

## **Part 2A of Form ADV: *Firm Brochure***

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This brochure provides information about the qualifications and business practices of The Investment Analyst Limited. If you have any questions about the contents of this brochure, please contact us at 004 420 7498 6593 or [mh@theanalyst.co.uk](mailto:mh@theanalyst.co.uk). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about The Investment Analyst Limited, also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 164479.

**Item 2    Material Changes**

As this is the firm's initial application for registration as an SEC-registered investment adviser, we do not have any material changes to report.

**Item 3. Table of Contents**

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

The Investment Analyst Limited (hereinafter “TIA”) is an SEC-registered investment adviser with its place of business located in London, United Kingdom. TIA began conducting business in 2010. Registration with the SEC does not imply a certain level of skill or training.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Mark Christopher Hiley.

TIA offers the following advisory services to our clients:

#### **RESEARCH AND CONSULTING SERVICES**

TIA provides independent equity investment research and ideas to its clients via a subscription-based website, a weekly newsletter and in-person and remote meetings.

Based on its proprietary research and analysis, TIA provides these clients with securities selections for use in their own managed portfolios or managed portfolio of their end-clients. Clients are not required to adopt our recommendations and TIA is not responsible for implementing any of the recommendations it so provides.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. Our investment universe is global, across the market capitalization range, and across industries. However, we have a bias towards European mid and large cap stocks.

#### **Item 5 Fees and Compensation**

TIA will receive a consulting fee, typically payable quarterly in arrears or in advance, as agreed with each individual client. The consulting fee is usually a fixed amount for a fixed period of time, ranging from \$10,000 to \$20,000 and is negotiated separately with each client. The fee may be payable with hard dollars by the end-user client or through a commission-sharing agreement (CSA) or a soft-dollar arrangement with an intermediary.

TIA may receive a fee higher than the one negotiated with the client, if the client has adopted a voluntary idea generation ranking system and voluntarily decides to award additional compensation to TIA.

***Limited Negotiability of Advisory Fees:*** Although TIA has established the aforementioned fee range, we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. The specific annual fee is identified in the contract between TIA and each client.

We may group certain related client accounts for the purposes of achieving the minimum fee and determining the annualized fee.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

#### **GENERAL INFORMATION**

***Termination of the Advisory Relationship:*** While termination criteria vary, depending on the specific terms of each advisory agreement, typically, either the client or TIA may terminate the advisory

relationship by giving written notice to the other party not less than ten business days prior to any Optional Termination Date, as defined in the advisory agreement. Upon termination, TIA will repay the terminating client a percentage of any fee advanced, with such percentage being equivalent to the percentage of the Subscription Period, as defined in the advisory agreement, which has yet to elapse as at that Optional Termination Date, rounded down to the nearest 5%.

***Mutual Fund and Exchange Traded Fund (ETF) Fees:*** All fees paid to TIA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund or an ETF directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual funds or ETFs are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

***Wrap Fee Programs:*** TIA does not offer Wrap Fee Programs.

***Additional Fees and Expenses:*** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

***Advisory Fees in General:*** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

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

TIA does not charge performance-based fees.

## **Item 7 Types of Clients**

As stated in Item 4 of this Brochure, TIA may provide advisory services to the following types of clients:

- High net worth individuals.
- Institutional clients.
- Other financial professionals.

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

### **METHODS OF ANALYSIS**

TIA utilizes a bottom-up fundamental research and analysis approach. Our investment ideas are based on a long-term investment horizon. A comprehensive understanding of how a business works and its financial fundamentals is critical to reaching an investment conclusion.

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Risks for all forms of analysis: Our securities analysis method relies on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

## **INVESTMENT STRATEGIES**

Long-term investments: While we do not implement securities transactions, our securities recommendations are typically made with the idea of holding them in the client's account for a year or longer. Such recommendations may be based on the belief that the securities are currently undervalued or because we recommend exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that, by holding the security for this length of time, a client may not take advantages of short-term gains that could be profitable. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make a recommendation to sell.

*Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal.*

### **Item 9    Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

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

Neither our firm nor any of its related persons are engaged in any other financial activities or have any other financial industry affiliations.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

TIA and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any

acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

TIA's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [mh@theanalyst.co.](mailto:mh@theanalyst.co.), or by calling us at 004 420 7498 6593.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an existing interest or position in a certain security(ies) which may also be recommended to a client.

Furthermore, since we do not implement securities transactions for clients and do not have any ability to control the timing of implantation by or for clients, our firm and/or individuals associated with our firm may purchase securities recommended to clients prior to such transactions being implemented by the clients or behalf of clients to their financial professionals.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
1. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
2. Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.
3. We maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or his/her designee.
4. We have established procedures for the maintenance of all required books and records.
5. Clients can decline to implement any advice rendered.
6. All of our principals and employees must act in accordance with all applicable laws and regulations governing registered investment advisory practices.
7. We require delivery and acknowledgement of the Code of Ethics by each supervised person of our firm.
8. We have established policies requiring the reporting of Code of Ethics violations to our senior management.

## **Item 12 Brokerage Practices**

As TIA does not implement transactions for clients and does not recommend brokers to clients, clients and their financial advisers (if any) are solely responsible for implementation of our recommendations. Clients may implement or reject the implementation of any and all of our recommendations.

## **Item 13 Review of Accounts**

TIA does not maintain client accounts. Our research and analysis are regular and continuous and are conducted by the following individuals:

- Mark Hiley, Founder, CEO, CCO and Analyst
- Thomas Whyman, Analyst

Unless otherwise agreed with clients, the service is a “push” methodology, whereby clients can stay updated with our thoughts via the website and a weekly email summary pointing back to the site and the most recent notes.

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

Our firm may pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. Payment of referral fees for prospective client referrals creates a potential conflict of interest to the extent that such a referral is not unbiased and the solicitor is, at least partially, motivated by financial gain. Therefore, such a referral may be made even if our advisory services are not suitable to a particular client's needs or entering into an advisory relationship with us is not, overall, in the best interest of the client. As these situations represent a conflict of interest, we have established the following restrictions in order to ensure our fiduciary responsibilities:

1. All such referral fees are paid in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements;
2. Any such referral fee will be paid solely from our advisory fee, and will not result in any additional charge to the client;
3. If the client is introduced to us by an unaffiliated solicitor, the solicitor, at the time of the solicitation, will disclose the nature of his/her/its solicitor relationship and provide each prospective client with a copy of our Form ADV Part 2 Brochure, together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between our firm and the solicitor, including the compensation to be received by the solicitor from us; and

## **Item 15 Custody**

Our firm does not manage client accounts and does not have any arrangement under which it would be deemed to have actual or constructive custody of client funds or securities.



**Item 16 Investment Discretion**

TIA does not implement securities transactions for its clients and does not accept any investment discretion over client funds.

**Item 17 Voting Client Securities**

TIA does not manage client accounts, does not vote proxies for clients and does not offer proxy voting advice to clients.

TIA will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are recommended to clients.

**Item 18 Financial Information**

We do not require United States clients to pay fees that are (a) greater than \$1200 and (b) billed six months or more in advance.

TIA has not been the subject of a bankruptcy petition at any time during the past ten years.