**Item 1-Cover Page**

Firm Brochure

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This Brochure provides information about the qualifications and business practices of TRADEway. If you have any questions about the contents of this Brochure, please contact us at (877) 777-0703. 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.

TRADEway is a Registered Investment Adviser. Registration of an investment adviser does not imply any level of skill or training. Additional information about TRADEway is also available on the SEC's website at www.adviserinfo.sec.gov.

## Item 2-Material Changes

Since the last annual update on March 27, 2025, there have been no material changes to this brochure.

We will provide you a new brochure as necessary based on material changes or new information, at any time, without charge.

You may request our brochure by contacting us at (877) 777-0703 or compliance@tradeway.com. Our brochure is available on our website, tradeway.com.

## Item 3-Table of Contents

## Item 4-Advisory Business

Designer Technologies, Inc., which does business as TRADEway, was organized in 1999 as a Texas corporation under the laws of the State of Texas. Its principal owners and founders are David and Charlotte Mitchell. The company began its evolution to the current business model in 2006 and established the name TRADEway and registered as an investment adviser with the U.S. Securities Exchange Commission in 2016.

TRADEway's mission statement is: "To break down the confusing world of finance so that our students can understand it. We glorify God through family, money, and business." The mission of TRADEway is to build a better America for our grandchildren and future generations. We believe the first step on this path is to reinvigorate the American entrepreneurial spirit and return to the foundational principles that first made this country great. For additional information please visit: https://www.tradeway.com/disclosures.

The TRADEway team recognizes the valuable human factor in business from both a tactical and strategic level. Our company is premised on the idea that enduring cultural change must start with individuals. We work toward our mission by teaching business principles from the Bible, reviving the entrepreneurial spirit in America, and empowering individuals to take control of their finances. TRADEway believes in the strength of the family-centered business providing education to individuals who want to learn how to invest and trade in the stock market. In this way, TRADEway believes that each generation can teach the next methods which can provide a competitive edge.

**TRADEway's business fits into the following categories:**

*Education*
TRADEway offers financial education designed to teach students its methods and strategies for becoming an active trader in the stock market. Its educational content is delivered through live and virtual events, on-demand courses and webinars.

*Coaching*
Investment adviser representatives of TRADEway are available to coach clients, which can include weekly webinars, community groups, daily marketing alerts and one-on-one mentors developing personalized investment plans based on an individual client's financial situation and investing goals.

*Charts by TRADEway*
Charts by TRADEway is a subscription-based system for analyzing securities and interfacing to certain custodial trading platforms. Clients may chart and trade directly from the platform, among other helpful research and journaling tools.

*Assisted Managed Portfolios by TRADEway (AMPT)*
AMPT is an advisory program in which TRADEway develops model portfolios for clients, based upon their investment goals. Clients may participate in one of two discretionary programs (AMPT-AIM, AMPT-UP or AMPT-SEED), in which TRADEway makes all investment decisions and trades.

Services offered by TRADEway may be tailored for individual clients as necessary.

As of December 31, 2025, TRADEway managed $89,228,820 in regulatory assets under management, all of which is managed on a discretionary basis. TRADEway does not participate in wrap fee programs.

## Item 5-Fees and Compensation

The fees for TRADEway's services vary based upon the type of service provided. Fees are charged in the following manner:

| Offering | Fee Basis |
| --- | --- |
| Education | Flat fee, charged at time of enrollment. The packages range in price from $97 to $30,000 depending on many variables. |
| Coaching | Included as part of certain monthly subscription packages or for an hourly fee. Coaching memberships are priced on a monthly basis ranging from $77 to $347 per month and clients may cancel anytime. Mentorship fees range from $8,000 to $20,500, based on the number of sessions and services provided. |
| Charts by TRADEway | Monthly subscription of $29.99/mo or $59.99/mo and client may cancel anytime. |
| AMPT Investment Portfolios | Asset based fees (described below) |

All fees are subject to negotiation in individual client circumstances. Employees of TRADEway may also receive discounted or free services depending on the terms of their employment.

**Flat and Subscription-Based Fees**

Clients participating in the education related programs ("Students") must pay for the live and virtual events and specialized educational programs in advance. For all of our flat rate products, we offer a 3-business day window in which the client may cancel their purchase without penalty. For our on-going monthly subscription a monthly payment is collected, however clients may cancel at any time with a simple phone call or email. In addition, our foundational Step 1 event provides a full money back guarantee--if someone attends the 2-day event and decides it is not for them, they may turn in their workbook and receive a full refund on their ticket purchase (they have 30 days to do this).

**AMPT Investment Portfolios**

The AMPT Investment Portfolios charge fees based on the value of the investment account. In determining the value of an account, the combined value of all accounts held by an individual client (i.e., like-titled) are aggregated. Fees are charged quarterly in arrears based upon the average daily value of the account and are in addition to the other fees related to the AMPT Investment Portfolios noted in the table above.

Accounts that close during the quarter are charged a fee upon closing. Asset-based fees are generally directly debited from the client's account at the independent custodian. Accounts closed during a calendar quarter are billed through the last day that TRADEway provides advisory services and are charged at the time the advisory relationship is terminated.

The AMPT accounts are not subject to a minimum initial investment requirement, with the exception of the AMPT UP portfolio, which has a minimum initial investment requirement of $10,000. In prior years, TRADEway followed separate fee schedules, which remain in effect with clients who signed agreements with TRADEway during such period and who have not agreed to an amended advisory fee schedule.

The asset-based fees as follows:

| Value of account | Annualized fee as a % of assets under management |
|---|---|
| Less than or equal to $200,000 | 1.85% |
| Above $200,000 and less than or equal to $400,000 | 1.75% |
| Above $400,000 and less than or equal to $700,000 | 1.65% |
| Above $700,000 and less than or equal to $1.5 million | 1.50% |
| Above $1.5 million and less than or equal to $10 million | 1.20% |
| Above $10 million | 0.95% |

**Additional Information About Fees**

TRADEway's fees are exclusive of fees and expenses charged by third parties, which shall be incurred directly by the client. Clients incur certain charges from custodians, brokers and other third parties, such as custodial fees, brokerage commissions, transaction fees, transfer taxes, odd-lot differentials, wire and electronic transaction fees and other fees and taxes on brokerage accounts and securities transactions. All fees paid to TRADEway are separate and distinct from fees and expenses charged by mutual funds and ETFs to their shareholders, which are discussed in each fund's prospectus.

In addition, Students may incur other fees when engaging other service providers to implement the strategies learned from TRADEway, such as brokerage, administrative or custodial fees. Except for the AMPT Investment Portfolios, TRADEway does not select these service providers on behalf of any Student.

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

TRADEway does not charge any performance-based fees (i.e., shares based upon a share of capital gains or capital appreciation of a client's assets).

## Item 7-Types of Clients

TRADEway generally provides its services to individuals. As noted above, TRADEway requires a minimum investment amount of $10,000 for the AMPT UP portfolio but otherwise does not have minimum account requirements.

## Item 8-Methods of Analysis, Investment Strategies and Risk of Loss

**Methods of Analysis and Investment Strategies**

*Education and Coaching*

TRADEway provides educational opportunities which teach its clients strategies to select stocks and make their own informed investment decisions. We do this through a series of live events, weekly webinars, on-demand courses, coaching, market corners, and web tools. The TRADEway education is based on David Mitchell's proprietary "3-legged table" trading system. The 3 legs of the trading table consist of: fundamental analysis (corporate financial analysis); technical analysis (price and volume trends in stocks and indices); and market tone (news and world events). When these three things come together, we believe trading becomes much more reliable, whereas when one leg is missing, the trading becomes sporadic and unpredictable. TRADEway teaches its clients how to do their own analysis, but assists them in this process through coaching, our membership programs, and other methods listed above. At our live/virtual events, we teach strategies for short-term trading and long-term investing, based on client goals, risk tolerance and appropriateness of methods, which include topics covering: rolling stocks, trending stocks, rolling options, trending options, debit spreads, credit spreads, call writing, and speculative plays which have to do with combining methods of trading along with market conditions.

*AMPT Strategies*

TRADEway offers the following distinct investment strategies in the AMPT program:

*AMPT AIM and AMPT SEEED*

AMPT AIM models reflect a long-term investment strategy using a diversified portfolio of stocks, bonds, real estate-related investments, natural resources, precious metals and cash or cash equivalents. Clients select from one of four models (Conservative, Balanced, Growth, Aggressive) based upon their individual risk tolerance. As discussed above, selecting model allocation weights and individual security selection are based upon fundamental analysis, technical analysis and market tone.

*AMPT UP*

AMPT UP portfolios are designed for an aggressive investor. These portfolios use index-based instruments, ETFs, stocks and options and execute a short-term trading strategy. Please see the additional risk disclosure related to active trading strategies, inverse ETFs and options below.

**Risk of Loss**

*Investing in securities involves risk of loss that clients should be prepared to bear.*

**Market Risks.** All investments present the risk of loss of principal-the risk that the value of securities, when sold or otherwise disposed of, is less than the price paid for the securities. Even when the value of securities sold is greater than the price paid, there is the risk that any appreciation will be less than inflation. At various times in the past, volatility in the markets has had a dramatic effect on the value of securities. Further, terrorist attacks, acts of violence or war, health pandemics or epidemics, natural disasters, political instability, force majeure, or other events affect the operations and profitability of a securities issuer. Such events can result in volatility in financial markets and the economy overall. Any of these occurrences could have a significant impact on the revenues and operating results of an issuer.

In addition, companies domiciled or with significant business activities outside of the United States (including emerging markets) are subject to additional risks, such as currency fluctuations, political uncertainty, periods or illiquidity and price volatility. These risks may be greater with investments in emerging markets and other developing countries.

TRADEway methods and strategies have not always been successful. In fact, there is no guarantee they will be successful. Any past performance, successes, or losses of anyone utilizing TRADEway investment strategies is not indicative of future results. TRADEway students should educate themselves of the risks associated with trading and investing in particular securities. TRADEway makes no guarantee of success of its trading strategy. You should not trade using our methodology or anyone else's, without first assessing whether you can bear to lose all of your investment.

**Exchange Traded Funds ("ETFs").** An investment in an ETF involves risk, including loss of principal. ETF shareholders are subject to the risks arising from the individual issuers of the fund's underlying portfolio securities. ETF shareholders are also liable for taxes on any capital gains or income, as an ETF is required to distribute its income and capital gains arising from portfolio transactions. An ETF is a marketable security that tracks an index, a commodity, bonds or a basket of assets and trades like a common stock on an exchange. ETFs experience price changes throughout the day as they are bought and sold. There is no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units. Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

**Foreign Securities.** Foreign securities are subject to various additional risks, such as political instability, changes in currency exchange rates, foreign economic conditions, higher trading costs, the imposition of trade or economic sanctions or inadequate or different regulatory and accounting standards.

**Real Estate Investments.** TRADEway invests in certain securities with exposure to the real estate industry, which are subject to additional risks, such as possible declines in the value of real estate, general and local economic conditions, interest rates and the availability of mortgage funds, property taxes, zoning ordinances, uninsured damages from hurricanes, earthquakes or other natural disasters and potential liability resulting from environmental problems. Real estate investment trusts are also subject to the risk of failing to qualify for tax-free pass-through treatment of income under tax laws.

**Commodities.** Investments in commodities such as natural resources and precious metals, or the companies that rely on such commodities, come with significant additional risks. Commodities prices are highly volatile and may be subject to various risks including, but not limited to, global energy policies; political instability; wars and other conflicts; general global economic conditions; business interruptions resulting from natural disasters, accidents, labor actions, or other unforeseen events; changes in currency exchange rates, scarcity; changes in supply or demand and market speculation.

**Inverse ETFs.** An Inverse ETF seeks to deliver the opposite of the daily performance of the index or benchmark it tracks and is designed to profit from or hedge exposure to downward moving markets. Most Inverse ETFs "reset" daily, meaning that they are designed to achieve their stated objectives on a daily basis and not for a longer period of time. Accordingly, if such an ETF is held for longer than one day, the ETF may not achieve its intended investment objective, which increases the risk of loss and such effect may be magnified in volatile markets. When investing in an inverse ETF, you will lose money when the benchmark index rises. An Inverse ETF seeks to meet its investment objective by investing in derivative instruments such as swap agreements and futures contracts. While it attempts to achieve an inverse correlation with an index, the fact that an Inverse ETF will not have inverse exposure to all securities in an index, may not have different weightings than an index and also incurs fees, expenses and transaction costs. **Investing in an Inverse ETF is considered an aggressive investment technique.**

**Options.** The AMPT UP portfolio makes use of options writing, which comes with significant additional risks. Such options include buying and writing puts and calls on some of the securities held in portfolios. The prices of many options are highly volatile. The value of an option primarily depends on the price of the security, index, currency or other underlying instrument. Price movements of options are also influenced by, among other things, interest rates, supply and demand considerations, general economic conditions, and trade, monetary or economic policies. Please review the options disclosure document provided by your broker-dealer for additional risk information.

**Active Trading.** The success of an active trading strategy is dependent upon the portfolio managers' ability to effectively anticipate short-term market movements and to execute trades accordingly. Markets are highly volatile over the short term and hard to predict. In addition, active trading strategies will incur higher brokerage-related costs, such as commissions, and may be subject to tax implications.

**Cybersecurity.** The computer systems, networks and devices used by TRADEway and our service providers to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks, or devices potentially can be breached. A client could be negatively impacted because of a cybersecurity breach. Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or otherwise disrupt operations, business processes, or website access or functionality. Cybersecurity breaches cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs; as well as the inadvertent release of confidential information. Similar adverse consequences could result from cybersecurity breaches affecting issuers of mutual funds, ETFs and other securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers, and other financial institutions; and other parties. In addition, substantial costs are incurred by these entities to prevent any cybersecurity breaches in the future.

The above is not intended to be a complete list or explanation of the risks involved in an investment strategy. You are encouraged to consult with your financial advisor, legal counsel and tax professional for additional information.

## Item 9-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 an adviser or the integrity of its management. TRADEway has no information applicable to this item.

## Item 10-Other Financial Industry Activities and Affiliations

**David Mitchell**

David Mitchell is the Chairman of TRADEway and has a controlling ownership interest in the Adviser. In addition, he has majority ownership stakes in other companies, which are considered to be under common control. Mr. Mitchell is a majority owner of the following companies:

- Exos Aerospace Systems and Technologies, Inc.

  Mr. Mitchell has an ownership interest in Exos Aerospace Systems and Technologies, Inc., an aerospace company seeking to build reusable rockets.

  Clients of TRADEway who do not opt-out of receiving information have been offered the opportunity to invest in Exos stock if they meet requirements of the offering. Because of the above described roles and economic incentives of Mr. Mitchell, there is an inherent conflict of interest in his recommendation to purchase Exos stock. As a current owner and officer of Exos, Mr. Mitchell is motivated to increase the funding of Exos. You should carefully consider this in your evaluation of Exos. Mr. Mitchell is a control person of TRADEway and any purchase of Exos stock benefits Mr. Mitchell.

- E.G. Hall Oil Company Inc. (Oil and Gas Production Co.)
- Petracorp LLC (Oil and Gas) Exploration Co.

The four companies have common ownership and control, in that all are owned by Mr. Mitchell. Because of the above-described roles of Mr. Mitchell, there is an inherent conflict of interest in his recommendation to purchase stock in any company in which he has ownership.

Mr. Mitchell only offers private offering stock in Exos to qualified, sophisticated investors, pursuant to private offering documents and related subscription disclosures. Investing in this company is a high-risk proposition. One should be willing to lose his/her entire investment in this company in order to be a purchaser of said stock.

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

TRADEway has adopted a written Code of Ethics in accordance with Rule 204A-1 (“Rule 204A-1”) under the Investment Advisers Act of 1940, as amended, (“Advisers Act”) that describes the firm’s fiduciary duties and responsibilities to its clients and sets forth the ethical standards of business conduct, including compliance with applicable federal securities laws, which TRADEway requires its supervised persons to uphold. The Code of Ethics sets forth TRADEway’s practices of supervising the personal securities transactions of its employees involved in formulating investment recommendations or who otherwise have access to nonpublic information regarding any client’s purchase or sale of securities (“Access Persons”). Further, the Code of Ethics sets forth additional provisions, applicable to all employees, prohibiting the use of material nonpublic information and protecting the confidentiality of client information. All employees are required to review the Code of Ethics at least annually and to sign an acknowledgement of such review. Violations of the Code of Ethics may result in disciplinary action or dismissal.

**Restrictions on Personal Securities Transactions**
Subject to certain restrictions, TRADEway employees are permitted to buy or sell securities for their personal accounts, including in securities identical to those recommended to clients. When trading in securities recommended to clients, Access Persons are subject to restrictions, including blackout periods, to ensure that an Access Person's activity is not preferred over client activity. Nonetheless, because the Code of Ethics permits employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client. Access Persons generally do not need pre-approval for personal securities transactions, except in the case of participating in a private placement or other limited offering. Further, employees are prohibited from participating in initial public offerings (IPOs). The Code of Ethics also includes guidelines relating to insider trading and gifts. TRADEway personnel may not receive gifts and gratuities from persons with whom TRADEway does business in excess of $250 in fair value from one particular source during the calendar year. Receipt of such gifts and gratuities might be viewed as causing a conflict of interest for TRADEway in selecting brokers and other service providers. TRADEway personnel may attend events such as sporting events or the theater, meals with clients, educational, training, or informational events in the company of and at the expense of a giver, as long as the expense is reasonable and not lavish or extravagant in nature. Associate persons are directed to contact the CCO regarding these areas.

**Disclosure of Personal Investments**
TRADEway employees, including Access Persons, may maintain personal brokerage accounts and make investments in securities subject to the firm's Code of Ethics. Access Persons will be required to provide quarterly reports to the Chief Compliance Officer or other designated person showing transactions in their personal accounts and will be required to disclose annually all securities held on their behalf. These reports will be monitored regularly to reasonably prevent conflicts of interest between TRADEway and its clients.

**Insider Trading Policy**
TRADEway and its employees may, from time to time, come into possession of material nonpublic or confidential information which, if disclosed, might affect an investor's decision to buy, sell, or hold a security. Under applicable law, TRADEway and its employees are prohibited from disclosing or using such information for their own benefit or for the benefit of any other person, regardless of whether that person is a client. Accordingly, should employees of TRADEway come into possession of material nonpublic or other confidential information with respect to any company, they are prohibited from communicating such information to, or using such information for the benefit of, clients and have no obligation or responsibility to disclose such information to, nor responsibility to use such information for the benefit of, clients. Any supervised person who fails to observe the aforementioned policies risks serious sanctions, including dismissal and personal liability.

TRADEway will provide a copy of its Code of Ethics to any client or prospective client upon request.

## Item 12-Brokerage Practices

**AMPT Investment Portfolios**
TRADEway recommends that AMPT clients utilize Interactive Brokers ("Custodian") for custody, brokerage and clearing services for AMPT Investment Portfolios.

TRADEway frequently reviews this program to ensure that its recommendation is consistent with its fiduciary duty. The Custodian's trading platform is essential to TRADEway's ability to provide advisory services to AMPT clients and TRADEway reserves the right to not accept clients who direct the use of other brokers. TRADEway anticipates that client transactions will receive best execution by arranging all transactions with the Custodian. In evaluating the Custodian's services, TRADEway considers a number of factors, including but not limited to, execution capability, experience, financial stability, reputation and the quality of services provided.

TRADEway receives certain services and benefits from the Custodian. These services include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution and allocation of orders, research, pricing information, market data, facilitate payment of TRADEway's fees from its clients' accounts and assist with back-office functions such as recordkeeping and client reporting.

The Custodian generally does not charge clients a custody fee and is compensated by clients through commissions or other transaction-related fees for securities trades that are executed through the Custodian.

TRADEway does not have any arrangements to compensate any broker-dealer for client referrals. Further, TRADEway does not participate in any soft-dollar relationships. TRADEway does not maintain any trade error gains and makes clients whole with respect to any trade error losses incurred by client and caused by TRADEway.

Client transactions are generally effected independently and not in a block transaction. However, TRADEway may aggregate transactions when possible and advantageous to clients. The aggregation of trades entails the trading of blocks of securities from multiple client accounts where transaction costs are shared equally and pro-rated between all accounts in the block.

## Item 13-Review of Accounts

For AMPT clients, TRADEway monitors its clients' investment portfolios at least monthly and contacts clients on a quarterly basis to conduct an account review. Model portfolio reviews are conducted by TRADEway's portfolio managers on an ongoing basis, no less than monthly, while individual client account reviews are conducted by one or more of TRADEway's Investment Adviser Representatives. AMPT clients are encouraged to discuss their financial situation with an investment adviser representative and must keep TRADEway informed of changes to needs, goals and objectives.

AMPT clients are provided with transaction confirmations and regular account statements at least quarterly from the Custodian.

## Item 14-Client Referrals and Other Compensation

For non-AMPT relationships, TRADEway recommends that clients utilize the brokerage services of tastytrade or Tradier Brokerage (each a "Recommended Brokerage Firm"). TRADEway receives compensation from the Recommended Brokerage Firms for referring customers. Such compensation does not increase or impact the brokerage costs to clients. The Mitchell family, and our team, have used the Recommended Brokerage Firms' brokerage services. However, any brokerage firm should be able to provide the services needed for clients executing investment strategies taught by TRADEway. Clients are encouraged to do their own research and find a brokerage firm that best fits their needs.

The Recommended Brokerage Firms have entered into marketing agreements with TRADEway, whereby the Recommended Brokerage Firms pay compensation to TRADEway to recommend their brokerage services. The existence of these agreements in no way represents an endorsement or recommendation of TRADEway by the Recommended Brokerage Firms or their affiliates. The Recommended Brokerage Firms and their affiliates are not responsible for the privacy practices of TRADEway or its website and do not warrant the accuracy or content of the products or services offered by TRADEway. TRADEway is independent and is not an affiliate of the Recommended Brokerage Firms.

These marketing agreements present a conflict for TRADEway as it has an incentive to recommend the Recommended Brokerage Firms.

As discussed in Item 12, above, TRADEway receives certain services from the Custodian that may benefit TRADEway, but not its clients.

## Item 15-Custody

The Investment Advisory Agreement between TRADEway and an AMPT Investment Portfolios client and/or separate agreements with a Custodian can authorize TRADEway through the Custodian to debit the client's account for the amount of TRADEway's investment advisory fee and to remit that fee directly to TRADEway in accordance with applicable custody rules. The Custodian has agreed to send a statement to the client, at least quarterly, indicating all activity in the account, including the amount of investment advisory fees paid to TRADEway.

TRADEway does not maintain physical custody of client assets; client assets are custodied by the Custodian. TRADEway is deemed to have custody of client funds because it has the ability to authorize the Custodian to debit its investment advisory fee. TRADEway is also deemed to have custody by virtue of Standing Letters of Authorization ("SLOAs") entered into by certain clients, which provide TRADEway with the ability to initiate transfers of client funds pursuant to and within the scope of a pre-defined authorization agreement established by the client. TRADEway is not subject to a surprise examination by a PCAOB firm because the firm is in compliance with the seven specified representations that gives relief to this requirement.

## Item 16-Investment Discretion

Clients in the AMPT Investment Portfolios have given TRADEway the authority to exercise investment discretion on behalf of clients. Such investment discretion enables TRADEway to effect and/or direct transactions in client accounts without first seeking client consent.

## Item 17-Voting Client Securities

TRADEway does not have any authority to and does not vote proxies on behalf of any clients. Clients retain the responsibility for directing the manner in which proxies solicited by issuers of securities will be voted and for making all elections relating to mergers, acquisitions, tender offers and other events pertaining to the securities. The Custodian will forward copies of all proxies and shareholder communications to the client.

## Item 18-Financial Information

TRADEway is required to provide certain financial information or disclosures about its financial condition. TRADEway does not solicit the prepayment of fees six months or more in advance. TRADEway has no financial condition that would impair its ability to meet its commitments to clients and has not been the subject of any bankruptcy proceedings.