

This brochure provides information as Customer Relationship Summary on 2 pages (referred to as "Form CRS" or "ADV Part 3")

If you have any questions about the contents of this brochure, please contact us (see Item 1.).

The information in this brochure has not been approved or verified by the SEC or by any state securities authority. Additional information about 1291 Group is available on the SEC's website at <https://adviserinfo.sec.gov/> or <https://www.investor.gov/CRS>. There is no specific level of skill or training required to "register" as a RIA with the SEC.

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## 1. Introduction – Item 1.

<b>Company:</b> 1291Group of the Americas Ltd. ("1291")	<b>CRD#:</b> 174939
<b>Address:</b> Sterling House, 16 Wesley Street, Hamilton, HM 11 Bermuda	<b>SEC#:</b> 801-100397
<b>Phone:</b> +441-295-3492	<b>Website:</b> <a href="http://www.1291group.com">www.1291group.com</a> <b>Email:</b> <a href="mailto:info@1291group.com">info@1291group.com</a>

1291Group of the Americas Ltd. ("1291" or the "Firm" or "we"), a corporation based in Bermuda, is registered with the Securities and Exchange Commission as an Investment Adviser and provides wealth consulting services and asset management services to clients resident in the United States ("US"). 1291 does not effect brokerage services.

1291 commenced operations in 2015.

1291 was owned by Marc-Andre Sola, with 100% of the shares and voting rights, residing in Dubai, United Arab Emirates. In due course of 2024 the company has changed its shareholder structure with the new set-up of shares as follows: Marc-André Sola, UAE; 40%; Serge Hediger, Liechtenstein, 30%; Yannick Manfred Haeni, Hong Kong, 30%. The portions of voting rights will be as follows: Marc-André Sola, 50%; Serge Hediger, 25%; Yannick Manfred Haeni: 25%.

Free and simple tools are available to research firms, financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS) or [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which also provides educational materials about investment advisers, and investing.

## 2. Relationships and Services – Item 2.

### What investment services and advice can you provide me?

1291 provides wealth management solutions to individuals as well as high net worth clients on a discretionary basis. We focus our investments almost exclusively outside the US, offering our US clients geographical diversification and exposure to non-US markets. All discretionary client accounts (each an "Account") are maintained at third-party financial institutions.

Client Accounts broadly are managed in a similar manner, however, differences in each portfolio occur due to client specific objectives, tax considerations, liquidity, risk tolerances, expected returns and legal restrictions. 1291 primarily invests in equities, fixed income securities and precious metals taking positions in specific securities that 1291 believes are undervalued or present an opportunity for appreciation in the context of macro-economic factors.

### How will you choose investments to recommend to me?

1291 offers different investment strategies depending on financial capacities, investor profile, risk appetite etc. of the client.

1291 does not participate in wrap fee programs.

**Investment Authority:** 1291 accepts discretionary and non-discretionary authority to manage client accounts as indicated above. Clients rarely restrict the authority by which 1291 may act; however, each client has the opportunity to communicate any form of limitation in writing. In the context of a discretionary mandate, 1291 makes investment decisions without consulting the client by utilizing its limited power of attorney for the management of the account maintained at the custodian bank selected by the client. 1291 never has discretionary authority to select a qualified custodian for a client's account. Upon request of the client, 1291 may recommend a custodian bank.

**Monitoring:** The portfolios of all investment advisory clients are internally reviewed quarterly or bi-annual by the advisers of 1291. Transactions in accounts are reviewed by 1291 on a regular basis. Significant changes in stock prices will also trigger a review. Various other circumstances also result in review of accounts. When necessary, accounts may be rebalanced based on 1291's tactical asset allocations, while striving to minimize potential tax implications.

Generally, 1291 requires the minimum amount of \$ 500,000 of assets under management. 1291 may accept accounts below this minimum requirement or may retain accounts that have dropped below the minimum requirement due to market fluctuation or investment performance. Accounts that have family corporate or other relationships may be aggregated for purposes of the minimum account size.

1291 treats all clients equitably and has a duty to act in its clients' best interests. Except as otherwise described in this brochure, the interests of clients will be placed above 1291's interests in case of any conflict. 1291 has adopted a Code of Ethics (the "Code") and attendant policies and procedures governing personal securities transactions by 1291 and its personnel. The Code also provides guidance and instruction to 1291 and its personnel on their ethical obligations in fulfilling its duties of loyalty, fairness and good faith towards the clients.

### Given my financial situation, should I choose an investment advisory service? Why or why not?

Asset Management with 1291 is recommended for investments for diversification reasons outside of the USA with custodians in Europe. In no case is this service be required in case of short-term investments, speculation or by investing the entire savings.

### 3. Fees, Costs, Conflicts and Standard of Conduct – Item 3.

#### What fees will I pay?

#### *a. Description of Principal Fees and Costs*

1291 generally charges fees for its Discretionary Investment Advisory services as a percentage of the market value of the assets under management ("AUM"). The investment advisory fee is charged quarterly and in arrears.	This fee schedule generally applies for 1291's discretionary management service:	Assets under Management in Discretionary Asset Management Mandate (in USD)	Annual Management Fee (charged quarterly)
		Up to 3,000,000	1.50%
		3,000,001 to 5,000,000	1.25%
		5,000,001 to 10,000,000	1.00%
		Over 10,000,001	Negotiable

#### Fees for other services:

Additional service fees may range from USD 200 to USD 500 per hour as agreed upon with the client on a case-by-case basis.

In general, there is no minimum annual fee.

#### Other fees and expenses you may incur:

Fees charged by 1291 do not include custodian fees, flat fees or so-called all-in fees, fees for trade settlement, brokerage commissions, or any other fee imposed by the custodian bank or the broker. 1291's fees do not include management or other fees charged by funds or other products that client Accounts may be invested in from time to time.

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.

#### *b. Standard of Conduct and Conflicts of Interest*

#### How does 1291 make money and what conflict of interests do we have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. All personal securities transactions by these persons must be conducted in accordance with the Code of Ethics and in a manner to avoid any actual or potential conflict of interest or any abuse of any person's position of trust and responsibility. Further, these persons should not take inappropriate advantage of their positions with or on behalf of a client. 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.

When 1291 manages client accounts, as a result of differences in the fees charged on various accounts, 1291 has conflicts related to such side-by-side management of different accounts. For example, 1291 Advisors may manage more than one account according to the same or a substantially similar investment strategy and yet have a different fee schedule applicable to such account as a result of the respective clients' AUM with 1291.

Side-by-side management of different types of accounts may raise conflicts of interest when two or more accounts invest in the same securities or pursue a similar although not identical strategy. These potential conflicts include the favorable or preferential treatment of an account or a group of accounts, conflicts related to the allocation of investment opportunities, and transactions in one account that closely follow related transactions in a different account.

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

1291 seeks to minimize conflicts of interest and resolve those conflicts of interests in favor of its clients to the extent it determines reasonable and necessary in accordance with its Code of Ethics.

The Code of Ethics contains provisions designed to try to: (i) prevent, among other things, improper trading by 1291's employees; (ii) identify conflicts of interest; and (iii) provide a means to resolve any actual or potential conflicts of interest in favor of the clients. The Code attempts to accomplish these objectives by, among other things: (i) requiring pre-clearance of specific trades, which includes documenting any exceptions to such pre-clearance requirement; (ii) restricting trading in certain securities that may cause a conflict of interest, as well as (iii) periodic reporting regarding transactions and holdings of employees.

#### *c. Description of How Financial Professionals Make Money*

1291 may pay fees for client referrals to individuals or entities for services provided in identifying and introducing prospective advisory clients. Any such arrangements comply with the conditions and requirements of Rule 206(4)-1 under the Investment Advisers Act of 1940.

### 4. Disciplinary History – Item 4

#### As a financial professional, do you have any disciplinary history?

Yes, 1291 does have legal or disciplinary history regarding formalities of a sister company called 1291Group Europe Ltd. (insurance broker), headquartered in Liechtenstein. The local supervisory authority "FMA" initiated a procedure for suspicion on AML procedures. The investigation was terminated without any outcome and consequences. For further information, please consult the current ADV filing.

### 5. Additional Information – Item 5.

Additional information about 1291's investment advisory services can be found on the website of 1291 ([www.1291group.com](http://www.1291group.com)) or obtained under +441-295-3492 and free and simple tools are available to research firms, financial professionals, e.g. at [www.investor.gov/CRS](http://www.investor.gov/CRS). A copy of the firm's current Form CRS can be requested from 1291 at any time or found under the indicated link.

#### Who is my primary contact person? Who can I talk to if I have concerns about how this person is treating me?

Please find all the necessary information here: [www.1291group.com](http://www.1291group.com). 1291 currently has no employees.

Please consider ADV Part 2A for further information.