

Introduction

Rubin Overseas Ltd. is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser and is not registered as a broker-dealer. Brokerage and investment advisory services and fees differ and it is important for retail investors to use any available tools to understand the difference.

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.

What investment services and advice can you provide me?

We offer discretionary investment advisory services to retail customers. You will choose individual strategy and one of three reference currencies, CHF, EURO and USD. Our strategies and their respective investment objectives are as follows:

- Fixed Income – Significant long-term capital preservation and regular interest income with minimal volatility;
- Conservative – Income generation and long-term capital appreciation with moderate volatility;
- Balanced – A balance of income and long-term capital appreciation generated by a broad mix of interest, income and capital gains with medium volatility;
- Growth – Significant long-term capital appreciation with modest interest income and dividend yield with above average volatility; and
- “Special Mandate” – Permits you to specify your own asset allocation.

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?*

We will continuously monitor your portfolio. We will also periodically review your portfolio to determine if the investments are meeting expectations. Factors that may trigger a review include interest rate changes, market fluctuations and changes in client situation. We will undertake a more thorough analysis periodically to determine that investments in your account are consistent with the investment objectives and restrictions of your account.

We do not limit our advice to a limited menu of products or types of investments. We do not offer proprietary products.

We require a minimum account size of \$250,000 but may waive this requirement at our sole discretion.

Further information about our advisory business and the types of clients we serve can be found in Item 4 and Item 7, respectively, of our Form ADV Part 2A brochure, which can be found here: <https://adviserinfo.sec.gov/firm/summary/169309>.

What fees will I pay?

- We charge an asset management services fee in the range of 0.3% to 1.2% per annum of your assets under management. Fees charged to you may be negotiable based on factors such as your financial situation and circumstances, the amount of your assets under management, your investment strategy and the overall complexity of the services we provide you.
- Your account will be held by a custodian selected by you. You may bear expenses incurred in connection with your investment activities, including custodial fees and transactional costs, as determined such custodian.

Conversation starter:

- *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?*

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 and ask us to clarify if you are unsure.

Further information about our fees and the other costs and expenses you may incur can be found in Items 5 and 6 of our Form ADV Part 2A brochure, which can be found here: <https://adviserinfo.sec.gov/firm/summary/169309>.

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. Here are some examples to help you understand what this means.

- Our receipt of an asset-based management fee may provide us with an incentive to encourage you to increase the amount of assets in your account; and
- Our policy of permitting employees to own, buy, or sell for themselves the same securities that they or our firm have recommended to clients raises potential conflicts of such as front-running. However, securities recommended by us are typically widely held and publicly traded. *Further information about employee trading can be found in Item 11 of our Form ADV Part 2A brochure, which can be found here: <https://adviserinfo.sec.gov/firm/summary/169309>.*

Conversation starter:

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

We seek to minimize all potential conflicts of interest. All of our employees are subject to a Code of Ethics, a copy of which is available upon request, describing our high standard of business conduct, and fiduciary duty to our clients. In accordance with our fiduciary duty to clients, our employees will place client interests ahead of their own interests. *Further information about our Code of Ethics can be found in Item 11 of our Form ADV Part 2A brochure, which can be found here: <https://adviserinfo.sec.gov/firm/summary/169309>.*

If you decide to take advantage of our services, we will enter into an advisory contract with you. Your advisory contract will set forth the details of the investment strategy, any investment restrictions, and details of the fees we will charge you, including the amounts and timing of these fees.

How do your financial professionals make money?

Our financial professionals are paid a fixed annual salary and may receive bonuses based on the assets managed by them.

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

No. Visit <https://www.investor.gov/CRS> for a free and simple search tool to research our firm and your financial professionals.

Conversation starter:

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

Additional Information

For further information please contact us at: Pelikanstrasse 18, 8001 Zurich, Switzerland; or by phone at: +41 58 680 59 19. A copy of our Form ADV, including Form CRS, can be found on the SEC's website at <https://adviserinfo.sec.gov>.

Conversation starter:

- *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?*