



## Item 1 - Cover Page

# Javelin Research

## Form ADV Part 2A

### Investment Adviser Brochure

This brochure provides information about the qualifications and business practices of Javelin Research (Javelin). If you have any questions about the contents of this brochure, please contact Surendran Panicker, Director and Compliance Officer at [surendran.panicker@javelin-research.com](mailto:surendran.panicker@javelin-research.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.

Javelin is registered in the United Kingdom and is authorised by the regulatory body, Financial Conduct Authority (FCA), to provide investment advice to professional clients in the United Kingdom. Javelin's FCA registration number is 785439, and details of the authorisation can be found at [www.fca.org.uk](http://www.fca.org.uk)

Registration as an investment adviser does not imply any level of skill or training.

This brochure does not constitute an offer to sell or the solicitation of an offer to purchase any securities of any entities described herein.

Additional information about Javelin is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may search this site using Javelin's unique identifying number, which is 6943679.

More details about Javelin can also be found at [www.javelin-research.com](http://www.javelin-research.com)

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19 May 2018



## Item 2 - Material Changes

18 May 2018

We are required to deliver information about our qualifications and business practices to clients on account opening and at least annually thereafter. Pursuant to SEC regulations, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, 5 April. We may further provide other ongoing disclosure information about material changes as necessary.

There have been no material changes during the previous year.

Our current brochure is always available on our website [www.javelin-research.com](http://www.javelin-research.com). A print copy may be obtained by contacting the Compliance Officer, at [surendran.panicker@javelin-research.com](mailto:surendran.panicker@javelin-research.com).



## Item 3 - Table of Contents

18 May 2018

### Form ADV Part 2A

	Page
Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	5
Item 6 – Performance-Based Fees	5
Item 7 – Types of Clients	5
Item 8 – Methods of Analysis & Risk of Loss	6
Statement of Investment Strategy	
General Risk of Loss Statement	
Item 9 – Disciplinary Information	9
Item 10 – Other Financial Industry Activities and Affiliations	9
Item 11 – Code of Ethics and Personal Trading	10
Item 12 – Brokerage Practices	12
Item 13 – Review of Accounts	12
Item 14 – Client Referrals and Other Compensation	12
Item 15 – Custody	12
Item 16 – Investment Discretion	12
Item 17 – Voting Client Securities	12
Item 18 – Financial Information	12
Item 19 – Requirements for State-Registered Advisors	12



## Item 4 - Advisory Business

Javelin Research (Javelin) is an investment advisor based in London, United Kingdom. Javelin is an independent research provider, whose primary business is to publish equity and industry sector research for the use of professional/institutional investors.

Javelin does not manage client assets.

Javelin does not have a fixed coverage list, and instead, its universe is US, European and UK stocks numbering more than 3,100. This allows Javelin to highlight the best (& worst) investment ideas not constrained by fixed lists, which inevitably limit investment choices for portfolio managers.

Javelin adopts a floating approach to recommendations. Since it has no fixed coverage list, it will initiate and close recommendations as opportunities dictate, but based on long-term shareholder value creation considerations.

The lack of a fixed coverage list also means that Javelin can issue just two recommendations - Buy or Sell

Javelin will also compile and publish for clients the history and performance of its recommendations.

Javelin research coverage does not extend to the Financial sector or Financial stocks, as per GICS classification.

Javelin was founded by Surendran Panicker.

Launched in March 2018, Javelin's philosophy and methodology were shaped by the lessons learnt and experience gained in portfolio management and research. His main experiences include a 10-year tenure as the US equity portfolio manager at Colonial First State, managing institutional funds, and 15 years of combined experience as an analyst and, latterly, as technology specialist sales at Société Générale Corporate & Investment Banking.

He has a BSc (Econ) Hons from the London School of Economics, and an MSc Econ from Cardiff University, both specialising in International Economics.

Javelin received United Kingdom regulatory approval on 1 March 2018 and is authorised by the Financial Conduct Authority (FCA), reference number 785439, and by regulatory authorities in major European nations, to provide investment advice to institutional investors in the United Kingdom and major European countries.

Surendran Panicker is the 100% principal owner of the business.



## **Item 5 - Fees and Compensation**

Javelin's research products and services are available only to investors who meet the criteria set out by regulatory authorities for institutional/professional investors.

Javelin's subscription-based research is its sole offering. There is no inducement to conduct investment banking, trading or anything else. Independence from commercial conflicts is guaranteed.

The fees paid by clients will depend on the breadth of products and services required by the client, and any customisation requirements. The decision on how (the method or mode, such as cheque) to pay for our research services is at the sole discretion of our clients.

## **Item 6 - Performance Based fees and Side-by-Side management**

Javelin does not manage client assets and therefore, any performance-based fees and side-by-side management are not applicable to the business.

## **Item 7 - Types of Clients**

Javelin provides investment advice through its equity research products to professional/institutional clients only. Examples of such clients that we service are traditional fund management firms, family offices and hedge funds.

## Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

### Philosophy & Insights

It is the prospect of sustained, incremental cash flow generation which drives valuation. Javelin evaluates cash flow, not in the absolute, but in the context of the invested capital consumed to generate that cash flow.

Shareholder value creation also needs persistent fundamentals. Also, to be of substance, shareholder value creation requires the prospect of sustainable competitive advantage.

Javelin adopts a sceptical approach when it comes to management guidance or sell-side forecasts. Valuation models based on forecasting are a futile exercise, and target prices are a folly.

And what's priced in? Stock selection requires not only an awareness of the fundamental outcomes but also a grasp of expectations embedded in the share price.

Javelin's research provides three crucial insights into what drives valuations.

- 1) There is no relationship between forecast EPS growth and the valuations
- 2) Even a focus on ROIC can be misleading. While this gives a good account of historic economic returns, it throws little light on it as a driver of valuation.
- 3) There is strong evidence that it is the Incremental-Return on Invested Capital (I-ROIC) which drive a stock's valuation.

### Javelin's Methods

#### Incremental Return on Invested Capital

I-ROIC is an objective measure of management's success in delivering incremental returns on each dollar invested in the business. Javelin's formula for I-ROIC computes how changes in a \$ unit of invested capital in the period (t-x) caused an increase or decrease in cash flow in the period (t+x). NOPAT is the numerator in the analysis - the cash flow available to all owners of capital. Acquisitions, capital expenditure, R&D and net working capital form the main components of invested capital.

#### Implied competitive advantage period and shareholder value creation

Understanding the competitive advantage an essential part of stock selection, not just for growth stocks, but also for value type stocks, as it indicates the duration over which rate shareholder value creation may be sustained. Javelin's measure on implied competitive advantage period (I-CAP) captures this by estimating the implied "future value" component of a stock's valuation. The key variables that go into calculations for I-CAP are forecast NOPAT, the company-specific WACC and assumptions on tax rates.

#### Management guidance, consensus forecasts and divergence from reality

Company managements' peddle beliefs; Javelin tests management guidance, captured by consensus forecast, to check these for irrational exuberance, or unwarranted despondence. Key question asked - how diverged is management guidance from the likely outcome predicted by Javelin's estimate of likely shareholder value creation?

**What's priced-in? Embedded Expectations**

We ask what has Mr Market made of it all? Has the outcome for forecast fundamentals been priced-in by the market? The sell-side often muddles consensus forecasts with expectations, ignoring the critical metric that embodies expectations - the stock price. Javelin's calculation of embedded expectations (EE) compares the momentum of forecast fundamentals relative to the momentum of the share price.

**Javelin's Coverage**

Javelin does not have a fixed coverage list, and instead, its universe is US, European and UK companies numbering more than 3,100. This allows us to highlight the best (& worst) investment ideas, not constrained by fixed lists, which inevitably limits investment choices for portfolio managers.

**Javelin's Recommendations**

Javelin adopts a floating approach to recommendations. Since it has no fixed coverage list, it will initiate and close recommendations as opportunities dictate, but based on long-term shareholder value creation considerations.

The lack of a fixed coverage list also means that Javelin can issue just two recommendations - Buy or Sell.

Javelin believes that companies offering significant upside in shareholder value creation will outperform the market index through expanding valuation multiples. Javelin aims to identify companies whose valuations have the potential for multiple expansion (for inclusion in the Buy list), and those where valuations may be at risk from multiple contraction (for inclusion in the Sell list).

Central to Javelin's analysis of value creation and valuation is the view that it is the present value of future cash flow, and not earnings, that drives equity valuations. There are four steps in the stock selection process. Firstly, Javelin estimates the outlook for what it believes is the critical valuation driver – the incremental cash flow generation (I-ROIC). Secondly, a trend in incremental cash flow generation must not be a one-off, and we assess whether these trends will persist by considering the implied competitive advantage period (I- CAP).

Thirdly, after the evaluation of value creation potential, the stock is also assessed to see if consensus may be too optimistic (or pessimistic) about a company's prospects for shareholder value creation. We evaluate if consensus forecasts are too exuberant or despondent. Fourthly, importantly, we also assess and quantify whether the good news (or bad news) is already priced-in to the shares. In other words, we present the case for whether the market has already discounted the outlook for shareholder value creation into the share price.

The process, in a nutshell, identifies companies with significant upside to I-ROIC and expanding CAP (potentially an attractive investment opportunity), on the one hand. On the other hand, it identifies companies which may have a significant downside to I-ROIC and contracting I-CAP outlook (potentially an unattractive investment opportunity). Companies that can deliver upside to shareholder value-creation (positive I-ROIC and I-CAP trends) but which have not been recognised by the market will see valuation expansion, are likely member of the list of Buy-rated stocks. Companies with downside to shareholder value creation (negative I-ROIC and I-CAP trends) or companies which suffer exuberance or high embedded expectations are

probable members of the Sell list.

Based on this methodology, Javelin research recommendations take the following forms:

**BUY:** A stock with the potential to significantly out-perform a market index, typically by 10-50%+ over a 1-2 year period.

**SELL:** A stock with the potential to significantly underperform the market index, and/or pose the risk of significant loss of capital, typically 10-50%+ over a 1-2 year period.

Javelin presents a range of 10-50% upside/downside as it recognises that different sectors pose differing risk/reward opportunities to investors, due to the underlying secular trends facing companies within that sector. For example, companies in the consumer staples sector, such as food retailing, may expect to face severe headwinds to revenue growth accompanied by competitive pressures. In these instances, a potential out-performance of the market index of 10% is considered an attractive opportunity. On the other hand, in an emerging growth area of the technology sector, such as enterprise software, a 40% outperformance may be a realistic required profile.

#### **What Javelin does not do**

Javelin does not supply maintenance research; no preview into results, and no post-results desk note.

With a disdain for long-term forecasting and use of multiples, or even peer comparisons as tools for equity valuation there will be no such commentary or spreadsheet models.

Finally, while Javelin will provide with a robust and coherent analysis and commentary, it does not profess to have in-depth expertise on all sectors and stocks. Clients are advised to seek alternate sources/personnel who may be able to drill-down into the minutiae.

Javelin offers no coverage of the Financials sector or Financial stocks as per the GICS classification systems.

#### **Risk of loss**

There are risks inherent in equity investing, and there is no guarantee that Javelin's investment recommendations to institutional clients will predict future outcomes and we do not claim that recommendation will not result in losses. Fluctuations in share prices can be caused by uncertainties due to economic and political outlook causing material changes in share prices and currency exchange rates. Other factors include disruption due to technology changes, new competition, fiscal policies, management changes and changes in legislation.

Javelin makes no representation that the companies under research coverage comply with certain informational reporting requirements imposed by the Securities Exchange Act of 1934.

Therefore, such investments may be unsuitable for certain clients.

Through its research reports and recommendations, Javelin intends to provide valuable information and insight to help institutional clients make an informed decision in portfolio





management. It should not be used as the sole basis for any investment decision making, and it is the responsibility of the institutional client to ensure that the equity recommendation is appropriate and suited to their investment style, process and needs. Javelin does not offer equity trading or execution facilities, and as recommendations carry no guarantees due to unknown risks and uncertainties, they should not be construed as an offer or solicitation to buy or sell a company's share.

The views and the other information provided in research reports to our institutional clients are subject to change without notice. Past performance is not necessarily a guide to future results.

## **Item 9 - Disciplinary Information**

Registered investment advisers are required to disclose certain material legal or disciplinary events that would be material to an evaluation of Javelin or the integrity of Javelin's management. Javelin, or its management, has no legal or disciplinary events to report.

## **Item 10 - Other Financial Industry Activities and Affiliations**

Javelin received regulatory approvals in the United Kingdom in March 2018, and is authorised by the Financial Conduct Authority in the United Kingdom, reference number 785439, and by regulatory authorities in major European nations, to provide investment advice to institutional investors in Europe and the United Kingdom.

Javelin is not registered (and does not have any applications pending to register) as a broker-dealer, registered representative of a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of any of the foregoing.



## Item 11 - Code of Ethics, Participation of Interest in Client Transactions and Personal Trading

Javelin has adopted a Code of Ethics that sets forth the high ethical standards that we require of all our employees.

**These are documented in its Compliance Manual and the following is a summary.**

The Code of Ethics reflects Javelin's fiduciary obligations, supervisory requirements and duty to comply with securities laws.

The Code of Ethics is based on the principle that Javelin owes a fiduciary duty to its clients. Accordingly, employees must avoid activities, interests and relationships that run contrary (or appear to run contrary) to the best interests of clients.

At all times, Javelin will:

- Place client interests ahead of Javelin's – As a fiduciary, Javelin will serve in its Clients' best interests. In other words, Employees may not benefit at the expense of Clients.
- Engage in personal investing that is in full compliance with Javelin's Code of Ethics – Employees must review and abide by Javelin's securities trading policies as described in its Compliance Manual.
- Employees must not accept investment opportunities, gifts or other gratuities from individuals seeking to conduct business with Javelin, or on behalf of a Client, except as permitted in the Compliance Manual.
- Maintain full compliance with the Federal Securities Laws – Employees must abide by the standards set forth in Rule 204A-1 under the Advisers Act [17j-1] and Rule 17j-1 under the IC Act.

Employees must promptly report any violations of the Code of Ethics to the Compliance Officer, Surendran Panicker.

Section 204A of the Advisers Act requires every investment adviser to establish, maintain, and enforce written policies and procedures reasonably designed, taking into consideration the nature of such investment adviser's business, to prevent the misuse of Material Non-public Information by such investment adviser or any person associated with such investment adviser. In accordance with Section 204A, Javelin has instituted procedures to prevent the misuse of Material Nonpublic Information.

In the past, securities laws have been interpreted to prohibit the following activities:

- Trading by an insider while in possession of Material Non-Public Information; or
- Trading by a non-insider while in possession of Material Non-Public Information, where the information was disclosed to the non-insider in violation of an insider's duty to keep it confidential; or
- Communicating Material Non-Public Information to others in breach of a fiduciary duty.

**What Information is Material?**

Individuals may not be held liable for trading on inside information unless the information is material. Advance knowledge of the following types of information is generally regarded as material:

- Dividend or earnings announcements
- Write-downs or write offs of assets
- Additions to reserves for bad debts or contingent liabilities
- Expansion or curtailment of company or major division operations
- Merger, joint venture announcements
- New product/service announcements
- Discovery or research developments
- Criminal, civil and government investigations and indictments
- Pending labor disputes
- Debt service or liquidity problems
- Bankruptcy or insolvency problems
- Tender offers, stock repurchase plans, etc.
- Recapitalization

Information provided by a company could be material because of its expected effect on a particular class of a company's securities, all of the company's securities, the securities of another company, or the securities of several companies. The misuse of Material Non-Public Information applies to all types of securities, including equity, debt, commercial paper, government securities and options.

Material information does not have to relate to a company's business. For example, information about the contents of an upcoming newspaper column may affect the price of a Security, and therefore be considered material.

**What Information is Non-Public?**

In order for issues concerning Insider Trading to arise, information must not only be material, but also non-public. Once non-public information has been effectively distributed to the investing public, it can no longer be classified as Material Non-Public Information. However, the distribution of Material Non-Public Information must occur through commonly recognized channels for the classification to change. In addition, the information must not only be publicly disclosed, there must be adequate time for the public to receive and digest the information. Lastly, non-public information does not change to public information solely by selective dissemination.

Employees must be aware that even where there is no expectation of confidentiality, a person may become an insider upon receiving Material Non-Public Information. Whether the "tip" made to the Employee makes him/her a "tippee" depends on whether the corporate insider expects to benefit personally, either directly or indirectly, from the disclosure.

**Item 12 – Brokerage Practices**

Javelin is not a broker dealer and nor does the business have any relationship in which we would select or recommend a certain broker-dealer for our institutional clients.

**Item 13 - Review of Accounts**

Javelin does not manage client assets and therefore, the review of accounts is not applicable to the business.

**Item 14 - Client Referrals and Other Compensation**

Javelin does not have any arrangements with any third parties pursuant to which such third parties will be paid a referral fee for soliciting and successfully introducing institutional clients that subscribe to the research provided by Javelin.

**Item 15 - Custody**

Javelin does not manage client assets and therefore, the custody of assets is not applicable to the business.

**Item 16 - Investment Discretion**

Javelin does not manage client assets and therefore, having investment discretion is not applicable to the business.

**Item 17 - Voting Client Securities**

Javelin does not manage client assets and therefore, the voting on client securities is not applicable to the business.

**Item 18 - Financial Information**

Javelin has never been the subject of a bankruptcy petition.