

## Lombard Odier Transatlantic, Limited Partnership

("Lombard Odier Transatlantic" or the "Registrant")

### FORM ADV PART 2 and 2B – Brochure and Privacy Policy

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Member FINRA & SIPC

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## Item 1 Cover Page

This Brochure provides information about the qualifications and business practices of Lombard Odier Transatlantic, LP (“Lombard Odier Transatlantic” or the “Registrant”). If you have any questions about the contents of this Brochure, please contact us at 514. 847.7747. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Lombard Odier Transatlantic is a registered investment adviser. Registration as an investment adviser does not imply a certain level of skill or training.

Additional information about Lombard Odier Transatlantic is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Material Changes

Lombard Odier Transatlantic made the following material change to Item 5.

The non-discretionary investment management fee schedule was revised to reflect reduced fees of between ten and thirty five basis points at each asset breakpoint, and the discretionary investment management fee schedule was revised to reflect an increase of up to five basis points depending on the asset breakpoint (see also chart at Item 5 for current fee schedule). The breakpoints reduced from six to five ranges, and the minimum quarterly advisory fee was increased to \$2,500.

### Discretionary mandate

Ranges	Market value in \$US			Annual rates	Effective annual rates
Range 1	0	-	2,000,000	0.90%	
Range 2	2,000,000	-	5,000,000	0.70%	From 0.90 to 0.78%
Range 3	5,000,000	-	10,000,000	0.60%	From 0.78 to 0.65%
Range 4	10,000,000	-	20,000,000	0.50%	From 0.65 to 0.55%
Range 5	Over 20,000,000	-		0.40%	From 0.55%

### Non-discretionary mandate

Ranges	Market value in \$US			Annual rates	Effective annual rates
Range 1	0	-	2,000,000	0.50%	
Range 2	2,000,000	-	5,000,000	0.40%	From 0.50 to 0.44%
Range 3	5,000,000	-	10,000,000	0.35%	From 0.44 to 0.38%
Range 4	10,000,000	-	20,000,000	0.30%	From 0.38 to 0.33%
Range 5	Over 20,000,000	-		0.25%	From 0.33%

Additionally, the Registrant has replaced Andrew Kost, previously the Senior Portfolio Manager and Chairman of the Investment Committee, with Luc Desbiens, who took over Mr. Kost's responsibilities as of September 4th, 2012. Also, we have added Frederic Carbonnier as a new Senior Relationship Manager to our team.

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### **| Item 4 Advisory Business**

Lombard Odier Transatlantic, organized as a limited partnership, started its business activities in 1969 in Montreal, Canada, as a US-registered broker-dealer serving institutional clients. Registrant registered as an investment adviser with the SEC in 2011.

Lombard Odier Transatlantic is owned by Lombard Odier & Cie (Canada), Limited Partnership, which is ultimately owned by Lombard Odier & Cie, a private bank headquartered in Geneva, Switzerland, that specializes in asset management services.

Registrant offers investment advisory services primarily to high net worth individuals, although it also may manage accounts for institutions, which may include pension plans, corporate accounts, foundations, trusts, etc. Registrant seeks to achieve the investment objectives of each client primarily through long -and short-term investments in securities issued by US and non-US corporate issuers, and derivatives related to such securities.

Client investment objectives, guidelines and restrictions are negotiated on a case-by-case basis and are memorialized in a signed written document referred as *Investment Policy Rules*, which are established for each account in accordance with each client's specific risk tolerance, objectives, restrictions and expected returns. Registrant manages assets on both a discretionary basis and non-discretionary basis.

For its discretionary mandates, the Registrant is authorized to manage the client's assets on a fully discretionary basis, according to the client's investment needs, objectives and restrictions as described within the *Investment Policy Rules* applicable to that client's account. Under this mandate, the Registrant will be responsible for the determination of the account's asset allocation, subject to any restrictions imposed by the client. The Registrant will review the discretionary account's asset allocation and portfolio holdings on a regular basis, depending on the market, economic and political conditions.

For its non-discretionary mandates, the Registrant will provide investment advisory services and will respond to the client's telephone calls within a reasonable time frame whenever the client seeks to obtain Registrant's investment advice and recommendations concerning particular financial instruments and investment strategies and opportunities. Registrant may also contact the client, from time to time, with recommendations that it believes to be in line with client's investment profile and the *Investment Policy Rules*. Under this mandate, the Registrant will not have discretionary authority over the client's account and the client will be responsible for making all final investment decisions. The Registrant will review the non-discretionary account's asset allocation and portfolio holdings on a regular basis, to best meet individual risk tolerance and objectives based on the client's *Investment Policy Rules*.

As of September 30<sup>th</sup>, 2012, we managed approximately \$143,000,000 on a discretionary basis and \$42,500,000 on a non-discretionary basis for a total of approximately \$185,500,000.

## Item 5 Fees and Compensation

All Clients receive and sign at the opening of their account an advisory fee schedule. Those fees are calculated on a quarterly basis in arrears based on the market value of the account on the last business day of each calendar quarter. The fees are paid on the last business day of March, June, September and December unless otherwise notified. The fee schedule could be applied after giving effect to the total aggregate market value of all of the accounts that are related to the client. The minimum quarterly management fee for both discretionary and non-discretionary mandates is **\$2,500**.

### Pricing scale :

#### Discretionary mandate

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#### Non-discretionary mandate

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Range 3	5,000,000	-	10,000,000	0.35%	From 0.44 to 0.38%
Range 4	10,000,000	-	20,000,000	0.30%	From 0.38 to 0.33%
Range 5	Over 20,000,000	-		0.25%	From 0.33%

These standard fee rates are negotiable and we reserve the right to negotiate fees on a client-by-client basis. Registrant is typically granted authority by each Client to direct the Client's custodian to pay the Registrant's quarterly investment management fee.

Certain affiliates of the Registrant provide advisory services to various pooled investment vehicles. The Registrant does not typically invest assets of its Clients in such vehicles. To the extent the Registrant does, in the future, recommend any such vehicles for its Clients, such client would have an equivalent amount excluded from their asset base when calculating the management fees or will receive a credit for management fees paid at the fund / product level so that they are not charged a duplicative fee in connection with management of their account(s).

Brokerage fees typically will be charged to the client account for the execution of buy or sell orders for securities by any dealer or other market intermediary (which may include affiliates of Registrant, having the required registrations or authorizations in the relevant jurisdictions) and negotiation of commissions payable on such transactions in accordance with applicable legislation. Please refer to Item 12 of this Brochure for more details.

In addition to the advisory fees, clients are required to pay custodial fees. For more information on fees charged by the custodian of your account, including any charges relating to foreign exchange transactions or how your custodian executes foreign exchange transactions for your account, you should contact your custodian or refer to any agreement you have entered into with your custodian.

Client may incur other charges such as exchange fees, stamp duties and taxes on securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in each such mutual fund's and exchange traded fund's prospectus. Such charges, fees and commissions are in addition to the advisory fees set forth above.

#### **Item 6 Performance-Based Fees and Side-by-Side Management**

Not applicable

#### **Item 7 Type of Clients**

Registrant offers investment advisory services primarily to high net worth individuals, although Registrant may also manage accounts for institutions, which may include pension plans, corporate accounts, foundations, trusts, etc.

Registrant requires a minimum account size of US \$1,000,000. The Registrant may waive the minimum account size in its sole discretion.

#### **Item 8 Methods of Analysis, Investment Strategies, and Risk of Loss**

Registrant uses a variety of methods of analysis and investment strategies including, for example, fundamental and technical securities analysis methods, applying information gathered from financial news publications, research materials prepared within the firm, by related persons, and by unrelated third parties, utilizing ratings of securities by corporate rating agencies, analyzing annual reports, prospectuses and other filings with the Securities and Exchange Commission, and evaluating corporate press releases. The specific investment strategies used by Registrant to advise a particular Client may vary depending, in part, on the Client's overall financial situation, including: risk tolerance, goals, suitability and other criteria. Investing in securities involves a risk of loss that Clients should be prepared to bear.

Although Registrant primarily relies on the research capabilities of its staff, the Registrant also may obtain research and analyses prepared by various affiliated or unaffiliated institutions; contacts with representatives of issuers, banks, brokers, governments and others; financial, economic and business publications; and other public

documents containing information concerning securities issuers.

Lombard Odier & Cie (Canada), Limited Partnership, a Canadian investment advisor affiliated with the Registrant, may furnish Registrant with research services including statistical and other factual information, and with advice regarding international economic, financial and monetary factors and sector trends that Registrant may use in making investment decisions. Registrant may from time to time also receive research services from other related entities.

Investment in equity securities presents a risk of loss of that may result in the loss of all or part of an investment. Investment in fixed income securities may also present risk of loss although this risk may be mitigated because fixed income securities typically include a claim(s) against the issuers assets that receive priority over the interest held by equity owners.

The Registrant may also invest the assets of its Clients in cash or cash equivalents (e.g. money market funds) and certain government issued securities (e.g., Treasury bills) which may present a risk of loss. The Registrant may also invest its Clients' assets in mutual funds.

Other material risks associated with discretionary and non-discretionary mandates include, but are not limited to:

### ***General Market Risk***

General market risk is the risk that equity markets will go down in value, including the possibility that equity markets will go down sharply and unpredictably. Several factors can influence market trends, such as economic developments, changes in interest rates, political changes, and catastrophic events. All investments are subject to general market risk.

### ***Foreign Market Risk***

Foreign investments are affected by global economic factors. There is often less information available about foreign companies and many countries have less stringent accounting, auditing and reporting standards than in the United States. Some foreign stock markets have less trading volume, which may make it more difficult to sell an investment or make prices more volatile. Certain countries may also have foreign investment or exchange laws that make it difficult to sell an investment or may impose withholding or other taxes that could reduce the return on the investment. Different financial, political and social factors could decrease the value of foreign investments. As a result, foreign investments may experience larger and more frequent price changes in the short term.

### ***Credit Risk***

Credit risk is associated with the uncertainty in a company's ability to meet its debt obligations. Debt securities rated below investment grade or unrated securities offer a better yield but are generally more volatile and less liquid than other debt securities. There is also a greater likelihood that issuers of below investment grade or unrated debt securities may default, which may result in losses. The market for lower rated debt securities can also be affected by many other factors, including adverse publicity toward the high yield bond markets, which can impact prices of such securities. The value of a portfolio that holds these securities may rise and fall substantially.

### ***Liquidity Risk***

Liquidity refers to the speed and ease with which an asset can be sold and converted to cash. In highly volatile markets, such as in periods of sudden interest rate changes, certain securities may become less liquid, which means they may not be able to be sold quickly or easily. Some securities may be illiquid because of legal restrictions, the nature of the investment or certain features of the investment, like guarantees or a lack of buyers interested in the particular security or

market. Difficulty in selling securities may result in a loss or reduced return.

### ***Currency Risk***

For investments denominated or traded in currencies other than the US dollar, changes in foreign currency exchange rates will affect the value of the investments. Generally, when the US dollar rises in value against a foreign currency, your investment is worth fewer US dollars. Similarly, when the US dollar decreases in value against a foreign currency, your investment is worth more US dollars. This is generally known as "currency risk", which is the possibility that a stronger US dollar will reduce returns for clients investing outside of the United States, and a weaker US dollar will increase returns for clients investing outside of the United States.

### ***Derivative Risk***

A derivative is a type of investment whose value is derived from the performance of an underlying investment or from the movement of interest rates, exchange rates or market indices. Investments in derivatives are subject to many risks, for example:

- derivatives can drop in value just as other investments can drop in value
- sometimes derivative prices are affected by factors other than the price of the underlying security. For example, some investors may speculate in the derivative, driving the price up or down
- the price of derivatives tends to change more than the price of the underlying investment
- there might not be a market for over-the-counter options and forward contracts, making it difficult to make a profit or limit a loss by selling the derivative when necessary
- if trading in a substantial number of stocks in an index is interrupted or stopped, or if the composition of the index changes, it could adversely affect derivatives based on that index
- it may be difficult to unwind an option position, because the options exchange imposes a temporary trading limit, or because a government authority often imposes restrictions on certain transactions
- the other party in a derivatives contract may not be able to fulfil a promise to buy or sell the derivative, or settle the transaction, which could result in a loss to the fund.

### ***Risk of Interest Rate Changes***

Changes in interest rates can affect the performance of some investments. Bonds, for example, tend to fall in value when interest rates rise. Money Market investments, however, tend to earn less when interest rates fall. Central banks may change interest rates at various times during the business cycle, which may affect interest income and performance.

### ***Fiduciary Deposits***

Fiduciary Deposits and other investments with counterparties may be exposed to a risk of counterparty default, with the possible consequence that the Client could lose all or part of his/her investment.

### ***High Yield Risk***

Lower quality debt securities are riskier, speculative and involve greater risk of default. Lower quality debt securities, known as "junk bonds," are of a less than investment grade quality.

### ***Alternative Investment Funds Risk***

Finally, the Registrant may invest its Client's assets in privately offered pooled investment vehicles such as hedge funds, funds of hedge funds, private equity funds and real estate funds ("Alternative Investment Funds").

To the extent the Registrant invests its clients assets in an Alternative Investment Fund, such investments are typically appropriate for sophisticated investors only and may be subject to additional types of risk, some of which are described below. In addition to the risks below, an investment in an Alternative Investment Fund involves a high degree of investment risk, including the risk that the entire amount invested may be lost.

#### Performance-Based Fees

A number of Alternative Investment Funds charge performance-based fees, which are often paid to the principals of the investment manager or general partner of an Alternative Investment Fund. Such fees may create an incentive for the investment manager or general partner of an Alternative Investment Fund to make investments that are riskier or more speculative than would be the case in the absence of such fee.

#### No Resale Market

Investments in Alternative Investment Funds are typically considered illiquid investments because interests or shares in such Alternative Investment Funds generally are not freely transferable and the withdrawal or redemption rights of limited partners or shareholders in such Funds are restricted. In addition, transfer of the interests or shares may be affected by restrictions on resales imposed by federal and state securities laws and, often times, the Funds' documents typically require that the investment manager, general partner or directors consent to any such transfer.

#### Right of an Investment Manager, General Partner or Director

In many Alternative Investment Funds, the investment manager, general partner or directors retain the right to require the withdrawal or redemption at any time of all or part of the interests or shares of an investor for any reason or no reason.

#### Reliance on Management and Key Personnel

In many Alternative Investment Funds, investors generally have no right or power to take part in the management of the Fund. Generally, the investment performance of an Alternative Investment Fund depends largely on the skill of key personnel of the investment manager in identifying, selecting and managing appropriate investments. If any key personnel of the investment manager were to leave the manager, such manager might not be able to find equally desirable replacements and the performance of an Alternative Investment Fund could, as a result, be adversely affected.

#### Absence of Regulatory Oversight

Alternative Investment Funds are generally not registered under the Investment Company Act of 1940, as amended (the "1940 Act") in reliance on an exception provided by either Section 3(c)(1) or Section 3(c)(7) of that Act, and, accordingly, investors in Alternative Investment Funds are not accorded the protections of the 1940 Act (which, among other matters, requires investment companies to have at least 40% disinterested directors, requires securities held in custody at all times to be segregated and marked to clearly identify the owner of such securities and regulates the relationship between the adviser and the investment company). Offerings of Alternative Investment Funds are also typically not registered under the Securities Act of 1933, in reliance on Section 4(2) and the rules promulgated thereunder and such Funds are not subject to the reporting and disclosure requirements of that Act. Furthermore, the investment manager of an Alternative Investment Fund may or may not be registered as an investment adviser under the Investment Advisers Act of 1940.



### Restrictions on Withdrawal

Investments in hedge funds may be subject to lock-up periods, meaning that for a set period of time, an investor may not be able to withdraw from or redeem its interest in a particular hedge fund or hedge fund of funds or may only withdraw or redeem if such investor pays a fee. Certain types of Alternative Investment Funds offer their investors no redemption rights and are considered long-term investments (e.g., private equity funds).

### **| Item 9 Disciplinary Information**

Not applicable

### **| Item 10 Other Financial Industry Activities and Affiliations**

Registrant generally will place orders for stocks traded on non-U.S. markets or exchanges with its related broker-dealer that is registered in Canada, Lombard Odier Securities (Canada) Inc. Also, Registrant is dually registered as a U.S. broker-dealer, and thus Registrant generally will place orders for stocks traded on U.S. markets or exchanges through itself in its capacity as a broker. Use of itself or an affiliated broker to execute client trades, raises a potential conflict of interest that Registrant may benefit from excessive trading (“churning”) through higher commission revenues earned by itself or its affiliated broker. Registrant mitigates such conflict by not charging a client a greater fee on a transaction than would otherwise be available through a non-affiliated broker pursuant to its duty to seek best execution on behalf of its clients. Furthermore, Registrant initiates a trade only when Registrant believes that it will further the client’s interests and Registrant will not initiate a trade for a client’s account solely to generate additional brokerage commissions.

Registrant may share office space and certain administrative and legal or compliance support with its affiliated broker-dealer and Lombard Odier Securities (Canada) Inc. pursuant to one or more Service Level Agreements that may be entered into from time to time.

Registrant’s Chief Executive Officer and Chief Compliance Officer are both persons registered as officers of the dually registered broker-dealer, Lombard Odier Transatlantic.

Clients may direct Registrant to use a broker other than Registrant or its related person as broker to execute their transactions. However, in such cases, clients may pay higher commission rates, including, for example, if Registrant is unable to avail itself of discounts available to batched orders that receive volume discounts.

Registrant has in place an allocation policy that requires that similarly situated clients of either advisory entity be treated equally regarding investment opportunities that may be suitable for both clients conflicts related to investment allocation decisions are escalated to Registrant’s Compliance Officer and senior management to determine how to resolve the conflict.

The Registrant does not have custody of client assets. Clients may select Lombard Odier & Cie (“LO&Cie”), a related entity, or an unaffiliated custodian, to provide custodial services. Clients will enter into a separate custodial arrangement directly with LO&Cie or the third-party custodian. LO&Cie may also provide other non-investment related services to Registrant’s clients, including clearing, matching and settlement of trades into client accounts, valuation of assets and provision of monthly statements, pursuant to separate agreements between each client and LO&Cie. Where an independent custodian is selected by a client, we will work with that client and custodian to ensure that the custodian sends directly account statements to Registrant’s clients.

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

Registrant has a Code of Ethics in place that imposes certain restrictions on personal trading activities in any employee account or any account in which an employee has control or a beneficial interest. Specifically, certain transactions, such as the acquisition of IPOs or short sales, are strictly prohibited, and Registrant's policy requires all staff to maintain accounts within the Group or to arrange duplicate confirmations and account statements for all personal securities accounts.

Registrant may share employees and research with its Canadian investment advisory affiliate. Consequently, employees who are "Access Persons" of either entity are subject to the Code of Ethics of the other, and also to any conflict of interest policies that may apply to either investment adviser entity.

Registrant has established procedures including policies that restrict trading related to proprietary or inside information and has adopted procedures to address conflicts of interests that may arise between the Registrant or a representative and a Client. Furthermore, Registrant and all of its related entities (the "LO Group") generally discourage and at times prohibit employees from serving as Directors of public companies. Registrant also requires at least an annual disclosure of all personal securities accounts from all of its employees, unless an employee's personal accounts are maintained solely within the LO Group. Registrant reviews at least quarterly employee's personal securities transactions for potential conflicts of interest.

Registrant does not engage in any principal, cross or agency cross transactions. Registrant may recommend to its Clients investments in an investment vehicle in which Registrant's affiliates have a financial interest as investment manager. However, in any case whereby the Registrant's affiliates typically receives a fee, Registrant will reimburse the full amount of any management fees charged by such investment vehicle for Client accounts that are also subject to an investment advisory fee.

Registrant does not maintain proprietary accounts.

Transactions at a time when an employee intends, or know of another's intention, to purchase or sell that same security (or a related security) on behalf of a client are prohibited. This prohibition applies whether the securities transaction is in the same (e.g., two purchases) or the opposite (a purchase and sale) direction of the transaction of the client. This prohibition becomes effective the moment the employee learns that the Registrant is considering or intends to purchase or sell such security, to recommend its purchase or sale or is in fact purchasing or selling the security. The aforementioned prohibition continues to apply until twenty-four (24) hours after the recommendation has been rejected or the purchase or sale has been completed or cancelled.

The Registrant and other affiliates impose a twenty-four (24) hour blackout period to all employees and their related accounts, which are accounts of a member of a staff member's immediate household. Immediate household includes a staff member's spouse, children, relatives or others living with a staff member, whose investment holdings and accounts the staff member controls or derives a financial benefit and over whose investment decisions the staff member exercises control.

A copy of the Registrant's Code of Ethics will be provided to any client or prospective client upon request.

## **Item 12 Brokerage Practices**

As discussed in Item 10, Registrant is registered as a broker-dealer with the Financial Industry Regulatory Authority ("FINRA"). For client transactions in securities traded on U.S. markets, Registrant will generally select itself to act as broker as disclosed in, and in accordance with, terms contained within each portfolio management agreement. In other cases, for markets outside the U.S., Registrant may select a related entity or affiliate to act as broker. In all cases, including those in which an affiliate or related person acts as broker for a client transaction,

Registrant will seek to obtain “best execution” available at the time of the transaction.

Clients may direct the Registrant to execute transactions through a specified broker-dealer. Note that not all advisers require or permit their clients to direct brokerage. By directing Registrant to use a particular broker, Registrant may be unable to achieve most favorable execution of client transactions, and this practice may cost clients more money. For example, in a directed brokerage account, the client may pay higher brokerage commissions because Registrant is not able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices.

Generally, in accordance with Registrant's standard Discretionary Portfolio Management Mandate, the portfolio manager will have full authority over the account, regarding both the selection of investments as well as brokerage, and thus clients are generally not able to direct brokerage to the firm of their choice.

Registrant may select a broker that charges more on a per-share basis than another broker, if the additional charges are paid in exchange for execution services. Registrant generally will not “pay up,” i.e. select a broker and pay more for execution than is otherwise available in exchange for the receipt of research materials (e.g. research reports or analysis) or third-party provided services (e.g. Bloomberg terminals). Together, the aforementioned practices are commonly referred to as “soft dollar payments,” and Registrant currently has no formal soft dollar arrangements.

Registrant does not consider, in selecting or recommending broker-dealers, whether it or a related person receives client referrals from a broker-dealer or third party.

Registrant will generally aggregate, when practicable, the purchase or sale of securities for various client accounts into the same *batched* trade, to realize efficiencies of scale and possible volume reduction in transaction charges.

#### **Item 13 Review of Accounts**

The Chief Compliance Officer monitors each Client's *Investment Policy Rules*, on a periodic basis, typically on a monthly basis but no less frequently than quarterly, in consultation with the Portfolio Manager responsible for the account. Each review generally includes consideration of the following matters: performance, compliance with account restrictions, consistency with account objectives, total brokerage commissions incurred by the account, and any conflicts of interest that may exist in light of the account's investments (e.g., investments in or fees charged for products offered by related entities).

Apart from the regular monthly statement, Registrant provides an investment management review written report to clients as often as agreed with such client, but no less frequently than annually. The reports highlight the Economic Outlook, the Portfolio Performance, the Review of Investment Mandates (investment profile, base currency, investment universe, investment horizon, and client objectives and constraints) and the market and currency performances, and will include a Portfolio Summary.

#### **Item 14 Client Referrals and Other Compensation**

Not applicable

#### **Item 15 Custody**

Lombard Odier Transatlantic does not retain custody of any client securities. Clients may choose as their custodian an entity that is a party related to the Registrant or an unaffiliated custodian. All Clients will retain a custodian of their choice and in such cases they should carefully review the account statement they receive from the broker-dealer, bank or other qualified custodian.

All clients will receive from Applicant at least a quarterly account statement that includes such data as the value of total assets at quarter-end, and the quarterly performance of their account(s). All Clients are urged to compare the account statement they receive from their custodian with statements they receive from Registrant.

#### **| Item 16 Investment Discretion**

Registrant typically is granted full discretionary authority to manage Client accounts pursuant to a power of attorney granted by each Client, including the authority to purchase or sell any security, or any derivative related to such security, consistent with the Client's investment objectives and restrictions described in the *Investment Policy Rules*. Registrant is typically also granted authority to direct the Client's custodian to pay Registrant's quarterly investment management fee.

#### **| Item 17 Voting Client Securities**

Registrant does not vote securities held in Client accounts. Clients retain responsibility for voting all securities maintained in their accounts. This same policy applies to solicitations regarding corporate actions and other similar solicitations.

#### **| Item 18 Financial Information**

Not applicable

**Form ADV Part 2B  
Brochure Supplement**

*Lombard Odier Transatlantic, Limited Partnership  
1000 Sherbrooke St. West, Suite 2260  
Montreal, Quebec, Canada H3A 3R7  
Tel.: 514. 847-7747*

This Form ADV Part 2B, also called the “brochure supplement” provides information about the following supervised persons employed by Lombard Odier Transatlantic, Limited Partnership “Lombard Odier Transatlantic”, and the information contained herein supplements Transatlantic’s Form ADV Part 2 Brochure “Firm Brochure”.

**Thomas Maxwell, Senior Relationship Manager and member of the Investment Committee**  
Direct telephone 1.514.847.7602

**Frederic Carbonnier, Senior Relationship Manager and member of the Investment Committee**  
Direct telephone 1.514.847.7605

**Luc Desbiens, Chief Investment Officer and Chairman of the Investment Committee**  
Direct telephone 1.514.847.7609

**Mario Zaccardelli, Portfolio Manager and member of the Investment Committee**  
Direct telephone 1.514.847.7647

**Martin Chapados, Portfolio Manager and member of the Investment Committee**  
Direct telephone 1.514.847.7644

The information about the above named supervised persons, set forth below, supplements the Lombard Odier Transatlantic “Firm Brochure”. You should have received a copy of that brochure. Please contact the Business Development Department or Chief Compliance Officer if you did not receive Lombard Odier Transatlantic’s “Firm Brochure” or if you have any questions about the contents of this brochure.

“Supervised persons” within Lombard Odier Transatlantic covered by the Brochure Supplement are identified as persons who: (i) formulate investment advice for clients and have direct client contact; or (ii) make discretionary investment decisions for clients’ assets, even if the supervised person has no direct client contact. Hence, this Brochure Supplements provides information on Lombard Odier Transatlantic Portfolio Managers (who have the daily client contact) and members of the Lombard Odier Transatlantic Investment Committee (which makes the investment decisions for Managed Accounts and decides on recommendations for Advisory Accounts). Your account may be managed by any or all of the individuals identified in this Form ADV Part 2B Supplement.

In the information about each supervised person provided below:

“Educational background” refers to the supervised person’s post-high school education. “Business background” refers to the supervised person’s business experience for the last 5 years.

“Disciplinary information” refers to legal or disciplinary events that are material to your evaluation of the supervised person, such as civil lawsuits, proceedings before a government or self-regulatory agency relating to investment activity, or criminal proceedings.

“Other business activities” refers to whether the supervised person is actively engaged in any investment-related business or occupation other than his or her employment by Lombard Odier Transatlantic.

“Additional compensation” refers to whether the supervised person receives an economic benefit for providing investment advice other than his or her regular salary and regular bonus from Lombard Odier Transatlantic.

“Supervisor” refers to the person at Lombard Odier Transatlantic who supervises the supervised person’s investment activities on behalf of the firm. The supervision takes place in various forms: attending client meetings and seminars, listening to the supervised persons’ telephone conversations with clients, regular meetings with the supervised persons and handling client complaints. In addition, there are a number of internal controls related to the supervised persons where reporting is made to the President/CEO.

The information in this brochure has not been approved or verified by the U.S. Securities (the SEC) and Exchange Commission or by any state securities authority.

#### **Supervised Person: Thomas Maxwell**

Business address:

1000, Sherbrooke Street West, Suite 2260 - Montreal (Quebec) - H3A 3R7 – Canada – Tel: 514.847.7602

Year of birth: 1968.

Education background: Bachelor in Laws from the University of Geneva and Certified International Investment Analyst (CIIA) charter holder.

Business background: Joined Lombard Odier Transatlantic in July 2011. Current position: Senior Client Relationship Manager and member of the Investment Committee. Previously Trust Officer and Senior Client Relationship Manager for Lombard Odier & Cie, October 1999-July 2011.

Disciplinary Information – None to report

Other Business Activities – None to report

Additional Compensation – None to report

Supervised by: Mr. Forestier. Mr. Forestier is responsible for overseeing and supervising the investment advisory activities of Mr. Maxwell. Mr. Forestier monitors the advice Mr. Maxwell provides to clients by reviewing on at least a quarterly basis during a meeting with Mr. Maxwell the following factors: trades executed and other investment activity that occurred during the prior quarter, the suitability of the recommendations provided to the client in light of the client’s objectives and any restrictions, amount of clients assets included under the advisory relationship, fees schedules and rates charged to each client for reasonableness in light of services provided, and in light of rates and rates charged to similarly situated clients.

**Supervised person: Frederic Carbonnier**

Business address:

1000 Sherbrooke Street West Suite 2260 Montreal (Quebec) H3A 3R7 - Canada – Tel: 514.847.7605

Year of birth: 1963

Education background: Masters Degree from the Graduate Institute of International Studies, Geneva, Switzerland.

Business background: Joined Lombard Odier Transatlantic in July 2012. Current position: Senior Client Relationship Manager. Previously Vice President with Pictet North America Advisors (2010-2012) Director with the multi-family office & trustee Stonehage (2005-2010).

Disciplinary information: None to report

Other business activities: None to report

Additional compensation: None to report

Supervised by: Mr. Forestier. Mr. Forestier is responsible for overseeing and supervising the investment advisory activities of Mr. Carbonnier. Mr. Forestier monitors the advice Mr. Carbonnier provides to clients by reviewing on at least a quarterly basis during a meeting with Mr. Maxwell the following factors: trades executed and other investment activity that occurred during the prior quarter, the suitability of the recommendations provided to the client in light of the client's objectives and any restrictions, amount of clients assets included under the advisory relationship, fees schedules and rates charged to each client for reasonableness in light of services provided, and in light of rates and rates charged to similarly situated clients.

**Supervised person : Luc Desbiens**

Business address:

1000, Sherbrooke Street West, Suite 2260 – Montreal (Quebec) – H3A 3R7 – Canada - Tel : 514.847.7609

Year of birth: 1964

Education background: Masters degree in Finance from Sherbrooke University and Bachelor in Business Administration, major in Finance from The University of Quebec. CFA chart holder since 1996. Passed the following Canadian Securities Institute courses: derivatives fundamentals and Canadian securities Course.

Business background: Joined Lombard Odier Transatlantic in 2012 as Chief Investment Officer. Also acts as Chief Investment Officer for Lombard Odier & Cie (Canada), Limited Partnership, an affiliated advisor in Canada for non-US clients. Vice-President and portfolio manager at Intact Financial 2011-2012. Worked as Chief Investment Officer for US investors at Pictet North America Advisors in Geneva (Switzerland) from 2007 to 2011 and portfolio manager for Canadian clients at Pictet et Cie (2000-2007). Senior portfolio manager at Caisse de dépôt et placement du Québec (1992-2000).

Disciplinary Information - None to report

Other Business Activities - None to report

Additional Compensation - None to report

Supervised by: Mr. Forestier. Mr. Forestier acts as Chairman of the Board and is responsible for overseeing and supervising the investment Management activities of Messrs. Desbiens, Chapados and Zaccardelli. On a day-to-day basis, Mr. Desbiens also supervises the investment management activities of Mr. Chapados and Mr. Zaccardelli.

Mr. Forestier monitors the discretionary investment advice provided to clients by reviewing on at least a quarterly basis during a meeting with Mr. Desbiens the following factors: portfolio performance, portfolio turnover rates during the prior quarter, the appropriateness of the recommendations provided to the client in light of the clients' objectives and any account or portfolio restrictions, the total amount of assets managed on behalf of the client, including any related accounts, fee schedules and rates charged to each client for reasonableness in light of services provided, and in light of rates charged to similarly situated clients.

**Supervised Person: Mario Zaccardelli**

Business address:

1000, Sherbrooke Street. West, Suite 2260 - Montreal (Quebec) - H3A 3R7 – Canada – Tel: 514.847.7644

Year of birth: 1972.

Education Background: Bachelor in Business Administration, Major Finances from Bishop's University and a Master in Accounting from The University of Quebec, CFA charter holder, passed the Canadian Securities Course from Canadian Securities Institute.

Business background: Joined Lombard Odier Transatlantic in 2011. Current position: Portfolio Manager and member of the Investment Committee. Mr. Zaccardelli also acts as Portfolio Manager for Lombard Odier & Cie (Canada), Limited Partnership since January 2008. Buy Side Analyst, July 2002 –January 2008 for Lombard Odier & Cie. Buy side Analyst for Socrate Gestion de Patrimoine, June 2000-July 2002.

Disciplinary Information – None to report

Other Business Activities – None to report

Additional Compensation – None to report

Supervised by: Luc Desbiens, Chief Investment Officer.

**Supervised Person: Martin Chapados**

Business address:

1000, Sherbrooke Street. West, Suite 2260 - Montreal (Quebec) - H3A 3R7 – Canada – Tel 514.847.7644

Year of birth: 1969.

Education Background: Bachelor in Business Administration, Major Finances and Master in Finances from Sherbrooke University, CGA and CFA charter holder, passed the Options Supervisors Course from Canadian Securities Institute.

Business background: Joined Lombard Odier Transatlantic in 2011. Current position: Portfolio Manager and member of the Investment Committee. Mr. Chapados also acts as Portfolio Manager for Lombard Odier &



Cie ( Canada), Limited Partnership since July 2002. Portfolio Manager for Socrate Gestion de Patrimoine, July 1997-July 2002.

Disciplinary Information – None to report

Other Business Activities – None to report

Additional Compensation – None to report

Supervised by: Luc Desbiens, Chief Investment Officer.

**Additional information:**

Each supervised person is responsible for ensuring the investment advice provided to clients is suitable in light of the client risks profile and investment objectives. A second level of monitoring is performed on a periodic basis by the Chief Compliance Officer ("CCO") who routinely monitors advisory correspondence (i.e., emails, letters, facsimiles, journal entries, contractual agreements, etc.) and advisory activities (including marketing materials and client meetings) of each Supervised Person. Yann Citte is Lombard Odier Transatlantic's CCO and he can be contacted at the following number: 514.847.7613.

**LOMBARD ODIER TRANSATLANTIC, L.P.**  
**(“LOMBARD ODIER TRANSATLANTIC”)**  
**PRIVACY POLICY<sup>1</sup>**

**LOMBARD ODIER TRANSATLANTIC’S POLICY**

Customers are the bedrock of our firm, and the protection of their nonpublic personal information (as defined in Regulation S-P) is our responsibility. It is Lombard Odier Transatlantic’s policy to not disclose its customers’ nonpublic personal information except as permitted by law and in the limited circumstances described in this Privacy Policy.

**INFORMATION SECURITY**

Lombard Odier Transatlantic’s legal department is responsible for establishing, maintaining, and implementing written procedures that address physical, electronic, and procedural safeguards reasonably designed to: guard customers’ nonpublic personal information; protect against any anticipated threats or hazards to the security of such information; protect against unauthorized access to or use of such information; and protect against unauthorized access to or use of such information in connection with its disposal. Such safeguards may include, but are not limited to, firewalls, passwords, and encryption and authentication technology. Lombard Odier Transatlantic employees are expected to report promptly any security incident, including breaches or inadvertent releases of customers’ nonpublic personal information to an unauthorized person, to the Chief Compliance Officer, who may consult a counsel to determine an appropriate response.

**USE OF INFORMATION**

Lombard Odier Transatlantic may disclose its customers’ nonpublic personal information only as permitted by law and in the following limited circumstances:

- Lombard Odier Transatlantic may share its customers’ nonpublic personal information with its affiliates, service providers or suppliers (collectively, “service providers”) that help with Lombard Odier Transatlantic’s business operations. Lombard Odier Transatlantic may also share its customers’ nonpublic personal information with service providers in connection with servicing customers’ accounts or processing customers’ transactions at the customers’ request or authorization. Lombard Odier Transatlantic shall seek assurances from these service providers that they will protect any nonpublic personal information they receive in a manner consistent with Lombard Odier Transatlantic’s Privacy Policy and, to the extent required by Regulation S-P or applicable state law, service providers that have access to such information shall be required by contract to comply with applicable requirements regarding the security and confidentiality of such information. In addition, any contract between such service providers and Lombard Odier

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<sup>1</sup> For purposes of this Privacy Policy, the term “customer” or “customers” includes both individuals who have or had investments with, or receive or received brokerage services from, Lombard Odier Transatlantic and individuals who have provided nonpublic personal information to Lombard Odier Transatlantic, but did not invest with, or receive brokerage services from, Lombard Odier Transatlantic. Lombard Odier Transatlantic extends the privacy and security protections described in this Privacy Policy to its institutional clients as well.

Transatlantic that grants such service providers access to customers' non-public personal information shall state that such service providers are prohibited from disclosing or using such information for any purposes other than those requested by Lombard Odier Transatlantic.

- Lombard Odier Transatlantic may share its customers' nonpublic personal information in response to a valid court order, subpoena, government investigation, or as otherwise required or permitted by law.
- Lombard Odier Transatlantic may share a customer's nonpublic personal information with a non-affiliated third party if requested, in writing, by a customer to do so.

Lombard Odier Transatlantic does not sell customers' nonpublic personal information to any third parties. Affiliates of Lombard Odier Transatlantic may have access to nonpublic personal information about Lombard Odier Transatlantic's customers, including information about Lombard Odier Transatlantic's transactions and experiences, but affiliates of Lombard Odier Transatlantic shall not use nonpublic personal information about Lombard Odier Transatlantic's customers for purposes of making marketing solicitations without prior compliance with any applicable requirements of, or exceptions to, Regulation S-AM.

## **NOTICE REQUIREMENTS**

Every Lombard Odier Transatlantic customer must receive notice of Lombard Odier Transatlantic's privacy policies and practices, as follows:

- Initial: new customers must receive a notice at the inception of the customer relationship.
- Annual: all customers must receive a notice annually.

## **MONITORING**

The Chief Compliance Officer is responsible for monitoring adherence to this Privacy Policy and is responsible to remind/trained employees on an annual basis with respect to the policy.

## **AMENDMENTS**

This policy may be updated periodically with the approval of Board of Directors.

Adopted by Lombard Odier Transatlantic on November 21, 2012