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Firm Brochure
(Part 2A of Form ADV)

BRITE ADVISORS PTY LTD

Shop 4 1-5 Piper Street
Caboolture, Australia
QLD 4510
Phone: +61408028205
Email: gordon@brite-advisors.com

This brochure provides information about the qualifications and business practices of BRITE ADVISORS PTY LTD. If you have any questions about the contents of this brochure, please contact us at +61408028205 and/or gordon@brite-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 BRITE ADVISORS PTY LTD also is available on the SEC's website at www.adviserinfo.sec.gov. The Firm's CRD/IARD number is 288092.

JULY 2017

2. Material Changes

Annual Update

The U.S. Securities and Exchange Commission ("SEC") issued rules in July and August of 2010 requiring advisers to provide a firm brochure written in narrative "plain English" format. The new rules specify mandatory sections and organization. This brochure is prepared in accordance with the SEC's new rules (the "Firm Brochure").

Material Changes

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. Such information is available at www.adviserinfo.sec.gov.

To review the Firm information for ADV Part 1 and ADV Part 2:

- Click "Investment Adviser Search" in the left navigation menu and "Enter"
- Select option for Investment Adviser Firm and enter "288092" in the field labeled "Firm IARD/CRD Number"
- ADV Part 1 will be displayed and you may also access ADV Part 2 from here

Full Firm Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure and any supplements thereto, please contact us by phone at +61408028205 or by email at gordon@brite-advisors.com.

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Important Information

As used in this Brochure, the words “we,” “our,” and “us” refer to Brite Advisors Pty Ltd and the words “you,” “your,” and “client” refer to you as either a client or prospective client of our firm. These terms are utilized for the reader’s ease of use while reviewing the brochure and are not meant to imply the firm is larger than it actually may be at the time of publication. Also, you may see the term Associate Person throughout this Brochure. As used in this Brochure, our Associated Persons are our firm’s officers, employees and all individuals providing investment advice on behalf of our firm. The term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary.

4. Advisory Business

Firm Description

Brite Advisors Pty Ltd (the “Firm” or “Brite”) was organized as an Australian proprietary company in January of 2009. The Firm began operating as a registered investment adviser with the U.S. Securities and Exchange Commission (“SEC”) in July 2017 to provide investment management services to individuals including high net worth individuals. The Firm is also registered with the Australian Securities and Investments Commission as a Financial Services Licensee. The Firm is a wholly-owned subsidiary of Brite Advisory Group Limited.

The mailing address of the Firm is Shop 4 1-5 Piper Street, Caboolture, Australia QLD 4510; telephone: +61408028205.

Types of Firm Services

Investment Management Services

The Firm offers customized investment management services on a non-discretionary basis to individuals including high net worth individuals. The Firm does not offer discretionary management services to clients.

International Pension Schemes

The Firm offers investment management services focusing on advising individuals that have accrued deferred pension benefits in the United Kingdom, who are now residing in the US and are US taxpayers. The Firm advises such clients on pension transfers from a defined benefit scheme or other scheme with safeguarded benefits and analyzes the assets in which a client’s funds will be invested as well as the specific receiving scheme. The methods of analysis and strategies which the Firm uses are further described in Item 3 below.

The Firm offers its services solely on an advisory basis and does not maintain pension assets. Clients are strongly encouraged to review their agreements with their pension trustees and any and all other disclosure materials provided by the pension trustees and other parties for a full understanding of the services provided and any associated costs therein.

The Firm does not provide any tax advice including, without limitation, in relation to any US tax reporting requirements and/or other tax implications arising in relation to clients’ pension transfers. While we may inform clients of certain tax developments, the Firm recommends that clients seek their own tax advice especially in relation to requirements and procedures under tax treaties between the US and the UK in order avoid double taxation in the UK.

The Firm has not limited the types of investments it recommends or conducts research on. The Firm may liaise with UK-based investment advisers on advising clients on proposed transfers to comply with both US and UK regulations. Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly on an as-needed basis.

This Firm did not have any regulatory assets under management as of March 31, 2017.

5. Fees and Compensation

Description

The Firm charges an investment advisory fee that is based on its investment advisory/consultative services rendered to the client. Brite's charges the following type and range of fees:

<u>Fee Type</u>	<u>Fee Range</u>
Percent of Pension Fund Value (annual)	0% to 1%

In general, fees are billed annually in advance, according to the fee schedule established in an Investment Advisory Agreement, where appropriate. The Firm reserves the right to negotiate its fees up or down, based on the size of the client account and other factors.

Lower fees for comparable services may be available from other sources. The Firm gives a client thirty (30) days prior written notice of any increase in fees unless otherwise specified in Investment Advisory Agreement.

Advisory agreements with Brite (whether written or oral) are also terminable upon thirty (30) days prior written notice. Upon termination, a client will receive a pro rata invoice for advisory fees outstanding from the beginning of the billing period up to the date of termination. The client will also incur brokerage commissions and other transaction costs as part of regular portfolio trading, which commissions and costs are separate from Brite's investment advisory fee. Brokerage practices are discussed in Item 12 of this brochure.

Other Costs Involved

Other types of costs may include transaction costs comprised of security trading costs, brokerage fees as well as margin costs.

6. Performance-Based Fees and Side-By-Side Management

The Firm does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

7. Types of Clients

The Firm provides investment advisory services to individuals including high net worth individuals. The Firm generally does not impose a minimum account size.

Prior to providing such services, clients will generally enter into one or more written agreements, which set forth the services Brite provides, the fees to be charged, and other terms and conditions regarding the relationship.

Client relationships vary in scope and length of service.

8. Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

The Firm advises clients by performing a comparison between the benefits likely (on reasonable assumptions) to be paid under a defined benefits scheme or other scheme with safeguarded benefits and the benefits afforded by a personal pension scheme, stakeholder scheme or other pension scheme with flexible benefits. In making the analysis, the Firm takes into account the likely expected returns of the assets in which the client's funds will be invested as well as the specific receiving scheme.

In each case, rates of return are compared, namely, the rate of return that would have to be achieved to replicate the benefits being given up and should be illustrated on rates of return which take into account the likely expected returns of the assets in which the client's funds will be invested. The analysis takes into account the likely expected returns of the assets, as well as the associated risks and all costs and charges that will be borne by a client.

Investment Strategies

The Firm does not follow any specific investment strategy but rather utilizes strategies driven by and tailored to each client's need and specific circumstances. In doing so, an analysis is conducted of each client's current financial situation and other information provided by client to determine an appropriate mix of investments for client.

Risk of Loss

All of Brite's investment strategies have certain risks that are borne by the investor, including the potential risk of a total loss. While Brite's investment strategies constantly seek to keep the risk of loss in mind, the risks that investors face by investing with the Firm include, without limitation, the following:

Market Risk: The price of a security, bond, or commodity interest may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's or other contract's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (e.g. interest rate). This primarily relates to fixed income securities.

Business Risk: These risks are associated with investing in a particular industry or a particular company within an industry.

Frequency of Trading: The Firm's investment strategy may have a high turnover of securities. Frequent trading can affect investment performance due to increased brokerage and other transaction costs. In addition, any trading strategy that is short-term in nature results in any profits or losses also being short-term for tax purposes.

Financial Difficulties of Institutions and Custodians. There is the possibility that institutions, including brokerage firms and banks, with which the Firm and/or its clients do business, or to which securities have been entrusted for custodial purposes, will encounter financial difficulties.

Liquidity Risk: Liquidity is the ability to readily convert an investment into cash.

Considering the Firm's method of analysis and investment strategy, investors should be aware that the investment recommendations are dependent on the Firm's judgment and abilities. All investment and trade recommendations are made exclusively by the Firm and based on the Firm's reports and analysis. Additionally, as the Firm utilizes proprietary models, trading strategies of the Firm are continually developing and evolving and may be changed without notice to the Firm's clients.

Brite's investment recommendations seek to limit risk. However, our investment strategies will still subject the client to declines in the value of their portfolios, which can at times be dramatic and lengthy, particularly for clients who are aggressively seeking increased expected returns by accepting increased levels of market risks. The securities traded in the investment strategy are in some cases are aggressive growth stocks. Therefore, significant losses can occur if the client's trading model is not successful. Regardless of the steps taken to minimize risk, investments in securities remains inherently uncertain especially with respect to future returns. Brite does not represent or guarantee any future results.

The foregoing list of risks does not purport to be a complete enumeration or explanation of the risks involves in an investment in securities.

9. Disciplinary Information

The Firm and its principal owner do not have any legal or disciplinary events to disclose.

10. Other Financial Industry Activities and Affiliations

Financial Industry Activities

The Firm does not engage in any financial industry activities outside of its normal advisory business. Furthermore, the Firm has no other active or pending financial industry registrations other than being registered with the Australian Securities and Investments Commission as a Financial Services Licensee.

Affiliations

Brite Advisory Group Limited is a Hong Kong based holding company with two subsidiaries in Hong Kong, one subsidiary in Australia, and one subsidiary in the United Kingdom. It is an organisation of licensed asset management entities with objectives to enter the FinTech market globally.

The first Hong Kong entity is Tribune Retirement Scheme Limited, a Mandatory Provident Fund Schemes Authority (MPFA) registered ORSO provider (No: R028912(3)) under the Occupation Retirement Schemes Ordinance (Cap. 426) (ORSO). It provides trust management and administration of pensions under the Tribune Retirement Scheme in accordance with the regulatory requirements of the MPFA and ORSO. The Scheme has recently been approved by Her Majesty's Revenue and Customs (HMRC) in the United Kingdom for status as a Recognised Overseas Pension Scheme (QROPS) under registered provider number: 901020, which will consequently allow for the trust management and administration of pensions transferred from UK.

Brite Advisory Group also holds the Hong Kong company Watermill Advisors Limited, a Securities and Futures Commission (SFC) licenced entity. The company owns a Type 9 Asset Management Licence (CE Reference: AYD086).

The Australian entity is Brite Advisors Pty Ltd.

Brite Advisory Group also owns a United Kingdom company Cesco Investments Ltd, a Financial Conduct Authority (FCA) licenced entity (Firm Reference Number: 569070).

The Firm does not have any other arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

The Firm has established a Code of Ethics that will apply to all of its associated and supervised persons. The Firm has a fiduciary duty to all of its clients which is the core underlying principle for its Code of Ethics. The Firm requires all employees, associated and supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times, including without limitation, the anti-fraud provisions of Rule 204A-1 of the Advisers Act. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand and agree to comply with the Firm's Code of Ethics. The Firm has the responsibility to make sure that the interests of all clients are placed ahead of the Firm's or its supervised person's own investment interest. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to any services being conducted. If a client or a potential client wishes to review the Firm's Code of Ethics in its entirety, a copy will be provided promptly upon request.

Participation or Interest in Client Transactions and Personal Trading

The Firm and its associated persons may buy or sell securities and other investments that are also recommended for clients. The resulting conflict of interest, however, is actively mitigated by the Firm as the Firm (a) prohibits trading in a manner that takes personal advantage of price movements caused by client transactions and (b) in accordance with the Firm's Code of Ethics, the Firm and its associated persons will never be allowed to place their personal interests ahead of those of their clients.

12. Brokerage Practices

Selecting Brokerage Firm

The Firm may recommend brokers to its clients upon request. Clients are free to use any brokerage services that they wish. However, the Firm considers a number of factors in selecting and/or suggesting brokers and custodians for its clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided.

The Firm does not have any affiliation with any brokerage or product sales firm.

Research and Soft Dollar Benefits

The Firm does not currently receive research or other products or services ("soft dollar benefits") other than execution from a broker-dealer or a third party in connection with client securities transactions in compliance with SEC rules.

Directed Brokerage and Aggregated Orders

The Firm will not require or engage in directed brokerage involving our clients.

13. Review of Accounts

Periodic and Other Reviews

Reviews of all accounts are performed on a daily basis & clients will have access to their accounts via an online portal 24/7 at all times. More reviews can be necessary due to the client's circumstances, economic conditions, general factors affecting the stock market, etc.

Regular Reports

The level of reporting will depend on the specific arrangements between the Firm and a respective client. If applicable, clients will receive transaction confirmations and monthly statements from their account custodians.

14. Client Referrals and Other Compensation

Client Referrals

The Firm does not directly or indirectly compensate any person for client referrals.

15. Custody

Custody of Client Funds or Assets

The Firm does not take custody of client assets.

16. Investment Discretion

Discretionary Authority for Trading

The Firm does not manage client accounts on a discretionary basis. The Firm only advises clients on investments. As such, clients are free to accept or disregard the recommendation.

17. Voting Client Securities

Proxy Voting

The Firm does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent. When assistance on voting proxies is requested, the Firm will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

For clients subject to ERISA, an authorized plan fiduciary other than the Firm will retain proxy voting authority. Our investment advisory agreement and/or the plan's written documents will evidence and outline this authority.

18. Financial Information

Financial Condition

There are no financial conditions which are reasonably likely to impair its ability to meet contractual commitments to clients.

Prepayments

The Firm does not require nor does it solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

Privacy Policy

Privacy Policy Notice

The privacy of the clients of the Firm is a matter of the utmost concern. The Firm does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law and is committed to safeguarding the confidential information of its clients. The Firm holds all personal information provided to clients in the strictest confidence and it is the objective of the Firm to protect the privacy of all clients.

In the event that there is to be a change in this policy, the Firm will provide clients with written notice and clients will be provided an opportunity to direct the Firm as to whether such disclosure is permissible. The Firm delivers a copy of its privacy policy to all clients on an annual basis.

To conduct regular business, the Firm may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to the Firm;
- Information about the client's transactions implemented by others and viewable by the Firm;
- Information developed as part of analyses or investment advisory services.

To administer, manage, service, and provide related services for clients' accounts, it is necessary for the Firm to provide access to customer information within the firm and to nonaffiliated companies with whom the Firm has entered into agreements with. To provide the utmost service, the Firm may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on the Firm's behalf.

- Information the Firm receives from the client on applications (name, social security number, address, assets, etc.);
- Information about the client's transactions with the Firm or others (account information, payment history, parties to transactions, etc.);
- Information concerning investment advisory account transactions;
- Information about a client's financial products and services with the Firm.

The Firm maintains the confidentiality of the information that its clients provide. The Firm protects client's information by meeting all laws setting forth procedures for providing physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

All people who work for the Firm are trained to handle client's information properly in order to maintain its security. The Firm also restricts access to personal information about clients to only those employees who need such information to provide service(s) to the client. The Firm does not sell or market clients' or prospective clients' personal information to third parties. The Firm does not disclose any information about its clients or former clients to anyone, except as needed by our service providers (e.g. broker, accountants, attorneys and auditors) or as required by law.