



Alvarium Investment Managers (US), LLC

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This brochure provides information about the qualifications and business practices of Alvarium Investment Managers (US), LLC (“AIMUS” or the “Adviser”). If you have any questions about the contents of this brochure, please contact us at (646) 992 8183. 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.

Additional information about AIMUS also is available on the SEC’s website at www.adviserinfo.sec.gov. Once you locate this web address, you can search for information on AIMUS by using a unique identifier known as a CRD number.

AIMUS is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

March 2021

Item 2 – Material Changes

This brochure provides information about the qualifications and business practices of AIMUS and affiliates (collectively, referred to as “AIMUS” or the “Adviser,” or “we,” or “us,” or “our”). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority. You will receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year, which is December 31 of each year. We will further provide you with a new brochure as necessary based on changes or new information, at any time, without charge. Currently, our brochure may be requested by contacting AIMUS’ Compliance Department at phone number at (305) 373-8033 or via email by contacting the group Director of Operations, Jamie.Grossman@alvariuminvestments.com.

In accordance with the new SEC Regulation BI or ‘Best Interest’, Alvarium Investment Managers, (US), LLC. has published a new Client Relationship Summary intended for any current and future retail clients to receive a condensed and more succinct description of our services and disclosures which are found in this brochure. Both this brochure and the CRS brochure are made available to our new and existing clients on an annual basis by electronic mail and upon request at any time.

AIMUS has made the transition to a new reporting and consolidation software to improve our services and allow us to provide a more accurate and detailed report of assets to our clients. The new software will now also use a more precise method to calculate fees: an average daily balance will be used in calculating the Assets Under Management used to determine the management fee charged. Previously this was calculated using the total asset value at the beginning of the period taking additions and withdrawals into account on a pro-rated basis.

Alvarium is a brand name which is used throughout the world by the group of affiliated members wholly and partly owned by Alvarium Investments Ltd. in London, England that has recently initiated operations in a new FINRA member Broker Dealer in New York under the name of Alvarium MB (US) BD, LLC to enhance our capacity and product offering to better serve our clients in the United States.

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Item 4 – Advisory Business

A. AIMUS is an investment adviser registered with the U.S. Securities and Exchange Commission (“SEC” or the “Commission”).

AIMUS is part of Alvarium, a global Private Wealth Partnership which operates from office locations in Europe, the USA and Asia and offers the following services: direct investments, investment advisory, merchant banking and private office.¹

B. AIMUS offers comprehensive investment advisory services, including investment strategy and implementation, asset allocation, investment manager selection and reporting. AIMUS provides such advisory services on both discretionary and non-discretionary bases.

AIMUS can execute trades or recommendations on behalf of a Client (as defined in Item 7 below) if a limited power of attorney (“LPOA”) has been granted by the Client to AIMUS.

AIMUS assists each Client in establishing investment objectives, return expectations and risk tolerance (“Client Profile”). Based on Client Profiles, AIMUS may offer investment supervisory services regarding the following:

- Equity securities: Exchange listed, over-the counter and foreign securities.
- Exchange Traded Funds
- Warrants
- Options contracts on securities and commodities
- Futures and Forward contracts
- Government Securities
- Corporate debt securities and commercial paper
- Certificates of deposit
- Municipal Securities
- Investment Company Securities
- Private Equity Funds, Hedge Funds, and other similar non exchange traded collective investment funds.
- Direct Investment Opportunities including Limited Partnerships, Private Equity and Direct Debt

Investment Manager Selection, Monitoring and Due Diligence Services

AIMUS may recommend that a Client allocate a portion of their Portfolio (as defined in Item 8 below) in hedge funds, private equity, real estate or other funds (each, a “Managed Fund”), which are managed by a third-party manager (a “Fund Manager”).

¹ www.alvariuminvestments.com

AIMUS identifies potential Fund Managers for Client Portfolios through networks established by employees of AIMUS and its affiliates as well as through periodicals, directories and databases containing information about investment managers. After a potential Fund Manager is identified, AIMUS will perform investment due diligence on the Fund Manager and its key personnel through a variety of methods, including but not limited to, a review of the manager's offering documents, SEC or other regulatory filings (if applicable), and interviews with the manager's personnel (both principals and staff).

AIMUS, independently and through its affiliates, conducts on-going reviews and analyses of each Fund Manager's investment performance, including adherence to its investment strategy, guidelines or restrictions.

Custodians / Schwab

AIMUS may recommend/require that clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. The final decision to custody assets with Schwab is at the discretion of the Advisor's clients, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder. AIMUS is independently owned and operated and not affiliated with Schwab. Schwab provides AIMUS with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to advisors. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Schwab also makes available to AIMUS other products and services that benefit AIMUS but may not benefit its clients' accounts. These benefits may include national, regional or AIMUS specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of AIMUS by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist AIMUS in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate

trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of AIMUS' fees from its clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of AIMUS' accounts, including accounts not maintained at Schwab Advisor Services. Schwab Advisor Services also makes available to AIMUS other services intended to help AIMUS manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to AIMUS by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to AIMUS. While, as a fiduciary, AIMUS endeavors to act in its clients' best interests, AIMUS' recommendation/requirement that clients maintain their assets in accounts at Schwab may be based in part on the benefit to AIMUS of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Performance Measurement and Reporting

On a monthly basis, AIMUS provides Clients with a performance report (a "Performance Report"), detailing the Clients' Portfolio performance and may compare such performance to benchmarks or indices. If requested by a Client, AIMUS can include in the Performance Report information on assets that are not in their Portfolio. The inclusion of such information may result in an additional fee to the Client.

AIMUS uses third-party software for record keeping, performance calculation and reporting. Performance Reports are prepared by AIMUS using data provided by custodians, investment managers and independent pricing services.

Non-advisory Services

AIMUS may offer non-advisory services to its Clients, including coordination of legal-related and strategic business planning, wealth transfer planning, estate planning, research on trustee placement and multi-generational education planning, administrative and concierge services among others.

C. AIMUS also offers a cash management service that provides investment advisory for clients seeking management of assets in lower volatility and highly liquid cash, cash alternatives, and money market eligible products. Allowable investments can include US Treasury obligations with maturities not exceeding 1 year in either bills or notes, money market funds, or any other money market eligible securities. As securities mature, the capital will be reinvested in materially similar securities.

D. AIMUS tailors its services to the individual needs of each Client, based on each Client's unique circumstances.

E. AIMUS offers a wrap fee program which is described in more detail in the firm's ADV Part 2A Appendix 1 Wrap Fee Brochure. Wrap fee accounts are managed on the same basis as other accounts. AIMUS receives a portion of the wrap fee for its services.

F. As of December 2020, AIMUS had \$ 173,520,095 in assets under management.

Item 5 – Fees and Compensation

A. AIMUS charges Clients a management fee (a "Management Fee") for advisory services provided, including the review and reporting services described herein. The Management Fee is established at the time the investment advisory agreement is signed and is defined in the investment advisory agreement. Generally, the Management Fee is expressed as a percentage of the value of the assets under management, typically 1.00% per annum and 0.30% per annum for the Cash Management Services.

The Management Fee is negotiable and depends on the types of assets included in a Client's Portfolio, the complexity and size of the Portfolio, the services to be provided and other factors. Accordingly, the Management Fee for any given client may be higher or lower than for any other Client.

B. AIMUS generally assesses its management fees on a quarterly basis, in advance, but also has services that are provided with management fees charged in arrears.

C. The Management Fee represents the fee for the services described above, payable to AIMUS. It does not include, among other things, managed fund or mutual fund fees that may be payable under the terms of the applicable fund, fees included or embedded in

structured products, brokerage fees, custodial fees or the cost of insurance or other third party fees.

D. Fees are payable quarterly in advance and are based on a percentage of assets under management. A client may obtain a refund of a pre-paid fee if the advisory contract is terminated before the end of the billing period. The amount of the refund will be determined on a pro rata basis.

E. AIMUS does not seek any fees or commissions from third parties with respect to Client transactions. In the limited circumstances where AIMUS receives any such amounts with respect to a Client or Client transaction, AIMUS transfers such compensation to the Client's account. AIMUS does not receive transaction-based compensation for the sale of securities to clients.

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

AIMUS does not charge Clients a performance-based fee.

Item 7 – Types of Clients

AIMUS generally provides investment advisory services to high net worth individuals, trusts, estates, foundations, corporations or other business entities (each a "Client") that have an average net worth of \$20 million and \$10 million of investable assets. AIMUS in its sole discretion may accept Clients or accounts with fewer assets.

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

AIMUS gathers and analyzes Client information, such as investment objectives, experience, financial circumstances, and risk tolerances. AIMUS evaluates a Client's attitude toward risk and works to create a portfolio that addresses the Client's investment objectives and risk tolerance ("Portfolio").

A. Based on a Client's risk assessment and preferences, assets are allocated across traditional asset classes and assets types, and individual investments. In selecting the individual investments, AIMUS, independently and through its affiliates, performs detailed analysis including:

1. **Fundamental analysis:** involves the analysis of accounts and financial statements, the general financial health of economies or companies.

2. **Qualitative and Quantitative Manager selection process:** involves a four-tiered process to assess the viability of inclusion of a Fund Manager (Long Only or Hedge fund) to a recommended list for eventual inclusion in Client Portfolios depending on each Client's risk profile.
3. **Technical analysis:** involves the analysis of past market data; primarily price and volume.
4. **Cyclical analysis:** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security and or asset class.
5. **Charting analysis:** involves the use of patterns in performance charts. AIMUS uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

B. AIMUS reaches Client's asset allocation goals through long term trading, while selectively using short term trading and options strategies (including writing covered options, uncovered options, or spreading strategies) for tactical reallocations. AIMUS utilizes investment strategies that are designed to capture return and risk in line with each Client's specific risk profile.

The following is a summary of material risks for significant investment strategies and products, but is not a complete explanation of the risks involved investment strategies:

Investing in securities and other investment products involves risk of loss that Clients should be prepared to bear. It is possible that a Client may lose a substantial proportion or all of its assets in connection with investment recommendations made. AIMUS' intention is to implement strategies that are designed to minimize potential losses to its Clients. However, there can be no assurance that such strategies will be successful.

Investment objective

There is no guarantee that in any time period, particularly in the short term, a Client's Portfolio will achieve appreciation in terms of capital growth or that a Client's investment objective will be met.

Active Trading and Concentrated Portfolios

Investments in an active strategy can result in higher transaction costs. In addition, the timing of implementation of investment decisions could adversely affect the Client's Portfolio.

Leverage

AIMUS may engage in or recommend investment strategies that constitute leverage or leverage a Client's Portfolio by borrowing, should this be considered necessary or desirable. Such strategies may include the borrowing and short selling of securities, bonds, foreign exchange and the acquisition and disposal of certain types of derivative securities and instruments, such as swaps, futures and options. While leveraging creates an opportunity for greater total returns it also exposes a Client to a greater risk of loss arising from adverse price changes. For a further explanation of the risks involved in entering into certain leveraged transactions see the paragraph below headed "Derivatives."

Portfolio investments may be volatile

The value of the securities in which AIMUS, on behalf of its Clients, will invest, or that AIMUS may recommend that a Client invest, may be volatile. There can be no assurance that Portfolio investments will be successful. Furthermore, such investments are subject to the risk that inflation, economic recession, changes in the general level of interest rates or other market conditions over which AIMUS will have no control may adversely affect the operating results of the Client's Portfolios.

Hedging transactions may increase risks of capital losses

AIMUS may utilize, or recommend that a Client utilize, a variety of financial instruments, such as options, for risk management purposes. While AIMUS may enter, or recommend that a Client enter, into hedging transactions to seek to reduce risk, such transactions may result in a worse overall performance for a Client's Portfolio (or a portfolio managed by a Client than if it had not engaged in any such hedging transactions). Moreover, Portfolios are always exposed to certain risks that cannot be hedged, such as credit risk, relating both to particular securities and counterparties.

Fixed Income

Portfolios that invest in fixed income securities are subject to several general risks, including interest rate risk, credit risk, and market risk, which could reduce the yield that a Client receives from his or her Portfolio. These risks may occur from fluctuations in interest rates, a change to an issuer's individual situation or industry, or events in the financial markets.

Liquidity of Investment Portfolio

The market for some securities in which AIMUS, on behalf of its Clients, may invest, or may recommend to Clients, may be illiquid. Liquidity relates to the ability of AIMUS, on behalf of its Clients, or the Clients that AIMUS recommends such securities to, to sell an investment in a timely manner. The market for illiquid securities tends to be more volatile than the market for more liquid securities. AIMUS' investment in illiquid securities and loans may restrict the ability of AIMUS, on behalf of the Client, or the Clients themselves,

to dispose of investments at a price and time that it wishes to do so. The risk of illiquidity also arises in the case of over-the-counter transactions (which involve securities which are not traded on an exchange). There is no regulated market in such contracts and the bid and offer prices will be established solely by dealers in these contracts. When no dealer pricing can be obtained, prices are determined by using cost basis accounting.

Foreign currency markets

AIMUS' investment strategy may cause a Client to be exposed to fluctuations in currency exchange rates where it invests directly or indirectly in securities denominated in currencies other than U.S. dollars. AIMUS, on behalf of the Client, may, in part, seek to offset the risks associated with such exposure.

Non-regulated investments

AIMUS may invest, or recommend that a Client invest, in securities that are not subject to regulation. Accordingly, only a relatively small amount of publicly available information about the securities may be available to AIMUS or Clients.

Foreign and withholding taxes

Certain foreign investments may be subject to taxes, including withholding taxes, or to changes in the rates or methods of taxation. Although all attempts will be to do so, AIMUS may not adequately predict the impacts of such taxes when deciding on and structuring investments or investment recommendations.

Emerging markets

AIMUS' investment strategies include investments made in emerging markets, and such investments involve special considerations and risks. These include a possibility of nationalization, expropriation or confiscatory taxation, foreign exchange control, political changes, government regulation, social instability or diplomatic developments which could affect adversely the economies of such countries or the value of a Client's investments, and the risks of investing in countries with smaller capital markets, such as limited liquidity, price volatility, restrictions on foreign investment and repatriation of capital, and the risks associated with emerging economies, including high inflation and interest rates and political and social uncertainties. In addition, it may be difficult to obtain and enforce a judgment in a court in an emerging country. The economies of many emerging market countries are still in the early stages of modern development and are subject to abrupt and unexpected change. In many cases, governments retain a high degree of direct control over the economy and may take actions having sudden and widespread effects. Investments in products of emerging market may also become illiquid which may constrain AIMUS' ability to realize some or all of a Client's Portfolio or constrain a Client's ability to realize some or

all of a Portfolio that it is managing. Accounting standards in emerging market countries may not be as stringent as accounting standards in developed countries.

Economic and political risks

The economies of individual countries in which AIMUS, on behalf of its Clients, may invest, or that AIMUS may recommend to Clients that they invest, may differ favorably or unfavorably from the economies of more developed countries in such respects as growth of gross domestic product, rate of inflation, currency depreciation, capital reinvestment, resource self-sufficiency and balance of payments position. With respect to any emerging country, there is the possibility of nationalization, expropriation or confiscatory taxation, political changes, government regulation, social instability or diplomatic developments (including war) which could affect adversely the economies of such countries or the value of a Client's investments in such countries. In addition, it may be difficult to obtain and enforce a judgment in a court in an emerging country. The economic and political risks described above may also adversely impact the value of derivative instruments and securities that are linked to the performance of emerging markets.

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to significant exposure to an underlying security or index. This leverage can compound gains or loss.

Inverse and Leveraged ETFs

Inverse or leveraged ETFs are complex investment products that carry risks that are generally not suited for conservative investing. Inverse ETFs are designed to track the inverse of its benchmark through the use of derivatives and leveraged instruments over the course of a single day. Leveraged ETFs employ financial derivatives to attempt to achieve a multiple (i.e. 2 or 3 times) of the return (or inverse return) of a stated index over the course of a single day.

Derivatives

A Client's investments in derivatives involve risks associated with the securities or other assets underlying the derivatives as well as risks different or greater than the risks affecting the underlying assets. Derivatives is used here to describe different types of investments, including over the counter derivatives, forwards on spot contracts, and swaps which are covered in more detail below. Risk unassociated with the underlying assets include the inability or unwillingness of the other party to a derivative to perform its obligations to an account, a Client's inability or delay in selling or closing positions in derivatives, and difficulties in valuing derivatives.

Swaps

The use of securities, interest rate, credit, currency, equity, commodity, index, and total return swaps, swaptions, and interest rate caps, floors, and collars is a highly specialized activity that involves investment techniques and risks which differ from those associated with ordinary securities transactions.

Swaps are individually negotiated transactions where each party agrees to make a one-time payment or periodic payments to the other party. Typically, the parties to a swap are not required to make “principal” payments, and instead agree to pay sums based upon rates or amounts which are applied to an agreed “notional” amount. Most swap agreements are currently principal-to-principal transactions, which means that performance is the responsibility of the individual counterparty (rather than being the responsibility of an organized exchange or clearinghouse). As such, the Client is exposed to the risk of counterparty default.

New regulations (which have been implemented or are due to be implemented) have introduced some rules intended to reduce the risk of counterparty default. These regulations require that a substantial portion of over-the-counter swaps are executed in regulated markets, submitted for clearing through regulated clearinghouses, subject to mandated margin requirements, and/or subject to mandatory reporting requirements.

Private Funds

Private investment companies are not registered with the Securities and Exchange Commission and are not necessarily registered with any other regulatory authority. Accordingly, they are not subject to certain regulatory restrictions and oversight to which other issuers are subject. There may be little public information available about their investments and performance. Moreover, as sales of shares of private investment companies are generally restricted to certain qualified purchasers, it could be difficult for a Client to sell its shares of a private investment company at an advantageous price and time. Since shares of private investment companies are not publicly traded, from time to time it may be difficult to establish a fair value for the Client’s investment in these companies.

Private Placement

Privately issued securities are restricted securities that are not publicly traded. Accordingly, the market liquidity for specific privately issued securities may vary. Delay or difficulty in selling such securities may result in a loss to the Client.

Material Risks for Particular Types of Securities

The material risks involved in AIMUS’ general investment strategies are described above.

C. AIMUS does not primarily recommend any particular type of security.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of AIMUS or the integrity of AIMUS' management. AIMUS has no information applicable to this item.

Item 10 – Other Financial Industry Activities and Affiliations

A. Management persons of AIMUS are registered representatives of Alvarium MB (US) BD, LLC ("AMB(US) BD") a Delaware company, US Broker Dealer and member of FINRA. AMB(US)BD is an affiliate of AIMUS and will have supervised persons in common as well as the same parent company.

B. Neither AIMUS nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entity.

C. Alvarium has affiliates that engage in similar business lines as AIMUS and whose clients are offered the same or similar co-investment opportunities that compete for capacity and funding among accredited and suitable investors with similar investment profiles. Alvarium has a policy to address this potential Conflict of Interest and to ensure that the client's best interest is always a priority. The Global Co-Investments Allocation Policy is available upon request.

D. AIMUS' related persons will buy or sell investment securities that may, from time to time, be recommended to Clients. Supervised Persons as well as other stakeholders have made co-investments in transactions with affiliates in the past and will continue to co-invest in some and possible all affiliate transactions in the future. Consistent with its internal policies and procedures, AIMUS will advise Clients of any co-investment made in a security offered by an affiliate at the time the recommendation is made. To the extent that these business practices raise conflicts of interest, they are addressed in AIMUS' Code of Ethics.

In providing advisory services, AIMUS may from time to time, recommend to Clients products or services offered or managed by one or more of its affiliates. Such affiliates will receive remuneration, which will be separate and in addition to any Management Fees received by AIMUS. AIMUS supervised persons will receive material compensation

according to existing agreements as well as discretionary bonuses related to performance of their duties. Consistent with its internal policies and procedures, AIMUS will advise Clients of any such compensation structure at the time the recommendation is made.

E. As previously outlined in this brochure the Adviser is under common ownership with various entities including companies that engage in financial services activities throughout the world via Alvarium. AIMUS' senior management, as well as parties reflected on Schedule A or B of Form ADV Part 1 maintain association, ownership and managerial positions with other entities within Alvarium creating a disclosable conflict of interest.

Other Material Relationships

AIMUS has a relationship with an affiliated brokerage house that is material to its advisory business and its Clients. Subject to its duty to obtain best execution for its Clients, AIMUS may use brokerage services from its affiliated brokerage house for the investments of the private investment companies and other separate accounts it manages. Transactions directed by AIMUS to its affiliated brokerage house are generally executed on an agency basis but may be executed on a riskless principal basis following notice to, and consent from, the Clients. Under certain circumstances, the affiliated brokerage house's commission rates are negotiable although the affiliations between AIMUS and the brokerage house may limit the ability of these rates to be negotiated on an arms' length basis.

In relation to some securities and services provided by contract to AIMUS and/or its Clients, the stakeholders mentioned above as well as affiliates listed below will receive material compensations.

In addition, AIMUS has a relationship with Alvarium Investment Advisors (US), Inc., an SEC registered investment advisor, whereby AIMUS shares the same Main Office and makes similar recommendations subject to each specific Client Profile. AIMUS also has material relationships with a number of other affiliated firms under common ownership or control, and the full list of such affiliated entities is set out below.

United States

- Alvarium Investment Advisors (US), Inc. is a US investment adviser which is registered with the U.S. Securities and Exchange Commission (CRD number 152104).
- Alvarium MB (US) BD, LLC is a member of FINRA and a Limited Purpose Broker Dealer (CRD number 304839).

British Virgin Islands

- LJ Cap Limited is an administration services provider.

Hong Kong

- Alvarium Investment Advisors (Hong Kong) Limited is an investment adviser which is registered with and regulated by the Securities and Futures Commission of Hong Kong, reference AJF298.

Isle of Man

- LJ Management (IOM) Limited is an administration services provider which is licensed by the Isle of Man Financial Services Authority.

Australia

- Alvarium Investments (AUS) Pty Ltd is an investment adviser which relies on class order exemptive relief for UK regulated financial service providers granted by the Australian Securities and Investments Commission to Alvarium RE Limited

New Zealand

- Alvarium Investments (NZ) Limited is an investment adviser which is authorized and regulated by the New Zealand Financial Markets Authority.

Portugal

- Alvarium Investment Advisors (Portugal) - Sociedade de Consultoria para Investimentos, S.A. is an investment adviser which is registered and regulated by Comissão do Mercado de Valores Mobiliários (“CMVM”).

France

- Alvarium Investment Advisors (France) SAS is an investment adviser which is authorized and regulated in France by the Autorité des Marchés Financiers (AMF) (AMF No GP 00-037).

United Kingdom

- Alvarium RE Limited is an investment adviser which is authorised and regulated by the Financial Conduct Authority (FCA number 582903).
- Alvarium Investment Advisors (UK) Limited is an investment adviser which is authorised and regulated by the Financial Conduct Authority (FCA number 541713).
- Alvarium PO (Payments) Limited is an insurance intermediary which is authorised and regulated by the Financial Conduct Authority (FCA number 315313).
- Alvarium Fund Managers (UK) Limited is an investment adviser which is authorised and regulated by the Financial Conduct Authority (FCA number 751355).
- Pointwise Partners Limited is an investment adviser which is an appointed representative of Alvarium Investment Advisors (UK) Limited, which is authorised and regulated by the Financial Conduct Authority (FCA number 930124).

- Pradera Limited is an investment adviser which is authorised and regulated by the Financial Conduct Authority (FCA number 192937).
- Alvarium Investment Managers (UK) LLP is an investment adviser which is authorised and regulated by the Financial Conduct Authority (FCA number 455686).
- Bluestar Advisors Limited is an investment adviser which is an appointed representative of Alvarium Fund Managers (UK) Limited, which is authorised and regulated by the Financial Conduct Authority (FCA number 937400).
- Cresco Capital Advisers LLP is an investment adviser which is an appointed representative of Alvarium RE Limited, which is authorised and regulated by the Financial Conduct Authority (FCA number 728726).
- Alvarium MB (UK) Limited is an investment adviser which is an appointed representative of Alvarium RE Limited, which is authorised and regulated by the Financial Conduct Authority (FCA number 824598).
- Osprey Equity Partners Limited is an investment adviser which is an appointed representative of Alvarium RE Limited, which is authorised and regulated by the Financial Conduct Authority (FCA number 606843).
- Alvarium Home REIT Advisors Limited is an investment adviser which is an appointed representative of Alvarium RE Limited, which is authorised and regulated by the Financial Conduct Authority (FCA number 934528).
- LXI REIT Investment Advisors Limited is an investment adviser which is an appointed representative of Alvarium RE Limited, which is authorised and regulated by the Financial Conduct Authority (FCA number 768283).
- Pradera Europe Limited is an investment adviser which is an appointed representative of Pradera Limited, which is authorised and regulated by the Financial Conduct Authority (FCA number 766068.)
- Alvarium CoRe Partners LLP is an investment adviser which is an appointed representative of Alvarium RE Limited, which is authorized and regulated by the Financial Conduct Authority (FCA number 841176).
- Casteel Capital LLP is an investment adviser which is authorized and regulated by the Financial Conduct Authority (FCA number 455718).
- Alvarium Securities Limited is an investment adviser which is an appointed representative of Alvarium RE Limited, which is authorised and regulated by the Financial Conduct Authority (FCA number 922726).

Singapore

- Alvarium Investment Advisors (Singapore) Pte. Ltd is an exempt financial adviser, which is registered with the Monetary Authority of Singapore.

Switzerland

- LJ Management (Suisse) SA is a trust and administration services provider which is regulated by SRO PolyReg, a self-regulatory body recognised by the Swiss Financial Market Supervisory Authority.
- Alvarium Investment Advisors (Suisse) S.A is a Swiss investment adviser which is registered with the Association of Swiss Asset Managers (Verband Schweizerischer Vermögensverwalter (VSV)).
- Alvarium Investment Managers (Suisse) SA is a Swiss investment adviser which is registered with the Organismo di Autodisciplina dei Fiduciari del Cantone Ticino.

AIMUS does not have any other relationships or arrangements that are material to AIMUS' advisory business or to its Clients that AIMUS or any of its management persons have with any of the following related persons: (i) 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); (ii) any financial planner; (iii) a futures commission merchant, commodity pool operator, or commodity trading advisor; (iv) a banking or thrift institution; (v) an accountant or accounting firm; (vi) a lawyer or law firm; (vii) an insurance company or agency, and (viii) a pension consultant.

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

A. AIMUS has adopted a code of ethics ("Code of Ethics") pursuant to Investment Advisers Act Rule 204A-1. The Code of Ethics applies to all employees and is designed to address conflicts of interest arising in relation to the purchase or sale of securities recommended to Clients for investment in Portfolios which may also be bought or sold by employees. It is also designed to detect and prevent the misuse of material, nonpublic information.

The Code of Ethics requires, among other things, employees to provide an annual report of securities holdings and quarterly reports of securities transactions, to pre-clear transactions in limited, private or initial public offerings, and to report all outside business interests. A copy of AIMUS' Code of Ethics is available upon request for Clients and prospective Clients by contacting the Compliance Department at phone number (305) 373-8033 or via email by contacting the group Director of Operations at: Jamie.Grossman@alvariuminvestments.com.

AIMUS has adopted the following principles governing personal investment activities by Supervised Persons:

- The interests of Client accounts must be placed first;

- All personal securities transactions will be conducted in such manner as to avoid any actual or potential conflict of interest; and
- Supervised Persons must not take inappropriate advantage of their positions.

No Supervised Person shall recommend any securities transactions to a Client without having disclosed his or her interest, if any, in such securities of the issuer, including without limitation:

- any direct or indirect beneficial ownership of any securities of such issuer;
- any contemplated transaction by such person in such securities;
- any position with such issuer or its affiliates; and
- any present or proposed business relationship between such issuer or its affiliates and such person or any party in which such person has a significant interest.

Item 12 – Brokerage Practices

AIMUS does not participate in soft dollars or directed brokerage transactions.

In order for AIMUS to manage a Portfolio, AIMUS will require the Client to appoint a custodian (a “Custodian”) for assets in the Portfolio, the account number(s) and account contact information, access to account statements and confirmations, and may authorize AIMUS to give instructions to such Custodian as needed.

Typically, the Client will receive a monthly brokerage statement from the applicable Custodian reflecting the holdings and activity for that month in the Client’s account.

As a matter of policy, AIMUS will usually execute transactions for assets held at a Custodian through that Custodian. Based on AIMUS’ policy of executing Portfolio transactions through the relevant Custodian(s), AIMUS considers each Client’s designation of a Custodian to be also a direction from the Client to execute transactions with respect to that custodial account through that Custodian. A Client may, of course, direct transactions to another broker-dealer with which it has a relationship and maintains an account.

In connection with any directed brokerage, Clients will bear the cost of execution, typically a commission agreed upon by the Custodian or the broker-dealer and the Client in advance of the transaction. Clients with directed brokerage arrangements are responsible for facilitating the settlement of Client directed transactions. This includes any transactions initiated by Clients directly with a Custodian. AIMUS bears no responsibility for determining whether Clients with directed brokerage arrangements receive volume

discounts or best execution. However, if AIMUS does exercise its authority to select a broker-dealer to execute a transaction, it will do so consistent with its obligation to seek best execution. AIMUS does not receive referrals from Client directed broker-dealers.

AIMUS does not have any formal or informal arrangements or commitments to utilize research, research-related products and other services obtained from broker-dealers, or third parties, on a soft dollar commission basis.

AIMUS has a fiduciary duty to seek best execution for client transactions, i.e., not necessarily seeking to obtain the lowest commission but the best overall qualitative execution in the particular circumstances. Best execution has been defined by the SEC as the “execution of securities transactions for clients in such a manner that the clients’ total cost or proceeds in each transaction is the most favorable under the circumstances.” In the event AIMUS exercises its authority to select a broker-dealer to execute a transaction, it will do so consistent with its obligation to seek best execution.

Item 13 – Review of Accounts

A. Portfolio Managers monitor Client Portfolios on an ongoing basis. At least one Portfolio Manager and one associate are assigned to each Client. Client Performance Reports are issued on a monthly basis.

B. At least quarterly, Portfolio Managers evaluate the performance of Client Portfolios on an absolute, relative and risk-adjusted basis and for compliance with the Client Profile established for the Portfolio. At least annually, the Portfolio Managers will review each Client’s Client Profile to confirm that it remains consistent with Client stated goals and objectives.

AIMUS encourages ongoing communication between its Clients, Relationship Managers and Portfolio Managers with respect to Client Portfolios.

Item 14 – Client Referrals and Other Compensation

A. AIMUS does not engage third party advisers to manage its Clients’ accounts.

B. A Client may be introduced to AIMUS by an unaffiliated solicitor or an affiliated solicitor, such as an employee of AIMUS or an affiliate. AIMUS may pay that solicitor a referral fee in accordance with the Investment Advisers Act Rule 206(4)-3 and other applicable federal and state laws. Any referral fee shall be paid by AIMUS and shall not result in any additional charge to the Client.

If the Client is introduced to AIMUS by an unaffiliated solicitor, AIMUS or the solicitor will provide the Client with this Brochure and a disclosure statement containing the terms and conditions of the solicitation arrangement between AIMUS and the solicitor, including compensation. AIMUS is required to disclose the nature of their relationship with AIMUS to prospective Clients. The referral fee payable to an unaffiliated solicitor may be more than what the solicitor would have received for recommending another investment adviser.

Item 15 – Custody

AIMUS does not permit employees to accept, hold, directly or indirectly, client funds or securities, or have any authority to obtain possession of them. AIMUS will not intentionally take custody of Client cash or securities.

- Any funds or securities received inadvertently from a Client must be returned to the Client within three business days of receipt.
- Any funds or securities received inadvertently from a third party on behalf of a Client must be returned to the Client or the Client's qualified Custodian within five business days of receipt.

Item 16 – Investment Discretion

On certain accounts, a Client may grant a limited power of attorney ("LPOA") to trade in a particular account to either AIMUS or to individual employees of AIMUS. Pursuant to an LPOA, AIMUS is responsible for placing orders for Clients, and unless otherwise directed, has time and price discretion over orders and will place the order directly with the Client's Custodian.

LPOA's are limited to purchasing and selling securities, and do not authorize AIMUS to transfer funds or securities out of any Client account.

Item 17 – Voting Client Securities

AIMUS does not have authority to vote proxies or corporate actions with respect to securities in Client Portfolios. Such responsibility remains with the Client.

AIMUS will not act for the Client in any legal proceeding, including class actions or bankruptcies, involving a security in any Portfolio or the issuer of any such security, but will forward to the Client materials AIMUS may receive related to any legal proceedings. AIMUS will not be liable for any failure to forward these materials to the Client.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about AIMUS' financial condition. All AIMUS Management Fees are billed and collected in advance. In 2020, AIM received a PPP Loan, a government program to aid small businesses during the global COVID-19 pandemic, which was converted to a grant and does not require repayment. AIMUS has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.