

ACP Investment Management
Client Relationship Summary
October 2025



ACP Investment Management is an investment adviser registered with the Securities and Exchange Commission. Investment advisory services and fees differ from brokerage services and fees and we feel it is important for you to understand the differences. [Investor.gov/CRS](https://www.investor.gov/CRS) is a website providing free and simple tools to research firms and financial professionals, and which provides educational materials about investment advisers, broker-dealers, and investing.

We encourage you to ask us questions. We provide suggested questions to ask us, set out using text boxes throughout this Relationship Summary.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We offer discretionary investment advisory services to retail investors and non-discretionary advisory services to retirement plan sponsors. We also offer financial planning, consulting services, advice for self-directed retirement accounts, and other custom advisory and consulting services. We first meet with you to gain an understanding of your current financial situation, your short- and long-term goals, and your risk tolerance. We use this information to recommend an investment portfolio specific to your investment objectives and needs.

Your financial professional, an investment adviser representative (IAR), implements client portfolios and monitors those as part of an ongoing process with regular account reviews at least annually. Reviews are also triggered by material market, economic or political events, or by changes in your financial situation, such as retirement, inheritance, or change in marital status. We do not provide ongoing monitoring for limited-scope consulting or advisory relationships.

We manage portfolios on both a discretionary and non-discretionary basis. When you grant us discretionary authority, this means we don't need to call you before buying or selling securities in your account. We obtain discretionary authorization through our signed advisory agreement with you. For non-discretionary portfolio management, we will obtain your consent before each securities transaction, which means you make the ultimate decision regarding all the purchase or sale of any investment.

We offer advice on different types of securities. We have no minimum account size, although some wrap fee programs we recommend have minimums.

For more detailed information about our services, please request a copy of our Form ADV, Part 2A brochure. Our brochure can also be found here searching by our firm name: <https://adviserinfo.sec.gov/>

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?

We charge a quarterly fee in advance for our asset management services. This fee is based on your total assets under management with us. The annual fee ranges from .50% to 2%. The percentage amount we charge goes down as your assets grow. We also offer financial planning and consulting services for an hourly or fixed rate fee. Our maximum hourly rate is \$500 and flat fee projects can be a broad range, anywhere from \$500 to \$20,000, and are entirely dependent upon the specific work involved. Our fees are negotiable. When we charge an asset-based fee, the more assets we manage, the more you'll pay in management fees. We therefore have a financial incentive for you to increase the assets we manage for you.

In addition to our advisory fees, you will pay fees charged by third parties for other services provided to you, including fees charged by your custodian and broker-dealer. Examples of costs you might pay include brokerage commissions, transaction

fees, custodial fees, transfer taxes, wire transfer and electronic fund fees. Mutual funds and exchange traded funds also charge internal management fees, which reduce the return of investments over time. We do not receive any portion of these charges; we are compensated only through our own advisory fees.

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?

Additional Information: 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. Our Form ADV, Part 2A (Item 5 and Item 12) contains more detailed information about fees and costs.

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. We have a conflict of interest through our receipt of asset-based fees. For example, if you asked us for a recommendation about paying down outstanding debt or making charitable contributions, versus keeping those funds in your account with us, we have a conflict of interest in making the recommendation because we earn more advisory fees when you keep more assets in your account. Some other examples of actual or potential conflicts of interest include how we are paid, non-cash benefits we receive from third parties, and other business activities of our IARs, including receipt of commissions. Our firm's Form ADV, Part 2A and the Part 2B supplement for your IAR provide details about applicable conflicts.

The only direct revenue we receive is from the advisory fees you pay us. However, we receive other benefits, such as billing, access to research, technology services, and seminars through our relationships with the custodians we recommend. We have an incentive to recommend certain custodians to you because of the benefits we receive.

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

Our Form ADV, Part 2A contains detailed information about our conflicts of interest.

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professionals receive variable compensation related to the number of clients served and total advisory fees generated. This creates a financial incentive to solicit and retain clients. Our financial professionals may also have additional or other business activities in which they engage. For example, some of our financial professionals are registered representatives with a broker-dealer and/or licensed insurance producers. Engaging in outside business activities creates a financial incentive to recommend products or services that generate commissions or other revenue. Your financial professional's other business activities will be disclosed in that financial professional's brochure supplement, also known as a Form ADV, Part 2B.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

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

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?

For more detailed information about our investment advisory services, or to request another copy of this Relationship Summary, please contact us at 808-657-6511 and speak to our compliance personnel. You may also visit the SEC's public disclosure website at www.adviserinfo.sec.gov.