

Client Relationship Summary
Belvedere Advisors LLC
March 28, 2025

Belvedere Advisors LLC (“Belvedere”, the “Firm” or “we”) is registered with the U.S. Securities and Exchange Commission as an investment adviser. The investment advisory services and fees offered by Belvedere and the brokerage fees charged by other service providers differ, and it is important for you to understand the differences.

This document is a summary of the services and fees we offer to clients that are natural persons who seek or receive investment services primarily for personal, family, or household purposes. Additionally, free and simple tools are available to research firms and financial professionals at www.sec.gov, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Belvedere offers investment advisory services to retail investors that generally involve buying and selling securities on behalf of clients in strategies selected or recommended by the client’s financial advisor, registered investment adviser, wealth manager, or financial consultant. These services are typically offered indirectly through managed account programs at third-party financial intermediaries, such as broker-dealers, RIAs, wealth managers, and consultants (“Advisors”), and are also offered directly. Belvedere limits the services it offers to retail investors to investing in equity portfolios through separately managed accounts (“SMA”). These SMAs must meet certain minimum account sizes, typically \$1 million. In providing investment advisory services to your account, you grant Belvedere discretionary authority so that we can buy and sell securities for your investment account without asking you in advance. Belvedere does not take possession or custody your assets and Belvedere will not invest SMA assets in Belvedere-sponsored or managed investment funds or other Belvedere-sponsored products. The types of equity securities that Belvedere includes in SMA portfolios may include stocks, exchange-traded funds (“ETFs”) and other types of equity securities.

Belvedere uses quantitative models and tools to implement its investment strategies. Our processes can incorporate certain customizations in these separately managed accounts, including choice of benchmark(s) and investment restrictions. Your account will be monitored on an ongoing basis. For additional information about our services, please see our [Form ADV, Part 2A](#).

Key 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?**

What fees will I pay?

You pay a fee to Belvedere based on a percentage of the assets we manage on your behalf. The more assets you invest with Belvedere, the more you will pay us in fees. As a result, we have an incentive to encourage you to increase the amount of assets we manage for you. Belvedere’s advisory fees typically can be negotiated only between Belvedere and your Advisor. Certain Advisors and their clients may pay lower fees than other Advisors and their clients, and you may pay more or less than other individual investors with accounts invested in similar strategies. Typically, Belvedere charges retail investors up to 2.5% per year, based on a variety of factors related to the account, including the applicable investment strategy, aggregate amount of assets within a household or invested by clients’ Advisor in Belvedere funds, strategies, or separate accounts. These fees are typically charged on a quarterly basis at the end of each quarter. We can charge prorated fees for accounts initiated or terminated during a billing period, and upon termination of an account, any earned, unpaid fees will be due and payable. In addition to Belvedere’s advisory fee, your account will be subject to other fees and expenses, such as brokerage commissions, fees you pay your Advisor, custodial fees, proxy voting service fees, taxes, fees charged to your investments (such as ETF fees and expenses), and other transaction costs and expenses.

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

Key Question 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 interests 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 we provide you. For instance:

- Belvedere manages investment funds and accounts for institutional investors and for retail investors. In many instances, Belvedere manages funds and accounts (including SMA accounts) according to the same or a similar investment strategy (*i.e.*, side-by-side management). The simultaneous management of these different funds and accounts gives rise to the possibility of favorable or preferential treatment of one account or accounts arising from differences in fee arrangements, including favoring clients with higher fee schedules over those with lower fee schedules. Belvedere has the ability to charge a higher fee and earn more because of its receipt of performance fees, from investment funds than from SMA accounts. However, when managing the assets of investment funds and accounts, including SMA accounts, Belvedere has a duty to treat all clients fairly and equitably, in each such client's best interest. Belvedere does not invest the SMA accounts in Belvedere-sponsored funds.

Key Question to Ask Your Financial Professional

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

How do your financial professionals make money?

Belvedere's financial professionals are generally compensated in the form of a base salary plus discretionary cash bonus. A portion of any Belvedere financial professional's bonus will be based upon the financial performance of the firm in any given year. The receipt of a bonus tied to the performance of the firm may create a conflict of interest for an Belvedere financial professional to seek to maximize Belvedere's profit by encouraging your Advisor or you to increase your assets under management in an SMA or invest your assets in an Belvedere-sponsored fund or other Belvedere advisory products and services.

Key Question to Ask Your Financial Professional

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

You can request a current copy of the relationship summary by contacting our firm at +1 (646) 361-3395 or by contacting your financial professional.

Key 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?