

#### INTRODUCTION

Glovista Investments LLC is a fee only investment adviser registered with the Securities and Exchange Commission. In the investment business, there is a difference between brokerage fees and fees for advisory services and it is important for you to understand these differences. We receive only management fees from our clients that are dependent on the amount of money we manage. In some cases, we receive performance fees that are dependent upon the profits we generate for you. We do not receive brokerage fees or commissions. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

#### **RELATIONSHIPS & SERVICES**

# What Investment Services and Advice Can You Provide to Me?

Glovista provides continuous and ongoing discretionary investment advisory services to retail clients. As part of those services, we review your portfolio, investment strategy, and investments. We also assess your financial situation and provide advice to meet your goals.

A description of our discretionary investment services and our investment strategies can be found at: <a href="https://glovista.net/servicesdescription/">https://glovista.net/servicesdescription/</a>. Also, see our Form ADV Part 2 Brochure, Item 4 at <a href="https://glovista.net/formadvpart2/">https://glovista.net/formadvpart2/</a> for more information regarding our specific investment strategies.

We monitor your account on a daily basis as part of our standard services. In addition, we review your account on at least an annual basis (and more frequently if requested by you) to ensure that your goals remain consistent with the strategies we have designed for you. To open an account with us, we require a minimum investment of \$250,000. We will however consider lesser minimum amounts.

## **Additional Information:**

You may obtain more information regarding our advisory services, including information regarding the services that we provide and the types of clients that we have, by reviewing our Form ADV Part 2A Brochure, Item 4 and 7 at <a href="https://glovista.net/formadvpart2/">https://glovista.net/formadvpart2/</a>.

Questions to ask your financial professional: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

# FEES, COSTS, CONFLICTS AND STANDARD OF CONDUCT

## What Fees Will I Pay?

Our annual management fees range from 0.75% to 1.25% of the amount of assets in your account. The more assets you have in your advisory account, the more you will pay us in US Dollar terms. Therefore, we have an incentive to increase those assets in order to increase our fees. Our fees are billed monthly or quarterly in arrears based on the market value of their portfolios as of the end of each calendar month and quarter-end. For additional information about how fees are determined and the conflicts that exist as a result of our fees please visit https://glovista.net/feesdescription/.

Certain investors may also pay "performance based fees" based upon the profits earned in your account. For additional informing about how performance fees work, see https://glovista.net/feesdescription/.

In addition, you may incur other fees and costs. To see a description of these other fees and costs, see https://glovista.net/otherfeesandcosts/.

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



your investments over time. Please make sure you understand what fees and costs you are paying. For more information about your fees and costs, including information regarding how fees are paid from your account, frequency of payment, types of fees or expenses you may pay, brokerage and other transaction costs, refunds of fees and other fee related matters, see our Form ADV Part 2A Brochure, Item 4 at https://glovista.net/formadvpart2/.

Questions to ask your financial professional: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Some examples to help you understand what that means can be found at https://glovista.net/conflicts/.

Questions to ask your financial professional: How might your conflicts of interest affect me, and how will you address them?

## **Additional Information:**

More detailed information about conflicts of interest may be found in our Form ADV Part 2A Brochure at

https://glovista.net/formadvpart2/.

# How do your financial professionals make money?

Our financial professionals are compensated with a base salary and discretionary bonus based upon the overall success of the firm. Our professionals are not compensated based upon any other factors. To see other ways some financial professionals are compensated, visit <a href="https://glovista.net/compensationfactors/">https://glovista.net/compensationfactors/</a>.

## **DISCIPLINARY HISTORY**

# Do You or Your Financial Professionals Have Legal or Disciplinary History?

No. Please visit <u>Investor.gov/CRS</u> for a free and simple search tool to research you and your financial professionals.

Questions to ask your financial professional: As a Financial Professional, do you have any disciplinary history? For what type of conduct?

#### **ADDITIONAL INFORMATION**

We encourage you to seek out additional information. You may find additional information about our investment advisory services at <a href="www.glovista.net">www.glovista.net</a>. You may request up-to-date information and request a copy of this Relationship Summary by calling us at (212) 336-1540.

Questions to ask your financial professional: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker dealer? Who can I talk to if I have concerns about how this person is treating me?



#### **HYPERLINKS:**

## Investor.gov/CRS

## LINK 1:

Our advisory services are offered to you on a **discretionary basis**, meaning that you provide us with the ability to buy and sell investment in your account without asking you in advance. You may place limits on our discretionary authority. For example, you may limit the types of securities that we may invest in without your approval.

Glovista provides continuous and ongoing discretionary investment advisory services to retail clients. As part of those services, we review your portfolio, investment strategy, and investments. We also assess your financial situation and provide advice to meet your goals. We also provide customized advisory services designed to meet your specific investment needs. In addition, we offer two distinct strategies:

- Our "Global Tactical Asset Allocation" strategy ("GTAA Strategy"); and
- Our "Emerging Market Equities strategy ("Emerging Markets Strategy").

Our GTAA Strategy is a global multi-asset strategy with no bias towards a particular asset class or geography. The strategy emphasizes capital protection during times of market uncertainty by raising cash. During times of lower macro and financial market volatility, the strategy invests in risk assets so as to generate returns in a risk-efficient manner.

Our Emerging Markets Strategy is intended for investors who seek to gain exposure to Emerging Market Equities on a long only basis. The focus of the strategy is on country, sector and currency allocations as opposed to bottom —up company analysis. The Emerging Markets Strategy invests in liquid markets and liquid US-listed securities. Since

this strategy is always fully allocated to EM equities, it should form a part of the growth investment portfolio.

#### LINK 2

https://files.adviserinfo.sec.gov/IAPD/Content/ Common/crd\_iapd\_Brochure.aspx? BRCHR\_VRSN\_ID=832486

## LINK 3:

Our annual management fees range from 0.75% to 1.25% of the amount of assets in your account. Our fees are billed monthly or quarterly in arrears. Factors considered in determining your fee schedule include: the complexity of your account; assets to be placed under management; anticipated future additional assets; related accounts; portfolio style; account composition; and reports, among other factors. The more assets you have in the advisory account, including cash, the more you will pay us in US Dollar terms. We therefore have an incentive to encourage you to increase the assets in your account in order to increase our fees.

In addition to an asset-based fee, "qualified clients" (who have a net worth of more than \$2,100,000 or at least \$1,000,000 under management with us) may be charged a negotiable performance-based fee. The performance-based fees are based on profits generated for investors subject to certain conditions described below. In each case, the performance fees are specifically authorized by you in the relevant investment management agreement.

We typically charge performance-based fees of up to 20% on an annual basis of the profits generated in the account, billed quarterly in arrears based upon the asset value of the account on the last day of the month. This performance fee will comply in full with Rule 205-3 under the Investment Advisers Act of 1940.

The performance fee allocation with respect to any Account is subject to a "high water mark" provision such that no performance fee will be paid to us, except



to the extent that the amount of the capital increase exceeds the sum of any cumulative loss in your Account as well as subject to adjustment for withdrawals or contributions.

The performance fee calculation may create an incentive for our Firm to make investments that are riskier or more speculative than would be the case in the absence of a performance fee formula.

## LINK 4:

In addition, you may incur other fees and costs including:

- Fees charged when certain investments are sold (e.g. surrender charges for selling mutual funds).
- Custodian fees paid to the bank or other financial institution that holds the assets in your account.
- Fees related to mutual funds and ETFs purchased and sold in your account; and
- Other transactional fees and product-level fees.

LINK 5

- Certain clients may pay us a performance fee (based upon the capital appreciation in their accounts) as opposed to just a management fee. This may create an incentive for us to allocate certain limited opportunities to those clients instead of to your account.
- Certain brokers that we use to execute trades in your account may provide research, capital introductions or other services to us that other brokers do not provide. This creates an incentive for us to use those brokers, even if the other brokers would provide better service at lower cost.
- Conflicts may exist between our employees and your account interests. For example, employees may want to buy or sell securities in their personal accounts that are the same securities that are being purchased by us on your behalf. In those cases, there could be a

conflict between the personal interests of those employees and you.

# LINK 6

Our financial professionals are compensated with a base salary and discretionary bonus based upon the overall success of the firm. Our professionals are *not* compensated based upon any other factors such as: the amount of client assets they service; the time and complexity required to meet a client's needs; the product sold (i.e. differential compensation); product sales commissions or revenue the firm earns from the financial professional's advisory services or recommendations (excepting only to the extent that the firm earns fees for managing your account and any profits that the firm earns generally may be distributed indirectly as discretionary bonus to individual professionals).