FOREM INVESTMENTS, LLC

CRD#169636

FORM ADV PART 2A - BROCHURE

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This Brochure provides information about the qualifications and business practices of Forem Investments, LLC ("Forem" or the "Adviser"). If you have any questions about the contents of this Brochure, please contact Forem's Chief Compliance Officer, Freddy Martinez at telephone number (305) 462-4267 and/or by email at fmartinez@foremg.com

The information in this Brochure has not been approved or verified by any state or federal securities authority.

Registration of an investment adviser does not imply any level of skill or training. The oral and written communications received from an adviser provide you with information about which to utilize in determining to hire or retain an investment adviser.

Additional information about Forem also is available on the SEC's website at www.adviserinfo.sec.gov.

July 1, 2026

Item 2 – Material Changes

Item 1 - has been updated to reflect the current date of this brochure.

Item 10 – Has been amended to disclose Mr. Martinez's service as an independent director of Lionheart Holdings and to update the percentage of time devoted to Forem Capital Partners LLC.

Form ADV Part 2B, Item 4 – Has been amended to disclose Mr. Martinez's outside business activity as a Class III Director of Lionheart Holdings and to update the percentage of time devoted to Forem Capital Partners LLC.

Form ADV Part 2B, Item 5 – Has been amended to disclose that Mr. Martinez may receive compensation in connection with his service as a director of Lionheart Holdings.

The following changes were previously reported in the brochure dated December 31, 2025 and are carried forward: Item 4 was amended to include assets under management as of December 31, 2025 and to include the use of Technology and Artificial Intelligence; Item 8 was amended to include specific disclosures related to the use of artificial intelligence.

You will receive a summary of any material changes to subsequent Brochures within 120 days of the close of our business's fiscal year, which is December 31 of each year. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure may be requested by contacting us at telephone number (305) 462-4267 and/or by email at fmartinez@foremg.com

Additional information about Forem is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Forem who are registered, or are required to be registered, as Investment Adviser Representatives ("IARs") of Forem.

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Item 4 – Advisory Business

General

Forem is a limited liability company duly organized under the laws of the State of Florida on October 25, 2013. Forem's principal owner is Freddy Martinez (CRD No. 1726400). Forem offers the following services to advisory clients:

Investment Advisory Services

Adviser provides investment advisory services to its clients through various types of discretionary and non-discretionary accounts in accordance with each client's investment objectives. Investment activities focus on investments in various kinds of assets and securities in a variety of markets that is intended to fit within the client's objectives, strategies and risk profile as described by each client.

Forem offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Forem creates an Investment Policy Statement for each client, which outlines the client's current investment profile (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Policy Statement may include, but not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Forem evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client. Accounts may focus on investments in specified and limited kinds of assets and securities, in limited markets, or they may be broad-based across many asset classes and markets. Such accounts are intended to fit within the investor's objectives, strategies and risk profile as described by each client. The strategies utilized for these customized accounts may be similar to or may vary widely from the core strategies typically utilized by the Adviser, as further described in Item 8. Clients may place targets on these accounts and may restrict the types of investments made in such accounts.

As an investment adviser, Forem provides portfolio management and administrative services to client accounts (the "Accounts"), including investigating, analyzing, structuring and negotiating potential investments, monitoring the performance of investments and advising the Accounts as to the disposition of investment opportunities.

Adviser provides investment advisory services to Adviser's clients through the management of investment portfolios in accordance with the objectives, guidelines and risk profiles of individual clients. Clients provide such information to Adviser at or before the time they enter into an advisory agreement with Adviser.

Other Services

The Adviser may provide additional services to clients as negotiated with each client and Adviser may charge a fee that would be negotiated with the client.

Additional General Information

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) may be recommended to clients or engaged directly by the client on an as-needed basis. Conflicts of interest related to the recommendations of other professionals will be disclosed to the client in the event they should occur. Additionally, Forem's client agreements may not be assigned without client consent.

Investment Restrictions

Adviser offers an array of services and clients can select among the services that the client and the Adviser feel are suited for the client. Clients may impose reasonable restrictions on the management of their accounts, including by restricting particular securities or types of investments. Clients should be aware that the performance of restricted accounts may differ from performance of accounts without such impediments, possibly producing lower overall results.

Use of Technology and Artificial Intelligence

The Firm utilizes certain technology tools, including artificial intelligence ("AI") and machine-learning based applications, to assist in the delivery of its advisory services. These tools may be used to support portfolio analysis, investment research, risk assessment, and the preparation of portfolio allocation recommendations and client proposals.

These AI tools analyze financial data, market information, investment characteristics, and other inputs to assist the Firm in evaluating potential investment strategies and portfolio allocations.

AI tools are used solely as analytical and support tools. All investment recommendations, portfolio allocations, and client proposals are reviewed and approved by the Firm's investment adviser representatives prior to being provided to clients. The Firm maintains full responsibility for all investment advice provided to clients.

The Firm does not rely solely on automated systems or algorithms to provide investment advice. All client recommendations are subject to professional judgment, review, and oversight by qualified personnel.

Assets Under Management

Forem Investments LLC has a total of $60,978,728 in Assets Under Management ("AUM") as of December 31, 2025.

Item 5 – Fees and Compensation

Basic fee schedule:

Advisers typically receive an annual management fee, between 0.50% and 1.50% for both Discretionary and Non-Discretionary Accounts. Advisers may enter into flat fee arrangements from time to time, typically for administrative services provided to clients or client Accounts. Adviser may also provide sub-advisory and administrative services for a flat fee based upon actual cost, which is outlined and established via sub-advisory/administrative services agreement. All fees are negotiable.

The specific manner in which fees are charged by Adviser is established in each client's written agreement with Adviser. Generally, and pursuant to contract, fees for the management of Accounts will be based upon a percentage of the total assets in the account (including margined assets).

Other Fees:

Fixed Fees

Forem Investments may also provide Advisory and Portfolio Management Services to Small Businesses and Institutional Clients. In some cases, these clients are required to pay only fixed fees to third party Advisers, such as Forem Investments. Fees for these Clients are based on the scope of each project and discussed with and approved by the client in writing.

Hourly Fees

Certain advisory services may be billed at an hourly rate, at the request of the client. An Hourly Fee Schedule will be provided to the client prior to the engagement. The standard Hourly Fee is $450.00/hr.

Performance Fees

Forem Investments LLC may charge a Performance Fee, in addition to Management Fees, to certain Qualified Clients as defined in SEC Rule 205-3. This fee will be a percentage of any gains in the client account during that period, to be determined with each specific client but never to surpass 20% of the performance per quarter.

Calculation and Deduction of Advisory Fees

With respect to accounts that Adviser manages on a discretionary basis, including the specialized discretionary programs, clients are generally required to authorize Adviser to directly debit management fees from client accounts quarterly. Fees for investment advisory services and other non-discretionary programs are billed to clients, although frequently clients pre-authorize their custodians to automatically deduct the fees from the client's account and to make payment to Adviser. Management fees are deducted or billed, as applicable, quarterly.

A client may pay more or less fees than similar clients depending on the particular circumstances of the client, size, additional or differing levels of servicing or as otherwise agreed with specific clients. Clients that negotiate fees, including a flat fee, may end up paying a higher fee than that set forth above as a result of fluctuations in the client's assets under management and account performance.

In the event the Adviser bills fees in advance, refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the quarter up to and including the day of termination. (*The daily rate is calculated by dividing the quarterly AUM fee by

the number of days in the termination quarter). Clients may terminate their contracts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

CURRENT FEE SCHEDULE

AUM's	FEE
<$1,000,000	1.50%
$1,000,001 to $10,000,000	1.25%
$10,000,001 to $50,000,000	1.00%
>$50,000,001	0.50%

Additional Fee Information

Clients may authorize the Adviser to directly debit management fees from client accounts on a quarterly basis. In such instances, management fees are prorated for each contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee.

Alternatively, in some instances, clients may receive an invoice for fees, in which it may choose to pay Forem directly for its billed fees for the relevant period.

Adviser's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred directly by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by fund managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic funds fees, and other fees and taxes on brokerage account and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. It is the Adviser's policy not to accept "kick-backs" or retrocession fees from any third non-affiliated party providing services to the Adviser's clients.

Termination of the Agreement

Although an Agreement between Forem and its clients are ongoing agreements, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party with a (30) thirty-day advance notice or as agreed upon otherwise between the client and the Adviser.

If an agreement is terminated during a period in which the client has already paid Forem its advisory fees in advance, then the Adviser will reimburse, on a pro-rated basis, the remaining advisory fees collected for any service not rendered; these fees will be sent to the client's address of record, unless otherwise directed by the client, within (30) days of termination of the agreement.

Item 6 - Performance-Based Fees and side-by-side management

Performance Fees

Qualified clients, as defined by Rule 205-3 of the Investment Adviser's Act, may enter into advisory agreements where the Firm is entitled to a performance fee as part or all of its compensation. Qualified clients must meet the following requirements: (a) have at least $1,000,000 in under management with the adviser; or (b) have a net worth of at least $2,100,000 in order to enter into performance-based compensation agreements with Forem Investments LLC. Suitability will be determined through the use of a detailed suitability questionnaire and follow up due diligence inquiries. The Firm at its sole discretion, may reject any client application where the above financial standards are not met and/or where it reasonably believes the investor lacks the necessary financial sophistication, who purport to not fully understand the Firm's method of compensation and the nature of its risks, or who are otherwise deemed to be unsuitable for such an arrangement.

In addition to the Management Fee, the Firm may receive a Performance Fee based upon any gains obtained in the client's account for the quarter. This fee will be a percentage of any gains in the client account during that period, to be determined with each specific client but never to surpass 20% of the performance per quarter.

Accounts that Forem Investments LLC currently manages may charge both a performance-based fee and a management fee. Because not all accounts are charged consistently, the performance-based fee arrangements may create an incentive for Forem Investments LLC to favor certain accounts over other accounts. Performance based fee arrangements may create an incentive for Forem Investments LLC to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements may also create an incentive to favor higher fee-paying accounts over other accounts in the allocation of investment opportunities. Forem Investments LLC has procedures designed and implemented to ensure that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients.

Currently, Forem does not have any agreements with Performance Fees.

Item 7 - Types of Clients

Forem provides asset and/or portfolio management services to high-net-worth individuals, corporations, institutions and other entities. The minimum dollar value for establishing an Account is generally $1,000,000. Initial investments of a lesser amount may be accepted at Adviser's discretion.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

General Investment Strategies and Methods of Analysis

Adviser has arrangements with third party service providers through which Adviser receives general macroeconomic analyses of economies, currencies, markets and market sectors. Such third-party service providers also provide research reports on specific securities, sample asset allocations and administrative services. Adviser uses such information and services as a tool and Adviser also performs its own research and due diligence on advisers and investment opportunities. Adviser makes investment allocation decisions based on each client's investment objectives and risk tolerance, among other factors. Adviser identifies, structures, monitors, invests and liquidates investments in discretionary accounts. The design and day-to-day management of client portfolios is determined by Adviser through the assigned portfolio manager. Third party service providers utilized by the Adviser do not have access to or knowledge of information concerning the specific investment decisions and recommendations made to Adviser's clients.

Adviser seeks asset preservation and capital appreciation of clients' portfolios by customizing asset allocations and selecting investment vehicles that it believes will align with each client's short and long-term investment needs and goals. The asset class allocations forecasts and expectations are analyzed and invested in various financial instruments, typically include equity, fixed income, options and alternative investments. Adviser will select and monitor the investment vehicles for each asset class in the portfolios based on their history and prospective risk and return characteristics, and determine suitability for each client's needs, as well as, estimated fees and expense.

Material Risks for Significant Investment Strategies

While it is the intention of Adviser to implement strategies, which are designed to minimize potential losses suffered by its client, there can be no assurance that such strategies will be successful. It is possible that a client may lose a substantial proportion or all of its assets in connection with investment decisions made by Adviser. The following is a discussion of typical risks for Adviser's clients, but it does not purport to be a complete explanation of the risks involved with Adviser's investment strategies.

There is no guarantee that in any time period, particularly in the short term, a client's portfolio will achieve appreciation in terms of capital growth or that a client's investment objective will be met by Adviser.

The value of the securities in which Adviser invests on behalf of its clients may be volatile. Price movements may result from factors affecting individual companies, sectors or industries that may influence certain strategies or the securities market as a whole. Furthermore, a client will be subject to the risk that inflation, economic recession, changes in the general level of interest rates or other market conditions over which Adviser will have no control may adversely affect investment results.

Adviser notes that while Adviser's management of accounts may not involve direct leveraging, or other risk factors discussed below, the underlying funds and other investments that comprise client accounts may engage in practices that can materially impact the performance of such fund or investment, which in turn may materially impact the value of Adviser's clients' portfolios.

Hedging transactions may increase risks of capital losses

Adviser utilizes hedging strategies primarily to protect and preserve capital as well as yield enhancement. Investment products in which Adviser invests clients' accounts may utilize a variety of financial instruments, such as options, for risk management purposes. While hedging transactions may seek to reduce risk, such transactions may result in a worse overall performance. Certain risks cannot be hedged, such as credit risk, relating both to particular securities and counterparties. Adviser will not always invest in funds or other investment vehicles that utilize hedging strategies.

Leverage

Adviser does not utilize leverage under its current strategies. Forem, however, reserves the right to engage in leveraged strategies.

Liquidity of investment portfolio

The market for some securities in which Adviser invests indirectly on behalf of its clients may be relatively illiquid. Liquidity relates to the ability to sell an investment in a timely manner. The market for relatively illiquid securities tends to be more volatile than the market for more liquid securities. Investments in relatively illiquid securities may restrict the ability of a fund or portfolio manager to dispose of investments at a price and time that it wishes to do so. The risk of illiquidity also arises in the case of over-the-counter transactions. There is no regulated market in such contracts and the bid and offer prices will be established solely by dealers in these contracts. Client accounts that are invested in funds or other instruments that contain illiquid investments may be subject to these risks.

Foreign currency markets

Adviser's investment strategies may cause a client to be exposed to fluctuations in currency exchange rates where it invests directly or indirectly in securities denominated in currencies other than U.S. dollars. Adviser may from time-to-time engage in direct foreign currency transactions. However, the underlying funds and other investment vehicles may engage in direct foreign currency trading. The markets in which foreign exchange transactions are effected are highly volatile, highly specialized and highly technical. Significant changes, including changes in liquidity and prices, can occur in such markets within very short periods of time, often within minutes. Foreign exchange trading risks include, but are not limited to, exchange rate risk, interest rate risk and potential interference by foreign governments through regulation of local exchange markets, foreign investment, or particular transactions in foreign currency.

Derivatives

Adviser's investment strategy may cause a client to be exposed to derivatives including instruments and contracts the value of which is linked to one or more underlying securities, financial benchmarks or indices. Derivatives allow an investor to hedge or speculate upon the price movements of a particular security, financial benchmark, index, currency or interest rate at a fraction of the cost of investing in the underlying asset. The value of a derivative depends largely upon price movements in the underlying asset. Therefore, many of the risks applicable to trading the underlying asset are also applicable to derivatives trading. However, there are a number of other risks associated with derivatives trading. For example, because many derivatives provide significantly more market exposure than the money paid or deposited when the transaction is entered into, a relatively small adverse market movement can result not only in the loss of the entire investment but may also expose a client to the possibility of a loss exceeding the original amount invested.

Settlement risks

Adviser's investment strategies may expose a client to the credit risk of parties with whom Adviser, on behalf of the client or the underlying funds, trades and to the risk of settlement default. Market practices in the emerging markets in relation to the settlement of securities transactions and custody of assets will provide increased risk. Although the emerging markets have grown rapidly over the last few years, the clearing, settlement and registration systems available to effect trades on such markets are significantly less developed than those in more mature world markets which can result in delays and other material difficulties in settling trades and in registering transfers of securities. Problems of settlement in these markets may affect the net asset value and liquidity of a client's portfolio or investments in such portfolios.

Emerging Markets

Adviser's investment strategies include direct and indirect investments in securities in emerging markets and such investments involve special considerations and risks. These include a possibility of nationalization, expropriation or confiscatory taxation, foreign exchange control, political changes, government regulation, social instability or diplomatic developments which could affect adversely the economies of such countries or the value of a client's investments, and the risks of investing in countries with smaller capital markets, such as limited liquidity, price volatility, restrictions on foreign investment and repatriation of capital, and the risks associated with emerging economies, including high inflation and interest rates and political and social uncertainties. In addition, it may be difficult to obtain and enforce a judgment in a court in an emerging country. The economies of many emerging market countries are still in the early stages of modern development and are subject to abrupt and unexpected change. In many cases, governments retain a high degree of direct control over the economy and may take actions having sudden and widespread effects. Investments in products of emerging market may also become illiquid which may constrain Adviser's ability to realize some or all of a client's portfolio holdings. Accounting standards in emerging market countries may not be as stringent as accounting standards in developed countries.

Investment Concentration

Some client accounts may have a high concentration in one sector, industry, issuer or security that may subject such accounts to greater risk of loss in the event such investments take an economic downturn.

Material Risks for Particular Types of Securities

The Adviser does not invest in a specific security or product type. The material risks involved with investing are described above.

Technology and Artificial Intelligence Assisted Analysis

As part of its investment research and portfolio management process, the Firm may use analytical tools that incorporate artificial intelligence, quantitative modeling, and data analysis technologies. These tools may be used to assist in:

- portfolio optimization and asset allocation analysis
- investment research and screening
- financial modeling and scenario analysis
- evaluation of investment strategies

- preparation of investment proposals and client reporting

The Firm's investment professionals review and evaluate the outputs generated by these tools before any recommendations are made to clients.

Risks Associated with AI-Assisted Analysis

The use of technology and artificial intelligence in investment analysis involves certain risks, including:

Data Quality Risk

AI tools rely on data inputs that may be inaccurate, incomplete, or outdated. Incorrect or incomplete data could lead to flawed analysis or recommendations.

Model Risk

AI models and algorithms may produce results that are based on assumptions or correlations that may not hold true in changing market conditions.

Technology Risk

AI systems may experience operational errors, system failures, or interruptions that could affect the Firm's ability to analyze investments or generate reports.

Over-Reliance Risk

Although the Firm reviews all outputs generated by AI tools, there is a risk that automated analyses may influence investment decision-making.

Third-Party Technology Risk

Some AI tools used by the Firm may be provided by third-party vendors. The Firm performs reasonable due diligence on these providers; however, the Firm cannot control the underlying technology or systems used by such providers.

Adviser Oversight

The Firm maintains oversight and supervisory procedures regarding the use of AI tools within its advisory process. These procedures are designed to ensure that:

- AI tools are used only as analytical support tools
- recommendations are reviewed by qualified advisory personnel
- client suitability considerations are applied to all investment recommendations
- the Firm retains full responsibility for advice provided to clients

No Automated Investment Advice

The Firm does not provide fully automated investment advice or algorithm-based portfolio management services without human review. All advice provided to clients involves review and oversight by the Firm's investment professionals.

Item 9 - Disciplinary Information

Investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an adviser or the integrity of the adviser's management. Adviser has no information applicable to this Item. Please visit www.adviserinfo.sec.gov at any time to view Forem's registration information and any applicable disciplinary action.

Item 10 - Other Financial Industry Activities and Affiliations

Neither Forem nor its management persons are registered, or have an application pending to register, as a broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor. Forem has no affiliated advisers or other financial industry affiliations. Mr. Martinez's outside business activities are described below.

Forem Capital Partners LLC

Mr. Martinez is a Managing Member of Forem Capital Partners LLC, a Florida limited liability company registered in September 2015 as a consulting firm specializing in capital restructuring for businesses. This activity is not investment-related and shares an address with Forem. Mr. Martinez dedicates approximately 10% of his time to this company.

Lionheart Holdings

Since June 2026, Mr. Martinez has served as a Class III Director of Lionheart Holdings, a real estate investment firm based in Miami, Florida. He serves as an external, independent director and is not an officer or employee of that company. The role requires approximately five (5) hours per month. This activity is not conducted through Forem, and Lionheart Holdings is not a client of Forem. Mr. Martinez may receive compensation for his service in this role.

Conflicts of Interest and Mitigating Procedures

This role may present conflicts of interest: Mr. Martinez may receive material, non-public information as a director, and compensation from an outside entity creates an incentive that could, absent controls, influence the advice given to clients. Forem addresses these conflicts as follows. The activity was approved in advance by the Chief Compliance Officer, is reported on Forem's Form ADV Part 1 and is reviewed not less than annually. Securities of Lionheart Holdings are placed on a restricted list; Forem does not recommend, solicit or effect transactions in them for client accounts. Personal transactions in Lionheart Holdings securities by Mr. Martinez and other supervised persons are subject to pre-clearance. Forem's insider trading policies apply to any material, non-public information so received, and Mr. Martinez will recuse himself from any Forem decision involving Lionheart Holdings or any counterparty as to which he holds such information. Any compensation Mr. Martinez receives from Lionheart Holdings is paid to him personally, is not derived from client assets or advisory fees, and does not increase the fees paid by any Forem client.

At all times, Forem and its supervised persons owe a fiduciary duty to place the interests of clients ahead of their own. Clients are under no obligation to engage in any transaction with, or invest in the securities of, any entity with which Mr. Martinez is affiliated.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics and Personal Trading Policies

Adviser has adopted the Code of Ethics pursuant to Rule 204A-1 of the Advisers Act in an effort to prevent violations of federal securities laws. Adviser expects all employees to act with honesty, integrity and professionalism and to adhere to federal securities laws.

All officers, directors, partners and employees of the Adviser and any other person who provides advice on behalf of Adviser and is subject to Adviser's control and supervision (collectively referred to as "Supervised Persons") are required to adhere to the Code.

Prevention of Insider Trading

Adviser has adopted policies designed to prevent insider trading that is more fully described in the Code. Adviser's policy on insider trading applies to securities trading and information handling by all Supervised Persons of Adviser (including spouses, minor children and adult members of their households and any other relative of a Supervised Person on whose behalf Supervised Person is acting) for their own account or the account of any client of Adviser.

Adviser takes its obligation to detect and prevent insider trading with the utmost seriousness. Adviser may impose penalties for breaches of its policies and procedures, even in the absence of any indication of insider trading. Depending on the nature of the breach, penalties may include a letter of censure, profit "give ups," fines, referrals to regulatory and self-regulatory bodies and dismissal.

Where a Supervised Person serves as a director or officer of a public or private company, the Adviser maintains procedures reasonably designed to prevent the misuse of material, non-public information obtained in that capacity, including restricted lists, pre-clearance requirements and recusal from related investment decisions.

Personal Securities Transactions

Periodic Reports

As more fully described in the Code, "access persons" are required to submit reports detailing their personal securities holdings to the Chief Compliance Officer on an initial basis, a quarterly basis, and an annual basis.

As an alternative to submitting quarterly transaction reports, Adviser requires persons who are "access persons" to submit brokerage statements or trade confirmations as long as such documents contain the information required under Rule 204A-1(b)(2)(i)(A)-(E) under the Advisers Act.

Initial Public Offerings and Limited Public Offerings

Access Persons must obtain prior written approval from the Chief Compliance Officer before investing in initial public offerings ("IPOs") or limited offerings (i.e., private placements). In the event the Chief Compliance Officer wishes to purchase IPOs or the securities of a private placement for his own employee account, the Chief Compliance Officer must obtain prior written approval from the Adviser's Board Committee.

Review of Personal Securities Reports

The Chief Compliance Officer (or its designee) is responsible for reviewing the Access Person's Quarterly Transaction Reports as well as the Initial Holdings Report and the Annual Holdings Report as part of Adviser's duty to maintain and enforce its Code.

In instances when the Chief Compliance Officer has engaged in personal securities transaction, the Adviser's Board Committee shall review the Chief Compliance Officer's brokerage statements and trade confirmations.

Outside Business Activities and Private Investments of Employees

Unless otherwise consented by the Chief Compliance Officer, all employees are required to devote their full time and efforts to the Adviser's business. As such, no person may make use of either his position as an employee or information acquired during employment, or make personal investments in a manner that may create a conflict, or the appearance of a conflict, between the employee's personal interests and Adviser's interests. Accordingly, every employee is required to complete a disclosure form and have the form approved by Adviser's Chief Compliance Officer prior to serving in any outside capacities, including service as a director of any outside company, or making any of the investments more fully described in the Code. Approved outside business activities are reviewed by the Chief Compliance Officer not less than annually and are disclosed to clients in this Brochure and in the applicable Brochure Supplement.

Reporting Violations

All Supervised Persons (any officer, director, partner and employee of Adviser) are required to report actual or known violations or suspected violations of Adviser's Code promptly to the Chief Compliance Officer or his designee.

Any report of a violation or suspected violation of the Code will be treated as confidential to the extent permitted by law.

As part of Adviser's obligations to conduct an annual review of all of its policies and procedures pursuant to Rule 206(4)-7 of the Advisers Act, the Chief Compliance Officer shall review on an annual basis the adequacy of the Code and the effectiveness of its implementation.

Recordkeeping

Adviser maintains the following:

- Copies of the Code;
- Records of violations of the Code and actions taken as a result of the violations;
- Copies of Adviser's supervised persons' written acknowledgement of receipt of the Code;
- Records of Access Persons' personal trading — Initial Holdings Reports, Annual Holdings Reports, and Quarterly Transaction Reports, including any information provided under Rule 204A-1(b)(3)(iii) in lieu of such reports, i.e., brokerage confirmations and transaction reports;
- A record of the names of Adviser's "Access Persons";
- Records of approved outside business activities of Supervised Persons and the annual review thereof;

- Records of decisions, and the reasons supporting the decision to approve an Access Person's acquisition of securities in initial public offerings or limited offerings; and
- Records of decisions, and the reasons supporting the decision to approve the Chief Compliance Officer's acquisition of securities in initial public offerings or limited offerings.

Acknowledgement of the Code

Each employee will execute a written statement certifying that the employee has (i) received a copy of Adviser's Code; (ii) read and understands the importance of strict adherence to such policies and procedures; and (iii) agreed to comply with the Code.

Training and Education

All Supervised Persons, i.e., all employees, are to receive training on complying with the Code on an annual basis as part of Adviser's annual employee compliance review meeting to ensure that all employees fully understand their duties and obligations and how to comply with the Policy's procedures.

Copies of Adviser's Code

A copy of Adviser's Code is available upon request. For a copy, please contact Adviser at (305) 462-4267.

Participation or Interest in Client Transactions and Associated Conflicts of Interest

Adviser has polices that require personnel who develop advice and recommendations for clients to render only disinterested and impartial advice to clients and to comply with other fiduciary obligations, including having an adequate basis in fact for all recommendations and an obligation to recommend only investments that are suitable for the particular client.

The potential conflicts of interest involved in any such transactions are generally governed by Adviser's Code. Pursuant to the stipulations of the Code, Adviser or a related person may buy or sell for itself securities that it also recommends to clients. The potential conflicts of interest involved in such transactions are governed by the Code, which establishes sanctions if its requirements are violated and requires that Adviser and employees place the interests of Adviser's clients above their own.

Investments in Securities by Adviser and its Personnel

Adviser's personnel or a related person of Adviser may invest in the same or similar securities and investments as those recommended to or entered into on behalf of Adviser's clients. The results of the investment activities of Adviser's personnel or related persons for their accounts may differ from the results achieved by or for client accounts managed by Adviser. The conflicts raised by these circumstances are discussed below.

Adviser may recommend or effect the purchase or sale of securities in which its related persons or an affiliate, directly or indirectly, has a position or interest, or of which related or affiliated person buys or sells for itself. Such transactions may also include trading in securities in a manner inconsistent with the advice given to Adviser's clients.

Activities and transactions for client accounts may be impaired or effected at prices or terms that may be less favorable than would otherwise have been the case had Adviser or related persons not pursued a

particular course of action with respect to the issuer of the securities. In addition, in certain instances Adviser's personnel may obtain information about the issuer that could limit the ability of such personnel to buy or sell securities of the issuer on behalf of client accounts.

Transactions undertaken by Adviser's clients may also adversely impact one or more client accounts. Other clients of the Adviser may have, as a result of receiving client reports or otherwise, access to information regarding Adviser's transactions or views that may affect their transactions outside of accounts controlled by Adviser, and such transactions may negatively impact other clients' accounts. A client's account may also be adversely affected by cash flows and market movements arising from purchase and sale transactions by, as well as increases of capital in and withdrawals of capital from, other clients' accounts. These effects can be more pronounced in less liquid markets.

The results of the investment activities of a client's account may differ significantly from the results achieved by Adviser's related persons and from the results achieved by Adviser for other client accounts.

As more fully described above, Adviser has adopted a Code of Ethics. Such Code of Ethics together with Adviser's policies and procedures restrict the ability of certain officers and employees of Adviser from engaging in securities transactions in any securities that its clients have purchased, sold or considered for purchase or sale, for an appropriate "black out" period. Other restrictions and reporting requirements are included in Adviser's procedures and Code of Ethics minimize or eliminate conflicts of interest.

Trading Alongside by Adviser and its Personnel

Client accounts managed by Adviser may trade in the same or similar securities at or about the same time as accounts managed or advised by affiliates of the Adviser. Investments by Adviser's affiliates and their clients may have the effect of diluting or otherwise disadvantaging the values, prices or investment strategies of a client's account, particularly in small capitalization, emerging market or less liquid strategies. This may occur when portfolio decisions regarding a client's account are based on research or other information that is also used to support portfolio decisions for Adviser's affiliates. If a portfolio decision or strategy for Adviser's affiliates' accounts or the accounts of clients of affiliates is implemented ahead of, or contemporaneously with, similar portfolio decisions or strategies for Adviser's client's account, market impact, liquidity constraints, or other factors could result in the account receiving less favorable trading results and the costs of implementing such portfolio decisions or strategies could be increased.

Errors

Errors may occur from time to time in transactions for client accounts. The Adviser will generally correct any such errors that are the fault of the Adviser or an affiliate at no cost to the client, other than costs that the Adviser deems immaterial. To the extent that the subsequent sale of such securities generates a profit to the Adviser, the Adviser may retain such profits, and may, but is not required to, use such profits to offset errors in the future or pay other client-related expenses. The Adviser will not be responsible for any errors that occur that are not the fault of the Adviser or any affiliate.

Privacy Policy

Adviser considers your privacy our utmost concern. Adviser does not share any information of clients with non-affiliated third parties, except such information may be disclosed as necessary to process a transaction an investor has requested, to the extent the investor specifically authorized the disclosure, to service providers or joint marketers who agree to limit their use of such information, and to the extent required or specifically permitted by law or reasonably necessary to prevent fraud, unauthorized transactions or liability.

When Adviser discloses non-public personal information of clients to a non-affiliated third party that provides services to Adviser or engages in joint marketing, Adviser shall:

- notify investors of the possibility of such disclosure; and
- enter into a contractual agreement with the third party that prohibits the third party from disclosing or using the investors' information other than to carry out the purposes for which the information was disclosed to the third party.

In particular, Adviser may enter, in compliance with the above conditions, into an agreement with a non-affiliated third party to store the records of Adviser clients and investors including electronic and e-mail records.

For more information about Adviser's privacy policies or to request a brochure describing Adviser's privacy policies contact Adviser at (305) 462-4267.

Item 12 - Brokerage Practices

As part of Forem's relationship with its clients, its Investment Advisory Agreement provides that client may restrict the discretion and direct brokerage to any broker. The Adviser is authorized in its Investment Advisory Agreement to select other securities brokers, unless the client directs otherwise in the Agreement.

Typically, Forem considers which broker-dealer will be able to effect the transaction efficiently. Additionally, the research and services provided by the broker-dealer with respect to the particular type of investment may be a factor in the selection process. The commissions payable to such broker-dealers may in certain cases be higher than those attainable from other broker-dealers who do not provide such research and services. Ordinarily, such research will be used to service all of the Adviser's accounts. Under the Adviser's standard Investment Advisory Agreement, the client can revoke the Adviser's authority to select the broker-dealer for the accounts.

It is the Adviser's policy not to enter into soft dollar arrangements. Adviser does not consider, in selecting or recommending broker-dealers, whether Adviser or a related person receives client referrals from such broker-dealer.

Brokerage for Client Referrals

Adviser does not direct brokerage to particular brokers in consideration for client referrals.

Item 13 - Review of Accounts

Accounts are typically reviewed by the Chief Compliance Officer or his designee on a quarterly basis or as needed due to market conditions or transactional activity. The Chief Compliance Officer typically reviews daily transactions entered into for investment advisory clients to determine that correct entries have been made for all client records. Additionally, accounts are reviewed on a periodic basis to assess overall performance, objectives and fees amongst other areas.

Factors Triggering a Review

There are no specific triggering factors leading to a review.

Client Reports

Clients of the Adviser with discretionary accounts receive quarterly reports from their qualified Custodian. The Adviser will also provide a performance report quarterly or as agreed between the Adviser and the client.

Item 14 - Client Referrals and Other Compensation

Forem, from time to time, receives client referrals, and such referrals often come from current clients, attorneys, accountants, employees, personal friends of employees and other similar sources. Furthermore, Forem does not currently accept referral fees or any form of remuneration from other professionals in relation to a referred prospect or client.

Item 15 - Custody

All assets are typically held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Therefore, aside from debiting fees from its clients' accounts to pay for services rendered, Forem does not maintain custody of its clients' funds. Clients receive monthly or quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains the client's investment assets.

Item 16 - Investment Discretion

Adviser receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Adviser observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Adviser in writing.

Item 17 - Voting Client Securities

Forem does not vote proxies on securities, however, the firm may, at the request of the client, provide advice on how to vote. Clients are expected to vote their own proxies.

Item 18 - Financial Information

The Adviser has no other financial commitments that impair its ability to meet contractual and fiduciary commitments to clients. Also, Firm has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State Registered Advisers

1. State Registered Advisers are required to identify each of their principal executive officers and management persons, and describe their formal education and business background:

Freddy Martinez – President & CEO

Freddy Martinez is the founder of Forem Investments LLC. Prior to starting the firm, Mr. Martinez had an extensive career as Financial Advisor in the International Private Banking sector.

Mr. Martinez is currently the Chief Executive Officer and Chief Compliance Officer of Forem. Prior to forming Forem, Mr. Martinez was a Portfolio Manager and Senior Vice President of Investments with UBS International. Mr. Martinez maintains over 25 years of industry experience and previously held the title of First Vice President with Merrill Lynch for approximately 19 years prior to joining UBS International. Mr. Martinez's clientele includes ultra-high net worth families, institutions and pension funds. Additionally, Mr. Martinez holds the Certified Financial Planner ("CFP") designation. Mr. Martinez also previously served as a producing manager during his tenure with Merrill Lynch. Mr. Martinez maintains a diverse background, previously holding various positions in Venezuela as a metal/commodities trader, quality control manager for the steel manufacturing industry and project manager for an engineering-based firm named, Techno Consult.

Mr. Martinez graduated from the Universidad Simon Bolivar in Caracas, Venezuela with a background in Mechanical Engineering. He obtained his Master of Business Administration (Finance concentration) from the Wharton School of Business and his Master of Science in Materials Engineering at the University of Pennsylvania simultaneously.

2. Other business activities of management persons are described in Item 10 above and in the Brochure Supplement (Form ADV Part 2B) that accompanies this Brochure. Mr. Martinez is a Managing Member of Forem Capital Partners LLC and serves as a Class III Director of Lionheart Holdings.

You may access Freddy Martinez' regulatory file at www.adviserinfo.sec.gov.

FORM ADV PART 2B - BROCHURE SUPPLEMENT

July 1, 2026

This brochure supplement provides information about the supervised persons listed below that supplement the Forem Investments, LLC Brochure. You should have received a copy of that brochure. Please contact Freddy Martinez, CEO, if you did not receive Forem Investments, LLC's brochure or if you have any questions about the contents of this supplement.

List of Supervised Persons

Freddy Martinez, Chief Executive Officer / Chief Compliance Officer

Michele Alessandro Di Carlo

Forem Investments, LLC
4000 Ponce de Leon Boulevard, Suite 470
Coral Gables, FL 33146
Telephone: (305) 462-4267
E-mail: fmartinez@foremg.com

Additional information about the above supervised persons is available on the SEC's website at www.adviserinfo.sec.gov.

Freddy Martinez, Chief Executive Officer, CFP

Item 2 - Educational Background and Business Experience

Mr. Martinez is currently the Chief Executive Officer and Chief Compliance Officer of Forem. Prior to forming Forem, Mr. Martinez was a Portfolio Manager and Senior Vice President of Investments with UBS International. Mr. Martinez maintains over 25 years of industry experience and previously held the title of First Vice President with Merrill Lynch for approximately 19 years prior to joining UBS International. Mr. Martinez's clientele includes ultra-high net worth families, institutions and pension funds. Additionally, Mr. Martinez holds the Certified Financial Planner ("CFP") designation. Mr. Martinez also previously served as a producing manager during his tenure with Merrill Lynch. Mr. Martinez maintains a diverse background, previously holding various positions in Venezuela as a metal/commodities trader, quality control manager for the steel manufacturing industry and project manager for an engineering based firm named, Techno Consult.

Mr. Martinez graduated from the Universidad Simon Bolivar in Caracas, Venezuela with a background in Mechanical Engineering. He obtained his Master of Business Administration (Finance concentration) from The Wharton School of Business and his Master of Science in Materials Engineering at the University of Pennsylvania simultaneously.

Item 3 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4 - Other Business Activities

Mr. Martinez is a Managing Member of Forem Capital Partners LLC, a Florida limited liability company registered in September 2015 as a consulting firm for businesses specialized in capital restructuring. This activity is not investment-related. Forem Capital Partners LLC maintains the same address as Forem Investments, LLC. Mr. Martinez dedicates approximately 10% of his time to this company.

Since June 2026, Mr. Martinez has served as a Class III Director of Lionheart Holdings, a real estate investment firm based in Miami, Florida. Mr. Martinez serves as an external, independent member of the board of directors and is not an officer or employee of that company. This activity requires approximately five (5) hours per month and is performed outside of securities trading hours. This activity is not conducted through Forem, and Lionheart Holdings is not a client of Forem.

Neither activity is expected to interfere with Mr. Martinez's responsibilities to Forem's advisory clients. Both activities have been disclosed to and approved by the Chief Compliance Officer and are subject to Forem's Code of Ethics. Securities of Lionheart Holdings are placed on a restricted list, and personal transactions in Lionheart Holdings securities are subject to pre-clearance. The conflicts of interest arising from these activities, and the procedures Forem uses to address them, are described in Item 10 of the Brochure (Form ADV Part 2A).

Item 5 - Additional Compensation

Mr. Martinez is not directly compensated for his work at Forem Capital Partners but, as a member, he receives annual dividends and an allocation of capital gains, if any.

Mr. Martinez may receive compensation in connection with his service as a Class III Director of Lionheart Holdings. Any such compensation is paid by Lionheart Holdings directly to Mr. Martinez, is not derived from client assets or advisory fees, and does not increase the fees paid by any Forem client. Mr. Martinez does not receive any economic benefit from any non-client for providing advisory services to Forem's clients.

Item 6 – Supervision

Individual(s) responsible for supervising the activities of Mr. Martinez is the CCO. Mr. Martinez can be reached at fmartinez@foremg.com

Forem has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Forem. Further, Forem is subject to regulatory oversight by various agencies. These agencies require registration by Forem and its employees. As a registered entity, Forem is subject to examinations by regulators, which may be announced or unannounced. Forem is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Outside business activities of supervised persons, including service as a director of an outside company, are pre-approved in writing by the Chief Compliance Officer and reviewed not less than annually.

Item 7 – Requirements for State-Registered Advisers

There are no legal, civil or disciplinary events to disclose regarding Mr. Martinez.

Mr. Martinez has not been a party to any bankruptcy proceedings.