



261 Hamilton Avenue, Palo Alto, California 94301

www.wealthfront.com

Client Relationship Summary

Wealthfront Advisers LLC and Wealthfront Brokerage LLC

October 6, 2025

Item 1. Introduction

This Client Relationship Summary (“Form CRS”) provides important information about Wealthfront Advisers LLC (“Wealthfront Advisers”), an investment adviser registered with the United States Securities and Exchange Commission (“SEC”), and Wealthfront Advisers’ affiliate broker-dealer Wealthfront Brokerage LLC (“Wealthfront Brokerage”), a member of [FINRA](#) and [SIPC](#). Choosing a financial institution is an important decision, and this Form CRS can help you decide if Wealthfront Advisers and Wealthfront Brokerage (collectively “Wealthfront”) are the right fit for you. Below, we’ve included some “conversation starters.” These should give you a better understanding of the services you will receive, the fees you will pay, and Wealthfront’s qualifications.

Wealthfront Advisers provides advisory services for its clients (“Clients”), who may open (a) an Automated Investing Account, which includes taxable, individual retirement accounts (“IRAs”), and 529 college savings plans (“529 Account”), which enable Clients to invest in portfolios we recommend, (b) a Stock Investing Account, which is a taxable account that allows Clients to invest in certain stocks and exchange-traded securities, (c) an Automated Bond Portfolio, which is a portfolio consisting of a diversified mix of exchange-traded bond funds, (d) an Automated Bond Ladder, which is a portfolio consisting of US treasury securities (“Treasuries”) of various maturities, or (e) Wealthfront’s S&P 500 Direct (“S&P 500 Direct”) or Wealthfront’s Nasdaq-100 Direct (“Nasdaq-100 Direct”), accounts that enable Clients to invest directly in the individual stocks that comprise the S&P® 500 or Nasdaq-100® indices and take advantage of automated Tax-Loss Harvesting (“TLH”).

Wealthfront Advisers maintains Client accounts and portfolios with Wealthfront Brokerage, which carries out Wealthfront Advisers’ instructions regarding those portfolios. Wealthfront Advisers also advises the Wealthfront 529 College Savings Plan and Wealthfront Brokerage distributes 529 Accounts. These 529 Accounts are administered by the Board of Trustees of the College Savings Plans of Nevada in conjunction with the Nevada State Treasurer.¹

Please note that investment advisory and brokerage services, and their fees, differ. It’s important for you to understand the differences. You can visit Investor.gov/CRS for free and simple tools to research firms and financial professionals and to access educational materials about broker-dealers, investment advisers, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

We provide a wide range of automated, software-based investment and advisory services designed to meet both investment and savings needs.

With an Automated Investing Account, Wealthfront Advisers provides a diversified, fully discretionary, automated, passive investment management service tailored to your individual risk tolerance and designed to help you meet your long-term financial goals. The minimum to open this account is \$500.

Wealthfront Advisers’ Classic portfolio invests your assets in a diversified portfolio of traditional asset class based index exchange-traded funds (“ETFs”) or other investments. Wealthfront Advisers chooses low-cost ETFs with high liquidity and low tracking error. For taxable accounts and IRAs we also offer the opportunity to invest in a diversified portfolio of socially responsible investing (“SRI”) ETFs. Our SRI portfolios use ETFs that include higher proportions of companies that score well for Environmental, Social, and Governance (“ESG”) measures, according to the investment research company MSCI.²

We allow Clients the ability to customize our recommendations in Classic and SRI portfolios. Clients who choose to customize our recommendations can make adjustments to our recommended investment allocations, increasing or decreasing the target percentage of a particular ETF or investment. Clients can also choose from a list of available ETFs or other investments and request specific allocations to each. In some situations, Clients can restrict Wealthfront Advisers from trading particular stocks.

¹ Before investing in a 529 Account, consider your state’s 529 plan or that of your beneficiary’s home, which may offer state tax and other benefits not available through 529 Accounts. For more information, see pages 10-11 of the [529 Plan Description and Participation Agreement Supplement](#).

² You can learn more about our SRI portfolios [here](#). See [Item 8. of our Client Brochure](#) for information regarding risks of SRI portfolios.

If you choose to customize our recommended portfolios for taxable accounts and IRAs,³ you can adjust the allocations to the ETFs or other investments in our recommended portfolio or you can choose from a variety of ETFs or other investments and request specific allocations to each.⁴

Clients with a taxable Automated Investing Account that have at least \$100,000 can opt into our [US Direct Indexing product](#), which depending on the value of such Clients' accounts, replaces the ETF that represents the US public equities asset class with individual securities that comprise up to 1000 US stocks with the largest market capitalizations as a way of generating additional tax savings through stock based tax-loss harvesting.⁵ Clients with a taxable Automated Investing Account of at least \$500,000 can opt into our Smart Beta⁶, which serves as an enhancement to our US Direct Indexing product.

With an Automated Bond Portfolio, Wealthfront Advisers provides fully discretionary, automated portfolios of bond ETFs that are tailored to your tax situation. Our Automated Bond Portfolio is designed to maximize after-tax yields through a diversified mix of bond ETFs with lower-risk, higher-yield attributes.⁷ The minimum to open this portfolio is \$500.

With an Automated Bond Ladder, Wealthfront Advisers provides fully discretionary, automated portfolios of Treasuries consistent with the Client's selected ladder length. Our Automated Bond Ladder is designed to preserve capital by offering relatively stable yield at a lower risk compared to other types of portfolios.⁸ The initial minimum deposit to open this portfolio is \$500.

With S&P 500 Direct or Nasdaq-100 Direct, Wealthfront Advisers provides fully discretionary, automated, and passive investment management services designed to invest Client assets in many of the individual stocks that make up the S&P 500® or Nasdaq-100® index, while applying TLH to maximize after-tax benefits. The initial minimum deposit to open these portfolios is \$5,000.

Wealthfront Advisers also offers Stock Investing Accounts, which allow you to invest in specific stocks and ETFs of your choosing and provide automated advice when clients take on too much or too little risk.

Wealthfront Advisers will periodically advise you to review and update your profile information, and we continuously monitor your Automated Investing Account, Automated Bond Portfolio, or Automated Bond Ladder so we can maintain your target portfolio allocation. For certain accounts and portfolios, we also conduct Tax-Loss Harvesting to minimize your tax liability. TLH takes advantage of daily market volatility to harvest losses that can be used to lower your tax bill, leaving more money to save while maintaining the risk and return characteristics of your portfolio.

When you open an Automated Investing Account, Automated Bond Portfolio, or Automated Bond Ladder you grant Wealthfront Advisers full discretionary authority to manage it. With a Stock Investing Account, you grant Wealthfront Advisers limited discretion, with Wealthfront Advisers exercising discretion over the specifics of transactions, including the time, price, number of shares, and units or dollar amounts in a transaction, while you retain general investment discretion over which securities to buy or sell. As noted above, Wealthfront Advisers holds Client portfolios in accounts at Wealthfront Brokerage. Please note that Wealthfront Brokerage does not provide recommendations and only buys and sells securities for you based on instructions provided by Wealthfront Advisers. Further, Wealthfront Advisers offers an opportunity for Clients to earn additional income if they choose to participate in our Securities Lending Program. In this program, Wealthfront Advisers lends securities held in eligible Accounts (taxable Automated Investment Accounts, Automated Bond Portfolios, Stock Investing Accounts, S&P 500 Direct accounts, and Nasdaq-100 Direct accounts) to Wealthfront Brokerage, which will further lend those securities to unaffiliated third parties, such as broker-dealers and financial institutions. These securities loans are collateralized with cash, typically between 102% and 105% of the market value of the loaned securities.⁹

Wealthfront Advisers and Wealthfront Brokerage offers software-based financial planning tools and services through their affiliate, Wealthfront Software LLC.¹⁰ This financial planning service is available at no charge.

Wealthfront Advisers also offers Automated Savings to Clients, free of charge. Automated Savings enables you to automatically move excess cash to a Wealthfront Cash Account or taxable Investment Account. You tell Wealthfront Advisers which account to monitor (an external checking account or Wealthfront Cash Account) and set a maximum balance for that account. When Wealthfront Advisers detects you're over that balance by at least \$100, it will schedule transfers of the excess cash to the Wealthfront accounts of choice. Wealthfront Advisers will notify you about each Automated Savings transfer by email, and you'll have at least 24 hours to cancel transfers before they happen. You can turn Automated Savings off at any time.

³ We do not support Client-customized portfolio allocations for 529 Account, Automated Bond Portfolio, or Automated Bond Ladder.

⁴ You can learn more about our Smart Beta service [here](#).

⁵ The customization capability is not available for an Automated Investing Account that uses our US Direct Indexing product.

⁶ You can learn more about our Smart Beta service [here](#).

⁷ You can learn more about our Automated Bond Portfolio [here](#).

⁸ You can learn more about our Automated Bond Ladder [here](#).

⁹ See [Item 8. of our Client Brochure](#) for information regarding risks of the Securities Lending Program.

¹⁰ The financial planning tool allows Clients to build automated financial plans for a variety of objectives, such as buying a home, retirement, paying for college, without a traditional financial planner interview. See [Item 4.B. of our Client Brochure](#) for more information about our financial planning tool.

For more details about Wealthfront Advisers' investment advisory services, see [Items 4 and 7 of our Client Brochure](#). We also encourage you to consider the following questions before becoming a Client:

Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not? We answer these questions [here](#), in the Conversation Starter Supplement disclosure.

Item 3. Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

Principal Fees and Costs: Our Automated Investing Account, Automated Bond Portfolio, Automated Bond Ladder, S&P 500 Direct, and Nasdaq-100 Direct are “wrap accounts.” This means that advisory fees and expenses, including any brokerage commissions, management fees, and administrative costs, are “wrapped” into a single fee. For the Automated Investing Account and Automated Bond Portfolio, Clients pay an annual wrap fee of 0.25%. For the Automated Bond Ladder, Clients pay an annual wrap fee of 0.15%. For S&P 500 Direct, Clients pay an annual wrap fee of 0.09%. For Nasdaq-100 Direct, Clients pay an annual wrap fee of 0.12%. For all accounts, the annual wrap fee accrues daily and is charged at the end of each month. Clients can lower these advisory fees by referring friends and family to use the service.

To calculate daily fees in an Automated Investing Account, Automated Bond Portfolio, Automated Bond Ladder, S&P 500 Direct, or Nasdaq-100 Direct account, we multiply the net market value of your Investment Account by the corresponding wrap fee. We calculate the net market value of your Investment Account as of the close of trading on the New York Stock Exchange on that day, or on days when the market is closed, the immediately preceding close of trading. We then divide the resulting number by 365 (or 366 in any leap year) to calculate your daily fee. Then, we multiply the daily fee by the number of days in the month to get your monthly fee. We deduct this monthly fee from an Automated Investing Account, Automated Bond Portfolio, Automated Bond Ladder, S&P 500 Direct, and Nasdaq-100 Direct account no later than the tenth business day of the following month. We do not charge any account-opening fees, withdrawal or account-closing fees, trading/commission fees, or account transfer fees.

For Clients with a Stock Investing Account, a percentage of the net interest margin earned by Wealthfront Brokerage on the Cash Account that Stock Investing Account clients are required to maintain will be paid to Wealthfront Advisers as the Advisory Fee for Stock Investing Accounts. As a result, Clients pay no out of pocket advisory fees for maintaining Stock Investing Accounts, nor does this reduce the rate of interest Clients receive from cash maintained in their Cash Accounts.¹¹

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will be invested for me?*
 - We manage client funds in our Automated Investing Account and Automated Bond Portfolio by purchasing the maximum number of whole or fractional shares of ETFs or company stock that match your target asset allocation. Partial shares are not available for the Automated Investing Account or Automated Bond Portfolio so some of your money may not be invested. This amount is allocated to a highly liquid money market fund until there is enough cash to buy more whole shares consistent with your target asset allocation. We also allocate a small amount of cash to the money market fund to cover approximately the next six months of advisory fees. In a Stock Investing Account, S&P 500 Direct account, or Nasdaq-100 Direct account, we invest your funds by purchasing the maximum number of whole or partial shares of company stock or ETFs possible. Any money that is not invested is allocated to a highly liquid money market fund until there is enough cash to buy more whole or partial shares consistent with your investment selection. In an Automated Bond Ladder, we invest your funds by purchasing Treasuries with the maximum face value possible for your selected ladder length and deposit amount. Some amount of money may still not be invested and this amount is allocated to a highly liquid money market fund until there is enough cash to buy more Treasuries. We also allocate a small amount of cash to the money market fund to cover approximately the next six months of advisory fees.
- *How much will go to fees and costs?*
 - If you have an average monthly balance of \$10,000 in an Automated Investing Account or Automated Bond Portfolio your advisory fee will be approximately \$2.05 each month. Assuming 30 days in the month and 365 days in the year, here's the math: $\$10,000 * 0.0025 * (30/365) \approx \2.05 . Nevada residents with 529 Accounts only pay the annual 0.25% fee on assets under management that exceed \$15,000. If you have an average monthly balance of \$10,000 in an Automated Bond Ladder, your advisory fee will be approximately \$1.23 each month. Assuming 30 days in the month and 365 days in the year, here's the math: $\$10,000 * 0.0015 * (30/365) \approx \1.23 . If you have an average monthly balance of \$10,000 in S&P 500 Direct, your advisory fee will be approximately \$0.74 each month. Assuming 30 days in the month and 365 days in the year, here's the math: $\$10,000 * 0.0009 * (30/365) \approx \0.74 . Funds in a Stock Investing Account are not used to cover the advisory fee, which is instead paid by Wealthfront Brokerage to Wealthfront Advisers from a percentage of interest Wealthfront Brokerage earns from the Wealthfront Cash Accounts of Clients with Stock Investing Accounts.¹²
 - To cover plan administration costs in 529 Accounts, the Board of Trustees of the College Savings Plans of Nevada (the “Board”) and Ascensus College Savings Recordkeeping Services, LLC, the Program Manager of the Plan each receive an annualized Program Administration fee equal to 0.01% and 0.05%, respectively, accrued daily based on assets under management. The Board may change the Program Administration fee plan without prior notice.

Other Fees and Costs: Certain clients may pay other fees or expenses to third parties, including an affiliate of Wealthfront Advisers.

- Third-party fees include expense ratios, which cover the total annual operating expenses of an ETF or fund. Expense ratios are expressed as a percentage of a fund's average net assets and will vary depending on the portfolio allocations in your Investment Account. You can

¹¹ See [Item 5.A. of our Client Brochure](#) for more information about advisory fees paid in relation to the Stock Investing Accounts.

¹² See [Item 5.A. of our Client Brochure](#) for more information about advisory fees paid in relation to the Stock Investing Accounts.

see the expense ratios for the ETFs and other funds in your Investment Account by logging into your Wealthfront user account. Wealthfront Advisers does not receive any compensation related to expense ratios.

- Wealthfront Brokerage offers a margin lending product called Portfolio Line of Credit ("PLOC"), which is offered to Clients who have invested in a fully discretionary, taxable account and who meet other minimum account thresholds. Wealthfront Brokerage charges interest on the funds borrowed under a PLOC for the time that the loan is outstanding. Please see [Item 8. of our Client Brochure](#) and Wealthfront Brokerage's [Margin Handbook](#) for more information on PLOC and risks associated with the product.

Additional information: You'll pay fees whether you make or lose money on your investments. Those fees will reduce the amount of money you make on your investments over time. Please make sure you understand the fees you're paying. For more information on fees for our investment services, see [Item 5.A. of our Client Brochure](#).

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

We do not provide recommendations as your broker-dealer. *When we act as your investment adviser*, we have to act in your best interest and put your interests ahead of our own. In some cases, the way we make money may create a conflict of interest. Some examples of potential conflicts you should understand include:

- **Client Referrals and other compensation:** Wealthfront Advisers runs promotional campaigns to encourage Clients to open accounts on the Wealthfront website. As a result, participating Clients will receive promotional benefits for successfully referring new Clients to Wealthfront Advisers. These campaigns may create an incentive for third parties or other existing Clients to refer prospective Clients to Wealthfront Advisers, even if they would not otherwise make such a referral. Account opening incentives do not influence the way we manage our Clients' accounts. Additionally, Wealthfront Brokerage may provide Wealthfront Advisers' Clients compensation as a promotional offer to open accounts at Wealthfront Brokerage. These arrangements are fully disclosed on [Item 14. of our Client Brochure](#).
- **Portfolio Line of Credit:** PLOC is a margin loan product Clients can use to access credit from Wealthfront Brokerage using their portfolio as collateral. This may present a conflict of interest because Wealthfront Brokerage can force the sale of assets in your account(s), but we believe the amount by which your portfolio must decline for this to happen is highly unlikely. You can read more about PLOC [here](#), in our Margin Handbook.
- **Securities Lending Program:** Clients choosing to participate in this program ("Participants") incur no direct cost or fee. Clients will receive 50% of the net compensation¹³ generated from lending activities. The remaining 50% is shared between Wealthfront Brokerage and Wealthfront Advisers, with each receiving 25% of the net compensation. Compensation will be paid on a monthly basis. Since Wealthfront Advisers and Wealthfront Brokerage will also receive compensation in connection with loans under this program, Wealthfront Advisers has a financial incentive to approve Participants for the Securities Lending Program. In addition to sharing the financial incentive to earn compensation along with Clients, Wealthfront Advisers mitigates this conflict by only recommending participation in the Securities Lending Program to clients for whom it is suitable.
- To further minimize conflicts of interest, we do not employ individual advisors or brokers to sell our products. For more information, see [Items 10. and 14. of our Client Brochure](#).

How do Wealthfront Advisers' or Wealthfront Brokerages' financial professionals make money?

Our investment advisory services are managed by software. We do not pay financial professionals or advisors sales or asset-based compensation.

Item 4. Disciplinary History

Do you have legal or disciplinary history?

Yes. For more information, see [Item 9. of our Client Brochure](#). You may also research us for free at investor.gov/CRS.

Item 5. Additional information

You can find more information about our investment advisory or brokerage services and obtain a copy of this Form CRS at <https://www.wealthfront.com/legal> or by emailing support@wealthfront.com.

How do I contact Wealthfront Advisers or Wealthfront Brokerage for questions/complaints I may have or if I need technical assistance? Please email us at support@wealthfront.com or call us at 844-995-8437.

¹³ Net compensation refers to compensation by third-party borrowers to Wealthfront Brokerage for securities loans, minus a portion paid to Sharegain Securities Inc., a registered broker-dealer, which acts as lending agent to Wealthfront Brokerage.



261 Hamilton Avenue, Palo Alto, California 94301

www.wealthfront.com

Client Relationship Summary

Wealthfront Advisers LLC and Wealthfront Brokerage LLC

August 1 ~~October 6~~, 2025

Item 1. Introduction

This Client Relationship Summary ("Form CRS") provides important information about Wealthfront Advisers LLC ("Wealthfront Advisers"), an investment adviser registered with the United States Securities and Exchange Commission ("SEC"), and Wealthfront Advisers' affiliate broker-dealer Wealthfront Brokerage LLC ("Wealthfront Brokerage"), a member of [FINRA](#) and [SIPC](#). Choosing a financial institution is an important decision, and this Form CRS can help you decide if Wealthfront Advisers and Wealthfront Brokerage (collectively "Wealthfront") are the right fit for you. Below, we've included some "conversation starters." These should give you a better understanding of the services you will receive, the fees you will pay, and Wealthfront's qualifications.

Wealthfront Advisers provides advisory services for its clients ("Clients"), who may open (a) an Automated Investing Account, which includes taxable, individual retirement accounts ("IRAs"), and 529 college savings plans ("529 Account"), which enable Clients to invest in portfolios we recommend, (b) a Stock Investing Account, which is a taxable account that allows Clients to invest in certain stocks and exchange-traded securities, (c) an Automated Bond Portfolio, which is a portfolio consisting of a diversified mix of exchange-traded bond funds, (d) an Automated Bond Ladder, which is a portfolio consisting of US treasury securities ("Treasuries") of various maturities, or (e) Wealthfront's S&P 500 Direct ("S&P 500 Direct"), ~~an account that enables~~ or Wealthfront's Nasdaq-100 Direct ("Nasdaq-100 Direct"), accounts that enable Clients to invest directly in the individual stocks that comprise the S&P[®] ~~500 index~~ P[®] 500 or Nasdaq-100[®] indices and take advantage of automated Tax-Loss Harvesting ("TLH").

Wealthfront Advisers maintains Client accounts and portfolios with Wealthfront Brokerage, which carries out Wealthfront Advisers' instructions regarding those portfolios. Wealthfront Advisers also advises the Wealthfront 529 College Savings Plan and Wealthfront Brokerage distributes 529 Accounts. These 529 Accounts are administered by the Board of Trustees of the College Savings Plans of Nevada in conjunction with the Nevada State Treasurer.¹

Please note that investment advisory and brokerage services, and their fees, differ. It's important for you to understand the differences. You can visit Investor.gov/CRS for free and simple tools to research firms and financial professionals and to access educational materials about broker-dealers, investment advisers, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

We provide a wide range of automated, software-based investment and advisory services designed to meet both investment and savings needs.

With an Automated Investing Account, Wealthfront Advisers provides a diversified, fully discretionary, automated, passive investment management service tailored to your individual risk tolerance and designed to help you meet your long-term financial goals. The minimum to open this account is \$500.

Wealthfront Advisers' Classic portfolio invests your assets in a diversified portfolio of traditional asset class based index exchange-traded funds ("ETFs") or other investments. Wealthfront Advisers chooses low-cost ETFs with high liquidity and low tracking error. For taxable accounts and IRAs we also offer the opportunity to invest in a diversified portfolio of socially responsible investing ("SRI") ETFs. Our SRI portfolios use ETFs that include higher proportions of companies that score well for Environmental, Social, and Governance ("ESG") measures, according to the investment research company MSCI.²

We allow Clients the ability to customize our recommendations in Classic and SRI portfolios. Clients who choose to customize our recommendations can make adjustments to our recommended investment allocations, increasing or decreasing the target percentage of a particular ETF or investment. Clients can also choose from a list of available ETFs or other investments and request specific allocations to each. In some situations, Clients can restrict Wealthfront Advisers from trading particular stocks.

¹ Before investing in a 529 Account, consider your state's 529 plan or that of your beneficiary's home, which may offer state tax and other benefits not available through 529 Accounts. For more information, see pages 10-11 of the [529 Plan Description and Participation Agreement Supplement](#).

² You can learn more about our SRI portfolios [here](#). See [Item 8. of our Client Brochure](#) for information regarding risks of SRI portfolios.

If you choose to customize our recommended portfolios for taxable accounts and IRAs,³ you can adjust the allocations to the ETFs or other investments in our recommended portfolio or you can choose from a variety of ETFs or other investments and request specific allocations to each.⁴

Clients with a taxable Automated Investing Account that have at least \$100,000 can opt into our [US Direct Indexing product](#), which depending on the value of such Clients' accounts, replaces the ETF that represents the US public equities asset class with individual securities that comprise up to 1000 US stocks with the largest market capitalizations as a way of generating additional tax savings through stock based tax-loss harvesting.⁵ Clients with a taxable Automated Investing Account of at least \$500,000 can opt into our Smart Beta⁶, which serves as an enhancement to our US Direct Indexing product.

With an Automated Bond Portfolio, Wealthfront Advisers provides fully discretionary, automated portfolios of bond ETFs that are tailored to your tax situation. Our Automated Bond Portfolio is designed to maximize after-tax yields through a diversified mix of bond ETFs with lower-risk, higher-yield attributes.⁷ The minimum to open this portfolio is \$500.

With an Automated Bond Ladder, Wealthfront Advisers provides fully discretionary, automated portfolios of Treasuries consistent with the Client's selected ladder length. Our Automated Bond Ladder is designed to preserve capital by offering relatively stable yield at a lower risk compared to other types of portfolios.⁸ The initial minimum deposit to open this portfolio is \$500.

With S&P 500 Direct [or Nasdaq-100 Direct](#), Wealthfront Advisers provides fully discretionary, automated, and passive investment management services designed to invest Client assets in many of the individual stocks that make up the S&P 500® [or Nasdaq-100®](#) index, while applying TLH to maximize after-tax benefits. The initial minimum deposit to open ~~this portfolio~~[these portfolios](#) is \$5,000.

Wealthfront Advisers also offers Stock Investing Accounts, which allow you to invest in specific stocks and ETFs of your choosing and provide automated advice when clients take on too much or too little risk.

Wealthfront Advisers will periodically advise you to review and update your profile information, and we continuously monitor your Automated Investing Account, Automated Bond Portfolio, or Automated Bond Ladder so we can maintain your target portfolio allocation. For certain accounts and portfolios, we also conduct Tax-Loss Harvesting to minimize your tax liability. TLH takes advantage of daily market volatility to harvest losses that can be used to lower your tax bill, leaving more money to save while maintaining the risk and return characteristics of your portfolio.

When you open an Automated Investing Account, Automated Bond Portfolio, or Automated Bond Ladder you grant Wealthfront Advisers full discretionary authority to manage it. With a Stock Investing Account, you grant Wealthfront Advisers limited discretion, with Wealthfront Advisers exercising discretion over the specifics of transactions, including the time, price, number of shares, and units or dollar amounts in a transaction, while you retain general investment discretion over which securities to buy or sell. As noted above, Wealthfront Advisers holds Client portfolios in accounts at Wealthfront Brokerage. Please note that Wealthfront Brokerage does not provide recommendations and only buys and sells securities for you based on instructions provided by Wealthfront Advisers. Further, Wealthfront Advisers offers an opportunity for Clients to earn additional income if they choose to participate in our Securities Lending Program. In this program, Wealthfront Advisers lends securities held in eligible Accounts (taxable Automated Investment Accounts, Automated Bond Portfolios, Stock Investing Accounts, ~~and S&P 500 Direct accounts, and Nasdaq-100 Direct accounts~~) to Wealthfront Brokerage, which will further lend those securities to unaffiliated third parties, such as broker-dealers and financial institutions. These securities loans are collateralized with cash, typically between 102% and 105% of the market value of the loaned securities.⁹

Wealthfront Advisers and Wealthfront Brokerage offers software-based financial planning tools and services through their affiliate, Wealthfront Software LLC.¹⁰ This financial planning service is available at no charge.

Wealthfront Advisers also offers Automated Savings to Clients, free of charge. Automated Savings enables you to automatically move excess cash to a Wealthfront Cash Account or taxable Investment Account. You tell Wealthfront Advisers which account to monitor (an external checking account or Wealthfront Cash Account) and set a maximum balance for that account. When Wealthfront Advisers detects you're over

³ We do not support Client-customized portfolio allocations for 529 Account, Automated Bond Portfolio, or Automated Bond Ladder.

⁴ You can learn more about our Smart Beta service [here](#).

⁵ The customization capability is not available for an Automated Investing Account that uses our US Direct Indexing product.

⁶ You can learn more about our Smart Beta service [here](#).

⁷ You can learn more about our Automated Bond Portfolio [here](#).

⁸ You can learn more about our Automated Bond Ladder [here](#).

⁹ See [Item 8. of our Client Brochure](#) for information regarding risks of the Securities Lending Program.

¹⁰ The financial planning tool allows Clients to build automated financial plans for a variety of objectives, such as buying a home, retirement, paying for college, without a traditional financial planner interview. See [Item 4.B. of our Client Brochure](#) for more information about our financial planning tool.

that balance by at least \$100, it will schedule transfers of the excess cash to the Wealthfront accounts of choice. Wealthfront Advisers will notify you about each Automated Savings transfer by email, and you'll have at least 24 hours to cancel transfers before they happen. You can turn Automated Savings off at any time.

For more details about Wealthfront Advisers' investment advisory services, see [Items 4 and 7 of our Client Brochure](#). We also encourage you to consider the following questions before becoming a Client:

Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not? We answer these questions [here](#), in the Conversation Starter Supplement disclosure.

Item 3. Fees, Costs, Conflicts, and Standard of Conduct ***What fees will I pay?***

Principal Fees and Costs: Our Automated Investing Account, Automated Bond Portfolio, Automated Bond Ladder, ~~and~~ S&P 500 Direct, ~~and~~ Nasdaq-100 Direct are "wrap accounts." This means that advisory fees and expenses, including any brokerage commissions, management fees, and administrative costs, are "wrapped" into a single fee. For the Automated Investing Account and Automated Bond Portfolio, Clients pay an annual wrap fee of 0.25%. For the Automated Bond Ladder, Clients pay an annual wrap fee of 0.15%. For S&P 500 Direct, Clients pay an annual wrap fee of 0.09%. For Nasdaq-100 Direct, Clients pay an annual wrap fee of 0.12%. For all accounts, the annual wrap fee accrues daily and is charged at the end of each month. Clients can lower these advisory fees by referring friends and family to use the service.

To calculate daily fees in an Automated Investing Account, Automated Bond Portfolio, Automated Bond Ladder, ~~and~~ S&P 500 Direct, ~~or~~ Nasdaq-100 Direct account, we multiply the net market value of your Investment Account by the corresponding wrap fee. We calculate the net market value of your Investment Account as of the close of trading on the New York Stock Exchange on that day, or on days when the market is closed, the immediately preceding close of trading. We then divide the resulting number by 365 (or 366 in any leap year) to calculate your daily fee. Then, we multiply the daily fee by the number of days in the month to get your monthly fee. We deduct this monthly fee from an Automated Investing Account, Automated Bond Portfolio, Automated Bond Ladder, ~~and~~ S&P 500 Direct, ~~and~~ Nasdaq-100 Direct account no later than the tenth business day of the following month. We do not charge any account-opening fees, withdrawal or account-closing fees, trading/commission fees, or account transfer fees.

For Clients with a Stock Investing Account, a percentage of the net interest margin earned by Wealthfront Brokerage on the Cash Account that Stock Investing Account clients are required to maintain will be paid to Wealthfront Advisers as the Advisory Fee for Stock Investing Accounts. As a result, Clients pay no out of pocket advisory fees for maintaining Stock Investing Accounts, nor does this reduce the rate of interest Clients receive from cash maintained in their Cash Accounts.¹¹

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will be invested for me?*
 - We manage client funds in our Automated Investing Account and Automated Bond Portfolio by purchasing the maximum number of whole or fractional shares of ETFs or company stock that match your target asset allocation. Partial shares are not available for the Automated Investing Account or Automated Bond Portfolio so some of your money may not be invested. This amount is allocated to a highly liquid money market fund until there is enough cash to buy more whole shares consistent with your target asset allocation. We also allocate a small amount of cash to the money market fund to cover approximately the next six months of advisory fees. In a Stock Investing Account ~~or~~ S&P 500 Direct account, or Nasdaq-100 Direct account, we invest your funds by purchasing the maximum number of whole or partial shares of company stock or ETFs possible. Any money that is not invested is allocated to a highly liquid money market fund until there is enough cash to buy more whole or partial shares consistent with your investment selection. In an Automated Bond Ladder, we invest your funds by purchasing Treasuries with the maximum face value possible for your selected ladder length and deposit amount. Some amount of money may still not be invested and this amount is allocated to a highly liquid money market fund until there is enough cash to buy more Treasuries. We also allocate a small amount of cash to the money market fund to cover approximately the next six months of advisory fees.
- *How much will go to fees and costs?*
 - If you have an average monthly balance of \$10,000 in an Automated Investing Account or Automated Bond Portfolio your advisory fee will be approximately \$2.05 each month. Assuming 30 days in the month and 365 days in the year, here's the math: $\$10,000 * 0.0025 * (30/365) \approx \2.05 . Nevada residents with 529 Accounts only pay the annual 0.25% fee on assets under management that exceed \$15,000. If you have an average monthly balance of \$10,000 in an Automated Bond Ladder, your advisory fee will be approximately \$1.23 each month. Assuming 30 days in the month and 365 days in the year, here's the math: $\$10,000 * 0.0015 * (30/365) \approx \1.23 . If you have an average monthly balance of \$10,000 in S&P 500 Direct, your advisory fee will be approximately \$0.74 each month. Assuming 30 days in the month and 365 days in the year, here's the math: $\$10,000 * 0.0009 * (30/365) \approx \0.74 . Funds in a Stock Investing Account are not used to cover the advisory fee, which is instead paid by Wealthfront Brokerage to

¹¹ See [Item 5.A. of our Client Brochure](#) for more information about advisory fees paid in relation to the Stock Investing Accounts.

Wealthfront Advisers from a percentage of interest Wealthfront Brokerage earns from the Wealthfront Cash Accounts of Clients with Stock Investing Accounts.¹²

- To cover plan administration costs in 529 Accounts, the Board of Trustees of the College Savings Plans of Nevada (the “Board”) and Ascensus College Savings Recordkeeping Services, LLC, the Program Manager of the Plan each receive an annualized Program Administration fee equal to 0.01% and 0.05%, respectively, accrued daily based on assets under management. The Board may change the Program Administration fee plan without prior notice.

Other Fees and Costs: Certain clients may pay other fees or expenses to third parties, including an affiliate of Wealthfront Advisers.

- Third-party fees include expense ratios, which cover the total annual operating expenses of an ETF or fund. Expense ratios are expressed as a percentage of a fund’s average net assets and will vary depending on the portfolio allocations in your Investment Account. You can see the expense ratios for the ETFs and other funds in your Investment Account by logging into your Wealthfront user account. Wealthfront Advisers does not receive any compensation related to expense ratios.
- Wealthfront Brokerage offers a margin lending product called Portfolio Line of Credit (“PLOC”), which is offered to Clients who have invested in a fully discretionary, taxable account and who meet other minimum account thresholds. Wealthfront Brokerage charges interest on the funds borrowed under a PLOC for the time that the loan is outstanding. Please see [Item 8. of our Client Brochure](#) and Wealthfront Brokerage’s [Margin Handbook](#) for more information on PLOC and risks associated with the product.

Additional information: You’ll pay fees whether you make or lose money on your investments. Those fees will reduce the amount of money you make on your investments over time. Please make sure you understand the fees you’re paying. For more information on fees for our investment services, see [Item 5.A. of our Client Brochure](#).

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

We do not provide recommendations as your broker-dealer. *When we act as your investment adviser*, we have to act in your best interest and put your interests ahead of our own. In some cases, the way we make money may create a conflict of interest. Some examples of potential conflicts you should understand include:

- Client Referrals and other compensation: Wealthfront Advisers runs promotional campaigns to encourage Clients to open accounts on the Wealthfront website. As a result, participating Clients will receive promotional benefits for successfully referring new Clients to Wealthfront Advisers. These campaigns may create an incentive for third parties or other existing Clients to refer prospective Clients to Wealthfront Advisers, even if they would not otherwise make such a referral. Account opening incentives do not influence the way we manage our Clients’ accounts. Additionally, Wealthfront Brokerage may provide Wealthfront Advisers’ Clients compensation as a promotional offer to open accounts at Wealthfront Brokerage. These arrangements are fully disclosed on [Item 14. of our Client Brochure](#).
- Portfolio Line of Credit: PLOC is a margin loan product Clients can use to access credit from Wealthfront Brokerage using their portfolio as collateral. This may present a conflict of interest because Wealthfront Brokerage can force the sale of assets in your account(s), but we believe the amount by which your portfolio must decline for this to happen is highly unlikely. You can read more about PLOC [here](#), in our Margin Handbook.
- Securities Lending Program: Clients choosing to participate in this program (“Participants”) incur no direct cost or fee. Clients will receive 50% of the net compensation¹³ generated from lending activities. The remaining 50% is shared between Wealthfront Brokerage and Wealthfront Advisers, with each receiving 25% of the net compensation. Compensation will be paid on a monthly basis. Since Wealthfront Advisers and Wealthfront Brokerage will also receive compensation in connection with loans under this program, Wealthfront Advisers has a financial incentive to approve Participants for the Securities Lending Program. In addition to sharing the financial incentive to earn compensation along with Clients, Wealthfront Advisers mitigates this conflict by only recommending participation in the Securities Lending Program to clients for whom it is suitable.
- To further minimize conflicts of interest, we do not employ individual advisors or brokers to sell our products. For more information, see [Items 10. and 14. of our Client Brochure](#).

How do Wealthfront Advisers’ or Wealthfront Brokerages’ financial professionals make money?

Our investment advisory services are managed by software. We do not pay financial professionals or advisors sales or asset-based compensation.

Item 4. Disciplinary History

Do you have legal or disciplinary history?

Yes. For more information, see [Item 9. of our Client Brochure](#). You may also research us for free at investor.gov/CRS.

Item 5. Additional information

¹² See [Item 5.A. of our Client Brochure](#) for more information about advisory fees paid in relation to the Stock Investing Accounts.

¹³ Net compensation refers to compensation by third-party borrowers to Wealthfront Brokerage for securities loans, minus a portion paid to Sharegain Securities Inc., a registered broker-dealer, which acts as lending agent to Wealthfront Brokerage.

You can find more information about our investment advisory or brokerage services and obtain a copy of this Form CRS at <https://www.wealthfront.com/legal> or by emailing support@wealthfront.com.

How do I contact Wealthfront Advisers or Wealthfront Brokerage for questions/complaints I may have or if I need technical assistance? Please email us at support@wealthfront.com or call us at 844-995-8437.