

Steady Returns, LLC
Form CRS/Customer Relationship Summary
Effective June 29, 2021

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| Introduction | <p>Steady Returns, LLC (the "Firm") is a limited liability company formed under Florida law and is registered as an investment adviser with the Securities and Exchange Commission ("SEC") pursuant to the Investment Advisers Act of 1940. 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, which also provides educational materials about broker-dealers, investment advisers, and investing.</p> |
| <p>What investment services and advice can you provide me?</p> | <p>We offer investment advisory services to retail investors, including high net worth individuals.</p> <p>If you engage us to provide ongoing monitoring of your portfolio, we will assist you in matching your goals and risk tolerance to a custom portfolio that addresses your specific needs. We will discuss your investment goals, design with you a strategy to achieve your investment goals, and regularly monitor your portfolio. We will contact you (by phone or email) at least annually or as required to discuss your portfolio. You will complete an investment policy that is designed to capture an initial picture and evaluation of your current financial situation. Our services will be on a discretionary basis, which means that buy and sell decisions are made by us.</p> <p>For additional information, please see Form ADV, Part 2A Brochure (Items 4 and 7 of Part 2A) and other applicable documents.</p> <p><i>Questions to Ask Us:</i></p> <ul style="list-style-type: none"> • 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? |
| <p>What fees will I pay?</p> | <p>Asset-based fees. This fee is charged in advance at the beginning of each quarter. It is based on the total value of your account on the last business day of the previous quarter. The asset-based fee reduces the value of your account. The fee will be deducted from your account, and our annual fee does not exceed 1.25%. The amount you pay will depend on the size, complexity, and nature of the portfolio that we manage for you and the services that you receive.</p> <p>Performance-based fees. This fee is charged in arrears. It is calculated by multiplying 15% times the profits of the previous quarter, to the extent the profits exceed a certain level (known as a High Water Mark).</p> <p>Our fees are separate from charges assessed by third parties, such as broker-dealers, custodians, mutual fund companies, variable annuities, and separate investment advisers. These third-party costs are in addition to our fees and are not shared with us.</p> <p>You will pay costs and asset-based fees whether you make or lose money on your investments. (You will only pay performance-based fees if your account goes up in value.) 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.</p> <p>For additional information, please see Form ADV, Part 2A Brochure (Item 5 of Part 2A).</p> |

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| | <p>Questions to Ask Us:</p> <ul style="list-style-type: none"> • 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? |
| <p>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?</p> | <p>When we act as your investment adviser, we must act in your best interest and not put our interests 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 affect the recommendations we provide to you. Here are some examples to help you understand what this means.</p> <p>The Firm may use a broker-dealer that provides benefits, including products and services, that assist the Firm in administering client accounts. As a result, this may provide an incentive for the Firm to recommend this broker-dealer because of the benefits to the Firm instead of being in the best interests of the client.</p> <p>Because the Firm charges some accounts a fee based on profits, those accounts may be charged more or less than if they were charged an asset-based fee. As a result, the Firm potentially has a conflict of interest with regard to accounts being charged a performance-based fee.</p> <p>For additional information, please see Items 10-12 on Form ADV, Part 2A Brochure.</p> <p>Questions to Ask Us:</p> <ul style="list-style-type: none"> • How might your conflicts of interest affect me, and how will you address them? |
| <p>How do your financial professionals make money?</p> | <p>When we act as your investment adviser, we have a fiduciary duty to place the interest of our clients ahead of our own and our Firm. Note that the Firm's revenue is from the advisory fees that we collect from clients' accounts each quarter. Our Financial Professionals are owners of the Firm and share in the Firm's profits and losses.</p> |
| <p>Do you or your financial professionals have legal or disciplinary history?</p> | <p>Yes. You can visit Investor.gov/CRS for a free and simple search tool to research us and our Financial Professionals ("FPs").</p> <p>For additional information, please see Item 9 in Form ADV, Part 2A Brochure; or for the FPs, Items 14 A-M in Form U4, and Items 7A or C-F in Form U5.</p> <p>We are held to a fiduciary standard that covers our entire investment advisory relationship with you.</p> <p>Questions to Ask Us:</p> <ul style="list-style-type: none"> • As a financial professional, do you have any disciplinary history? For what type of conduct? |
| <p>Additional Information</p> | <p>If you would like additional, up-to-date information or a copy of this summary, please call us at 800-798-2860, or view adviserinfo.sec.gov, under our CRD# 166834.</p> <p>Questions to Ask Us:</p> <ul style="list-style-type: none"> • 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? |