

Astor Investment Management LLC - Customer Relationship Summary

Form ADV, Part 3 – Form CRS

February 28, 2021

Item 1. Introduction

Astor (“Astor”) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment adviser, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

We primarily offer investment advisory services to retail investors by providing our portfolios to wrap fee programs and acting as the adviser to mutual funds. Your financial representative will determine which of our investment products is appropriate for your investment objectives and financial situation. Additionally, we sponsor a wrap fee program where we provide portfolios through an online interface. For this program, we will suggest portfolios based on your answers to a risk questionnaire.

Monitoring

When we are a third-party manager, we monitor the securities in your account on a daily basis, but we do not monitor the investments as they relate to your specific financial situation due to the limitations of the relationship structure.

When we offer our investment services directly to you, we will monitor your portfolio on a daily basis and require you to periodically update us regarding your financial situation so we can offer the appropriate portfolio for you.

Investment Authority

Our clients grant us discretionary authority to manage their accounts, which means we can purchase and sell investments on behalf of our clients without seeking permission for each trade. Discretionary authority allows us to choose the timing of trades, broker-dealer used, fees, and securities. Certain arrangements do not allow us to direct trades to a broker-dealer other than the one holding your account.

Limited Investment Offering

We only offer our proprietary investment portfolios and do not provide advice on other investments.

Account Minimums and Other Requirements

The required minimum of investible assets to invest in our portfolios will vary depending on the type of account and/or the agreement in place. Generally, we require a minimum of \$100,000 for separate managed accounts to utilize our strategies within wrap fee program sponsored by other firms. We do not require a minimum to invest in the wrap fee program we sponsor.

More Additional information about Astor services is available on Part 2 of our Form ADV, which is available at <https://astorim.com/download/form-adv-part-2/>.

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 Standards of Conduct

A. What fees will I pay?

We charge clients an investment management fee based on the value of each client’s assets under management. Fees are negotiable and range between 0.30% and 0.50% annually, depending on the size and structure of each client’s accounts. Fees are charged either monthly or quarterly, depending on the contractual arrangement. The fee will be calculated using the value of your account at the end of the billing period or the value at the start of the period if billed in advance. For partial billing periods, the management fee will be prorated according to the number of days we provided services. In addition to our management fee, clients typically pay a bundled fee to the broker-dealer, investment adviser, or bank that maintains the account. This bundled fee, also called a “wrap fee”, generally consists of custody, transaction, and maintenance fees. Certain client arrangements will also pay a \$100 annual fee to cover administrative costs such as mailing and paperwork.

Clients who participate in our sponsored wrap program will pay an annual wrap fee of 0.72% that is charged monthly based on the value of assets in each client’s account at the end of a month. If you choose to have certain reporting or custodial services in addition to those provided under the wrap fee program such as the delivery of paper statements, you will be charged additional fees.

Our firm's fees generally increase as client accounts grow, so we have an incentive to encourage our clients to increase the amount of assets in the accounts that are under our management. Additional information about our firm's fees are included in Item 5 of Part 2 of Form ADV, available at <https://astorim.com/download/form-adv-part-2/>.

Our firm primarily utilizes ETFs for clients' portfolios. Such investment vehicles pay their own management, transaction, and administrative fees and expenses, and those fees and expenses are indirectly borne by the investors in those vehicles, including our clients. Additionally, Astor may execute trades with a broker-dealer different than the one maintaining your account. In this scenario where Astor trades away, there may be additional fees such as brokerage commissions which are not covered by the wrap fee.

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.

Conversation Starter. 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?**

B. 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 to you. Here are some examples to help you understand what this means.

- We manage portfolios and investment products with different fee schedules such as separate managed accounts and mutual funds. We have an incentive to recommend the products with the highest fee.
- We earn a fee based on the amount of money invested in our portfolios. We have an incentive to recommend clients invest more assets with us.

Conversation Starter. Ask your financial professional—

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

More Additional information about conflicts of interest between Astor and its clients is available on Part 2 of our Form ADV, which is available at <https://astorim.com/download/form-adv-part-2/>.

How do your financial professionals make money?

Astor's financial professionals generally receive a salary and an annual discretionary bonus. Certain individuals may have different compensation structures including arrangements where they are paid an amount based on the assets or revenue generated by their activities. Astor and its financial professionals have an incentive to receive more assets from clients which can create a conflict of interest. The amount you invest with Astor should be discussed with your financial professional as it relates to your individual financial situation.

Item 4. Disciplinary History

Do your financial professionals have legal or disciplinary history?

Yes

No

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

Conversation Starter. Ask your financial professional—

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

Item 5. Additional Information

Additional information about our services can be found at <https://astorim.com/download/form-adv-part-2/>. If you have any questions about the contents of this brochure or would like to request a copy of this relationship summary, please contact call 800-899-8230.

Conversation Starter. 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?**