

INVESTOR RELATIONSHIP SUMMARY (Form CRS)

Revised March 3, 2025

Introduction

ST Global Markets USA LLC ("STGM") is registered with the Securities and Exchange Commission ("**SEC**") as a broker-dealer and is a member of the Financial Industry Regulatory Authority ("FINRA") and Securities Investor Protection Corporation ("**SIPC**"). There is an important difference between brokerage and investment advisory services, their related fees, and how those fees may apply to you. Free and simple tools are available to you to research firms and financial professionals at www.Investor.gov/CRS. Additional information can be found at [FINRA BrokerCheck](#) or by calling the BrokerCheck hotline at (800) 289-9999. You may also obtain an investor brochure that includes information describing FINRA BrokerCheck.

Relationships and Services

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

STGM is engaged as a registered broker-dealer for application-way mutual funds, private placements of securities to qualified investors and assisting in the structuring of employer-sponsored qualified retirement plans (ERISA). STGM offers investments in mutual fund families to individuals on an application-way basis, access to investments in Reg D and Reg A private offerings for qualified retail and institutional investors and ERISA compliance for employer-sponsored retirement plans. STGM does not hold investor accounts, accept investor funds or securities, or facilitate clearing securities through third-party clearing firms. As the investor, you independently make all decisions regarding the suitability of any investment opportunity STGM introduces with respect to your individual goals, risk tolerances, and the ultimate ability to ask for participation in any introduced investment. STGM offers a limited number of products, while other firms may offer a wider variety of investment options, some of which may have lower costs. STGM does not have discretion or access to any investor portfolios or accounts and will not monitor the performance of any securities introduced from private issuers.

STGM does not have a stated minimum initial investment amount. Each investment opportunity introduced by STGM has a minimum investment amount that the issuer has independently chosen to accept. STGM's registered representatives are required to maintain certain securities licenses (such as a Series 7) that allow them to engage in the regulated activity of offering mutual funds and private securities to investors. It is important to understand that having a license merely demonstrates that the financial professional has met the testing standards and does not represent the expertise of the financial professional in any of the securities or products introduced.

Conversation Starter

*"Given my financial situation, should I choose a brokerage 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?"*

Fees, Costs, Conflicts, and Standards of Conduct

"What fees will I pay?"

Depending on the type of investment offered, fees will be structured and assessed differently. The details and schedule of fees will be disclosed to you by your financial professional and the mutual fund or private issuer prior to the funding of any investment. These related fees may be assessed in one of the following ways: 1) A private investment into a fund will charge you either management fees, performance fees, or both. STGM will be paid by the fund's manager or sponsor a percentage of those fees charged to your investment. 2) In a direct private investment, STGM will charge a commission as a percentage of the total investment amount. The buyer or the seller of the securities will pay this commission, and in some cases, the commission paid to STGM is shared between the buyer and seller. These fees may reduce the amount of your investment. You may also incur other transaction fees directly from the issuer for other services. All commissions and fees will be disclosed to you in the mutual fund prospectus or issuer's disclosure documents. 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 could potentially gain on your investments over time. STGM only earns these fees or is paid a commission when you make an investment into the mutual fund or underlying issuer's offering introduced to you by STGM. Please make sure you understand what commissions and expenses you will be paying.

Conversation Starter

*"Help me understand how these fees and costs might affect my investments.
"If I invest \$10,000, how much will go to fees and costs, and how much will be invested for me?"*

INVESTOR RELATIONSHIP SUMMARY

(Continued)

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

When STGM provides you with a recommendation, we must act in your best interest and not put our interest ahead of yours. STGM acts as an agent in mutual fund transactions and external capital raising, on behalf of our mutual fund and private issuer clients. Due to this simple intermediary construct, and because we will have no access to your portfolio, you must independently determine if an investment opportunity is suitable considering your investment goals, risk tolerance, portfolio or similar considerations for sub-advised accounts for which you act as fiduciary. At the same time, the way STGM makes money creates some conflicts with your interests.

You should understand and ask us about these conflicts because they can affect the recommendations and introductions we provide to you. Here are some examples to help you understand what this means: 1) STGM acts as a third-party placement agent for mutual fund investments and raising capital on behalf of private issuers. STGM only makes money if you complete a transaction in an investment we have recommended or introduced to you. 2) We economically benefit from the sale of mutual funds and private placements; therefore, we have an incentive to recommend those investments to you. We also generate income from assisting in the structuring of employer-sponsored retirement accounts. Thus, we have a conflict of interest that is inherent in our business. 3) Our financial professionals sometimes invest in the same securities as you; therefore, they may have an incentive to favor their interests over yours. 4) Certain products may pay our Firm or our financial professionals more than other products.

Please ask your financial professional to detail the commission or fee to be received from the recommended investment against other investments that may impose a lower commission. STGM is always available to discuss how these commissions or fees can affect the investments we introduce to you.

Conversation Starter

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

How do your financial professionals make money?

The financial professionals at STGM receive commissions generated from the selling of mutual funds and private placement securities to its investors. Certain financial professionals may receive a base salary. Financial professionals at STGM are not paid a salary based on assets under management and will only receive a commission when you make an investment in a mutual fund family or a private issuer's offering, which creates a conflict of interest you should be aware of. Additionally, STGM financial professionals are paid a commission whether your investment makes or loses money. STGM has an incentive to introduce investments where the issuer or investment manager shares the revenue they earn with us. You may find other private issuers elsewhere who might be better suited to your investment needs or goals. You are welcome to ask your financial professional or the STGM compliance department any questions you may have concerning commissions the financial professional earns.

Legal and Disciplinary History

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

Yes. Please visit www.investor.gov/CRS and/or the FINRA [Broker Check](http://www.finra.org/brokercheck) websites for a free and simple search tool to research our firm and financial professionals.

Conversation Starter

*"As a financial professional, do you have any disciplinary history?"
"If so, for what type of conduct?"*

Additional Information

For additional information about ST Global Markets USA LLC's services, please visit our website at www.stgmusa.com and/or mutual fund or offering materials provided by the firm. If you would like additional information or a copy of this disclosure, please call (855) 800-1688.

Conversation Starter

*"Who is my primary contact person?"
"Is he or she a representative of an investment advisor or a broker-dealer?"
"Who can I talk to if I have concerns about how this person is treating me?"*