

Unbiased Inc.

Part 2A of Form ADV

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Form ADV Part 2A – Firm Brochure

December 22, 2023

This Brochure provides information about the qualifications and business practices of Unbiased Inc. (“Unbiased”, “the Firm”). If you have any additional questions about the contents of this Brochure, please contact Unbiased at +44 7754 544208 or contact@unbiased.com. 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. The Firm is a registered investment adviser. Registration as an investment adviser does not imply a certain level of skill or training. Additional information about Unbiased is available on the SEC’s website at [IAPD - Investment Adviser Public Disclosure - Homepage \(sec.gov\)](https://www.sec.gov/IAPD-Investment-Adviser-Public-Disclosure-Homepage).

Free and simple tools are available for you to review Unbiased and its financial professionals at [Welcome to Investor.gov/CRS | Investor.gov](https://www.investor.gov/crs), which also provides free educational materials about broker-dealers, investment advisers, and investing.

Item 2. Material Changes

There have been no material changes to Unbiased business or the contents of this brochure.

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Item 4. Advisory Business

Unbiased Inc. (“Unbiased”) was incorporated in the state of Delaware, USA, in July 2022. Unbiased is a wholly owned subsidiary of Unbiased EC1 Limited, a company based in London, United Kingdom. Unbiased’s advisory service is focused on recommending to individuals (each referred to as a “Consumer”) other investment advisers (each an “RIA/IARs” or “Adviser”). Unbiased’s advisory service is provided through our interactive, online platform at www.unbiased.com that utilizes an online questionnaire and proprietary algorithm to connect Consumers to Advisers who have chosen to sign up to our matching platform (“Service”). It is solely the responsibility of the Consumer to determine whether to meet with and/or retain an Adviser. We do not establish advisory accounts or manage any client assets. We do not review the ongoing performance of any RIA/IAR, participate in the management of any Consumer’s account held at an RIA/IAR or provide advice regarding specific investments. The Adviser is responsible for determining and implementing specific investment strategies for the Consumer. The Service does not recommend an specific security or investment strategy. It is the responsibility of the Consumer and the Adviser to determine what types of investments are suitable. Any tax, estate planning, accounting, legal or other advice or services other than as described in this document are beyond the scope of the Service, and Unbiased makes no representation regarding the Adviser’s suitability, ability or appropriateness to perform any of those other services.

Unbiased does not meet with Consumers. Unbiased does not manage any client assets. As of the date of this document, Unbiased managed \$0 on behalf of any clients.

Item 5. Fees and Compensation

Unbiased does not charge any fees to Consumers for the Service. If a Consumer decides to engage an Adviser referred by the Service, the Consumer will pay fees to that Adviser based on the services it provides to the Consumer and the terms and conditions of any investment management and advisory agreements between the Consumer and the Adviser. Consumers may also incur certain fees or charges imposed by third parties, independent from Unbiased, in connection with their investments.

Unbiased earns compensation from the RIAs/IARs in accordance with Unbiased’s standard Terms and Conditions agreement, which includes both a platform subscription

fee and a fee each time a Consumer is matched with an RIA/IAR (the “Match Fee”). The Match Fee is tiered based on certain Consumer factors and earned by Unbiased when an RIA/IAR accepts the Consumer match. While Unbiased does not negotiate its fees, it has and may offer volume discounts when an RIA/IAR commits to a minimum number of Consumer matches. In general, the RIAs/IARs are not affiliated with Unbiased. However, Unbiased currently has an RIA on its Board as a non-executive Board director (“NED”). The RIA with the NED pays Unbiased the same fees as other RIAs/IARs. The total compensation each RIA/IAR pays to Unbiased will vary between RIA/IAR, which creates a potential conflict of interest for Unbiased as Unbiased has an incentive to refer Consumers to RIAs/IARs that pay more fees. Unbiased has implemented certain policies and procedures to mitigate this conflict of interest, including ensuring its proprietary, rules-based algorithm does not consider the fees paid to Unbiased by the Advisers. In addition, Consumers will receive a disclosure statement that describes the relationship between Unbiased and each Adviser with whom the Consumer was matched and the fact that compensation is paid to Unbiased.

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

Unbiased does not receive performance-based fees.

Item 7. Types of Clients

Unbiased primarily provides investment advisory services to individuals and high net worth individuals. There is no fee or minimum level of wealth for such Consumers to use the Unbiased platform. However, Advisers may have minimum threshold levels required to invest with them.

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

Unbiased does not manage Consumer assets. Unbiased matches Consumers with Advisers who agree to be matched with a specific Consumer. The matching process occurs through Unbiased’s proprietary algorithm, which uses information collected from each Adviser concerning their investment advice offering and Consumer’s responses to an online (www.unbiased.com) questionnaire (the “Questionnaire”), which collects information, including for example, about their financial situation including asset and income levels and investment goals, and other relevant information that can be used by

Advisers to assist Consumers achieve their financial goals. If no match is found, Unbiased suggests the Consumer confirms their responses to the Questionnaire and/or consider sharing any additional information they may want to include which may assist with identifying an Adviser that can help them achieve their financial goals. At the time a match is presented, Unbiased will provide an electronic link to the Adviser's brochure and Form CRS. Consumers are encouraged to read the Adviser's Brochure and Form CRS.

To be accepted onto Unbiased's platform, RIAs/IARs must satisfy Unbiased's initial due diligence, which includes ensuring all RIAs are registered with the Securities and Exchange Commission and that applicable IARs are associated with such an RIA. Unbiased also verifies the identity of all RIAs/IARs on the platform with independent email verification and documentary evidence of their identity. Unbiased does not review or consider an RIA/IAR's investment performance or any other aspect of the RIA/IAR's investment advice in the due diligence process. After the initial onboarding, Unbiased conducts at least annual reviews to confirm the RIA/IAR registration status and eligibility to remain on the platform. Unbiased may, without notice, change the eligibility criteria for Advisers participating on the Unbiased Platform. Notwithstanding the eligibility criteria described above, Unbiased retains discretion with respect to which Advisers may access the Unbiased Platform.

Investment Risks

Investing involves risks, including the potential loss of the principal amount invested, which Consumers should be prepared to bear. When a Consumer is matched with an RIA they will be provided an electronic link where they can access the Adviser's Firm Brochure and Form CRS (Client Relationship Summary). When a Consumer is matched with an IAR, the link will be to the Manager who employs and supervises the IAR. Consumers should carefully read these documents prior to investing with a Manager as they contain important information, including a discussion of the risks associated with investing with the Manager.

Other risks:

Use of Third-Party Advisers. Unbiased will not have any control over, or responsibility for, supervising the investments that Advisers make. When a Consumer invests with more than one Manager, it is important to understand that Advisers will make investment

decisions independently of each other and at times, may hold economically offsetting positions. Gains achieved by one or more Advisers may be offset by losses incurred by one or more other Advisers. Certain Advisers will be excluded from Unbiased's list of Advisers when a Consumer's stated investment amount is below the Manager's minimum for opening a new account.

No Predictive Value of Historical Returns. A Manager's past performance is no guarantee of future results. There is no assurance that any investment strategy will be successful.

Limited Available Information. Unbiased will not have access to information about the underlying portfolio positions or investment methodologies of each Manager. Consumers will depend upon information as furnished by the Manager (in addition to custodians' account statements). Furthermore, the amount of information used by Unbiased in recommending Advisers is limited and may not be timely or complete. Unbiased does not seek to assess or rank the investment performance of the Advisers. As such, Unbiased may recommend Advisers that have underperformed the market or their peers.

Limited Selection of Advisers. Unbiased will only provide as matches Advisers that have agreed to be on our platform. Other advisers not on the Unbiased platform may offer similar advisory services at lower fees and may outperform those Advisers on the Unbiased Platform.

Natural Disasters, Epidemics, Pandemics and Terrorist Attacks. There is always the risk of natural disasters (e.g., fire, flood, earthquake, storm, tornado and hurricane) and epidemics, pandemics or other outbreaks of serious contagious diseases (e.g., COVID-19, influenza, MERS, etc.). As such, the occurrence of any of the above could adversely affect and severely disrupt the business operations, economies, and financial markets of many countries (even beyond the site of the natural disaster or epidemic), and could adversely affect individual Advisers' investment programs and their ability to do business. In addition, terrorist attacks, or the fear of or the precautions taken in anticipation of such attacks, could, directly or indirectly, materially or adversely, affect certain industries in which Advisers invest, or could affect the areas in which individual Advisers have offices or do business. Other acts of war (e.g., war, invasion, acts of foreign enemies, hostilities, and insurrection, regardless of whether war is declared) could also have a materially adverse impact on the financial condition of industries or countries in which Advisers invest.

Item 9. Disciplinary Information

Unbiased and its employees have not been involved in any legal or disciplinary events that would be material to a Consumer's evaluation of Unbiased or its personnel.

Unbiased encourages Consumers to perform their own due diligence on any RIA/IAR with whom Consumers consider engaging.

Item 10. Other Financial Industry Activities and Affiliations

Unbiased is 100% owned by Unbiased EC1 Limited, which is incorporated in the United Kingdom, which does not operate in the USA. Unbiased currently has a RIA on its Board as a non-executive Board director (NED), and may add a handful of individual RIA's as NED and/or advisors from time to time. Such RIA's or their firms may participate in the Unbiased referral program on the same terms as other RIAs/IARs. Unbiased has taken steps to mitigate this conflict of interest by designing its proprietary rules-based modeling to ensure that Unbiased does not favor any RIA/IAR over another in the matching process.

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

Unbiased has adopted a written code of ethics that is applicable to all supervised persons that defines our fiduciary commitment to each Consumer. Among other things, the code of ethics provides ethical guidelines and mitigation of conflicts of interests regarding Unbiased's duties to its Consumers. The code of ethics is predicated on the belief that Unbiased's Consumers shall be treated with honesty and good faith, and that Unbiased will put the interests of its Consumers ahead of itself, and its employees and other affiliated persons, particularly where Unbiased's interests conflict with those of its Consumers. As neither Unbiased nor its supervised persons manage any assets or has any knowledge of any recommendations made by any Advisers on its platform, Unbiased does not impose reporting obligations by its supervised persons of their personal securities transactions. A copy of Unbiased's code of ethics is available on request by contacting Unbiased via contact@unbiased.com. Unbiased also recommends that Consumers obtain and review the code of ethics of any Adviser the Consumer engages for products or services.

Item 12. Brokerage Practices

Unbiased does not select or recommend broker dealers or custodians. However, Unbiased does recommend Advisers, which may recommend broker dealers or custodians as a part of the Consumer's relationship with that Adviser including broker dealers that may be affiliated with the Adviser. Unbiased encourages Consumers to discuss brokerage practices with the Advisers they engage.

Item 13. Review of Accounts

As Unbiased does not manage any assets or have access to any account information a Consumer may have with any Adviser, there are no accounts requiring review.

Item 14. Client Referrals and Other Compensation

Unbiased is compensated by the RIAs/IARs as discussed in Item 5. Unbiased received no other compensation.

Item 15. Custody

Unbiased does not accept or maintain any Consumer accounts. Therefore, Unbiased does not have custody of any client assets.

Item 16. Investment Discretion

Unbiased does not manage Consumer assets. Therefore, it does not exercise any investment decision.

Item 17. Voting Client Securities

Unbiased does not manage Consumer assets and does not accept proxy voting authority for any Consumer. Additionally, Unbiased will not provide advice regarding proxy solicitations. Unbiased does not participate in class actions on behalf of Consumers. Unbiased encourages Consumers to discuss proxy voting and class action policies and procedures with the RIA/IAR they engage.

Item 18. Financial Information

Unbiased has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to meet its obligations to Consumers.