

Brite Advisors USA, Inc.

Form CRS Customer Relationship Summary

March 31st, 2023

Brite Advisors USA, Inc. is registered with the Securities and Exchange Commission (SEC) as an investment adviser. (CRD# 155775/SEC#: 801-78041). Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

1. What investment services and advice can you provide me?

We offer customized, non-discretionary investment advisory services to retail investors based upon such factors as their age, income, assets and debts, education, need for cash flow, investment goals and experience, and tolerance for risk. The Firm's investment advisory services primarily focus on the use of international pension schemes, described below, and the allocation of client assets among exchange-traded funds ("ETFs"), mutual funds, individual debt and equity securities, Undertakings for Collective Investment in Transferable Securities ("UCITS"), and currency. The firm does not have discretion in client accounts, the retail investor makes the ultimate decision regarding the purchase or sale of investments. Clients may elect to allocate their assets according to model portfolios developed by the Firm. Clients are restricted to an Approved Securities List. Investments outside of this list are subject to exception approval by the Firm. Clients on the Brite Platform have their portfolios automatically rebalanced when allocation band triggers are met. Where no rebalancing has occurred for 3 years, the portfolio will be rebalanced to an optimal portfolio. In addition to the Firm's focus on international pension schemes, the Firm's investment advisory services include the management of client assets custodied in the U.S. These services include the allocation of client assets among mutual funds, ETFs, and individual debt and equity securities. We monitor your account as needed. You should discuss your needs, goals, and other factors affecting your financial situation with your advisor. We contact you at least annually to discuss any changes. Brite USA does not impose a minimum portfolio size on advisory business, except that a SIPP generally is subject to a minimum of GBP 100,000.00. For additional information, please see Form ADV, Part 2A brochure Items 4 and 7, located at <https://adviserinfo.sec.gov/firm/summary/155775>.

Conversation Starters. *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?*

2. What fees will I pay?

You will pay us an asset-based fee up to 1.25% of assets under management based on the value of assets held in the Client's account at the end of each day of a given month or, as of the end of a given month or quarter, as the case may be. There is an exception for Clients who hold accounts with Utmost Worldwide, in which the quarterly billing cycle is based on the day the account was opened. The date on which the advisory fee is deducted is three months after the last day of the month on which the Plan Commencement Date falls. We have the right to waive/ negotiate fees for certain retail clients. You may also pay other fees and costs, including custodian fees, brokerage fees, commissions, interest fees, taxes, duties and other governmental charges, transfer and registration fees, foreign exchange transaction costs, fees and costs charged by other investment advisers or funds, account maintenance fees, mutual fund fees, variable annuities fees, and other transactional fees and product-level fees.

The Firm charges an upfront flat fee if you open a SIPP account ("SIPP Fee"). The flat fee is deducted from the value of the assets transferred or paid by you directly to the SIPP Trustee.

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.

The other costs that you may pay, and the conflicts of interest they cause, are discussed in our public filings with the SEC. For additional information, please see Form ADV, Part 2A brochure Items 4 and 7, located at <https://adviserinfo.sec.gov/firm/summary/155775>.

Conversation Starters. 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?

Please make sure you understand what fees and costs you are paying. Please see the more detailed disclosure in Item 5 of our Form ADV Part 2A, which is available at <https://adviserinfo.sec.gov/firm/summary/155775>.

3. 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 must 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 as they can affect the investment advice we provide. Here are some examples to help you understand what this means. The following arrangements and activities give us an incentive to make investments for you based on our own interests rather than on your needs.

- We may be compensated by the SIPP Fee referred to above, which gives us an incentive to encourage you to open a SIPP Account.
- We may invest personally in the same (or related) securities that we recommend to you, which are generally broad-based funds or indices. We may also buy or sell securities for you at or about the same time that we buy or sell the same securities for our own accounts. This could give us an incentive to favor our own accounts over your account.
- We address these conflicts by ensuring that supervisors review employee trading and the transfer of your assets.

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

Please see the more detailed disclosure on our conflicts of interest in Items 5, 6, 10, 11, 12 and 17 of our Form ADV Part 2A, which is available at <https://adviserinfo.sec.gov/firm/summary/155775>.

4. How do your financial professionals make money?

Our employees are paid a cash salary and may receive additional compensation based on a variety of factors, including the assets under their management, and their ability to establish new client relationships and add to our assets under management. This gives our professionals incentive to manage more assets. Our employees may be compensated by the SIPP Fee referred to above if you open a SIPP account.

5. Do you or your financial professionals have legal or disciplinary history?

Yes, we have legal and disciplinary events. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

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

6. Additional Information

You can find additional information about our investment advisory services on the SEC's website and on our website www.briteadvisors-usa.com. You can request up to date information and a copy of our relationship summary by contacting us at 646-449-7253.

Conversation Starters. 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?