

NUKU Asset Inc. is registered with the Securities and Exchange Commission ("SEC") as an investment advisor. Brokerage and investment advisory services and fees differ and it is important for the retail investor to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors through individually-managed accounts primarily over the internet through an interactive website. As a client, you input information about yourself, your investment goals and other instructions such as future withdrawal dates, and restrictions on industries or companies you do not want to be invested in, and our software will construct and manage your portfolio based on the information provided.

Monitoring As part of our standard service offering, our software monitors your account and its' investments on a daily basis and will make adjustments by buying and selling securities over time.

Investment Authority You grant us discretionary authority, allowing us to buy and sell investments on your behalf. Trades will be conducted based on the information you have provided.

Investment Offerings Our primary portfolio strategy is to utilize non-proprietary medium and large capitalization U.S. and international company stocks and bonds, as well as government bonds, to form a diversified portfolio. We generally do not utilize funds or other structured assets, other than money market funds in the management of cash. We do not use any proprietary products in your account.

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?

Account Minimums and Other Requirements The minimum amount required for our service is \$50,000, but can be waived in certain circumstances.

More detailed information about our services is available in our Form ADV, Part 2A brochure, including Items 4, 5, 6.

What fees will I pay?

You will pay asset-based fees based on the size of your account, determined daily, and billed monthly. Our fees start at 1.5% for up to \$750,000, and decline thereafter, but are negotiable, depending on the number of accounts, and size of total assets. Indirectly, you may pay fees for any fund fees embedded in securities purchased on your behalf, however, we generally would only use funds for the management of cash holdings and we do not receive any portion of those fees.

We are paid based on the asset under management in your account, therefore we do have an incentive to encourage you to contribute more to your account. 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.

Additional information about our fees is included in our Form ADV, Item 5.

What are your legal obligations to me when acting as my investment advisor? How else does the 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.

CONVERSATION STARTERS

- How might your conflicts of interest affect me, and how will you address them?
- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

We do have conflicts of interest including the fact that the more assets that are in your account, the more you will pay in fees, therefore leading to an incentive to encourage you to increase the assets in your account. Additional information about conflicts of interest we may have is available in Part 2 of Form ADV, Items 4 and 11.

How do your financial professionals make money?

Our financial advisors earn income based on the overall size of the assets under management and the asset-based fees that are earned. No compensation is based on the performance or selection of specific securities.

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

No. NUKU Asset does not have any disciplinary history. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

CONVERSATION STARTERS

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

Additional Information

You can find additional information about our services in our Form ADV Part 2 and an up-to-date relationship summary at nuku.com/important-disclosures or by contacting us at 206-596-2110. For answers to the Conversations Starters, visit nuku.com/conversation-starters.

CONVERSATION STARTERS

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