



ABSOLUTE STRATEGY RESEARCH SERVICES

Form ADV – Part 2A Brochure

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This brochure provides information about the qualifications and business practices of Absolute Strategy Research Services (ASRS). If you have any questions about the contents of this brochure, please contact us at (212)899-5286. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Absolute Strategy Research Services is an investment adviser registered with the SEC. Registration as an investment adviser does not imply a certain level of skill or training.

Additional information about Absolute Strategy Research Services also is available on the SEC's website at www.adviserinfo.sec.gov. The general public can search this site, known as the Investment Adviser Public Disclosure (IAPD) system, by using the firm's name or identification (CRD) number: 164668.

Item 2: Material Changes

There are no material changes since the last filing of March 26, 2019.

Item 3: Table of Contents

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Item 4: Advisory Business

Absolute Strategy Research Services, Inc. (“ASRS”, “the firm”, “we”, “our”, “us”), provides independent research to institutional investors. ASRS was formed as a corporation under the laws of the state of Delaware in 2010. ASRS’s principal place of business is located in London, United Kingdom. ASRS also has an office located in New York.

ASRS is a fully owned subsidiary of Absolute Strategy Research Ltd (ASR), an independent research provider established in the United Kingdom in 2006. Our London office is shared with ASR, which is not registered as an investment adviser with the U.S. Securities and Exchange Commission. The owners of ASR, David Bowers and Ian Harnett, serve as board members and officers for ASRS.

ASRS publishes and distributes independent investment strategy and economic research. ASRS may also offer customized or bespoke research services. The firm provides research only to institutional investor clients, and does not provide any services to individual investors. ASRS’s research is based in whole or in part on research prepared by our parent, ASR. As such, ASRS’s research is also distributed by ASR directly to clients of ASR.

Clients of ASRS may contact us directly in connection with the research we provide. Clients may also receive communications regarding research directly from ASRS, including electronic or phone communications as well as meetings. Any communications between persons associated with our parent, ASR, and our U.S. clients, will take place through and on behalf of ASRS.

Clients may elect to receive different levels of services from ASRS.

ASRS does not provide portfolio management services or manage investment advisory accounts or other client assets on either a discretionary or nondiscretionary basis. ASRS does not review or supervise client assets and accounts. ASRS does not participate in any wrap fee program.

The information that ASRS provides to clients contains analysis and commentary that is typically general in nature, and is intended to be used as research. Any advice offered in our research is general in nature and does not purport to meet the objectives or needs of specific institutions, funds, mandates, or accounts. It is the client's ultimate responsibility to accept or reject the information provided in any of ASRS’s research reports, and clients should make their own investment decisions based upon their specific investment objectives and financial situation.

Item 5: Fees and Compensation

Fees for ASRS's research are charged on a fixed basis or on such other basis as may be approved by ASRS's officers or directors.

Fees are negotiable, and are dependent on the actual level of service required, the complexity of the research provided, the level of customized research, and the amount of one-on-one service given. Annual fees vary, but may range from \$15,000-\$500,000, based on the breadth and depth of research provided.

ASRS's fees are paid quarterly; but at a client's request, may be adjusted to a monthly or semi-annual basis. ASRS does not have the ability or authority to deduct fees from any client account.

ASRS does not provide refunds for the cancellation of subscriptions.

When implementing securities transactions, clients may incur brokerage and other transaction charges. ASRS does not hold, manage or trade securities on behalf of its clients, does not accept any form of trading authorization (discretionary or otherwise) over its clients' assets, and does not recommend broker/dealers to its clients.

With the exception of fees paid through commission sharing arrangements as described in Item 14, ASRS does not receive any portion of fees and expenses charged by third parties or for the sale of securities or other investment products, including asset-based sales charges or service fees.

Item 6: Performance-based Fees and Side-by-Side Management

ASRS does not charge fees based on a share of the capital gains or appreciation of clients' assets (i.e. performance-based fees).

ASRS does not manage any client accounts.

Item 7: Types of Clients

ASRS provides investment advice to institutional clients. These may include but are not limited to: managers of registered investment companies, hedge funds, and pension plans; broker/dealers; and other institutions such as banks, investment advisers, corporations or other business entities.

ASRS's business model does not require any minimum account size.

Item 8: Methods of Analysis, Investment Strategies, Risk of Loss

Methods of Analysis and Investment Strategies. ASRS's research methods are based on objective, empirical analysis and consider a wide range of data.

Our methods include but are not limited to: top-down fundamental analysis (e.g., the Price-Earnings Ratio of an equity index); technical analysis (e.g., the Relative Strength of an index); quantitative analysis (e.g. classifying securities by earning quality); surveys (e.g., consumer confidence), and general economic releases (e.g. quarterly industrial production). ASRS analyzes research across assets, including bonds, equities, and commodities.

Some of ASRS's research relies on indicators or data that is proprietary to ASRS or to our parent company, ASR. Examples of this include ASR's Risk Indicators and the ASR Survey of U.S. Household Finances.

Market data used in ASRS's analysis comes from publicly available sources, including but not limited to: Bloomberg, ThomsonReuters DataStream, and direct government and agency releases.

ASRS also monitors legislative and regulatory initiatives to determine the likely impact of government policy on financial markets. ASRS policy research relies on publicly available information, including Congressional hearings, government publications, and policy briefs issued by outside parties.

ASRS may express a preference for a specific asset class (e.g. “equities over bonds”), or present a list of securities with performance tied to a specific macro-economic theme (e.g., “equities that outperform with a rising oil price”). However, ASRS does not provide portfolio management services nor does ASRS develop or adhere to any particular investment strategy.

Material Risks Involved. Investing in financial markets involves risk of loss that clients should be prepared to bear, and past performance is not a guarantee of future results.

Clients should not assume ASRS research, by itself, is the only guide a client should use when determining which securities to buy or sell. Different types of investments involve varying degrees of risk, and there can be no assurance that the future performance of any specific investment or investment strategy made reference to directly or indirectly in research materials provided by ASRS will be profitable, equal any corresponding indicated performance level(s), or be suitable for every investor.

Investors must make their own investment decisions based upon their specific investment objectives and financial situation, and utilizing their own financial advisors as they deem necessary. ASRS, its affiliates, employees, and any third party data provider, shall not have any liability for any loss sustained by anyone who has relied on the information contained in any ASRS publication or presentation. It is the client’s ultimate responsibility to accept or reject the information provided by ASRS.

Item 9: Disciplinary History

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client’s evaluation of the firm or the integrity of the firm’s management.

ASRS does not have any disciplinary events to report. This statement applies to ASRS, and ASRS’s owners, employees and access persons.

Item 10: Other Financial Industry Activities and Affiliations

ASRS is not registered nor has a petition to register as a broker/dealer. ASRS is not registered nor has a petition to register as a futures commission merchant, commodities pool operator, commodity trading advisor or an associated person of the foregoing entities.

As referenced in Item 4, ASRS’s research is based in whole or in part upon research prepared by its parent, ASR, which is not registered as an investment adviser with the U.S. Securities and Exchange Commission. ASRS has procedures designed to ensure that its interactions with its parent are conducted in compliance with applicable U.S. securities laws. ASRS does not have any other relationship or arrangement with any persons in the

financial or legal industry that would be material to our advisory business or create a conflict with our clients.

ASRS does not recommend or select other investment advisers.

Item 11: Code of Ethics, Participation or Interest in Client Transactions, Personal Trading

All employees of ASRS adhere to the highest ethical standards, and the interests of our clients are always paramount.

Code of Ethics. ASRS seeks to foster a reputation for integrity and professionalism. The confidence and trust placed in ASRS by clients is something we value and endeavor to protect. To further that goal, and in keeping with SEC Rule 204A-1, ASRS has adopted a Code of Ethics, which applies to all of the firm's officers, directors and employees or any other person with independent access to the firm's premises, files and client records, as well as anyone else who provides investment advice on ASRS's behalf and is subject to ASRS's supervision and control, including its parent, ASR and any employees of ASR involved in the provision of investment advice by ASRS.

The ASRS Code of Ethics deals with a range of issues, including the firm's fiduciary duties toward clients; the need to maintain the confidentiality of information regarding our clients and the investment advice we render; the prohibition on insider trading; and other aspects of supervised persons' trading for their personal accounts.

ASRS will provide a copy of the Code of Ethics to any client or prospective client upon request. For questions about this Code of Ethics, please contact ASRS's Chief Compliance Officer ("CCO"), Sarah Franks, for assistance and advice.

Interest in Client Transactions. The nature of the work undertaken by ASRS means that its relationship with its clients is exclusively advisory, and so conflicts of interest are unlikely to occur except in the context of Personal Account Dealing by staff and related persons, which is addressed below.

Personal Trading. Advising on securities is the fundamental business of ASRS, and personal dealings that in any way endangers the reputation of ASRS is not tolerated.

The ASRS Code of Ethics sets out personal trading rules for employees and related persons, with the key points as follows:

- a) ASRS's personal trading restrictions apply to every account in which a supervised person or member of his or her immediate family has a beneficial interest.
- b) Although ASRS does not trade on behalf of clients, policies are set out to ensure that the fair interests of clients are not compromised.
- c) ASRS supervised persons are discouraged from dealing in IPOs. IPOs and offerings of limited availability must be preapproved.
- d) ASRS supervised persons must supply the CCO with a list of all his or her securities holdings, and update this list on an annual basis.

- e) In addition to the Holdings Reports, supervised persons are also required to report their securities transactions to the CCO on a quarterly basis.
- f) Authors of a report are not permitted to trade in a security with an explicit Buy or Sell recommendation in either the 14 calendar days prior to or 14 calendar days after the publication of the report. No employee should trade in a security in a way that is inconsistent with the published recommendation of the firm.
- g) Employees are required to hold all positions in securities for a minimum period of 30 calendar days. In exceptional circumstances, and even then only with the prior written permission of the Compliance Officer, employees may be permitted to unwind a position in less than the 30 day period specified.

Some securities are considered exempt from these restrictions, including direct obligations of the U.S. Government, bankers' acceptances, bank certificates of deposit, commercial paper, high-quality short-term debt instruments (including repurchase agreements), shares issued by registered open-end investment companies (including money market funds), and shares issued by unit investment trusts that are invested exclusively in one or more open-end funds. Except for trading in investment programs such as variable annuities, pension or 529 plans, etc., ASRS's supervised persons (and their immediate families) are required to execute their personal trades through a bank or broker-dealer from whom ASRS can receive electronic transaction and position reports.

Item 12: Brokerage Practices

ASRS does not hold, manage or trade securities on behalf of our clients, and does not select broker/dealers for client transactions.

Item 13: Review of Accounts

ASRS does not hold, manage or trade securities on behalf of its clients and does not accept any form of trading authorization (discretionary or otherwise) over our clients' assets.

ASRS does not hold itself out as providing financial planning.

Accordingly, ASRS does not review any accounts or financial plans of its clients and does not make reports to its clients regarding their accounts.

Item 14: Client Referrals and Other Compensation

At a client's election, ASRS may receive cash payments from one or more broker-dealers in consideration for providing services to that client. In such a situation, ASRS acts as a third-party research provider in the client's soft-dollar/commission sharing arrangement with the client's broker-dealer. ASRS does not believe such situations involve any conflicts of interest between our interests and those of our clients who choose to pay in this fashion.

Item 15: Custody

ASRS does not manage assets of clients or hold securities on clients' behalf and does not have direct access to client funds and securities or control over client funds and securities. Therefore, ASRS does not have custody or control over client accounts and assets.

Item 16: Investment Discretion

ASRS does not hold, manage or trade securities on behalf of its clients, does not accept any form of trading authorization (discretionary or otherwise) over its clients' assets, and does not recommend broker/dealers to its clients.

Item 17: Voting Client Securities

ASRS does not hold securities on behalf of its clients and does not vote proxies on behalf of its clients.

Item 18: Financial Information

ASRS does not require or solicit prepayment of more than \$1,200 in fees per client more than six months in advance and does not have discretionary authority or custody of client funds or securities. Therefore, ASRS is not required to provide a balance sheet for its most recent fiscal year end.

ASRS has no financial condition that is reasonably likely to impair its ability to meet its contractual commitments to clients.

ASRS is not currently, nor at any time in the last ten years has been, the subject of a bankruptcy petition.

Item 19: Requirements for State-Registered Advisers

Not applicable.