

WrapManager Client Relationship Summary

Item 1 Introduction

04/06/2021

WrapManager, Inc. is registered with the Securities and Exchange Commission as an Investment Adviser.

Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. The SEC offers free and simple tools to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs) which also provides information tailored to educate retail investors about financial professionals.

Item 2 Relationships and Services

What investment services and advice can you provide me?

Our firm provides investment discretion for the following services. When you invest on a discretionary basis, our firm will buy and sell investments in your accounts without requiring your pre-approval on an ongoing basis until you notify us otherwise in writing.

- WrapManager Wrap Fee Program - monitored continuously as part of our standard service with a \$500,000 household investment minimum.

For additional information including minimum investment amounts, please see <https://adviserinfo.sec.gov/firm/summary/108834> for our Form ADV, 2A brochure (Items 4 and 5).

Conversation starters. Ask your financial professional:

- 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?

Item 3 Fees, Costs, Conflicts and Standard of Conflict

What fees will I pay?

Our fees are assessed quarterly in advance with adjustments made monthly for deposits or withdrawals. They are disclosed in our Form ADV Part 1A, Item 5 and more fully described in our Form ADV Part 2A, Item 5. Some fees create a conflict of interest described below and in more detail in our Firm's Part 2A.

- Our firm charges asset-based fees, therefore more assets in the account will cause you to pay more in fees and therefore we may have an incentive to encourage you to increase the amount of money invested in those accounts.
- Under our wrap fee program, advisory services, portfolio strategies, management and transaction services are provided for one fee. This is different from non-wrap fee management programs whereby an investment firm's services are provided for a fee, but transaction services are billed separately on a per-transaction basis and portfolio management may be charged as a separate fee. Currently, we only offer wrap fee asset management services.

Additional Information:

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.

For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure (Item 4) which can be found at <https://adviserinfo.sec.gov/firm/summary/108834>.

Conversation starters. Ask your financial professional:

- 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?

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 may create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.
- Our firm earns money by charging fees based on an agreed upon percentage of assets under management. The larger the amount of assets we manage for you, the more we will make in fees. Therefore, as your account increases in value, our fees will also increase. If your account decreases in value, our fees will decrease.

Conversation starters. *Ask your financial professional:*

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

Additional information:

For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure (Item 4) which can be found at <https://adviserinfo.sec.gov/firm/summary/108834>.

How do your financial professionals make money?

- Our professionals are compensated based on the amount of assets they service and therefore earn higher compensation for investing more of your money.

Item 4 Disciplinary History

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

- Our firm has no disciplinary history.

Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Conversation Starters. *Ask your financial professional:*

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

Item 5 Additional Information

You can find additional information about our services and request a copy of the relationship summary by visiting www.wrapmanager.com; emailing compliance@wrapmanager.com or calling us at 415-541-7774.

Conversation starters. *Ask your financial professional:*

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