk. Under the Firm's discretionary model, Conviction uses rule-based automated execution after a client approves a strategy. An order may be missed, duplicated, delayed, or submitted incorrectly because of software, integration, configuration, or communication errors.
- Oversight Risk. Human monitoring may not identify every data, model, strategy, or system error in real time, and intervention may be delayed or ineffective.
- **Cybersecurity and Privacy Risk.** Cyberattacks, credential theft, malware, prompt injection, unauthorized API access, vendor breaches, or operational mistakes may expose data, disrupt the service, or lead to unauthorized activity.
- **Third-Party AI and Vendor Risk.** The Firm relies on third-party models, data, cloud, brokerage, and software providers. The Firm may not be able to inspect all underlying systems or prevent a provider from changing, degrading, or discontinuing a service.
- **Explainability Risk.** Some model outputs may be difficult to explain fully. An explanation presented by the platform may simplify or fail to capture the actual factors that influenced an output.
- **SEC Filing and News Interpretation Risk.** Public filings and news can be complex, delayed, amended, or ambiguous. Automated extraction or interpretation may omit context or treat immaterial information as significant.

Risks of Securities Currently Supported

- **Common Stock Risk.** Common stocks can lose value because of market, industry, or issuer-specific developments. Shareholders are generally paid after creditors in a liquidation and may lose their entire investment.
- **Large-Capitalization Stock Risk.** Large companies may grow more slowly, may be less responsive to changing conditions, and may underperform smaller companies or other market segments.
- **Small- and Mid-Capitalization Stock Risk.** Smaller companies may have limited product lines, management depth, financial resources, analyst coverage, and trading liquidity. Their securities may be more volatile.
- **ETF Risk.** An ETF is subject to the risks of its underlying holdings and may trade at a premium or discount to net asset value. Tracking error, fund expenses, concentration, liquidity, market closure, and creation or redemption disruptions can reduce returns.
- **Cash and Cash-Equivalent Risk.** Cash and cash equivalents may lose purchasing power because of inflation and may earn less than other investments. A bank or money-market product can also have credit, liquidity, or coverage limitations.
- **Registration Basis Risk.** The Firm relies on the Internet Adviser Exemption under Rule 203A-2(e) of the Investment Advisers Act of 1940 as its sole basis for SEC registration. If the Firm fails to maintain an

operational interactive website at all times, provides human-directed client-specific investment advice outside of the platform, or otherwise ceases to satisfy the conditions of the exemption, the Firm could lose its basis for SEC registration. In such event, the Firm would be required to withdraw its SEC registration and register with one or more state securities authorities, which could disrupt advisory services or require changes to the Firm's business model.

- **No Operating History Risk.** The Firm was formed in May 2025 and, as of the date of this brochure, has no regulatory assets under management and no advisory client accounts. The Firm's platform has not been tested in live market conditions, and there is no historical performance data or operating track record against which to evaluate the Firm's services. Clients should consider the risks associated with relying on a newly formed adviser with an unproven platform.
- **Key Person Risk.** The Firm currently has two principal owners and officers: Aria Narayan Vikram (CEO and CCO) and Tony Yamin (President and CTO). The Firm's operations, compliance oversight, and technology development depend substantially on the continued involvement of these two individuals. The departure, incapacity, or unavailability of either principal could materially impair the Firm's ability to operate the platform, service client accounts, or maintain compliance with applicable regulations.
- **Limited Scope of Advisory Services Risk.** Conviction does not provide holistic financial planning, tax advice, estate planning, insurance advice, or retirement-plan consulting. The platform does not ordinarily consider a client's outside holdings, tax situation, household assets, retirement accounts, debt, insurance coverage, or estate plan unless that information is specifically provided. A client may make suboptimal investment decisions because the Firm's advice does not account for the client's complete financial picture. Clients should consider consulting additional professionals for comprehensive financial, tax, and legal advice.
- **Conflicts of Interest Risk.** The Firm's subscription-based fee model creates an incentive for the Firm to retain clients, encourage continued use of the platform, and potentially promote higher-priced subscription tiers. Because advisory services are delivered through proprietary technology, the Firm also has an incentive to recommend or prioritize its own platform and strategies rather than alternatives available outside Conviction. These conflicts are addressed through disclosure, consistent subscription terms, client controls, compliance oversight, and by not receiving commissions or compensation for the sale of securities.
- **Third-Party Broker-Dealer Failure Risk.** Client assets are held by an unaffiliated supported broker-dealer or qualified custodian — not by the Firm. If a supported broker-dealer experiences financial distress, regulatory action, insolvency, or operational failure, clients' access to their accounts, ability to trade, or ability to withdraw funds could be delayed or impaired. Client brokerage accounts may be protected by the Securities Investor Protection Corporation (SIPC) up to applicable limits, but SIPC coverage does not protect against market losses, and coverage limits may not cover all assets in a client's account.
- **SIPC and Insurance Coverage Limitations Risk.** Client brokerage accounts held at a Supported Broker are generally protected by SIPC, which covers up to $500,000 per customer (including up to $250,000 in cash claims) in the event of a broker-dealer's failure. SIPC does not protect against declines in the market value of securities. Additional excess-of-SIPC coverage may be available depending on the client's broker-dealer. Cash or cash-equivalent positions may or may not be covered by FDIC insurance depending on the broker-dealer's sweep arrangements. Clients should review the terms of their brokerage account for details regarding applicable protections.
- **Algorithmic Bias and Fairness Risk.** The Firm's algorithms and machine-learning models may systematically favor, disfavor, or produce different outcomes for certain investment strategies, market conditions, client profiles, or security types in ways that are difficult to detect or correct. Historical data used to train or test models may reflect biases present in the markets or data sources. The Firm monitors for potential algorithmic bias but cannot guarantee that all forms of bias will be identified or eliminated.
- **Inflation and Interest Rate Risk.** Changes in inflation expectations or interest rates can affect the value of equity securities and ETFs held in client accounts. Rising interest rates may reduce the present value of future cash flows and cause broad declines in equity valuations. Inflation may erode the purchasing power of investment returns. Strategies that do not account for macroeconomic factors such as interest rates or inflation may underperform in certain environments.

Item 9. Disciplinary Information

The Firm is required to disclose legal or disciplinary events that are material to a client's evaluation of the Firm's advisory business or the integrity of its management. The Firm and its management have no disciplinary events required to be disclosed in this brochure.

Item 10. Other Financial Industry Activities and Affiliations

The Firm is not a broker-dealer, municipal securities dealer, futures commission merchant, commodity pool operator, commodity trading adviser, bank, trust company, insurance company or agency, accountant, law firm, pension consultant, real estate broker, or sponsor of pooled investment vehicles. The Firm does not have a related person engaged in any of those financial-industry businesses.

The Firm's primary business, conducted under the Conviction name, is financial technology software, including strategy creation, research, backtesting, simulated trading, market data, analytics, risk controls, and connectivity to unaffiliated broker-dealers. This software business is closely related to, and shares technology and personnel with, the Firm's proposed digital advisory business. The Firm does not currently sell unrelated products or services to advisory clients.

Aria Narayan Vikram serves as Chief Executive Officer and Chief Compliance Officer. Tony Yamin serves as President and Chief Technology Officer. Neither is known to be registered with or employed by a broker-dealer, futures firm, insurance agency, bank, law firm, accounting firm, or other investment adviser.

Item 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics and Personal Trading

The Firm has adopted a Code of Ethics designed to require supervised persons to act in clients' best interests, protect confidential information, avoid misuse of material nonpublic information, disclose conflicts, and comply with applicable securities laws. The Code addresses personal securities transactions, insider trading, gifts and entertainment, outside business activities, and reporting and review of personal holdings and transactions. A copy of the Code of Ethics is available to any client or prospective client upon request by contacting the Firm at support@convictiontrade.ai or (917) 801-7970.

The Firm's personnel may buy or sell for their own accounts the same securities that are included in a client-defined strategy or analyzed through Conviction. This creates a potential conflict because personnel could trade before, at the same time as, or after a client. The Firm's policies prohibit front-running, misuse of client information, and trading on material nonpublic information and require review of personal trading for compliance with the Code.

B. Participation or Interest in Client Transactions

The Firm does not recommend that clients buy or sell securities in which the Firm or a related person has a material financial interest as issuer, sponsor, general partner, or principal. The Firm does not engage in principal transactions or agency cross transactions with client accounts.

Item 12. Brokerage Practices

A. Selection of Supported Broker-Dealers

The Firm does not hold client assets or execute trades as a broker-dealer. Clients maintain their brokerage accounts directly with one or more supported unaffiliated broker-dealers or qualified custodians. The Firm may add, suspend, or discontinue supported broker integrations in the future after appropriate review and disclosure.

In determining which broker-dealers the platform supports, the Firm may consider financial strength, regulatory status, custody arrangements, execution quality, commissions and fees, order types, available securities, account protections, API reliability and security, data access, customer service, and compatibility with Conviction. Supporting a broker does not guarantee that the broker will provide the best execution for every order or client.

The Firm has a duty to seek best execution for client transactions. In evaluating whether best execution is being provided, the Firm considers factors including execution quality, commission rates, the range of services provided, and the reliability of the broker-dealer's technology and API integrations.

The Firm will disclose any material partnership, revenue-sharing arrangement, referral fee, account-opening incentive, data or API credit, sponsorship, or other economic benefit involvingSupported Broker, if applicable. The availability of a broker integration does not constitute a guarantee or endorsement of that broker's services.

B. Research and Other Soft-Dollar Benefits

The Firm does not currently receive soft-dollar research or brokerage services in exchange for directing client transactions to a broker-dealer.

C. Brokerage for Client Referrals

The Firm does not currently receive client referrals or referral compensation from a broker-dealer in exchange for recommending, supporting, or directing clients to that broker-dealer.

D. Directed Brokerage and Platform Limitations

A client selects and maintains the client's own account with a Supported Broker. Any live-trading functionality offered through Conviction will operate only through supported integrations. This limitation may prevent a client from obtaining a more favorable price, lower fee, different order type, or other execution feature available through another broker-dealer. The Firm will periodically evaluate the execution and operational quality of supported broker relationships.

E. Order Aggregation

The Firm does not currently intend to block trade or aggregate client orders. At launch, Conviction will submit each live order separately to the applicable client's brokerage account. Separate submission may result in clients receiving different execution prices for the same security or signal.

Item 13. Review of Accounts

Conviction performs automated monitoring of active strategies, data feeds, broker connections, and configured risk limits. The system may generate alerts concerning rejected orders, connection failures, unusual activity, drawdowns, exposure limits, or other exceptions. Automated monitoring does not guarantee that an error or loss will be detected or prevented.

The Firm reviews client profile information and the continued suitability of an advisory relationship at least annually and on a more frequent basis as circumstances warrant. Additional reviews may be triggered by a client request, a material change to a strategy, a significant market or economic event, a system or model issue, unusual trading activity, a compliance alert, or a material change in the client's stated circumstances. The Chief Compliance Officer, Aria Narayan Vikram, is responsible for overseeing client account reviews, with technical support from Tony Yamin and other supervised persons.

Clients are responsible for promptly updating their profile, brokerage status, restrictions, financial circumstances, and risk tolerance and for reviewing trade confirmations and account statements sent directly by their broker-dealer.

Item 14. Client Referrals and Other Compensation

The Firm does not currently compensate any person for client referrals, receive compensation from any person for referring clients or supporting a particular broker-dealer or investment product, or use testimonials, endorsements, or third-party ratings in its marketing. If the Firm begins using testimonials, endorsements, or third-party ratings, it will comply with the requirements of Rule 206(4)-1 under the Investment Advisers Act of 1940 and will update this brochure accordingly.

Item 15. Custody

The Firm does not have physical custody of client funds or securities and does not act as a qualified custodian. Client assets will be held by a Supported Broker or other qualified custodian supported in the future. Any brokerage or API permissions offered through Conviction will be limited to the functionality disclosed in the client agreement and will not permit the Firm to withdraw or transfer client funds or securities to the Firm or its personnel. The Firm does not have custody of client assets as defined under Rule 206(4)-2 under the Investment Advisers Act of 1940.

Clients receive confirmations and account statements directly from their broker-dealer or custodian and should review them carefully. The Firm does not currently deduct subscription fees from client brokerage accounts.

Item 16. Investment Discretion

The Firm accepts limited discretionary authority over client accounts. When a client approves a strategy through the Conviction platform, the client authorizes the Firm to make and execute investment decisions—including selecting securities, determining trade timing, and setting order parameters—without obtaining the client's prior

approval before each transaction, subject to the strategy rules, risk limits, and restrictions the client has established.

Discretionary authority is granted by the client in the investment advisory agreement and the associated brokerage authorization. Clients may impose reasonable restrictions on the Firm's discretionary authority, including restrictions on specific securities or types of securities, position sizes, trading frequency, and other parameters, which the client may set or modify through the platform interface.

The Firm's discretionary authority is limited to the execution of the client-approved strategy within the parameters and guardrails the client has configured. The Firm does not have authority to withdraw or transfer client funds or securities to the Firm or its personnel, change the client's custodian without authorization, or trade outside the scope of the client's approved strategy and brokerage authorization.

Clients who wish to retain approval authority over each individual transaction before execution may do so by enabling the manual approval setting in the platform, if available.

Item 17. Voting Client Securities

The Firm does not accept authority to vote client proxies. Clients are responsible for voting proxies and making elections relating to mergers, tender offers, reorganizations, bankruptcies, class actions, and other corporate actions. Proxy materials and corporate-action notices are expected to be delivered directly by the client's broker-dealer, custodian, transfer agent, or issuer. The Firm does not provide advice regarding how a client should vote a proxy or make a corporate-action election.

Item 18. Financial Information

The Firm is not required to provide a balance sheet because it does not require or solicit prepayment of more than $1,200 in fees six months or more in advance and does not have a financial condition that impairs its ability to meet contractual commitments to clients. The Firm has not been the subject of a bankruptcy petition during the past ten years.

The Firm's privacy policy, as required under Regulation S-P, is provided to clients separately and describes how the Firm collects, uses, and protects client personal information.

The Firm has adopted a business continuity plan to address events that could significantly disrupt its operations. In the event of a significant business disruption, clients may contact the Firm at support@convictiontrade.ai for further information.