

CUSTOMER RELATIONSHIP SUMMARY

Zenith AM is registered with the Securities and Exchange Commission as an *investment adviser*. The services provided and fees charged by *investment advisory* and *brokerage* firms differ, and it is important that retail investors understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about investment advisers, broker-dealers and investing.

What investment services and advice can you provide me?

We are an investment advisory firm that provides portfolio management for individuals, institutions and other business entities. It buys and sells investments for the accounts of its clients on a discretionary basis. Retail clients may engage us through various Advisers.

Upon request by the client, we provide investment management services focused on the asset management, ie the ongoing selection and management of marketable security portfolios. Such services incorporate a financial planning perspective with a holistic view of Client's investment management needs. Based upon each Client's situation, we help Clients understand and plan for their liquidity needs, as well as develop and maintain an appropriate long-term investment plan. In particular, we seek a complete understanding of each client's investment objectives.

The investment management policy is detailed in a « mandate » that reflects the client's return objectives, risk tolerance and liquidity restraints given current market conditions, fees. This mandate which may be amended from time to time as client circumstances or objectives change, implements the objectives using the appropriate asset classes and instruments for the client.

The Firm invests in mutual funds where appropriate to maintain broadly diversified portfolios and has access to particular asset classes as well as in straight securities.

The Firm will not advise the client or act for the client in any legal proceedings, including bankruptcies, involving securities held or previously held, or the issuers of those securities. The Firm will not vote proxies for securities held in Client accounts. Zenith AM generally does not accept clients with less than \$300,000 of investable assets.

More detailed information regarding our services is provided in our [Form ADV, Part 2 Brochure](#).

"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?"

What fees will I pay?

Fees charged for our asset management services are based on a fixed charge, billed at the end of the billing period on a quarterly calendar basis. The initial Account Fee is due at the beginning of the quarter following execution of the Mandate. Subsequent Account Fee payments are due and will be assessed at the beginning of each quarter. Clients will be charged an annual fee which equates to around 1.50% of the amount of assets under management.

Investment activity may also involve other transaction fees payable by Clients, such as sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. In addition, as stated, Clients may incur certain charges imposed by custodians, broker/dealers, third-party investment consultants, and other third parties, such as custodian fees, consulting fees, administrative fees, and transfer agency fees. Zenith AM is not the beneficiary of such fees.

Zenith AM may receive performance-based fees for its investment management services, which may be in addition to the Investment Advisory Fee. Generally, Zenith AM receives a performance-based fee up to 10% of any exceptional performance, as defined in the Mandate. Performance-based fee can create certain inherent conflicts of interest with respect to Zenith AM's management of assets. To maintain fair and equitable treatment of all of accounts, Zenith AM has implemented specific controls, and policies and procedures, to further its efforts to treat all accounts fairly, regardless of their corresponding fee-structure.

Note that the more assets there are in a retail investor's advisory account, the more a retail investor will pay in fees. Therefore, Zenith AM may have an incentive to encourage the retail investor to increase the assets in his or her account. 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. More detailed information regarding fees and costs is provided in our [Form ADV, Part 2 Brochure](#).

"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 by 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 certain conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

Proprietary Products. We could receive advisory fees based on the amount of assets in the Zenith AM Funds, which creates an incentive for Zenith AM to use Zenith AM Funds in client accounts. Fees charged by Zenith AM Funds should exceed the management fee we charge clients, creating an incentive for us to recommend Zenith AM Funds. Actually, we do not invest in Zenith AM funds in US Persons Portfolios.

"How might your conflicts of interest affect me, and how will you address them?"

How do your financial professionals make money?"

Our portfolio managers' compensation includes an annual fixed salary, which is based on various market factors and the skill and experience of the individual, and a discretionary bonus. The discretionary bonus takes into account several factors including the Adviser's profitability (net income and ability to pay a bonus). The formula for determining these amounts may vary, and no individual's compensation is solely tied to the investment performance or asset value a portion of our firm's profits. This compensation structure creates an incentive for our portfolio managers to recommend that you increase the size of your account with us.

Do you or your financial professionals have legal or disciplinary history?"

No. For a free and simple search tool to research us and our financial professionals, please go to Investor.gov/CRS.

"As a financial professional, do you have any disciplinary history? For what type of conduct?"

Additional Information

For additional information regarding us (including an up-to-date copy of this statement), please contact us by phone at +33 1 80 98 00 50 or visit our website at <https://zenith-am.com/>

"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?"

For any information, please contact us by phone at +33 1 80 98 00 50 or by email at info@zenith-am.com