

Client Relationship Summary (Form CRS / ADV Part 3)

March 2024

ITEM 1: INTRODUCTION

ROVS – REYL Overseas Ltd. is registered with the U.S. Securities and Exchange Commission as an investment adviser (CRD 152526), and licensed as a portfolio manager by the Swiss Financial Market Supervisory Authority (FINMA).

Investment advisory and brokerage services and related fees differ, and it is important for retail investors to understand those differences. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker-dealers, investment advisers, and investing.

ITEM 2: RELATIONSHIPS AND SERVICES

What investment services and advice can you provide me?

We provide investment advisory services to retail investors including high-net-worth individuals, insurance companies, investment companies, and pooled investment vehicles.

We offer our investment advisory services for an ongoing asset-based fee calculated on the market value of your assets under our management (as described below).

Based on our understanding of your goals, we will work with you to define an investment strategy tailored to your particular needs and restrictions, and designed to help you meet those goals. This investment strategy will guide our investments and investment proposals.

We offer two types of advisory accounts. We manage advisory accounts either on a discretionary basis, meaning that we are allowed to buy and sell investments in your account without asking or notifying you in advance (a “**discretionary account**”), or on a non-discretionary basis, meaning that we will provide you with advice and you will make the ultimate decision regarding the purchase or sale of investments (a “**non-discretionary account**”). All discretionary accounts and non-discretionary accounts are continuously monitored as part of our standard services. We also review your advisory account in response to particular events. Generally, our investment minimum to open and maintain an advisory account is one million dollars (USD 1,000,000), although we may accept accounts below that amount and related accounts can be aggregated. Other eligibility requirements to open and maintain an advisory account or relationship with us differ depending on your profile.

We do not limit investment offerings to a particular class of assets or proprietary products.

More detailed information about our advisory services is available in our Form ADV, Part 2A Brochure (Items 4, 7, and 13) at <https://adviserinfo.sec.gov>.

Conversation Starters. Ask your financial professional:

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

ITEM 3: FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

What fees will I pay?

We charge an annual asset-based fee ranging between 0.8% and 1.2% of the market value of the assets in your account. The asset-based fee is due and payable at the end of each quarter, and is calculated using the average market value of the assets in your account over the three previous months. However, regardless of the value of the assets in your account, there is a minimum annual fee of ten thousand dollars (USD 10,000). The more assets you invest in your advisory account, the more you will pay in asset-based fees, and therefore we have an incentive to encourage you to increase the assets in your account.

In addition to or instead of asset-based advisory fees, we may charge performance-based fees to certain clients with discretionary accounts. Specifically, we may charge those clients a quarterly or an annual performance-based fee equal to a percentage of the realized or unrealized appreciation of such client’s account value.

Our advisory fees do not include or cover other fees related to your account such as custodian fees, fees for trade settlement, brokerage commissions, taxes, management fees or other fees charged by funds and other transactional fees and product-level fees.



You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

More detailed information about our fees is available in our Form ADV, Part 2A Brochure (Items 5 and 6) at <https://adviserinfo.sec.gov>.

Conversation Starters. Ask your financial professional:

- Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

Proprietary Products: We earn more compensation when you invest in products that we (or any of our affiliates) issue, sponsor, or manage, than when you invest in other available products. Therefore, depending on the type of advisory account, we have an incentive to recommend (or to invest your assets in) those products rather than in third-party products.

Third-Party Payments: We could receive compensation from third parties, such as cash benefits, when we recommend or sell certain investments. Therefore, we may have an incentive to recommend (or invest your assets in) these investments over investments of third parties that do not pay us, or pay us less. Thus, we may not always be impartial with respect to our recommendations, which can be motivated by the compensation we receive for certain investment products rather than based on your investment goals.

More detailed information about our conflicts of interest is available in our Form ADV, Part 2A Brochure (Items 6 “side-by-side management”, 10, and 11) at <https://adviserinfo.sec.gov>.

Conversation Starters. Ask your financial professional:

- How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

All our financial professionals are paid a monthly fixed salary. In addition, certain of our financial professionals, including relationship managers, may also receive additional compensation in the form of bonus payments. We base bonuses upon a combination of revenue generated by the client accounts each professional manages, and growth in the value of the assets in such accounts. We consider factors like the amount of client assets they service, and gathering of assets and income for us. Therefore, our financial professionals have incentives to recommend that you purchase investments based on the revenue they may generate, and to invest more assets with us.

ITEM 4: DISCIPLINARY HISTORY

Do you or your financial professionals have legal or disciplinary history?

Yes. Visit <https://www.investor.gov/CRS> for free and simple search tools to research us and our financial professionals.

Conversation Starters. Ask your financial professional:

- As a financial professional, do you have any disciplinary history? For what type of conduct?

ITEM 5: ADDITIONAL INFORMATION

Where can I obtain additional information?

For additional information about our investment advisory services, please see our advisory program brochures available at <https://adviserinfo.sec.gov>. If you would like additional, up-to-date information or a copy of this disclosure, please call +41 58 717 94 00.

Conversation Starters. Ask your financial professional:

- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?