

# ACPI Investments Limited

## Form CRS Relationship Summary

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*We are an SEC registered investment adviser. This Relationship Summary is posted on our website at [www.acpi.com](http://www.acpi.com) and is filed with the SEC at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (search under our name). *Investment* advisory services and fees differ. It's important to understand the differences. Free, simple tools are available to research firms and financial professionals at [Investor.gov](http://Investor.gov), which provides educational materials about brokers, investment advisers and investing. This Relationship Summary is solely for U.S. person prospects and clients.*

### Relationship and services: what investment services and advice do we provide?

***Why should you choose our investment advisory services? How do we select investments for you? What is our relevant experience, including education and other qualifications, and what do these mean?***

Our Clients are U.S. and non-U.S. individuals, HNWIs, trusts, charities, pensions or corporate entities. We offer our services for accounts in excess of \$5,000,000. We may negotiate fees. Occasionally, we aggregate accounts of family members to reach this amount on request, as part of a single-family relationship.

We provide discretionary and non-discretionary investment management advice. In order to offer investment management services, we obtain certain client information, including evidence of identity and sources of funds, for anti-money laundering purposes and other information to meet our regulatory obligations. Our primary objectives are to preserve our clients' capital and generate positive real returns by actively managing risk. We support the structure our clients have, whether corporate or personal, and manage assets held by the client's custodian through a client mandate and a limited power of attorney.

The investment strategies that we offer are Conservative, Balanced, Growth and Specific (bespoke), as outlined in our Form ADV Part 2A. For U.S. clients, we do not offer advice on or become involved with: pension products; insurance and other protection needs, such as life policies or health care; longer term financial planning needs such as care and equity release; tax planning or tax structures; choice of custodian, including the jurisdiction in which it is based.

For discretionary Clients, we agree investment objectives, restrictions and strategy and record them in the mandate. We exercise discretion to buy, hold or sell equities, fixed income, long only funds, hedge funds, currency forwards, cash in multiple currencies, REITs, commodities and options.

For non-discretionary Clients, we offer research, advice and recommendations based on the investment profile, but Clients effect their own transactions. We do not take U.S. client orders to buy or sell securities; these clients must execute all such transactions through their own brokerage account.

Account performance differs based on strategy and market performance. All investments and portfolios are monitored regularly and reviewed quarterly and when events occur (events, changes in market conditions, significant inflows or outflows or changes in circumstances) by our Chief Investment Officer.

Information about our education and other qualifications are available on request. More information about us and our fees is available in our Form ADV Part 2A, [ACPI Form ADV Part 2A](#).

### Fees, costs, expenses, conflicts of interest/standard of conduct: what fees and costs will you pay? How might our conflicts of interest affect you and how do we address these?

***Here, we explain how fees and costs affect portfolios and investments. For example, if you give us \$10,000 to manage, how much will go to fees and costs, and how much will be invested? When we act as your investment adviser, we do so in your best interests and do not put ours ahead of yours. At the same time, the way we make money creates conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice that we provide you or that we act on. Here are some examples to help you understand what this means.***

We do not manage money on the basis of a fixed amount with a withdrawable fee, say, \$10,000, take a fee and invest the balance. We charge our clients a fee based upon assets under management: portfolios smaller than \$25,000,000, a management fee of 1.2%; portfolios with assets between \$25,000,000 and \$50,000,000, a management fee of 1.0%; and portfolios larger than \$50,000,000, a management fee of 0.8%. Fees are invoiced at the end of each quarter based on the value of the assets under management at that date. We issue an invoice, and the custodian, as the client's agent deducts and pays us our fee. We do not charge fees in advance. Fees payable to us do not include other fees and expenses that clients incur, including: fees charged by managers of investment products (we will not double charge clients); brokerage commissions; transaction fees; exchange fees; custodial fees; transfer taxes; wire transfer and electronic fund processing fees; or commissions or mark-ups/ mark-downs on security transactions.

***What are our legal obligations to you when acting as your investment adviser? How do we make money and what conflicts of interest do we have and how will these affect me?***

As a fiduciary, we act in your best interests. This legal obligation comes from the antifraud provisions of the U.S. Investment Advisers Act of 1940 and the rules thereunder, the SEC's Standard of Conduct Interpretation and includes the duties of loyalty and care - best execution, the disclosure of material facts, such as conflicts of interest and the means to address (mitigate) them, suitability and a reasonable basis for recommendations. We make money based on the fees that we charge, as noted above. We do not make money another way.

Our conflicts of interest are set forth in our Form ADV Part 2A Item 10, [ACPI Form ADV Part 2A](#).

***How will our professionals make money?***

We compensate our investment professionals with a salary and a discretionary bonus, not non-cash compensation. For the bonus, we use these factors: Performance, value added to other individuals within the organization, professional attitude.

***You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on investments over time. Please make sure you understand what fees and costs you are paying.***

More information is available in our Form ADV Part 1 Item 5.E, [ACPI Form ADV Part 1](#), and Form ADV Part 2A Items 4, 5 and 10, [ACPI Form ADV Part 2A](#).

**Disciplinary history: what is our disciplinary history and, if any, what type of conduct?**

**We have nothing to report.**

**Additional Information**

Your primary contact is Daniel Pasini. Alternatively, if you have any concerns about us or this person, contact Andrew Banks. You can reach us at the e-mail address or phone number, below. [We will provide you with a copy of this Form CRS and our Form ADV Parts 2A and 2B by contacting us at info@acpi.com, + 44 020 7369 79500 or by accessing these on our website at www.acpi.com.](#)

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