

FORM ADV Part 3 - RELATIONSHIP SUMMARY

Item 1. INTRODUCTION

Axiom Investment Management LLC (“AIM”, “We” or “Us”) is registered with the Securities & Exchange Commission as a Registered Investment Adviser that provides investment advisory and planning services. We are engaged as an adviser, to individuals and entities, generally using the services of a broker-dealer to hold client assets and to execute trades and perform all the services expected from a broker-dealer, such as preparing and delivering client confirmations and monthly statements. Brokerage services and investment advisory services have differing fee structures, it is important for advisory clients to understand the differences. Free and simple tools are available to research firms and financial professionals at: www.investor.gov/CRS which also provides educational materials about broker-dealers, investment advisers, and investing. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about AIM also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2. WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

AIM provides asset allocation and investment management services on a discretionary basis to you as an individual or an entity regarding securities and investments in accordance with your investment objectives and financial circumstances. AIM also provides its own investment and allocation methodologies for its clients. The asset classes for which we invest for you may be stocks, bonds, options, treasuries, corporate debt, municipal debt, mutual funds, secondary offerings and new issues/IPO’s which are publicly traded on an exchange. We may also recommend you invest a portion of your assets in private companies through a private placement of securities. Private Placements would not be on a discretionary basis and would need additional documentation signed by you, should you choose to invest. When an advisory client purchases a private placement, the broker dealer where your account is held may receive a placement fee paid by the issuer, and that fee would be a portion of the amount invested.

We do not currently have any minimum account size, minimum investment, or other requirements in order to open an advisory account.

We can offer you additional services to assist you in developing and executing your investment strategy and monitoring the performance of your account. As a fiduciary we are required to monitor your portfolio and investments on an ongoing basis.

You may find further information at: <https://www.sec.gov/rules/final/2019/34-86031.pdf>

Questions to consider asking an advisor and conversation starters

- *Given my financial situation, should I choose an advisor? Why or why not?*
- *How will you choose investments for my account?*
- *What is your relevant experience, including your license, education and other qualifications?*
- *What do these qualifications mean?*
- *Does AIM monitor advisory accounts? How often?*
- *Is investment advice on limited investments or the market/economy as a whole? If limited how?*
- *What are the requirements for opening or maintaining an advisory account?*

Item 3. FEES, COSTS, CONFLICTS AND STANDARD OF CONDUCT

3A. What fees will I pay?

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 and the performance of your portfolio over time. Please make sure you understand what fees and costs you are paying. Advisory services are paid for based on the fee schedule you choose. All AIM fees are subject to negotiation. The specific manner in which fees are charged by AIM is established in your written client advisory agreement. AIM generally bills its fees on a quarterly basis, and you may elect to be billed in advance or arrears each calendar quarter. For specifics on fee payment methods and fee calculations please refer to the AIM’s Form ADV Part 2A.

AIM’s advisory fees do not include brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by you. You may incur certain charges imposed by custodians, brokers, third party investments and other third parties such as fees charged by managers, custodial fees, performance and billing fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. For more specifics on other charges please refer to AIM’s Form ADV Part 2A.

AIM offers several different types of advisory products (“Advisory Products”), which vary based on investment style. AIM will assist you in choosing the Advisory Product most suitable for you based on such factors as your investment objectives, financial circumstances, anticipated frequency of transactions, and expected types of investments. The basic parts of the

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advisory products are AIM's annual management fee percentage, and execution charges such as commissions and service fees charged by the broker dealer. Although all fees are subject to negotiation, AIM's standard fee schedules and Advisory Products are listed in our Form ADV Part 2A. For additional information on types of fees please visit:

<https://www.investopedia.com/articles/basics/04/022704.asp>

Questions to consider asking an advisor and conversation starters

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?

3B. What are your legal obligations to me when providing advisory services? How else does your firm make money and what conflicts of interest do you have?

When we provide you with advisory services, we are required to act as a fiduciary, putting your interests ahead of ours. At the same time, the way we make money may create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the way your assets are managed. Here are some examples to help you understand what this means:

- As an advisory client you would be charged more commissions when there are more trades in your account, and if your account is held at AIM's affiliated broker dealer we may have an incentive to trade more often.
- Some mutual and money market funds provide additional fees to broker dealers on an annual basis and if your account is held at AIM's affiliated broker dealer, we do not have an incentive to purchase 12b-1 fee producing mutual or money market funds in your advisory account because all 12b-1 fees are rebated back to client accounts. Please ask us about any mutual funds that are in your account.
- If your account is held at AIM's affiliated broker dealer, it has a clearing agent that may also share, with the broker dealer, a portion of interest earned from your credit and debit balances, and AIM may therefore have an incentive to keep high credit and/or debit balances in your advisory account. This is called interest sharing.

For additional information on conflicts of interest and fiduciary responsibilities of your advisor please visit:

<https://consumerfed.org/wp-content/uploads/2019/04/CFA-Conflict-of-Interest-Framework.pdf>

<https://www.investopedia.com/terms/i/investmentadvisor.asp>

<https://www.investopedia.com/terms/f/fiduciary.asp>

Questions to consider asking an advisor and conversation starters

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

3C. How do your financial professionals make money?

Financial advisory professionals generally get paid advisory fees based on the market value of your account. In addition to fees, AIM's affiliated broker dealer may be compensated in other ways such as commissions, a portion of the interest generated from client credit and debit balances, annual mutual fund fees, and other service fees that may be charged to advisory clients.

Although we have to act as a fiduciary in your best interest and not put our interest ahead of yours, some conflicts of interest such as the ones mentioned in section 3B above are inherent in AIM's business model. Simply put Advisory firms and financial professionals have an incentive to maximize compensation, whatever their compensation structure, and that may result in various conflicts of interest between the firm and client.

Item 4. DISCIPLINARY HISTORY

Do you or your financial professional have legal or disciplinary history? The answer is Yes

For additional information about AIM and its personnel, visit <https://brokercheck.finra.org/>.

Questions to consider asking an advisor and conversation starters

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

Item 5. ADDITIONAL INFORMATION

Up to date information such as Form ADV Part 2A and copies of this Customer Relationship Summary can be obtained from us at: Axiom Investment Management, 350 Fifth Avenue, Suite 6740, New York, NY 10118. Your primary contact person is your advisor. You can always call the Compliance Department with any concerns at (212) 521-3800.

Questions to consider asking an advisor and conversation starters

Who is my primary contact person? Is he/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?

Axiom Investment Management, LLC

Form ADV Part 3 - Relationship Summary March 28, 2024