

Item 1 – Cover Page

Haven Global Partners, LLC

ADV Part 2A

This Brochure provides information about the qualifications and business practices of Haven Global Partners, LLC (hereinafter “HGP”). If you have any questions about the contents of this Brochure, please contact Jason Kindland. 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.

HGP is a SEC 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 that you can use in determining whether to hire or retain an Adviser.

Additional information about HGP may be available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Brochure dated January 25, 2021, is a document prepared according to the State of Georgia and/or SEC's requirements and rules.

This section entitled "Item 2 – Material Changes" will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes as of the date of the last annual update of our brochure.

Material changes to the Brochure are as follows:

- Assets under management in Item 4 is \$167.7 as of 12/31/20. This change will be reflected on ADV Part I as part of the annual update based on assets of 12/31/2020 as required by the rule.
- The Fee Schedule in Item 5 was updated to 100bps on the first \$10 million in AUM, from the previous schedule of 100bps on the first \$25 million in AUM.

HGP ensures that clients receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year.

HGP will further provide clients with a new Brochure as necessary based on changes or new information, at any time, without charge.

Our Brochure may be requested by contacting Jason Kindland. Additional information about HGP may also be available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site may also provide information about any persons affiliated with HGP who are registered as investment adviser representatives.

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Item 4 – Advisory Business

Haven Global Partners, LLC (“HGP”) is an institutional investment management firm founded in 2017 and registered with the SEC or the State regulatory authority. HGP is organized under the laws of the State of Georgia. HGP’s principal place of business is located in Atlanta, Georgia where all books and records are maintained.

Haven Global Partners is 80% owned by its employees:

Kenneth Holley, CFA owns 41.9%

Anuja Singha, CFA owns 29.9%

Jason Kindland, CFA owns 8.2%

4S Bay Haven Opportunity LLC owns 20%

While accounts are primarily invested according to the investment strategy selected by the client, clients may impose reasonable restrictions on the management of their portfolios subject to HGP’s acceptance of those restrictions. Client-specific restrictions may adversely affect performance including generating additional trading costs.

HGP provides discretionary Investment Supervisory Services, defined as giving continuous advice to a client or making investments for a client based on the individual needs of the client. HGP manages equity portfolios according to the following strategies:

- International Equity

There is a minimum portfolio size of \$5,000,000 required for these services; however, this minimum may be negotiable under certain circumstances.

As of December 31, 2020, HGP’s assets under management were as follows:

Discretionary	\$167,727,734
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Item 5 – Fees and Compensation

Clients pay HGP a fee based on the value of assets in their account. Fees are charged quarterly in arrears based on the market value of the account at the end of the quarter. The advisory fee covers only the portfolio management and advisory services provided by HGP and does not include brokerage commissions, mark-ups and mark-downs, exchange fees, dealer spreads, other costs associated with the purchase and sale of securities, custodian fees, transfer fees, wire fees, interest, taxes, or other account expenses. Refer to Item 12 for a detailed discussion of brokerage practices, including HGP’s procedures for determining the reasonableness of commissions and other transaction costs.

HGP typically sends invoices to clients for payment of advisory fees. To the extent that HGP is authorized to directly invoice the client's custodian for payment of its advisory fee, HGP is deemed to have custody of the client's funds, so HGP will not do that. Clients will receive a statement, usually monthly but no less than quarterly, directly from their account custodian. HGP urges clients to review the information on the statement for accuracy and compare the information to any reports received directly from HGP. Please refer to Item 15 of this document for additional disclosures relating to Custody.

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice, unless stated otherwise in the client agreement. Upon termination of any account, the advisory fee will be prorated for the period for which services were rendered. Any prepaid, unearned fees will be promptly refunded.

HGP's standard International Equity investment advisory fee schedule:

Up to \$10 million	1.00%
Above \$10 million	0.50%

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

HGP does not market a performance-based fee.

Item 7 – Types of Clients

HGP provides portfolio management to public and corporate pension plans, endowments, foundations and Taft-Hartley plans, as well as RIAs and Family Offices.

A minimum account size of \$5,000,000 is required for investment advisory services provided directly by HGP. However, this minimum may be negotiable under certain circumstances.

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

HGP uses traditional bottom-up fundamental analysis to identify securities for inclusion in client portfolios. HGP attempts to measure the intrinsic value of a security by looking at fundamental factors to determine if the company is attractively priced relative to its market price. HGP employs both quantitative models and qualitative, fundamental analysis to distinguish attractive companies.

Information about the specific investment strategies offered by HGP follows:

International Equity

Our International Equity investment philosophy is that we want to invest in sound businesses at attractive valuations. In order to accomplish this, we focus our efforts on achieving a thorough understanding of the fundamentals of a company. In our experience, stock prices tend to be more volatile than the underlying fundamentals of the company, driven by behavioral reaction of short-term investors. We have found that during such instances a company's underlying fundamentals are not appropriately reflected in its equity valuation.

Investing in securities involves risk of loss that clients should be prepared to bear. HGP uses its best judgment and good faith efforts in providing advisory services to clients. HGP cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. Not every investment decision or recommendation made by HGP will be profitable. Investments in securities are subject to various market, currency, inflation, economic, political and business risks. HGP attempts to minimize these risks by employing what it considers to be a rigorous stock selection process along with thorough economic, market and industry analysis.

While exposure to international markets provides diversification that cannot be achieved by investing solely in a domestic equity portfolio, foreign investments are subject to different risks than U.S. markets. Risks include:

Changes in currency exchange rates – Fluctuations in exchange rates could materially affect the value of a foreign investment.

Political, economic and social events – Stability of foreign governments and economies could adversely affect the value of an investment.

Lack of liquidity - Foreign markets may have lower trading volumes and fewer listed companies. Some countries limit foreign ownership of securities.

Less information – Foreign companies are not required to provide investors with the same type of information as U.S. public companies.

Reliance on foreign legal remedies – Legal action against a foreign company may not be available to U.S. investors.

Different market operations – Foreign markets operate differently than U.S. markets, including different settlement and reporting requirements.

Item 9 – Disciplinary Information

Investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's or prospective client's evaluation of the investment

adviser's business or the integrity of the investment adviser's management. HGP has no reportable disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

None

Item 11 – Code of Ethics

HGP requires employees to adhere to HGP's Code of Ethics. The purpose of the Code of Ethics is to ensure that HGP conducts its business with the highest level of ethical standards and fulfills its fiduciary duties to its clients. HGP has a duty to exercise its authority and responsibility for the benefit of its clients, to place the interests of its clients first, to refrain from having outside interests that conflict with the interests of its clients, to safeguard clients' personal information, and to comply with all federal securities laws as they apply to the business of HGP. HGP and its employees must avoid any circumstances that might adversely affect or appear to affect its duty of loyalty to its clients.

HGP, its employees or other affiliated persons, hereinafter "Access Persons", are all required to understand and abide by rules established by HGP to ensure that clients' interest comes first. HGP established a Code of Ethics pursuant to Rule 204A-1, which includes the following restrictions in order to protect the interests of its clients:

The requirements and restrictions apply to all personal securities transactions of the Access Person and his/her immediate household. At the firm's discretion, exceptions may be granted in certain circumstances.

- No Access Person shall prefer his or her own interest to that of an advisory client.
- Any transaction in a Covered Security must be pre-cleared by the Access Person completing a Request for Pre-Clearance form and the portfolio manager granting approval.
- As an exception to the Pre-Clearance requirement, HGP has implemented a De Minimis Rule, exempting the Pre-Clearance requirement as long as the traded value in that security is under \$10,000 within any 30 day period and the Access Person has no knowledge of any recent or pending trade in that security for any client account.
- The Pre-Clearance requirement does not apply to Exchange Traded Funds (ETF), as HGP does not normally trade ETFs for clients. Accounts of Access Persons that are managed by HGP are also exempt from the Pre-Clearance Requirement but will not trade in front of trades for the same or similar security for any client account.
- Access Persons are required to submit personal holdings within 10 days of becoming an Access Person and annually thereafter.

- Access Persons are required to submit personal transaction reports at the end of each calendar quarter for accounts where he/she has trading discretion.
- Access Person's broker statements and account holdings will be utilized for reporting purposes provided that such materials provide all information required to be reported.
- Access Persons' personal trading may be subject to cancellation should a conflict arise.
- Access Persons are strictly prohibited from acquiring any securities in any initial public offering.
- Access Persons are prohibited from acquiring any securities pursuant to a private placement without prior written authorization by a principal of HGP.
- Access Persons are prohibited from actively engaging in short-term trading for profit.
- Any Access Person not in observance of the above may be subject to termination.

HGP maintains a Gifts and Entertainment Policy that places restrictions on gifts and entertainment given and received by HGP associates and details required reporting requirements.

HGP claims compliance with the CFA Institute Asset Manager Code of Professional Conduct and the CFA Institute Code of Ethics and Standards of Professional Conduct. These claims have not been verified by CFA Institute. The CFA Institute Code of Ethics and Standards of Professional Conduct is an Addendum to the HGP Code of Ethics.

A copy of HGP's Code of Ethics is available to clients or prospective clients upon request.

Item 12 – Brokerage Practices

Obtaining best execution is an important aspect of every trade that we place in client accounts. Best execution can be described as seeking the most favorable terms for completing client transactions considering all relevant circumstances at the time. HGP investment professionals pay close attention to trading practices, including execution quality, soft dollars, directed brokerage, broker selection, and trade aggregation. The goal is to take a best practices approach to trading to ensure transactions are executed in a manner that is most beneficial to our clients.

Broker Due Diligence

HGP selects broker/dealers it believes will execute orders at the most favorable prices reasonably obtainable and, in doing so, will consider a number of factors, including without limitation:

- Quality of execution (best execution statistics);
- Agreed upon commission rate;
- Financial strength and stability of the broker;
- Efficiency with which the transactions are effected;

- Specialization in a particular market;
- Quality of the research services provided by the broker/dealer;
- Other products and services available from the broker.

The reasonableness of commissions is based on the broker's ability to provide professional services, competitive commission rates, research and other services, which will help HGP in providing investment management services to clients. HGP may therefore use a broker who provides useful research and/or brokerage services even though a different broker may charge a lower commission.

Research and Soft Dollar Benefits

Section 28(e) of the Securities Exchange Act permits advisers to use soft dollars, wherein a portion of client commissions is used to purchase research and brokerage services that assist the adviser in managing client accounts. Section 28(e) provides a safe-harbor permitting an investment adviser to cause an account to pay commission rates in excess of those another broker/dealer would have charged for effecting the same transaction, if HGP determines in good faith that the commission paid is reasonable in relation to the value of the research and brokerage services provided. When HGP uses client brokerage commissions to obtain research or other product or services, HGP receives a benefit because HGP does not have to produce or pay hard dollars for the research products or services.

Under soft dollar arrangements, HGP would receive both proprietary research created and developed by the brokers as well as third party research. This may cause HGP to select a broker based on the research received rather than on the client's interest in receiving the most favorable execution. Research services include, among other things, market, economic or financial data; a particular aspect of economics or on the economy in general; statistical information; data on pricing and availability of securities; financial publications; electronic market quotations; analyses concerning specific securities, companies, industries or sectors; and market, economic and financial studies and forecasts. Although research will be used to service all clients, brokerage commissions paid by a client may be used to pay for research that is not used in managing the client's account.

If HGP receives research products and/or brokerage services that do not directly benefit client accounts, HGP makes a good-faith allocation between the administrative benefits and the research services received, and the value of any administrative benefits will be borne by HGP (and paid for with hard dollars by HGP). In making good faith allocations between administrative benefits and research services, a conflict of interest may exist by reason of HGP's allocation of the costs of such benefits and services between those that primarily benefit HGP and those that primarily benefit its clients. HGP has policies and procedures in place, including monitoring by our Best Execution committee to mitigate this potential conflict of interest.

Currently, HGP has no soft dollar arrangements.

Directed Brokerage

Some clients, when undertaking an advisory relationship, already have a pre-established relationship with a broker and they will instruct HGP to execute all transactions through that broker. HGP requires that such instructions be in writing. In the event that a client directs HGP to use a particular broker or dealer, it should be understood that under those circumstances HGP would not have the authority to negotiate commissions, obtain volume discounts, and best execution may not be achieved. In addition, under these circumstances, a disparity in commission charges may exist with respect to the commission charged to other clients. As a result of such brokerage, client may pay a higher brokerage commission than might otherwise be paid if HGP had been granted discretion to select a broker to handle the client's account. In addition, HGP may be unable to bunch, block, or aggregate trades with those of other clients. The inability to bunch trades may result in the client's trades being executed at a price different from trades that are bunched and may be less favorable.

Aggregating Trades

HGP will aggregate trades providing that the following conditions are met:

1. HGP's policies for the aggregation of transactions shall be fully disclosed in the Form ADV, and to the broker/dealers through which such transactions will be placed.
2. HGP will not aggregate transactions unless it believes that aggregation is consistent with its duty to seek best execution (which includes the duty to seek best price) for its clients, and is consistent with the terms of HGP's investment advisory agreement with each client for which trades are being aggregated.
3. No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all HGP's transactions in a given business day, with transaction costs shared pro-rata based on each client's participation in the transaction.
4. If the aggregated order is filled in its entirety, it will be allocated among all clients included in the order. If the order is partially filled, it will generally be allocated pro-rata, based on the accounts included in the order, or randomly in certain circumstances, such as when a Round Lot requirement prohibits allocating exactly pro-rata.
5. Notwithstanding the foregoing, the order may be allocated on a basis different from pro-rata if all client accounts receive fair and equitable treatment, and the reason for different allocation is explained in writing.
6. HGP will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation.

Item 13 – Review of Accounts

Portfolio Managers review and monitor accounts to ensure that the investment strategy meets the objectives of the clients.

HGP expects that clients receive account statements directly from the qualified custodian of their account. To the extent that HGP provides reports to clients, the nature and frequency of those reports are separately determined for each client. While reports are typically provided quarterly, clients will receive a report no less than annually. Reports can include information such as current holdings, market value, cost basis, transactions and realized or unrealized gains/losses.

Item 14 – Client Referrals and Other Compensation

HGP may pay referral fees for referral arrangements but currently does not have an active third-party marketing arrangement. The referral fee would be based on a percentage of the investment advisory fee paid by the client. Payment of a referral fee does not result in additional cost to the client. Rather, the referral fee simply acts to reduce HGP's net revenue. The details of any such payments to a third party are described to clients as required, and acknowledged and accepted by those clients, in a signed Solicitors Disclosure Document prior to or at the time the client entered into an investment advisory agreement with HGP. Any HGP third party arrangements would be consistent with the requirements of Rule 206(4)-3.

Item 15 – Custody

HGP does not take custody of clients' assets.

Item 16 – Investment Discretion

HGP manages client portfolios on a discretionary basis. Clients grant HGP discretion over their account by providing authorization in the investment advisory agreement. This discretionary authority authorizes HGP to determine the type and amount of securities to be bought or sold, the broker/dealer to be used for transactions as well as the commission to be paid for each transaction. Investment discretion is limited only by specific instructions, guidelines and/or mandates provided by clients in writing and to which HGP agrees.

Item 17 – Voting Client Securities

HGP has a fiduciary obligation to, at all times, place the best interest of advisory clients (including plan participants and beneficiaries) as the sole consideration when voting proxies of portfolio companies. HGP will analyze the voting issues and carry out the actual voting process in accordance with guidelines provided by the client. Proxy issues receive consideration based on all relevant facts and circumstances.

Clients may direct their votes in a particular situation.

Some accounts may wish to retain responsibility for proxy voting or assign that responsibility to a third party. In this case, clients will receive their proxies directly from their custodian or transfer agent. Clients can contact HGP directly with questions about any particular solicitation. In the case of ERISA accounts, such accounts must either provide HGP with a plan document that expressly precludes HGP from voting proxies or include in the contract that HGP will not vote proxies on behalf of the client. In the absence of such documentation, HGP has the legal responsibility and obligation to vote on behalf of any ERISA accounts.

As mandated by the U. S. Department of Labor, HGP maintains applicable records regarding proxy voting for accounts. HGP can access records. Any voting decision that may require a deviation from the standard policies will be deferred by HGP for further analysis and a final decision. In these rare situations, outside legal counsel may be sought for additional guidance, and reasons for such action will be noted.

Regardless of any material conflict of interest, HGP will, at all times, vote in the best interest of the client. Proxy votes generally will be cast in favor of proposals that maintain or strengthen the shared interest of shareholders and management, increase shareholder value, maintain or increase shareholder influence over the issuer's board of directors and management, and maintain or increase the rights of shareholders; proxy votes generally will be cast against proposals having the opposite effect.

HGP will provide a proxy voting report to those clients that request it, in a manner consistent with the client's request.

It is HGP's policy not to act on the client's behalf in any class action or bankruptcy proceeding, including providing guidance. Should the client insist, HGP will take the responsibility of acting on the client's behalf. In the event that proceeds from a Class Action are sent to our offices, the check will be promptly forwarded to the client.

Item 18 – Financial Information

A registered investment adviser is required to provide clients with certain financial information or disclosures about its financial condition. HGP 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.

Item 19 – Requirements for State-Registered Advisers

- A. Please see ADV Part 2B (Brochure Supplement) for the educational and business background of the principal executive officers of HGP, Mr. Kenneth Holley and Ms. Anuja Singha.
- B. HGP is not engaged in any business activity other than the Investment Advisory business.

- C. HGP does not market a performance-based fee as also disclosed in Item 6 of this brochure.
- D. Neither of the events apply to any management person of HGP.
- E. None