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## Introduction

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Nevastar Finance Ltd. (“Nevastar”, “we” “us” or “our”), founded in 2003, is registered with the Securities and Exchange Commission as an investment adviser since 2017 and based in London, United Kingdom.

Brokerage and investment advisory services and the fees they charge will differ. It is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

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

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Nevastar offers investment advisory services to certain retail investors in the United States. We will meet with you to identify and discuss your financial goals, financial needs, and the level of investment risk that you are willing to bear. We will then help to build a portfolio of investments (including accommodating any of your investment restrictions) that will consist of a combination of equities, fixed income investments, currencies, commodities and options that can help you meet those goals and financial needs.

If you provide Nevastar with discretionary authority, Nevastar will make investment decisions for your account and execute trades on your behalf. Nevastar maintains a Portfolio Investment Committee which meets to review investment allocations and makes all investment decisions for your account. Nevastar also offers non-discretionary services or advisory services meaning that Nevastar will discuss its trade recommendations with you, but you will make the ultimate decisions regarding the purchase or sale of securities.

As part of the standard services Nevastar provides, Nevastar monitors the investments in your account on an ongoing basis to make sure the investments Nevastar recommends to you are meeting your financial goals. Additional information can be found by reading Items 4, 5, 7, 8 and 12 of Nevastar’s [ADV 2A Brochure](#).

*Conversation Starter: Given my financial situation, should I choose an investment advisory service? Why or why not?*

*Conversation Starter: How will you choose investments to recommend to me?*

*Conversation Starter: What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

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## What fees will I pay?

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Nevastar has minimum account size of \$3,000,000. Nevastar’s annual management fee for its separately managed retail accounts is generally up to 0.95% of a client’s assets under management, but may vary depending on the size of the asset under management. Nevastar’s fees are typically billed quarterly, in arrears, and debited from your account or billed to you depending on the terms contained in the investment management agreement. Because Nevastar is paid based on the assets in its client’s account(s), there is an inherent incentive for Nevastar to encourage a client to increase the assets under management in their account to earn higher fees.

### *Description of Other Fees and Costs*

You may be charged additional fees and/or expenses by third parties that include, but are not limited to, custodial fees, brokerage commissions, and transaction fees. All of these fees are paid by you in addition to the management fees you pay to Nevastar on these investments. Nevastar does not receive any portion of these fees or costs.

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. Additional information is available by reading Items 4, 5, 12 and 15 of our [ADV 2A Brochure](#).

*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?

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**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?**

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*When Nevastar acts as your investment adviser*, Nevastar must act in your best interest, and not put our interest ahead of yours. At the same time, the way Nevastar makes money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice Nevastar provides you. Here are some examples to help you understand what that means:

Nevastar has many clients, which means that their financial professionals may have a conflict in allocating time and investments to different clients. To address this conflict, Nevastar has procedures in place to monitor client portfolios. Nevastar may earn higher fees on certain clients over others. All fees are disclosed to clients in advance of investing. Nevastar employees can purchase the same securities as they recommend to clients. Nevastar employees must obtain pre-approval prior to purchasing securities for their own accounts. For additional information about our conflicts of interest, please read Items 5, 11, 12 and 14 of Nevastar's [ADV 2A Brochure](#).

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

**How do your financial professionals make money?**

The compensation of Nevastar's financial professionals is determined at our discretion, includes salary and discretionary bonus, and is based on contracting with new clients and increasing assets under management.

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

No. Neither Nevastar nor our financial professionals have legal or disciplinary history. Additional information can be found in Item 11 in our [Form ADV Part 1A](#). Please visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research financial professionals.

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

**Additional Information**

Please contact us +44 20 7290 3210 or [contact@nevastar.com](mailto:contact@nevastar.com) for additional information about Nevastar's investment advisory services or to request a copy of this relationship summary.

*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?

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