

Firm brochure

ADV 2A, March 2022

1. About this document

This Firm Brochure (the "**Brochure**") provides information about the qualifications and business practices of LGT Wealth Management US Limited ("**LGT WM US**" or the "**Firm**"). If you have any questions about the contents of this Brochure, please contact us at +44 (0)20 3207 8000 or email steven.payne@lgt.com. You may also visit our website at www.lgtwm-us.com.

The information in this Brochure has not been approved or verified by the United States Securities & Exchange Commission (the "**SEC**") or by any state securities authority..

LGT WM US is a registered investment adviser. Registration of an investment adviser does not imply that LGT WM US or any of its principals or employees possesses a particular level of skill or training in the investment advisory business or any other business.

Additional information about LGT WM US is also available on the SEC's website at www.adviserinfo.sec.gov and on the Financial Conduct Authority's website at www.fca.org.uk.

2. Material changes

LGT WM US US has updated the following sections:

All items Revised throughout to reflect that, as of 31 March 2022, LGT Vestra US Limited has been renamed LGT Wealth Management US Limited. This represents the final stage of the acquisition of the Firm by LGT.

Item 4 Updated to reflect that the Firm can provide Wealth Planning services to its clients.

Item 5 Updated to reflect information about fees relating to the Wealth Planning service.



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4. Advisory business

LGT Wealth Management US Limited ("**We**", "**Us**", "**LGT WM US**" or the "**Firm**") is a United Kingdom ("**UK**") based wealth management company which is a wholly owned subsidiary of LGT Wealth Management UK LLP ("**LGT WM UK**"). LGT WM US was formed in 2012 to provide discretionary and advisory investment management services to a broad spectrum of clients who have a connection to the United States of America ("**US**") and United Kingdom ("**UK**").

LGT WM US is a private limited company incorporated in England & Wales (Company No. 06455240) and is authorised and regulated by the UK Financial Conduct Authority (the "**FCA**") (Firm Reference Number 585547). LGT WM US is also a registered investment adviser with the US Securities and Exchange Commission ("**SEC**") under reference 801-77580.

LGT WM UK, which is the sole shareholder of LGT WM US, was set up in 2008 to provide wealth management services to private clients, companies, trusts, charities and financial intermediaries based predominately in the UK and the European Economic Area ("**EEA**"). LGT WM UK is a limited liability partnership (LLP) incorporated in England & Wales (Company No. OC329392), is authorised and regulated by the FCA (Firm Reference Number 471048) and is a Member of the London Stock Exchange ("**LSE**").

In June 2016, LGT owned by the Princely Family of Liechtenstein took a majority stake in LGT WM UK (previously Vestra Wealth LLP), primarily from external investors in the firm. In October 2020, LGT completed the acquisition by buying the remaining equity previously held by the executive partners of LGT WM UK. The final action in the acquisition process saw the UK and US entities (formerly LGT Vestra Wealth LLP and LGT Vestra US Wealth Management Limited respectively) to be renamed LGT WM UK and LGT WM US. The Firm's affiliate, LGT Vestra (Jersey) Limited, was also renamed LGT Wealth Management Jersey Limited ("**LGT WM Jersey**").

LGT Group is the largest private banking and asset management group in the world that is wholly owned by a single family. As at 31 December 2021, LGT managed CHF 285.8.9bn (c.£231bn/\$306bn) in assets and the group benefits from a well-diversified revenue base and economies of scale.

LGT WM US provides discretionary and advisory investment management services across a broad range of client portfolio/account types, including (where eligible) individual savings accounts and investment portfolios, individual retirement accounts, personal pensions, trust and charity accounts.

Subject to your criteria and/or particular requirements, we may be able to offer you a:

- Strategic Portfolio Service;
- Discretionary Account Service; or an
- Advisory Account Service.

LGT WM US does not undertake to provide direct custody and execution services. For each type of service, you are required to enter into a separate agreement appointing LGT WM UK, LGT WM Jersey or RBC Advisor Services ("**RBC**") (each a "**Custodian**" together the "**Custodians**") as your custodian. The Custodians undertake to provide you with (amongst other things) custody, execution, reporting and trade settlement services. Further information about Custody practices are covered in more detail in Item 15 (Custody) of this Brochure.

Strategic Portfolio Service

LGT WM US's Strategic Portfolio Service enables you to invest into a risk rated model portfolio, ranging from low risk to very high risk. All LGT WM US's models are managed on an entirely discretionary basis and the Firm carefully selects suitable assets relevant to each models' investment and risk strategy. Owing to the nature of the Strategic Portfolio Service, it is not possible for you to impose any security and/or sector restrictions or to instruct the sale/purchase of any security or securities. The minimum investable amount for this service is typically £250,000 or currency equivalent.

Discretionary Account Service

LGT WM US also offers a Discretionary Account Service whereby your account is managed by us on a discretionary basis, and in accordance with your agreed investment and risk parameters. The Discretionary Account Service allows for the purchase and sale of specific securities and can, in some circumstances, allow for you to impose certain restrictions; meaning we will not purchase any securities which, for any reason, you may not be comfortable holding. The minimum investable amount for this service is typically £1m or currency equivalent.

Advisory Account Service

LGT WM US's Advisory Account Service enables you to receive tailored advice from us which is specific to your needs. We undertake to make recommendations and provide advice to you in accordance with your agreed investment and risk parameters. We will not instruct any transactions without your express consent.

US domestic account services

We are also able to offer discretionary investment management services if you hold a US domestic account, where the assets within that account must be maintained in the US. LGT WM US works with RBC who are able to provide custody, execution and certain other ancillary account services to you. RBC is a division of RBC Capital Markets LLC. This does require that you establish a separate contractual relationship with RBC and agree to the terms governing the services that they provide to you.

Wealth planning services

We are able to offer a comprehensive financial planning service which helps ensure your ambitions remain on track. We work with you to create a bespoke financial plan designed around your individual needs, offering long-term guidance. Typically, clients benefit from Wealth Planning advice in relation to pension aggregation, inheritance tax planning, retirement planning and cash flow analysis.

4. Advisory business (continued)

General

Further information about Brokerage practices are covered in more detail in Item 12 (Brokerage Practices) of this Brochure.

In all instances, we require you to complete our Investment and Risk Profile Questionnaire, which enables us to establish an investment strategy that considers your investment objectives, attitude to risk, investment experience and financial circumstances. Once the Investment and Risk Profile Questionnaire has been completed, an Investment Manager will identify and discuss with you any of your responses that may appear to be inconsistent, and propose an Investment Policy Statement which will act as a mutual agreement between you and us regarding the circumstances, objectives and constraints that govern the way we will manage your portfolio.

As at December 31, 2021, the Firm has US \$1.065bn of assets under management, all of which are managed on a discretionary or advisory basis.

5. Fees and compensation

Our charges are levied based on the value of the assets that you entrust us to manage. We will charge you on a tiered basis which means that our percentage investment management fee will decrease as your assets grow, as illustrated below:

Investment Management fee for LGT WM US custodied accounts

Tier	Annual Management Fee (Charged by LGT WM US)
On the first £1m (or currency equivalent)	0.90%
On the next £4m (or currency equivalent)	0.75%
Above £5m (or currency equivalent)	0.50%

In certain circumstances we may, at our discretion, negotiate our fee tiers and charges with you. This will be agreed in writing with you.

Our investment management fees are paid to us directly by the custodians and on a quarterly basis in arrears. We do not have any authority to deduct fees directly from your account.

Investment Management fee calculation

To calculate our annual charge, the below formula is used:

$$\text{Account value as at the last day of the quarter} \times \text{LGT WM US annual rate per tiered structure (\%)} = \text{annual management charge}$$

To calculate LGT WM US's quarterly charge, the following formula is used:

$$\frac{\text{annual management charge}}{365 \text{ days}} \times \text{number of days in the quarter} = \text{quarterly fee}^*$$

* Plus VAT if applicable

Custodian fee

Separate to our Investment Management fee, you will also be required to pay certain custody/administrative fees to the Custodian for the services which they provide to you. All relevant fees/charges will be clearly set out in any fee agreement between you and the Custodian, but we set out below salient fees and charges for illustrative purposes. LGT WM US cannot negotiate nor has any control over the fees that you pay to the Custodians.

LGT WM UK/LGT WM Jersey custody fees

All clients pay a custody and execution fee of 0.25% to LGT WM UK or LGT WM Jersey as appropriate. There may also be other ancillary account charges levied by LGT WM UK and LGT WM Jersey (such as money transfer and foreign exchange fees) for the operation of your account and these will be agreed with you in advance. In certain circumstances, LGT WM UK and LGT WM Jersey may, at their discretion, negotiate their fees and charges with you.

RBC fees

For accounts custodied with RBC, LGT WM US undertakes to charge a fixed investment management fee 0.95% per annum based on the value of the assets under management. In addition, RBC will charge a fixed custody fee of 0.05%. There may also be other ancillary account charges levied by RBC for the operation of your account and these will be agreed with you in advance.

Wealth Planning fees

Fees for bespoke Wealth Planning services are agreed on a case by case basis and are payable separately from our investment management fees. You will be advised of the fees before any Wealth Planning service is provided. The Wealth Planning fee covers associated research and analysis of your situation. It is important to note that such fee would be payable regardless of whether our advice is to implement a change to your financial set-up or not. For example, if after reviewing a client's circumstances we decide that it is prudent to remain in an existing pension scheme and to not move into a new scheme, the payment would remain payable regardless. In circumstances we may, at our discretion, negotiate this fee with you which will be agreed in writing.

6. Performance-based fees

This Item is not applicable. No Supervised Person of LGT WM US accepts performance-based fees.

7. Types of clients

LGT WM US can generally provide investment management services to high net worth individuals and families (retail clients), companies, charities, trusts and financial intermediaries on either a discretionary or an advisory basis.

8. Methods of analysis, investment strategies and risk of loss

LGT WM US has its own investment committee (the “**Investment Committee**”) which is responsible for formulating the Firms overall investment policy. The overall objective of the Investment Committee is to research and communicate, on a consistent and timely basis, global investment themes and market views. These are then blended to create an investment menu of approved or preferred investment solutions that support the portfolio construction process and investment demands of our clients.

The Investment Committee sits at the heart of LGT WM US’s investment process and serves to consider and, where suitable, implement the investment strategy and disseminate its views and the investment recommendations. Whilst the Investment Committee is independent of LGT WM UK, it utilises the output from certain of LGT WM UK’s committees, including the UK Investment Committee, UK Equity Committee, International Equity Committee, Bond Committee and Authorised Collectives Committee.

LGT WM UK’s Equity Committee and International Equity Committee (together the “**Equity Committees**”) are responsible for maintaining and monitoring a preferred list of UK and international equities. The Equity Committees undertake both fundamental and technical research to identify potential investment opportunities and undertake periodic reviews of equities currently on the recommended list. Fundamental methods are used to assess the fair value of a prospective equity holding while technical analysis is used to analyse historic price movements. The Equity Committees utilise several sources of information for investment research, including market data, independent research analytics and research provided by third parties and global investment banks.

LGT WM UK’s Fixed Income Committee (the “**Fixed Income Committee**”) undertakes both fundamental and technical research to identify prevalent and potential investment opportunities within the global fixed income universe. The Fixed Income Committee will analyse yields, interest rates, credit spreads, downgrades/upgrades, new issues and liquidity conditions.

LGT WM UK’s Authorised Collectives Committee (the “**Authorised Collectives Committee**”) is responsible for researching, monitoring and maintaining a list of preferred regulated funds. The Authorised Collectives Committee undertakes both quantitative and qualitative analysis of third- party funds and ETFs. The objective of the committee is to select the best of breed funds for each asset class and to formulate a list of approved funds which would be suitable for both LGT WM US and LGT WM UK clients.

A key objective of the LGT WM US Investment Committee is to analyse the output from the various abovementioned committees and, where applicable, incorporate its own views, taking into account any multi-jurisdictional considerations. This allows LGT WM US to construct portfolios which take into account our clients’ specific investment needs.

Investment Strategies

As outlined in Item 4, the investment strategies run by LGT WM US will ultimately be determined by the service and the investment mandate agreed upon with you. Our investment approach is to seek to provide a moderate rate of return above inflation through the economic cycle.

Risk of Loss Factors

It is important that clients understand the risks involved in investing in various instruments. All investments involve a degree of risk to a client’s capital and/or income, but the level of risk can vary significantly. Clients should be aware that even when an investment (for example) is labelled as low risk, it does not mean that the return of your initial investment is guaranteed. There are few investment products which provide total capital protection.

Investors should be aware that past performance is not a reliable indicator of future performance and that the value of any investments, as well as any income derived from those investments can go down as well as up, and investors may get back less than the original amount invested.

There are many risk factors which can impact on a client’s investment portfolio and below is an outline of some of the major risks which are inherent in investing into different asset class securities. This section cannot cover all risks but is meant to act as a general guide to the most significant aspects of the risk associated with any products and services the Firm may offer its clients.

9. Disciplinary information

LGT WM US has no material legal or disciplinary events to disclose.

10. Other financial industry activities and affiliations

LGT WM US and its affiliate, LGT WM Jersey are wholly owned subsidiaries of LGT WM UK. LGT WM UK is ultimately owned by LGT and the Princely Family of Liechtenstein. LGT WM Jersey primarily provides investment advisory services and discretionary management services to internationally based clients.

Mr. Ben Snee is a Director of LGT WM US and is also a Partner and the Chief Executive Officer of LGT WM UK. Mr. Snee is not remunerated by LGT WM US and does not undertake to formulate investment advice for clients of LGT WM US or have direct client contact or discretionary investment authority over client assets.

Mr. Paul Nixon, Chief Executive Officer of LGT WM US, Mr. Nicholas Blogg and Mr. Christopher Gabbett are also a Partners of LGT WM UK. Such matters are recognised on our internal conflicts of interest register and are managed accordingly.

Through its ownership structure, LGT WM US is also able to assist should require credit facilities secured against the assets within the portfolio that we manage for you. Lending is provided by LGT Bank and is subject to LGT Bank's own assessment of your lending criteria and subject to certain conditions. There is no guarantee that clients of LGT WM US will be approved by LGT Bank for a loan facility. At present, lending is only available to our UK resident clients.

11. Code of ethics, participation or interest in client transactions and personal trading

The code of ethics

The following is a summary of LGT WM US's Code of Ethics and Personal Securities Transactions Policy (the "**Code**" or "**Code of Ethics**") which has been adopted in accordance with Section 204A- 1 of the Investment Advisers Act of 1940.

A full copy of the Code is available to any client or prospective client upon request and without charge.

LGT WM US has adopted a Code of Ethics that applies to employees of the Firm and to any other person the Chief Compliance Officer ("**CCO**") deems appropriate.

The foundation of the Code of Ethics is based on the underlying principles that:

- Employees must at all times place the interests of the Firm's clients first;
- Employees must make sure that all personal securities transactions are conducted consistent with the Code and Personal Account Dealing Policy; and
- Employees should not take inappropriate advantage of their position at LGT WM US

All of LGT WM US's employees are required to adhere to the Code of Ethics and certify their adherence to the Code upon commencing their employment and on a quarterly basis thereafter.

Holdings and transactions reporting

Certain of LGT WM US's employees (Access Persons, as defined in the Code of Ethics) are obligated to deliver certain periodic reports to the Firm's CCO.

All Access Persons must initially, and at least annually, deliver a Holdings Report to the CCO.

Any new employee to LGT WM US deemed to be an Access Person must provide an Initial Holdings Report to the CCO within 10 days of commencing employment.

Holdings information must be current and of a date no older than 45 days prior to submission and must also contain details of any brokerage accounts that the Access Person has which are capable of holding certain reportable securities.

Furthermore, all Access Persons are required to deliver to the CCO a detailed report of personal transactions (covering substantially all securities other than exempted securities) undertaken during each calendar quarter. Information in respect of any new brokerage accounts opened during the relevant period is also required to be disclosed.

Personal trading

From time to time, employees (and certain related persons) may have an interest in securities which are owned by or recommended to clients of LGT WM US. In such circumstances, the Firm has Policies in place to ensure that the interests of the Firm's employees do not conflict with the obligations the Firm owes to its clients. All employees are encouraged to discuss any concerns or potential conflicts of interest with the Firm's CCO.

All Access Persons must obtain pre-clearance from the CCO (or his designee) for all personal trades and also obtain pre-approval from the CCO (or his designee) before engaging in any outside business activities or applying for an allocation of an Initial Public Offering ("**IPO**") or private placement.

Conflicts of interest

It is the Policy of the Firm that all employees and others working on its behalf act in good faith and in the best interests of the Firm and its clients. The Firm has Policies and Procedures in place to identify and manage conflicts of interest.

Code Violations

The Firm takes any violation of the Code seriously and will take relevant action where necessary.

Extension of the Code

The Firm recognises that, in light of affiliated entities providing custodial and execution services to its clients, the Code should reach beyond individuals employed by LGT WM US. To this end, any individual not directly employed by LGT WM US but who provides ancillary services to the Firm is identified as an 'Access Person' and is duly required to comply with the Code and the principles therein. All individuals identified by the CCO as Access Persons are identified within the Code itself.

12. Brokerage practices

General arrangements

As described in Item 4, clients are required to separately appoint a Custodian to undertake (amongst other things) custody and execution. The Custodian will charge you certain fees for the services they provide which will be agreed with you at the outset of the relationship, and prior to the provision of any service.

LGT WM US does not receive research or other products/services ("**soft dollar benefits**") from any third party as payment for services undertaken by the Firm. Any investment research received is paid for by the Firm.

Directed Brokerage

For its primary investment management business, you are required to enter into (where appropriate) a separate agreement with LGT WM UK, LGT WM Jersey or RBC.

You will need to open a custody account and enter into a separate agreement with the Custodian.

If you open a custody account with LGT WM UK or LGT WM Jersey, you will direct LGT WM US to transmit all transactions to LGT WM UK or LGT WM Jersey as appropriate. It is possible that LGT WM US may not be able to achieve the most favourable execution terms of transactions undertaken through LGT WM UK or LGT WM Jersey. If so, this may cost you more money. Not all advisers require their clients to direct brokerage to another organisation.

If you have a US domestic account(s) where the assets in the account(s) must be maintained in the US, LGT WM US has entered into an agreement with RBC. Under this agreement, RBC will be able to provide to you custody of your assets, execution and other ancillary account services where you appoint LGT WM US as their investment manager.

You would be required to open a custody account and enter into a separate agreement with RBC. If you open a custody account with RBC, you will direct LGT WM US to execute all transactions through RBC. It is possible that LGT WM US will not be able to achieve the most favourable execution terms of transactions undertaken through RBC. If so, this may cost you more money. Not all advisers require their clients to direct brokerage to another organisation.

13. Review of accounts

Each portfolio that LGT WM US manages is subject to a review. These reviews are designed to ensure that all accounts remain within the investment guidelines agreed with each client. LGT WM US's Investment Committee and the Firm's portfolio risk and compliance team also undertake additional ad-hoc reviews.

In addition to the portfolio reviews, further reviews may also be triggered by any material changes such as a notification of a change in a client's circumstances, an injection or redemption of capital in the client portfolio managed or changes in the prevailing market, political or economic environment.

Client reporting is provided by the Custodians in accordance with the underlying account agreement and prevailing regulatory rules and regulations. Each of LGT WM UK and LGT WM Jersey undertakes to send quarterly account information directly to you.

We would urge you to ensure that you carefully check these statements and compare any statements received from us against statements received from LGT WM UK and LGT WM Jersey.

14. Client referrals and other compensation

This Item is not applicable. LGT WM US is not remunerated by any party other than its clients which is disclosed in the client's fee schedule. The Firm receives no economic benefit for providing investment advice or other advisory services to its clients whether directly or indirectly, other than as set out above.

The Firm does not currently utilise third party marketing firms.

15. Custody

LGT WM US does not undertake to provide direct custody and execution services and does therefore not consider itself to have direct Custody of its client's assets. Depending on the type of services you need, you would be required to enter into a separate agreement appointing LGT WM UK, LGT WM Jersey or RBC as your custodian. The agreements with the Custodians permit LGT WM US to facilitate the passing of orders for execution by the Custodians.

LGT WM US does not have custody of cash, bank accounts or securities, as these services and the administration of them are provided exclusively by the Custodians. We do however recognise that both LGT WM UK and LGT WM Jersey are affiliated entities (commonly known as related persons) of LGT WM US and the view that this relationship may present a conflict of interest. To this end, and as required by regulation, we have certain controls in place overcome any presumption that we are not operationally independent of those entities.

Each of LGT WM UK and LGT WM Jersey undertakes to send quarterly account information directly to you. As mentioned in section 13, we would urge you to ensure that you carefully check these statements and compare any statements received from us against statements received from LGT WM UK and LGT WM Jersey.

16. Investment discretion

LGT WM US provides investment management services on either a discretionary or advisory basis.

Each of the models offered via the Strategic Portfolio Service are managed by LGT WM US on an entirely discretionary management basis. This means that the Firm will not contact you prior to executing transactions, and we retain full discretion to buy and sell securities suited to the risk strategy of the relevant model.

For Discretionary Account Services, we will manage your account, at our discretion, in accordance with an agreed strategy between you and us. We will not contact you prior to executing transactions and retain discretion to buy and sell securities suited to the risk strategy desired by you.

For Advisory Account Services, we will contact you when we establish a suitable opportunity which we firmly believe will maximise the potential value of your portfolio. We refrain from taking any action until you have confirmed that you are agreeable to the proposed action.

Prior to managing your assets, we conduct a full "Know Your Customer" ("**KYC**") assessment which includes you completing an Investment and Risk Profile Questionnaire ("**IRPQ**"). The IRPQ provides us with relevant information about you, your personal circumstances, your investment experience and your attitude to risk.

Once you have completed the IRPQ, one of our investment managers will identify and discuss with you any responses that appear to be inconsistent. Following this discussion, we would propose an Investment Policy Statement ("**IPS**"). The IPS acts as a mutual agreement between you and us regarding the circumstances, objectives and constraints that govern the way we will manage a client's portfolio.

LGT WM US will not assume any investment management responsibility until all portfolio opening paperwork and Anti-Money Laundering ("**AML**") checks have been satisfactorily undertaken and completed. Furthermore, no trading activity will be undertaken until we have received a completed IRPQ which outlines your investment objectives, attitude to risk, investment experience and financial circumstances.

We want to ensure that we manage your money in the way you feel most comfortable, so ensuring that we have as much relevant information as possible is key to ensuring this, and your trust in us.

17. Voting client securities

The type of securities LGT WM US invests in for its clients are primarily equities and other equity related securities. We will exercise any vote in respect of shares in equities on your behalf where appropriate, and where we have the discretionary authority to do so.

As investment manager, LGT WM US will be notified of any action (which requires voting by the security holder) by the relevant Custodian.

Where we have your discretionary authority, we would not consult with you before exercising any vote but will always seek to vote in a manner that we determine as in your best interests. LGT WM US maintains written records of the proxy vote on each occasion a proxy is voted.

Information on how the Firm has voted a particular client proxy is available to that client upon request.

Where any material conflict is identified, no action will be taken without referral to the Firm's CCO and CEO. The CCO and CEO will consider all aspects of the material conflict and will advise the investment manager and/or other personnel accordingly.



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18. Financial information

The Firm has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to its clients and has not been the subject of a bankruptcy proceeding.

19. Requirements for State-Registered Advisers

LGT WM US has no additional disclosures to make.