#### Njord Capital, LLC – Form CRS

#### Item 1 – Introduction

Njord Capital, LLC ("Njord", the "firm", "we" or "us") is registered with the Securities Exchange Commission ("SEC") as an investment adviser. Our services and compensation structure differ from a registered broker-dealer, and it is important for you to understand the differences between those structures. Free and simple tools are available to research firms and financial professionals at <a href="https://www.investor.gov/CRS">www.investor.gov/CRS</a>. The site also provides educational materials about broker-dealers, investment advisers and investing. The italicized sentences appearing in text boxes below are intended to be "conversation starters" for you to have with us, as required by the instructions to Form CRS.

# <u>Item 2 – Relationships and Services</u> - What investment services and advice can you provide me?

Njord provides fee-based personalized discretionary investment advisory services primarily to individuals, high net worth individuals, retirement plans, and trusts ("you" or "client"). We provide these services based on each client's unique circumstances, including their investment objectives, risk tolerance, investment time horizon, withdrawal requirements, tax considerations, and other special circumstances, which we develop through discussions/meetings with our clients. We monitor portfolios periodically and make changes to them as we deem necessary. When we manage portfolios on a discretionary basis, we have the authority to buy and sell investments in your accounts without speaking to you before doing so. However, you can place reasonable restrictions on the securities that we buy by notifying us, in writing. Njord does not offer proprietary products, and we do not artificially limit the securities and types of investments we trade for Clients. We generally construct and manage portfolios containing individual stocks and bonds, exchange-traded funds ("ETFs"), mutual funds, alternative investments (e.g. private placements), and cash.-We may also agree to provide financial planning and consulting services. When we provide those services, we rely upon the information clients provide and do not verify or monitor that information because we do not directly implement any aspect of a client's financial plan, except for the ongoing management of a client's investments. We monitor portfolios periodically as part of our advisory services. Account reviews are conducted annually but may occur more frequently depending on the complexity of the client or, at the request of at the request of the client. While we do not monitor certain client-directed securities purchases, we consider such securities as part of the client's overall asset allocation, tax strategy, risk, and financial planning goals, and such assets are included under our investment management fee.

Njord requires a minimum of \$5,000,000 of household assets under management to open and maintain accounts. However, based on facts and circumstances Njord may, at its sole discretion, accept accounts with a lower value. Njord reserves the right to decline any prospective Client engagement, even those meeting the minimum investable asset requirement, in its sole discretion. If the Client is subject to an annual minimum fee, the client could pay a higher percentage fee than referenced below. Our minimum fee may be waived, reduced, or increased at our sole discretion.

<u>For more detailed information</u> about our Advisory Business and the Types of Clients we generally service, please see Items 4 and 7, respectively in our <u>Form ADV Part 2A</u>.

#### 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?

## <u>Item 3 – Fees, Costs, Conflicts, and Standard of Conduct</u> What fees will I pay?

Njord provides discretionary investment advisory services, including financial planning, on a *fee* basis. Njord's annual investment advisory fee shall be based upon a percentage (%) of the market value and type of assets placed under its management, including cash and accrued interest on bonds and dividends payable on mutual funds between 0.50% per annum to 2.00% per annum depending on the type and complexity of the investment management strategy employed, and the size of the account or overall client relationship. Investment Advisory fees may be reduced or waived for directors, officers, and employees of Njord, as well as family members or accounts with 100% cash at the discretion of management. Njord may negotiate these fees at its sole discretion. As a result, similarly situated clients could pay diverse fees. Because this fee is based on the amount of your assets under our management, the more assets you designate to us for management, the more you will pay us for our services. Therefore, we have an incentive to encourage you to increase the amount of assets you designate for our management. Additionally, as further disclosed in Part 2A of our Form ADV, cash positions (money markets, etc.) shall be included as part of assets under management when determining your advisory fee. We deduct and/or bill clients for our fees either monthly or quarterly, in arrears or in advance, based upon average daily balance. Njord may charge a financial planning fee (from \$5,000 - \$30,000 or more) for the initial comprehensive financial plan provided as a stand-alone plan or an integrated component of overall advisory services. The financial planning fee depends on the scope and complexity of the engagement, and services rendered. Fees for financial planning may be reduced or waived in the Firm's sole discretion.

Your account will be held with a qualified custodian. You will be responsible for the fees and expenses charged by qualified custodians and imposed by broker-dealers according to their fee schedules. Those fees and expenses include but are not limited to certain transaction charges, wire transfer and electronic fund fees, and other fees, taxes, and costs related to maintaining an account. If your assets are invested in mutual funds, ETFs, or other registered and unregistered investment companies, you will bear your pro rata share of the investment management fees and other fees of the funds, which are in addition to the fees you pay us. These fees and expenses are described in each fund's prospectus or other offering documents. Please refer to your investment advisory agreement for your exact 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.

<u>For more detailed information</u> about our fees and costs related to our management of your account, please see Item 5 in our <u>Form ADV</u> Part 2A.

#### Conversation Starters:

Help me understand how these fees and costs might affect my investments. If I give you \$5,000,000 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:

- \* We may receive commissions or other compensation from the placement of private market investments. This presents a conflict of interest because we may have an incentive to recommend investments that generate such commissions.
- \* We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee. If we do not currently manage your account held with your employer's plan, this will increase our compensation.

#### Conversation Starters:

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

For more detailed information about our conflicts of interest, please review Items 4, 8, 11, and 12 of our Form ADV Part 2A.

# How do your financial professionals make money?

Our financial professionals primarily receive compensation based upon the advisory fees received by Njord. We may also receive commissions or other compensation from the placement of private market investments, including but not limited to private equity, private debt, and other private offerings. This compensation may be paid to the firm by third parties, such as the issuers or sponsors of these investments or broker-dealers not affiliated with the Firm. Others are equity owners of the firm, who stand to receive a share of the firm's quarterly income. We mitigate any conflicts of interest by adhering to our fiduciary duty when making recommendations so that we make recommendations that conform with each client's investment strategy and objectives. You should discuss your financial professional's compensation directly with your financial professional.

## Item 4 – Disciplinary History

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

No. We encourage you to visit <a href="www.Investor.gov/CRS">www.Investor.gov/CRS</a> to research our firm and our financial professionals.

# Conversation Starters:

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

#### Item 5 – Additional Information

Additional information about our firm is available on the SEC's website at <a href="www.adviserinfo.sec.gov">www.adviserinfo.sec.gov</a>. You may contact our Chief Compliance Officer at 770-209-3757 to request a current copy of our <a href="Form ADV Part 2A">Form ADV Part 2A</a> or our relationship summary.

#### Conversation Starters:

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