



Item 1 – Cover Page

Absolute Return Strategies Ltd.

Harbor Centre. George Town,

Cayman Islands KY-1107

+44 203 287 6768

March 2020

Form ADV, Part 2; our “Disclosure Brochure” or “Brochure” as required by the SEC under the Investment Advisers Act of 1940 (“Advisers Act”) is a very important document between Clients (“you”, “your”) and Absolute Return Strategies Ltd. (“ARS”, “us”, “we”, “our”). ARS’ IARD firm number is 153202.

This Brochure provides information about the qualifications and business practices of ARS. If you have any questions about the contents of this brochure, please contact us at +44 203 287 6768. 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.

We are a registered investment adviser with the Securities and Exchange Commission. Our registration as an Investment Adviser does not imply any level of skill or training. Additional information about ARS also is available on the SEC’s website at www.adviserinfo.sec.gov (click on the link, select “Investment Adviser Search” and type in our firm name). The results will provide you with both Parts 1 and 2 of our Form ADV.

Item 2 – Material Changes

This filing contains material changes since the last annual filing of our Form ADV Part 2 or “Disclosure Brochure” dated April 2018 in that we have closed our Citi FX Indices relationship. We have also changed our phone number and have made various clarifications throughout this Disclosure Brochure.

1. For future filings, this section of the Disclosure Brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this document on the SEC’s public disclosure website (IAPD) at www.adviserinfo.sec.gov.
2. We may, at any time, update this Disclosure Brochure and send to you including a summary of material changes, or a summary of material changes that includes an offer to send you a copy [either by electronic means (email) or in hard copy form].
3. If you would like another copy of this Disclosure Brochure, please download it from the SEC website as indicated above or you may contact our Chief Operating and Compliance Officer, Ross Taylor, at 44 020 3290 0822.

Item 3 – Table of Contents

Item 1 – Cover Page	
Item 2 – Material Changes	i
Item 4 – Advisory Business	1
Item 5 – Fees and Compensation	2
Item 6 – Performance-Based Fees and Side-By-Side Management.....	3
Item 7 – Types of Clients.....	4
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	5
Item 9 – Disciplinary Information	7
Item 10 – Other Financial Industry Activities and Affiliations	8
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	9
Item 12 – Brokerage Practices	10
Item 13 – Review of Accounts.....	11
Item 14 – Client Referrals and Other Compensation.....	12
Item 15 – Custody	13
Item 16 – Investment Discretion	14
Item 17 – Voting Client Securities (i.e., Proxy Voting)	15
Item 18 – Financial Information	16

Item 4 – Advisory Business

ARS is a Limited Company organized in the Cayman Islands in 2008. We have been registered as an investment adviser with the U.S. Securities and Exchange Commission since May 5, 2010. John Dean is the majority owner of ARS and acts as its Managing Director and Chief Investment Officer.

This Disclosure Brochure provides you with information regarding our qualifications, business practices, and the nature of advisory services that should be considered before becoming our advisory client.

Please contact Ross Taylor, Chief Operating and Compliance Officer, if you have any questions about this Brochure.

A select group of regulated third parties associated with us will deliver our research and market commentary to clients. These regulated third parties are known as Investment Advisor Representatives (IARs). These third parties are appropriately licensed and qualified to provide research services and market commentary on our behalf.

Investment Advisory Services

ARS develops and owns quantitative trading models for both Passive Overlay (Hedging) and the generation of Alpha in the FX, Equity and Commodity markets.

ARS does not have any direct assets under management

ARS charges fees to regulated third parties who use its models to generate trading strategies for clients.

Item 5 – Fees and Compensation

ARS trading and hedging strategies are offered by regulated third parties to qualified purchasers as defined in the Investment Company Act 1940.

Fee structures for our research and advisory services and the use of our models vary.

Item 6 – Performance-Based Fees.

Our compensation structure is disclosed in Item 5 above.

Item 7 – Types of Clients

ARS offers research, market commentary and investment advisory services to qualified purchasers as defined in the Investment Company Act 1940 such as banks, investment companies, family offices and high net worth individuals.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

ARS offers research and advisory services under the trademarked name Alpha Blend. The models developed and owned by ARS are quantitative in nature.

The primary objectives of the Alpha Blend Overlay/Hedging models are to reduce downside volatility.

The primary objectives of the Alpha Blend Alpha models are to deliver strong excess returns whilst maintaining an attractive risk/return profile.

Risks

General

There are inherent risks involved for each investment strategy or method of analysis we use and for any particular type of security we may recommend. Investing in foreign exchange involves risk of loss which you should be prepared to bear.

General Investment Risk

All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments for investment.

Loss of Value

There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies.

Foreign Exchange Risk

Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned, and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation and other economic and political conditions. If the currency in which a security is denominated appreciates against the U.S. dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Item 9 – Disciplinary Information

We do not have any legal, financial or other “disciplinary” item to report. We are obligated to disclose any disciplinary event that would be material to you when evaluating us to initiate an Advisory relationship, or to continue an Advisory relationship with us.

Item 10 – Other Financial Industry Activities and Affiliations

Neither ARS nor any of our management persons are registered (except as stated below), or have an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or as an associated person of the foregoing entities. ARS is currently registered as a commodity trading advisor.

In addition, neither ARS nor any of our management persons have any relationship or arrangement that is material to its advisory business or to our clients with an affiliated person that is a:

- Broker-dealer, municipal securities dealer, or government securities dealer or broker,
- Futures commission merchant (or commodity pool operator or commodity trading advisor),
- Banking or thrift institution,
- Accountant or accounting firm,
- Lawyer or law firm,
- Insurance company or agency,
- Pension consultant,
- Real estate broker or dealer or
- Sponsor or syndicator of limited partnerships.

The CEO of ARS also serves as the Managing Director of Currency Insight Ltd., a UK regulated investment advisor.

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

ARS has adopted a Code of Ethics for the purpose of instructing all our employees, officers, and directors in their ethical obligations and to provide rules for their personal securities transactions. All such persons owe a fiduciary duty to you. A fiduciary duty means a duty of loyalty, fairness and good faith towards you, and the obligation to adhere not only to the specific provisions of this Code but to the general principles that guide the Code. These general principles are:

- The duty at all times to place your interests first;
- The requirement that all personal securities transactions be conducted in a manner consistent with the Code of Ethics and in such a manner as to avoid any actual or potential conflict of interest or any abuse of any individual's position of trust and responsibility; and
- The fundamental standard that such employees, officers, and directors should not take inappropriate advantage of their positions or of our relationship with you.

It is imperative that the personal trading activities of our employees, officers, and directors is conducted with the highest regard for these general principles in order to avoid any possible conflict of interest, any appearance of a conflict, or activities that could lead to disciplinary action. This includes executing transactions through or for the benefit of a third party when the transaction is not in keeping with the general principles of this Code.

A copy of our full Code is available to you or any prospective client upon request.

We do not, nor does a related person, recommend securities to you, or buy or sell securities for your accounts, at or about the same time that we (or a related person) buy or sell the same securities for our own (or the related person's own) account.

We do not execute transactions on a principal or agency basis.

Item 12 – Brokerage Practices

We do not select or recommend broker-dealers for client transactions, nor receive research or other products or services from broker-dealers or a third parties in connection with client securities transactions (“soft dollar benefits”). Therefore, we do not consider whether we or a related person receives client referrals from a broker-dealer or third party. Additionally, we do not routinely recommend, request or require that a client execute transactions through a specified broker-dealer.

Item 13 – Review of Accounts

Reviews and Reviewers

All client accounts holding assets in which transactions are signaled by our models are reviewed daily by your custodian. We neither hold your funds nor give instructions to move funds.

Custodian banks typically provide either online account reporting in real time or daily reporting. You typically make specific arrangements on a case by case basis with the custodian bank. You are encouraged to review these reports.

Item 14 – Client Referrals and Other Compensation

We receive economic benefit from third parties who use our models for providing investment advice or other advisory services to clients. ARS may pay introducing intermediaries and may pay third party research providers for buy and sell recommendations. Such agreements will comply with the requirements set out in Rule 206(4)-3 of the Advisers Act and any applicable corresponding state securities law requirements. Such compensation will not result in any additional charge to you greater than the fees or costs we charge to our advisory clients.

Item 15 – Custody

We do not have custody of your funds or securities; however, advisory fees may be deducted directly from your account. Your custodian will send to you, at least quarterly, an account statement identifying the amount of funds and each security in the account at the end of the period and setting forth all transactions in the account during that period including the amount of advisory fees paid directly to us. You should immediately inform us of any discrepancy noted between the custodian records and the reports you receive from us.

Item 16 – Investment Discretion

ARS does not take investment discretion directly from clients; however, the investment managers that we work with will be given complete responsibility for investment services, which allows them to make investment decisions without prior consultation with you. Such discretion would involve determinations regarding which securities and the total amount of the securities to be bought and sold for the account. However, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client. You will have the right to place reasonable restrictions on such authority. Any restrictions must be submitted in writing to them.

Selections of brokerage and custody firms are at your discretion.

Item 17 – Voting Client Securities (i.e., Proxy Voting)

We do not have, nor will we accept authorization to vote client securities. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent. Clients should contact their custodian or a transfer agent with questions about a particular solicitation.

Item 18 – Financial Information

We have no financial condition that is reasonably likely to impair our ability to meet our contractual commitments given that we do not have custody of client funds or securities.

We do not require prepayment of fees in advance.

We are not currently, nor at any time in the past ten years been the subject of a bankruptcy petition.