

April 2024

Swiss American Advisors AG, ADV Form Part 2A Disclosure Brochure		
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SEC File No. 801-71175		

This brochure provides information about the qualifications and business practices of **Swiss American Advisors AG**. If you have any questions about the contents of this brochure, please contact us at info@s-a-advisors.com. 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 **Swiss American Advisors AG** is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for our firm name Swiss American Advisors Ltd. or our firm CRD number 152531.

*Registration as an investment advisor does not imply a certain level of skill or training.

Item 2 – Material Changes

Since our last required annual amendment filed in May 2023, there have been a few changes filed in n accordance with new requirements from the Swiss Financial Supervisory Authority (FINMA):

- In April 2023 the firm moved its main office location to the address listed on the cover page of this Brochure.

- A second Board of Director was changed:

Mr. Alessandro Balestra (alessandro.balestra@s-a-advisors.com)
Swiss American Advisors AG
Bellerivestrasse 67
CH-8008 Zurich / Switzerland

Resigned and was replaced by:

Ms. Lina Popova
Swiss American Advisors AG
Bellerivestrasse 67
CH-8008 Zurich / Switzerland

We will ensure that you receive a summary of material changes, if any, to this and subsequent disclosure brochures within 120 days after our fiscal year ends. At that time, we will also offer a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes, as necessary.

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Item 4 – Advisory Business

Swiss American Advisors AG (hereafter “the Company”) a company established under Swiss law, is acting as an asset manager and investment advisor. The Company is a member of the Swiss limited corporation for supervision (AOOS) and is registered with the U.S. Securities Exchange Commission (SEC) as an Investment Advisor. We are also required to be approved by the Swiss Financial Market Supervisory Authority (FINMA) and meet their annual requirements for additional education in financial markets. The Company, in its current form since November 19, 2009, provides investment services to individual and corporate clients, trusts and foundations. The Company’s primary service is managing separate portfolios of clients who either (a) grant the Company discretionary management authority or (b) take advantage of the Company’s advisory services, for those clients who prefer to manage their own portfolios.

We provide asset management services which involves us managing and trading your designated account(s). We will discuss your investment goals and design a strategy to try and achieve your investment goals. As a standard part of our services, we will continuously monitor your account when providing asset management services and contact you at least annually to discuss your portfolio.

For Discretionary Accounts: We purchase or sell securities as set out the Investment Agreement made between the client and Swiss American Advisors (please see the ADV Forms Part II Replacement Brochure for more information).

For Non-Discretionary Account: We purchase or sell as per final instructions given by the client for each purchase or sale of any security. If necessary, we attempt to advise clients if we see problems with the type of security, the size of the transactions or possible restrictions for the clients to invest in certain instruments. Instructions given by the client are placed as soon as possible, during business hours and taking into consideration, possible delays (short absence, meetings, etc.).

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Types of Investments

Typical investments include international common and preferred stocks, mutual funds, bonds, time deposits denominated in various currencies, precious metals, warrants, options and hedge funds. These investments are diversified both in geographic terms and in the currencies, they are traded.

Assets Under Management

As of March 31, 2024, the firm managed \$53,210,614 (USD) of client assets. \$35,519,372 are managed on a Non-Discretionary basis and \$17,691,242 is managed on a discretionary basis.

Item 5 – Fees and Compensation

Fee Schedules

Total assets under Management Program

The following is the fee schedule for separately managed individual account, who select to pay an annual percentage management fee based solely upon the total assets under management in their account:

Annual Percentage Fee Schedule

Investment Strategy	Conservative	Balanced	Growth	Equity
Assets under Management (AUM)				
USD up to 2,500,000	0.90%	1.10%	1.20%	1.40%
USD 2,500,001 - 5,000,000	0.85%	1.05%	1.15%	1.35%
USD 5,000,001 - 10,000,000	0.80%	1.00%	1.10%	1.20%
More than USD 10,000,001	Negotiable	Negotiable	Negotiable	Negotiable

Minimum Fee for all strategy accounts is USD 1,000 p.a.

The Company believes the fees and costs involved with both the managed as well as the advisory portfolios, are competitive with other institutions in Switzerland and worldwide. The Company estimates running costs for the client of approx. 1.10% - 1.71% p.a. (management & depository banks) of the average portfolio value. Market conditions over the running year may cause significantly higher or lower fees for the client, than the estimated average range mentioned above.

Clients may at any time add or withdrawal assets from/to their account. There are in most cases, no lock-up provisions.

Item 6 – Performance-Based Fees and Side-By-Side Management

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item 6* is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

Item 7 – Types of Clients

We provide investment advisory services to a wide range of clients, including individuals, families, corporations, trusts and charities.

Conditions for Managing Accounts

The Company generally requests a minimum of USD \$500'000 to establish either an advisory or managed Portfolio and a Minimum Annual Fee for all strategy accounts is USD 1,000 p.a.. The Company believes that these are the minimum amount required to successfully execute its investment strategies for an individual portfolio. Smaller accounts can be accepted at the Company's discretion.

Item 8 - Method of Analysis, Source of Information and Investment Strategies

The Company employs a wide range of methods to evaluate investments and manage portfolios, including fundamental analysis, technical analysis together with analysis of the economic, market, industry, the firm itself and cycles and trends. The Company's investment philosophy is international diversification, not exposing clients to higher risks than they are prepared to take (according to investment profile).

The main sources of information used are financial newspapers and publications, both in print and in electronic forms, Internet, broker research information, corporate reports and press releases.

The Company continually adapts its investment strategies to match the market conditions and individual client needs, based upon the basic guidelines and strategy which is currently applicable for the account in question. The Company generally attempts to hold securities for a minimum duration of 6 – 12 months,

however, market conditions are not predictable and can shorten the duration a security is held. Investments on margin can only be made upon the client's request and approval. Investments in options (long or short) can be made to either cover (hedge) existing holdings or enhance the overall portfolio diversification. Such investments are not the basis for the investment strategy.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that the future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an

ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.

- **Management Risk** – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease

We also invite clients to read “Risks Involved in Trading Financial Instruments”, from the Swiss Bankers Association: (https://www.swissbanking.ch/Resources/Persistent/6/1/3/c/613cf17d17e7628788b2135114e5d399e822778d/SBA_Risks_Involved_in_Trading_Financial_Instruments_2019_EN.pdf)

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity that are required to be disclosed.

Item 10 – Other Financial Industry Activities and Affiliations

The Company is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

We are an independent investment registered adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure.

Relationship with affiliated Investment Advisors

Certain representatives of Avalon Capital AG are also affiliated with Swiss American Advisors AG. For the sole purpose of being a member of the Board of Directors and providing administrative support. Swiss American Advisors AG and Avalon Capital AG are affiliated. The dual relationship creates a conflict of interest which will be addressed by each firm, closely monitoring the activities of the dual affiliated persons to insure the protection of private business and client information.

being a member of the Board of Directors and providing administrative support. Swiss American Advisors AG and Avalon Capital AG are affiliated.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

According to the Investment Advisers Act of 1940, an investment adviser is considered a fiduciary and has a fiduciary duty to all clients. The Company has established a Code of Ethics to comply with the requirements of Section 204(A)-1 of the Investment Advisers Act of 1940 that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal

securities laws. The Code of Ethics covers all individuals that are classified as “supervised persons.” All employees, officers, directors and investment adviser representatives are classified as supervised persons. The Company requires its supervised persons to consistently act in your best interest in all advisory activities. The Company imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm’s fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of The Company. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

Affiliate and Employee Personal Securities Transactions Disclosure

The Company or supervised persons of the firm are prohibited from buying and selling for their personal accounts investment products identical to those recommended to clients. It is the express policy of The Company that all persons associated in any manner with our firm must place clients’ interests ahead of their own when implementing personal investments. As is required by our internal procedures manual, The Company and its supervised persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations. To mitigate conflicts of interest that can occur when access persons manage their personal accounts at the same time The Company manages client accounts, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, supervised persons):

- Supervised persons cannot prefer their own interests to that of the client.
- Supervised persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts.
- Supervised persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment unless that information is also available to the investing public upon reasonable inquiry.
- Supervised persons are prohibited from purchasing or selling securities of companies in which any client is deemed an “insider.”
- Supervised persons are discouraged from conducting frequent personal trading.
- Supervised persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted to the Chief Compliance Officer of The Company.

Any Supervised person not observing our policies is subject to sanctions up to and including termination.

Item 12 – Brokerage Practices

The Company is an independent asset manager and has no direct affiliations to other institutions. Clients of The Company make use of the banking, clearing and depository services of other Swiss banks with which the clients have established an account relationship. These banks levy fees for safe custody, accounting, securities transactions and general banking business such as transfers of cash, issuing and collecting checks etc., based upon their own fee schedule and policies.

Although not a material consideration when recommending that a client consider using certain custodian

banks for custody and execution services, the Company may receive from the custodians, without cost (and/or at a discount) research and support services and/or products which may assist us to better monitor and service client accounts maintained at their custodian. Included within the support services that may be obtained by The Company are economic, market and individual security research, pricing information and market data, software and technology that provide access to client account data, and software and/or other products that can be used by us in furtherance of our investment advisory business.

Directed Brokerage

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular broker/dealer, The Company may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/dealers may cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, The Company has decided to require our clients to use broker/dealers and other qualified custodians determined by The Company.

Our clients do not pay more for investments transactions effected and/or assets maintained at their custodian, as a result of this arrangement, and we have no obligation to direct any specific amount of transactional business to or purchase any particular security or service from any entity as a result of the above arrangement.

Soft Dollar Benefits

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

The Company does not have a soft dollar agreement with a broker-dealer or a third-party.

Item 13 - Review of Accounts

The Company's portfolio managers and Compliance regularly monitor accounts to identify and correct any transactions or valuation errors, and to implement strategies that serve each client's investment objectives. At a minimum, a review is conducted by the portfolio manager, the day of and the day following the booking of any securities transactions being made on a client's account.

Performance figures are reviewed monthly by the portfolio managers. More frequent account reviews are triggered by such factors as; a) awareness of a material change in a client's circumstances or investment objectives, b) significant changes in the market conditions, c) changes in the portfolio manager's assessment of a security held in an account, and d) divergence of an account's investment performance from management's expectations.

Portfolio statements, indicating the current value, year-to-date performance and the current holdings in the portfolio, are to be sent to clients on a quarterly basis, directly from the depository bank, unless otherwise instructed by the client. Individual contract notes for each transaction made, showing prices and any commissions or charges levied, can be sent upon request, from the Company. Annual statements required for filing taxes, showing gains/losses, income and fees deducted, will be sent to the client in the first quarter of the calendar year by their bank.

The bank provides quarterly reports showing diversification of the portfolio by industry, sector, currency, region and investment type, along with cost basis, profits or losses of all securities held by the client. If additional information is needed, please contact the Company. Through personal meetings, telephone calls, e-mails or other forms of communication, the Company regularly informs the client about investment policies and strategies being followed to achieve the client's investment objectives. The nature and frequency of these reports and other communications are determined primarily by the particular needs and wishes of each client.

The Company will inform clients through this and/or other printed material regarding its policy and any changes thereto at a minimum, on an annual basis.

Item 14 - Client Referrals and Other Compensation

The Company is involved exclusively in the business of asset management and advisory services. The Company does not have arrangements for receiving compensation for any services or functions other than those mentioned in Item 1 (Advisory, Management Services and Fees).

The Company is an independent asset manager and has no direct affiliations to other institutions. Clients of The Company make use of the banking, clearing and depository services of other Swiss banks with which the clients have established an account relationship. These banks levy fees for safe custody, accounting, securities transactions and general banking business such as transfers of cash etc., based upon their own fee schedule and policies.

Although not a material consideration when recommending that a client consider using certain custodian banks for custody and execution services, the Company may receive from the custodians, without cost (and/or at a discount) research and support services and/or products which may assist us to better monitor and service client accounts maintained at their custodian. Included within the support services that may be obtained by The Company are economic, market and individual security research, pricing information and market data, software and technology that provide access to client account data, and software and/or other products that can be used by us in furtherance of our investment advisory business.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented. The Company is deemed to have custody of client funds and securities whenever The Company is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody The Company will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which The Company is deemed to have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly.

Clients should carefully review those statements and are urged to compare the statements against reports received previously from the bank. When clients have questions about their account statements, they should contact the Company which can either answer themselves or forward to the clients bank, which created the statement.

Item 16 - Investment or Broker Discretion

The Company provides advisory services and manages accounts on a discretionary basis, on the client's behalf.

This discretionary management authority gives the Company the power to decide on the securities, the timing and size of any investment to be made on the client's behalf. Without specific client instructions (signed), the Company does not, with the exception of its quarterly management fee, have the authority or power to transfer funds or securities to or from the client's account.

Item 17 – Voting Client Securities

Proxy Voting

The Company does not vote proxies on behalf of Clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility, if desired, to vote all proxies for securities held in Account.

If registered with the individual companies, you will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided. Although we do not vote client proxies, if you have a question about a particular proxy feel free to contact us. However, you will have the ultimate responsibility for making all proxy-voting decisions.

Item 18 – Financial Information

This *Item 18* is not applicable to this brochure. **The Company does not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance (Sorry I do not understand where the \$1200 came from or why this is needed).** Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, The Company has not been the subject of a bankruptcy petition at any time.

Item 19 - Ombudsman

Should clients believe their interests are not being correctly followed by Swiss American Advisors, new regulations require that we are registered with an Ombudsman office and provide this contact information to our clients (www.ombudfinance.ch) OFS, Ombud Finance Switzerland.

Form ADV Part 2B: Brochure Supplement - Otto E. Hueppi

Swiss American Advisors AG
Bellerivestrasse 67,
CH-8008 Zurich, Switzerland
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Date of Supplement: May 2024

This brochure supplement provides information about Otto Hueppi, that supplements the Swiss American Advisors AG ("Swiss American Advisors") disclosure brochure. You should have received a copy of that brochure. Please contact us at +41 43 888 6425 or at info@s-a-advisors.com if you did not receive Swiss American Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about Otto Hueppi, is available on the SEC's website at www.adviserinfo.sec.gov. Additional information about Otto Hueppi, is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience
Otto Hueppi,

Born 1959; CRD # 7379635

Post-Secondary Educational Background:

University of South Florida, Bachelor of Arts: 1981

Business Background:

Swiss American Advisors, CEO, 01/2009 to Present;

Item 3 – Disciplinary Information

Otto Hueppi has no legal or disciplinary events that are required to be reported.

Item 4 – Other Business Activities

Mr. Hueppi has no other business activities to report.

Item 5 – Additional Compensation

Otto Hueppi has no additional benefits to report.

Item 6 – Supervision

The Chief Compliance Officer of the firm remains Otto Hueppi In 2023 the firm retained the services of an external Law Firm to serve in the capacity of Risk Manager :

LEXARTE, Attorneys at Law
Stockerstrasse 12
8022 Zurich/Switzerland
Mr. Thomas Huegi (thomas.huegi@lexarte.ch)
Deputy:
Mr. Andreas Erb (andreas.erb@lexarte.ch)

As CEO and CCO Otto Hueppi, of Swiss American Advisors is responsible for overseeing and enforcing the firm's programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives. Otto Hueppi can be contacted at +41 43 888 6425.