



Scott Capital Partners LLP
24 St James's Square
London
SW1Y 4JH
Tel. +44 (0)204 574 2828
Web. scottcp.com

Form ADV Part 3/Form CRS

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Item 1. Introduction

We are an applicant to become an SEC registered investment adviser. When our registration becomes effective, we will amend this Form CRS. This and our Form ADV Parts 1 and 2A will be filed with the SEC at www.adviserinfo.sec.gov. Brokerage (we are not a broker) and investment advisory services and fees differ, and it is important for you to understand the differences. Free, simple tools are available to research firms and financial professionals at Investor.gov/CRS, with educational materials about brokers, investment advisers and investing. This information applies only to our U.S. clients.

Item 2. Relationship and Services: “What Investment Services and Advice Do We Provide?”

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

Our clients are U.S. and non-U.S. high net worth individuals, trusts, family investment vehicles and retirement accounts. We do not have a minimum account size as we consider all the services we provide to a client.

We offer discretionary investment management services, non-discretionary investment management services and occasional and non-continuous non-discretionary investment advice.

Each of our clients has their own dedicated investment manager. We gather and assess a range of information from our clients so that we can understand their investment objectives, financial situation, personal circumstances, restrictions and willingness and ability to take risk. Based on this assessment, we develop a bespoke investment strategy for each client. This will be amended when you provide us with updated information that materially affects our view on the suitable strategy for you. We record this in the mandate with our client. This will be amended when our client provides us with updated information that materially affects our view on the suitable strategy for them.

We conduct our own research. We also buy research and analyse it to come to our own views. We make investment decisions based on the strategy selected, taking into account the client's investment objectives, restrictions and our internal investment guidelines. We exercise discretion to buy, hold or sell equity securities, corporate bonds, US government and other sovereign bonds, securities issued by pooled investment vehicles, and cash and cash equivalents.

We do not offer brokerage (solicited or unsolicited U.S. client securities execution services).

The performance of investment portfolios depends on the strategy we implement for the client and market performance.

We meet or speak with our clients regularly throughout the year to discuss the performance of their portfolio of investments. The client's dedicated investment manager will perform a comprehensive review of each client's portfolio of investments annually and present the outcome of this review to the client at their review meeting.

Information about the firm's licenses, and the experience, education and professional qualifications of all our staff will be provided on request.

More information is available in our Form ADV Part 2A Items 4, 7 and 8, and in our Brochure Supplement on Form ADV Part 2B. These will be available at www.adviserinfo.sec.gov when our registration is effective.

Item 3. Fees, Costs, Conflicts and Standards Of Conduct: “What Fees Will I Pay?”

You will pay fees and costs whether you make or lose money on 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. Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to manage, how much will go to fees and costs, and how much will be invested?

When we act as your investment adviser, we act in your best interests and do not put our interests 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 use for you. How might your conflicts of interest affect me, and how will you address them?

We do not manage money on the basis of a fixed amount with a withdrawable fee, say, \$10,000. We charge an annual management fee for our discretionary and non-discretionary investment management services. This is based on a percentage of assets under management and is negotiable. It is shown in our Form ADV Part 2A Item 5. If a client requests it, they may pay an annual flat fee for our discretionary and non-discretionary investment management services. Where we provide occasional and non-continuous non-discretionary investment advice, the client pays us a one-off fee.

We may agree a performance fee with a client in relation to occasional and non-continuous non-discretionary investment advice, which is in addition to the one-off fee they pay. A performance fee is based on the performance of the client's investments as agreed with the client. Any investment advice we give is based upon a portfolio of assets that is different from a portfolio on which we provide discretionary or non-discretionary investment management services, and for this reason we do not believe that this is a conflict of interest. We may only enter a performance fee agreement if the client meets the definition of a qualified client under Rule 205-3(d)(1) of the Advisers Act. Before we start providing services to our client, we ensure they understand and agree with the methodology we will use to calculate the performance fee and include this in the written agreement between us. Performance fees are structured subject to Section 205(a)(1) of the Advisers Act in accordance with the available exemptions thereunder, including the exemption set forth in Rule 205-3(d).

Separately from our fees, clients bear costs charged by third parties, for example custody and execution fees, underlying financial instrument costs associated with investments in funds or other investments, taxes, interest expenses, duties and other governmental charges, transfer and registration fees, or costs associated with foreign exchange transactions. We do not receive any part of these third-party charges.

What are our legal obligations to you when acting as your investment adviser?

As a fiduciary we always seek to act in our clients' best interests. This legal obligation comes from the antifraud provisions of the U.S. Investment Advisers Act of 1940 and the rules thereunder, the SEC's Standard of Conduct Interpretation and includes the duties of loyalty and care - best execution, the disclosure of material facts, such as conflicts of interest and the means to address (mitigate) them, suitability and a reasonable basis for recommendations. We make money based on the fees that we charge, as noted above. We do not make money another way.

Our conflicts of interest are set out in our Form ADV Part 2A Item 10.

How will our professionals make money?

Our investment advisers receive a base profit share. Awards of variable profit share are based on an individual's performance assessment and alignment with our code of conduct during the financial year to which the award relates. Awards of variable profit share is discretionary and can be reduced to zero. Variable profit share is based on these factors: financial criteria, such as firm profitability and an individual's contribution to that; and non-financial criteria, such as contributing to the delivery of good outcomes for clients and to our objectives, achieving personal objectives, performance higher than expected in their role, taking responsibility for compliance and risk management, and exemplifying our core values and expected standards of behaviour.

More information will be available in our Form ADV Part 1 Item 5.E and Form ADV Part 2A Items 4, 5 and 10, which are filed with the SEC and for which we will provide links after we are SEC registered.

Item 4. Disciplinary History: “Do We or Our Professionals Have Legal or Disciplinary History? For What Type of Conduct?”

No. We have nothing to report.

Item 5. Additional Information

Your primary contact person is Anna O'Shaughnessy. If you have any concerns about us or this person, contact David Scott. You can reach us at the e-mail address or phone number, below.

We will provide you with a copy of this Relationship Summary and our Form ADV Parts 2A and Part 2B when our SEC registration becomes effective, or by contacting us at info@scottcp.com or +44 (0)204 574 2828.

Please visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.