

Form ADV Part 2A Brochure

January 1st, 2026

This brochure provides information about the qualifications and business practices of Annualitix and its Investment Adviser Representatives. If you have any questions about the contents of this brochure, please contact Sebastián Garcés at (844) 346-3343 or email us at: compliance@annualitix.com

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State securities authority. Registration of an investment adviser does not imply any level of skill or training.

Our brochure is provided, and can be obtained, free of charge. Additional information about Annualitix (CRD#: 332510) and its Investment Adviser Representatives (IARs) is available on the SEC's website at: www.adviserinfo.sec.gov

Our Firm has one Investment Adviser Representative and supervising principal: Sebastián Garcés

ITEM 2 - MATERIAL CHANGES

This section will contain any amendments or material changes to our ADV Part 2 from our last annual update filing.

As of December 31st 2026, our Firm held a total of \$1,934,442 in discretionary managed accounts and \$0 in non-discretionary accounts.

As of November 12th 2025, our Firm's name has changed to Annualitix. In addition, our email has changed to compliance@annualitix.com and our phone number has changed to 1-844-FIN-EDGE (1-844-346-3342).

Our advisory business has changed to exclude financial planning as a separately offered service.

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ITEM 4 - ADVISORY BUSINESS

Annualitix, also referred to herein as the "Advisor," "Firm," "our," or "we," is a State Registered Investment Advisory Firm founded on July 18th, 2024. Annualitix is a registered trademark and DBA of Alphawave Investments, LLC., an entity owned in its entirety by Sebastián Garcés, a Texas resident. Our Firm specializes in portfolio management and financial consulting; collectively referred to as our "services," "advisory services," or "investment advisory services." Our services may be rendered in person or virtually using voice, video, or email and may include referrals to other professionals. All clients must complete a Suitability Form and execute an Investment Advisory Agreement (IAA) prior to obtaining our services.

As of December 31st, 2026, our Firm held a total of \$1,934,442 in discretionary managed accounts and \$0 in non-discretionary accounts. Discretionary authority gives us the ability to trade on a client's behalf with that authorization only obtained when a client executes their Investment Advisory Agreement (IAA). No subsequent trades require a client's prior approval. We do not participate in wrap fee programs.

Our services are tailored to client needs, circumstances, and risk tolerance, and consist of portfolio management, communications regarding investment recommendations, client-centric goals and progress, company-specific information, general economic information, monthly contribution amount recommendations, debt repayment, and strategic use of debt. We may buy, sell, or trade, or recommend buying, selling, & trading stocks, bonds, mutual funds, index funds, equity-based funds, fixed income funds, money market funds, exchange-traded funds, publicly traded cryptocurrency funds, sale and repurchase agreements, and other securities and/or contracts relating to the same, and may recommend investing in short-term money-market instruments when we deem appropriate. It is up to the client to implement recommendations. We store, document, and record all recommendations issued via email, and email back-ups. Clients can impose restrictions on investments to be included in their accounts and limit the use of leverage and margin loans.

ITEM 5 - FEES & COMPENSATION

We charge an annualized fee on Net Assets Under Management (AUM) for portfolio management services. Financial consulting is provided free with our portfolio management services. Clients authorize our custodian to calculate and deduct fees directly from client assets. We obtain authorization for direct deduction of fees through Investment Advisory Agreements (IAAs) executed by each client and the Firm. We may also receive compensation for referring clients to legal, accounting, real estate, and tax professionals.

Our annualized fee of 1.5% is calculated daily by the Custodian on net AUM and deducted monthly in arrears. To calculate the fees to be deducted, the Custodian multiplies the net account liquidation value at the end of

each day by the Effective Rate. The Effective Rate is calculated by dividing the fee percentage by 252 (two hundred and fifty-two) business days per year. Fees are applied on a pro-rata basis starting the day clients assign assets to us for management to account for varying durations for initial and final pay periods withdrawals and contributions. Pro-rata fees are calculated by applying the effective rate to the daily net liquidation value for the number of days in the period. Our fees and billing practices are delineated in Clause 3 of our Investment Advisory Agreement. All AUM fees are negotiable. We may base negotiations on factors such as account size, complexity, and specific client needs. We do not have pre-payment arrangements of fees for account management.

In addition to our fees, clients may incur additional direct or indirect account fees and expenses such as interest, commissions, custodial fees, taxes, fund management fees and expenses, brokerage fees, and other general expenses. The Firm and its personnel do not receive any economic benefit from these additional expenses and fees incurred by clients.

Payment Method: Annualized portfolio management fees are calculated and directly deducted from client assets by the Custodian.

Negotiability of Fees: All fees are negotiable. As a result, you may be billed more, or less, for the same service as other clients. Our fees may be higher or lower than those charged by other advisors offering similar services.

Billing on Cash Positions: The Firm treats cash and cash equivalents as managed assets. Accordingly, and unless otherwise agreed upon in writing, all cash and cash equivalents are considered part of a client's assets for the purpose of calculating the client's fees. At any time, the Firm may move client assets to or maintain cash and/or cash equivalents in anticipation of economic headwinds, market events, or adverse financial conditions. Even so, there is no guarantee that such scenarios will materialize. Clients should note that cash and cash equivalents could miss market advances, and that depending on current yields, our management fee could exceed interest generated by cash or cash equivalent positions.

Periods of Portfolio Inactivity: The Firm has a fiduciary duty to provide services consistent with the client's best interests. As part of our advisory services, we review client portfolios on an ongoing basis to determine if changes are necessary. Actions and recommendations may be based on a variety of factors including performance and returns, client contributions and withdrawals, changes in a client's objectives and circumstances, and fund manager tenure and style drift. There may be extended periods of time when we decide changes to a client's portfolio are not necessary or prudent. Notwithstanding, our fee will continue to apply during these periods unless otherwise agreed to in writing. There can be no assurance that decisions made by the Firm will equal any specific level of performance or be profitable.

ITEM 6 - PERFORMANCE BASED COMPENSATION

Our Firm does not charge performance-based fees.

ITEM 7 - TYPES OF CLIENTS

We provide our advisory services to individuals, families, and companies. No investment minimums are currently required to open a managed account.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES, & RISK OF LOSS

Our primary goal is to deliver above-average long-term returns for our clients through an equity-focused strategy. We continually search for high quality, or high potential, companies to add to our select group of companies and value them using our proprietary software. We regularly compare our valuation estimates to market prices aiming to invest in securities we deem undervalued. Once fully invested, client portfolios typically hold equities and equity-based funds issued by 100 or more companies and institutions, fixed income funds, and cryptocurrency funds; collectively referred to herein as "Selected Securities." Our investment style is considered high risk since securities may fluctuate widely in value.

Methods of Analysis: We use independent research, financial information, and proprietary internal software to assist in evaluating equity investments through fundamental analysis. Our platform gathers, organizes, and stores macroeconomic and issuer-specific financial data, which our analysts review to develop valuation estimates for individual securities. These valuations consider quantitative financial metrics and qualitative factors and may be aggregated into internal analytical benchmarks to evaluate broader market pricing conditions. Valuations are used together with sector, regional, and monetary data as part of our overall investment decision-making and portfolio construction process.

Cryptocurrencies, fixed income funds, and broad geographic index funds present challenges from a traditional equity valuation perspective, as they lack company-level fundamental financial data, may consist of numerous underlying securities, and can be influenced by structural, interest rate, or market-driven factors. Despite these limitations, such investments may be included in client portfolios to provide liquidity, diversification, and exposure, generally through limited allocations to large, publicly traded funds offered by established providers.

Investment Strategy: We primarily invest client funds across numerous companies, sectors, and equity-based funds. Because we seek to invest in securities at times and prices we consider advantageous, the speed of capital deployment will naturally vary. We tend to deploy capital more rapidly during periods of volatility and more gradually when we perceive markets to be overvalued. In general, trading within client accounts is infrequent, and investment time horizons ideally span into decades.

While evaluating investment opportunities, we may allot client assets to fixed-income securities and short-term instruments such as money market funds, corporate and municipal bonds, U.S. Treasuries, bank certificates of deposit, and repurchase agreements. A limited portion of client assets may also be invested in publicly traded cryptocurrency funds for diversification and exposure purposes. When appropriately authorized, we may also utilize leverage in certain accounts and selectively use options strategies for hedging.

Risk of Loss: Investing in securities involves a risk of loss clients should be prepared to bear. Our equity-focused strategy is considered high-risk as equities and equity-based funds may fluctuate widely in value. Clients could also miss gains on other types of asset classes and investments which could prove more profitable, and/or stable, during any given period. While we work diligently to achieve our goals, we make no guarantee that we will obtain the desired results.

Concentrated Position Risk: Infrequently, we may recommend that clients concentrate and/or hold concentrated positions in specific securities, asset classes, or sectors due to various economic circumstances, internal conclusions and equity valuations, or appreciation of specific positions within a portfolio. Such positions may come to represent a relatively large percentage of a client's managed assets. As a result, the account may be subject to greater volatility, as changes in the value of a concentrated single position can disproportionately affect the overall portfolio and may result in greater losses than would be experienced in a more diversified portfolio. In addition, adverse economic and political conditions specific to issuers, sectors, or regions may impact the value of such a portfolio more substantially than if the portfolio's positions were not so concentrated.

Preferred Securities Risk: Preferred Securities have similar characteristics to bonds in that they are senior to common stock and are designed to make fixed payments based on a percentage of their par value. As with bonds, the market value of Preferred Securities is sensitive to changes in issuer credit quality and changes in interest rates. Preferred Securities in the form of preferred stock differ from bonds in that they are junior to bonds with regard to the distribution of corporate earnings and liquidation in the event of bankruptcy. Dividends associated with preferred stock must be declared by the issuer's board of directors, whereas interest payments on bonds generally do not require action by the issuer's board of directors. In addition, bondholders generally have protections preferred stockholders do not have. Subject to the credit quality of the issuer, protections may include indentures designed to guarantee payments with terms and conditions for the benefit of bondholders. Preferred stocks generally pay dividends, not interest payments, which can be deferred or stopped in the event of credit stress without triggering bankruptcy or default. In addition, preferred dividends are paid from the issuer's after-tax profits, while bond interest is paid before taxes.

Inverse Funds: Inverse mutual funds and ETFs, which are sometimes referred to as "short" funds, seek to provide the opposite of the single-day performance of the index or benchmark they track. Inverse funds are often marketed as a way to profit from, or hedge exposure to, downward moving markets. Some inverse funds also use leverage, seeking to achieve a return that is a multiple of the opposite performance of the underlying index or benchmark (e.g. 3X or 300%). In addition to leverage, these funds may use derivative instruments to accomplish their objectives. As such, inverse funds are highly volatile and provide the potential for significant loss.

Cybersecurity Risks: Cybersecurity is a generic term used to describe implementation and adoption of tools, policies, and services designed to protect computer networks, systems, programs, and data from attacks and hacking by external users, loss or corruption of data, misappropriation of confidential information, and damage and disruption to hardware and software systems.

Our Firm, our custodian, entities in which we invest, and our service providers are susceptible to cybersecurity risk and breaches. Any such attack could expose our Firm to civil liability and regulatory inquiry and/or action. We strive to enact robust security systems by carefully selecting service providers, regularly reviewing prevention and mitigation procedures, and establishing and reviewing business continuity plans. Even so, all plans and systems are subject to inherent limitations including the possibility of unidentified risks. Although cyberattacks are generally deliberate, unintentional events may have similar effects.

Cyberattacks may cause investors losses by impeding or sabotaging trading, impeding transaction processing, affecting our ability to calculate net asset value, and through unauthorized and improper use of information. Targeted attacks can result in adverse consequences for issuers of securities in which we invest and may cause investments in such securities to lose value. Investors may also incur costs associated with upgraded security measures and forensic analysis to determine the origin and scope of a breach. Clients may also be exposed to the dissemination and unauthorized use of confidential and personal information, identity theft, and litigation.

Pandemic Risk: Large-scale outbreaks of infectious disease can cause significant economic, social, and political disruption, cross international boundaries, and greatly increase morbidity and mortality over a wide geographic area. It is difficult to predict the short and long-term impact of such events because they are dependent on a variety of factors including the global response of regulators and governments to address and mitigate the worldwide effects of such events. Reductions in workforce participation, governmental responses and policies, travel restrictions, and other macroeconomic factors may negatively impact investment returns.

Recommendation of Other Advisors: Annualitix does not refer clients to other Registered Investment Advisors.

However, where appropriate, and in conjunction with our investment advisory services, we may advise you to use legal, accounting, real estate, and tax professionals. We do not control third-party professionals. Clients bear the risk that third parties may deviate from stated mandates or strategies, fail to achieve expected performance, and/or become less suitable over time, which may result in losses or other adverse consequences. If material deviations from stated mandates, strategies, or performance objectives are identified, we may recommend replacing the third party. To help mitigate these risks, we conduct due diligence prior to making recommendations, including evaluating management, credentials, and historical performance. Past performance of a third-party professional is not a guarantee of future results. They may be adversely affected by market conditions and economic risks and may not be able to replicate past performance, even if they have demonstrated a certain level of success previously. Additional details and associated risks regarding our use of third parties can be found in our IAA, Form ADV Part 2A Brochure, and disclosure documents.

Cryptocurrency Risk: Cryptocurrencies (e.g., Bitcoin, Ether, Tether, and others), often referred to as "digital assets," "tokens," or "virtual/digital currencies," are an emerging asset class designed to act as a medium of exchange using tokens and blockchain technology. Thousands of tokens exist, the most well-known being Bitcoin (₿). Cryptocurrencies, like fiat currencies, are susceptible to destruction, theft, or loss.

In our view, some exposure to cryptocurrencies is suitable for most clients if allocations represent a small fraction of total assets. Our Firm may invest small portions of a client's assets into publicly traded cryptocurrency funds for exposure and diversification purposes. Factors such as income, account size, and risk tolerance may be used to determine your specific allocation percentage. We rely on cryptocurrency fund managers to determine the quality of digital assets to be included in their funds. Due in part to the numerous risks associated with cryptocurrency, we do not invest in digital tokens directly and typically only allocate 3-5% of client assets to cryptocurrency funds. Your allocation percentage may ultimately be a higher or lower percentage of your total assets due to fluctuations in prices over time, and we may rebalance overweight positions into other asset classes at our discretion.

Regulation for this asset class is still developing in the United States. Tokens generally function without central authority or banks, are not backed by any government, and are not considered legal tender. Federal or State government entities, domestically and internationally, may restrict the use and exchange of cryptocurrencies at any time. In addition, the SEC has issued a public report stating that U.S. federal securities laws require treating some digital assets as securities. Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrencies are uncertain and an investment in cryptocurrencies may produce income that is not treated as qualifying income for purposes of the income test

applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the Firm's clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and "flow-through" to the underlying investors.

Cryptocurrency exchanges and other trading venues are relatively new and are largely unregulated. These exchanges may be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives, and other currencies and may stop operating or permanently shut down due to technical glitches, hackers, or malware. In addition, digital assets are highly dependent on their developers. There is no guarantee development will continue or that developers will not abandon a cryptocurrency project with little or no notice. Third parties may also assert intellectual property claims relating to the holding and transfer of cryptocurrencies, digital assets, and their source code. Threatened action that reduces confidence in a network's long-term ability to hold and transfer cryptocurrency may affect exchanges and cryptocurrency investments.

Cryptocurrency transactions may be irreversible. It is possible that an improper transaction may only be undone or reversed unilaterally by the receiver agreeing to return the cryptocurrency to the sender. In addition, most cryptocurrencies have a limited trading history and have experienced extreme volatility and price fluctuations making it difficult for investors to assess the quality and viability of investments. Furthermore, cryptocurrencies may continue to be affected by high volatility and clients with exposure to digital assets through securities and investment vehicles like ETFs may experience losses related to high volatility. Digital assets may also trade at a significant premium or discount to NAV.

ITEM 9 – DISCIPLINARY INFORMATION

There are currently no legal or disciplinary events to report for our Firm or its CEO, Sebastián Garcés.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

Our CEO, Sebastián Garcés, is a minority owner of 57 West Capital Holdings Inc., the parent company of 57 West Capital Advisors Inc., a Registered Investment Advisory Firm. Although we consider this ownership complementary to his role at our Firm, it may present a potential conflict of interest. To address this, we disclose that both Annualitix and Mr. Garcés may receive a direct economic benefit when clients transfer accounts from 57 West Capital Advisors Inc. to our Firm.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, & PERSONAL TRADING

We require all personnel to comply with all applicable laws of the United States and internal policies. We have adopted and regularly review Supervisory Procedures and

have designated a Chief Compliance Officer (CCO) responsible for verifying adherence to these laws and policies. The CCO verifies the Firm's adherence to laws and Supervisory Procedures quarterly and a copy of our Code of Ethics is available upon request. We do not receive soft dollar benefits from broker-dealers and do not participate in any soft dollar arrangements.

Our Firm and its personnel are prohibited from acting as principal in trades with clients and we keep a record of all trades. Neither the Firm nor its personnel may purchase or sell securities directly to clients from their own portfolios. Our policy in any purchase or sale of securities is that client orders are executed ahead of any orders for our Firm or personnel. We may acquire the same securities we recommend to clients or acquire securities we do not recommend to clients. Personnel are required to disclose all trades in personal accounts ahead of execution.

ITEM 12 – BROKERAGE PRACTICES

Where clients do not designate a broker-dealer, we may suggest Interactive Brokers, LLC. or another broker-dealer we reasonably believe will provide the best execution. Please note this is considered Directed Brokerage and that not all advisers require or recommend the use of a specific broker to their clients. Our preference for Interactive Brokers (IB) is based on commission rates, margin rates, ease of use, trade execution, and technological features. IB may also save clients work and time by providing consolidated account views, reports, and functions. Even so, directed brokerage may result in clients not being able to achieve the most favorable transaction executions, which may result in higher costs than those available at other brokerage Firms. We do not obtain economic benefits from selecting a broker-dealer. We are not affiliated with, nor have, another economic relationship with IB that creates a conflict of interest.

When appropriate, trades on accounts using IB will be aggregated and done in the name of our Firm. Only accounts in the custody of IB will have the opportunity to participate in aggregated securities transactions, or block trades. We will inform the executing broker that the trades are for client accounts and not for the Firm itself. No client account within a block trade will be favored over another account. Each account will participate in a block trade at the average share price and receive the same commission rate. IB will be notified of the amount for each trade on each account. Block trades may reduce or increase the costs of execution.

Clients may instruct us to use a broker-dealer of their choice. Thus, clients are responsible for negotiating rates and other expenses with their broker and they may not be able to obtain the most competitive rates. They may pay more than the rates available at our preferred broker-dealer. Other than for the execution of trades, we do not use information, research, or any other service provided by your selected broker to make investment, trading, or advisory decisions.

ITEM 13 – REVIEW OF ACCOUNTS

Client accounts are reviewed annually. Portfolios may also be reviewed, other than periodically, when the Advisor considers it beneficial to do so in response to new developments, market conditions, or changes in an investment's valuation or business. Clients receive monthly performance reports digitally. Performance is benchmarked against the S&P 500 Index.

ITEM 14 – CLIENT REFERRALS & OTHER COMPENSATION

Annualitix does not refer clients to, compensate, or receive compensation from other Registered Investment Advisors. However, we may receive compensation for referring you to legal, accounting, real estate, and tax professionals. We disallow compensation and refuse referrals to, and from, individuals from blacklisted countries as per the Financial Action Task Force (FATF).

ITEM 15 – CUSTODY

We are deemed to have constructive custody of client funds and securities since clients grant us the authority to deduct fees directly from their accounts. Authority is obtained through each client's executed Investment Advisory Agreements (IAA). In accordance with regulatory requirements, we maintain policies and safeguards regarding custody of client assets.

ITEM 16 – INVESTMENT DISCRETION

We only accept client accounts where an executed limited power of attorney grants us discretionary authority. This authorization is also described, and agreed upon, in the IAA signed by the Advisor and each client. Clients may limit our ability to invest in particular securities, investment vehicles, and/or asset classes. Customarily, few restrictions have been placed on the Advisor.

ITEM 17 – VOTING CLIENT SECURITIES

The Advisor and its personnel do not vote proxies on behalf of clients. Clients retain the responsibility and the right to vote on proxies for all securities held in their accounts, and may receive proxies directly from their custodians, transfer agents, or from publicly traded companies via direct mail or other forms of electronic communication. Our proxy voting policies are available upon request. We may provide advice on voting proxies via telephone or in writing via email by client request.

ITEM 18 – FINANCIAL INFORMATION

We do not solicit pre-payments or upfront fees of any kind. The Firm and Sebastián Garcés, have no financial commitments which impair their ability to meet agreed upon obligations with our Clients.

ITEM 19 – REQUIREMENTS FOR STATE REGISTERED ADVISERS

Sebastián Garcés is the CEO of Annualitix and has been in the investment industry for over a decade. Prior to establishing this Firm, he served as Chief Compliance

Officer and Investment Advisor Representative at 57 West Capital Advisors, Inc.

The Firm operates only in the investment advisory and investment management business in the United States. Sebastián Garcés is the only state registered advisor for Annualitix and manages the Firm full-time. He dedicates 90% of his professional time to various capacities at the Firm with the remainder spent on personal business matters not related to the activities of the Firm.

Form ADV Part 2B Brochure Supplement

January 1st, 2026

This Brochure Supplement provides information about Sebastián Garcés, that supplements Annualitix's Investment Brochure. You should have received a copy of that Brochure. Please contact our CCO at (844) 346-3343 if you did not receive our brochure or if you have any questions about the contents of this Brochure Supplement.

Additional information about Sebastián Garcés (CRD#: 6580033) is available on the SEC's website at: www.adviserinfo.sec.gov

ITEM 2 – EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

Full Name: Juan Sebastián Garcés
Year of Birth: 1984

Educational Background:

- B.A. - Political Science: Texas State University 2010

Business Background for the Previous 10 Years:

- Chief Executive Officer - Annualitix 07/24-Present
- Transition Assistant - 57 West Capital Advisors 08/24-04/25
- Chief Compliance Officer - 57West Capital Advisors 04/22-08/24
- Investment Advisor Representative - 57 WCA 12/15-08/24
- Board of Directors - 57 West Capital Holdings 09/16-09/23
- Marketing Director - 57West Capital Advisors..... 07/12-08/24

ITEM 3 – DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Sebastián Garcés and Annualitix. Mr. Garcés has no history of legal or disciplinary events.

ITEM 4 – OTHER BUSINESS ACTIVITIES

Sebastián Garcés manages Annualitix full-time. He dedicates 90% of his professional time to various capacities at the Firm, with the remainder spent on personal business matters not related to the activities of the Firm. Annualitix is a registered trademark and DBA (Doing-Business-As) of Alphawave Investments LLC, a Registered Investment Advisor wholly owned by Sebastián Garcés, a Texas resident.

Mr. Garcés is a minority owner of 57 West Capital Holdings Inc., the parent company of 57 West Capital Advisors Inc., a Registered Investment Advisor. While we consider this ownership complementary to his role at our Firm, it may present a potential conflict of interest. To address this, we disclose that both Annualitix and Mr. Garcés may receive a direct economic benefit if clients transfer accounts from 57 West Capital Advisors Inc. to our Firm for management.

ITEM 5 – ADDITIONAL COMPENSATION

Sebastián Garcés does not receive any additional compensation or economic benefits from third party sources in connection with his advisory activities.

ITEM 6 – SUPERVISION

Annualitix is subject to regulatory oversight by various agencies. These agencies require registration by the Firm and its Advisors, and conduct announced and unannounced examinations. The Firm is required to periodically update the information provided to these agencies and to provide various reports regarding the Firm's business and AUM.

Mr. Garcés is the Chief Compliance Officer (CCO) and an Investment Advisor Representative (IAR) at the Firm. He has drafted and implemented a Code of Ethics and Supervisory Procedures intended to guide the Firm in meeting its fiduciary obligations to its clients. Clients may obtain a copy

of our Code of Ethics by contacting the CCO using the contact information listed on the cover of this brochure.

As CCO, Mr. Garcés is responsible for creating and implementing the Firm's compliance program and staying abreast of industry compliance topics, practices, and regulations. He is committed to adhering to all pertinent regulations promulgated by the Texas State Securities Board and ensuring all employees adhere to all policies outlined in our Supervisory Procedures and Code of Ethics.

As an IAR, Mr. Garcés is responsible for investing client funds and issuing recommendations according to client objectives, reviewing client portfolios, monitoring investments, and following pertinent policies in our Supervisory Procedures.

ITEM 7 – REQUIREMENTS FOR STATE REGISTERED ADVISERS

Disciplinary Information

Sebastián Garcés has not been involved in any reportable disciplinary events.

Bankruptcy Petition

Sebastián Garcés has not been subject to a bankruptcy petition.