

## Item 1



# HOTTINGER

## Hottinger & Co Limited Form CRS – Form ADV Part 3 16 March 2026

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We are registered with the SEC as an investment adviser under the U.S. Investment Advisers Act of 1940. This Relationship Summary is on our website at <https://hottinger.co.uk> and is filed with the SEC at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Brokerage and 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), that provides educational materials about brokers, investment advisers and investing.

### **Item 2 Relationship and services. What investment services and advice can you provide me with?**

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

Our clients are U.S. and non-U.S. HNWI, families and family offices, foundations, trusts, charities, pensions and corporations. We do not have a minimum amount for which a client is required to give us to open an account; the initial size of a portfolio accepted is at our sole discretion.

We offer discretionary investment management services in separately managed accounts to Retail Investors. Our investment strategies are: Treasury only; Defensive; Balanced; Growth; Equity only; and Special Mandate (bespoke). Each investment strategy is confirmed in a Mandate. Subject to the client's investment objectives and restrictions, a portfolio will feature investments/securities including, but not limited to, direct or indirect holdings of US and non-US equities, government securities, bonds or fixed interest securities, ETFs, Commodity ETFs, units or shares in regulated or unregulated collective investment schemes and other pooled investment vehicles. We do not offer or advise on proprietary products for Retail Investors. We also offer non-discretionary (advisory), non-execution services where the investor makes the ultimate decision regarding the purchase or sale of investments and executes through his own broker-dealer relationship.

The performance of accounts differs based on client strategy and market performance.

Quarterly, the Investment Managers monitor to confirm whether portfolio holdings were selected in accordance with the Investment Profile. Quarterly and annually, Investment Managers, and Relationship Managers check for asset allocation deviations to see whether the asset allocation is within the agreed asset allocation ranges.

Information about our education and qualifications are set forth on our website at <https://hottinger.co.uk>. We are required to hold individual licenses with our local regulator, the UK Financial Conduct Authority. For information on this, please see <https://register.fca.org.uk/individuals>. More information about us and our fees is found in our Form ADV Part 2A Items 4, 7 and 8.

### **Item 3 Fees, costs, conflicts, and standards of conduct. What fees will I pay?**

***You will pay fees and costs whether you make or lose money on 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. Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to manage, how much will go to fees and costs, and how much will be invested?***

We do not manage money based on a fixed amount with a withdrawable fee, say, \$10,000, take a fee and invest the balance. We charge a management fee ("Fee") based on assets under management ("AUM") agreed with the client and recorded in the Mandate.

Client custodians calculate the value of investments/securities/and cash. We calculate our Fee based on quarter-end valuations produced by us based on data from the custodian which is again reconciled within our systems. Our annual external audit includes a review of the Fee calculation methodology and sample calculations which would mitigate any perceived conflict of interest. Fees are invoiced and debited quarterly, in arrears, from the custodial account ("Account"), based on the Account's quarter end value. Clients bear all other expenses, such as charged by managers of funds, brokerage commissions or mark-ups/mark-downs on transactions, exchange fees, custodial fees, transfer taxes, wire transfer fees and electronic fund processing fees.

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

***When we act as your investment adviser, our legal obligations to you outline that we have to act in your best interest and not put our interests 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 that we provide you. Here are some examples to help you understand what this means.***

A conflict of interest arises when we manage assets (securities and cash) for two or more clients at the same time, which clients have differing investment objectives and restrictions and pay different fees. We do not manage money based on a fixed amount with a withdrawable fee, say, \$10,000, take a fee and invest the balance. We offer our discretionary clients a fee based only upon a per cent of assets under management, which is negotiable and is shown in our Form ADV Part 2A Item 5. No performance fees are charged. Fees are calculated and charged quarterly in arrears. Clients bear all other expenses, such as fees charged by third party fund managers, brokerage commissions or mark-ups/mark-downs on security transactions, exchange fees, custodial fees, transfer taxes, wire transfer fees and electronic fund processing fees.

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

Our conflicts of interest and how we address them are set forth in our Form ADV Part 2A Item 10, [Form ADV Part 2A](#).

***How do your professionals make money?***

We make money based on the fees that we charge, as noted above. We do not make money any other way. We compensate our investment professionals with salary and discretionary bonus, not non-cash compensation. For the bonus, we consider performance of the person and the firm. We do not believe that there are conflicts of interest with respect to how we compensate our professionals and the criteria are objective and not client-performance based. More information is available in our Form ADV Part 1 Item 5.E, and Form ADV Part 2A Items 4, 5 and 10.

**Item 4 Disciplinary history. Do you or your professionals have legal or disciplinary history?**

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

No. We have no disciplinary history and nothing to report. Please visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

**Item 5 Additional information**

***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?***

Your primary contact is Tim Sharp; he is our Chief Compliance Officer. If you have any concerns about us or this person, contact CEO, Penny Lovell. 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 [admin@hottinger.co.uk](mailto:admin@hottinger.co.uk), + 44 207 227 3405 or by accessing these on our website at <https://hottinger.co.uk/us-investors>.

***Please visit [Investor.gov](http://Investor.gov) for a free and simple search tool to research us and our financial professionals.***