

Investment Placement Group and IPG Investment Advisors LLC

Form CRS Customer Relationship Summary - August 31, 2025

Introduction

Investment Placement Group ("IPG Brokerage" or the "Firm") is registered with the Securities and Exchange Commission (SEC) as a broker-dealer and is a registered broker-dealer of the Financial Industry Regulatory Authority (FINRA), and the Securities Investor Protection Corporation (SIPC). IPG Investment Advisors LLC., ("IPG IA Advisory", or the "Advisor") is an (affiliate) investment adviser registered with the SEC. IPG Brokerage and IPG Advisory are often collectively referred to as ("IPG") and referenced as "We" throughout this Summary. IPG Brokerage and IPG IA Advisory both maintain common ownership, as well as share certain office space, personnel that are dually associated with the referenced entities. While these entities conduct part-shared operations, they offer separate and distinct services. Security products are offered and conducted through IPG Brokerage and investment advisory products and services are offered through IPG IA Advisory. Brokerage and investment advisory services as well as fees differ, therefore, it is important for you to understand these differences.

Free and simple tools are available to research firms and financial professionals at https://www.investor.gov/CRS. which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

IPG offers brokerage services through IPG Brokerage and investment advisory services through IPG IA Advisory to retail and institutional investors. Depending on your Financial goals, Investment Objectives and Risk Tolerance/Profile we can provide you with services in a brokerage account or an investment advisory account, or both at the same time.

- A broker-dealer is a firm that acts as an intermediary between buyers and sellers of securities for which they will usually receive a commission and may purchase or sell those securities in/out of their own account. Some transactions carry a mark-up or mark-down charge on the transaction. Please refer to the IPG customer fee & commission schedule for the review of such fees.
- An investment adviser is generally any person or group that provides investment advice or conducts securities analysis in exchange for a fee.

Our **brokerage** services provide clients with the ability to buy and sell securities across a wide range of asset classes, including but not limited to equities, options, mutual funds, fixed income securities, structured notes/bonds, alternative investments, and private placements. Services are available through cash accounts, margin accounts, and delivery-versuspayment/receipt-versus-payment (DVP/RVP) accounts for institutional or custodial relationships. Margin accounts involve the extension of credit by the Firm and carry additional risks of loss; clients considering margin accounts should carefully review the terms of the margin agreement before engaging in margin activity.

The Firm is committed to executing transactions consistent with its regulatory obligation of best execution. Orders may be directed to a variety of execution venues, including market centers, exchanges, or other broker-dealers, depending on the nature of the order and market conditions. The Firm does not receive payment for order flow.

We will accept limited trading authority in certain cases, typically restricted to facilitating timely execution or handling specific instructions. The Firm does not accounts; clients retain ultimate authority over all purchase and sale decisions.

IPG Brokerage generally requires a minimum account value of \$300,000, although lesser-value accounts may be accepted on a case-by-case basis. Clients are responsible for providing accurate and updated financial and suitability information so that the Firm can make appropriate recommendations.

As part of our regulatory obligations, the Firm conducts supervisory review of securities recommendations and SEC requirements. These reviews are conducted solely for compliance and risk management purposes and do

Our advisory services include personalized discretionary and non-discretionary investment management services, family office services, and sub-advisory services, as explained in the advisory Form ADV 2A "Brochure". The Advisor also provides access to third-party asset managers for situations where clients seek specific portfolio management, execution, or platform access services. From time to time, the Advisor may also offer services in connection with investment vehicles created and/or structured by affiliates of IPG IA Advisory. These structures enable investors to purchase private shares of certain securities or target investments.

The Advisor also serves as Investment Manager to both offshore and domestic private funds that offer interests pursuant to a Private Offering Memorandum, as well as Cayman-registered mutual funds. The offering or recommending of clients to invest in private funds (offshore or domestic) or Cayman-registered mutual funds is limited to investors who meet the applicable suitability and eligibility requirements. IPG IA Advisory receives compensation from managing these funds and directs the investment and reinvestment of securities, cash, and other assets in accordance with each Fund's governing documents. These Investment Funds authorize IPG IA Advisory to exercise complete discretion in the investment of assets within such Funds. Please note, Cayman-registered mutual funds are organized and generally accept full discretionary authority in brokerage regulated under the laws of the Cayman Islands and are not registered under the U.S. Investment Company Act of 1940. As such, they do not provide the same regulatory protections as U.S.-registered mutual funds. Investments in Cayman-registered mutual funds are only available to eligible investors who meet applicable suitability and eligibility requirements.

IPG IA Advisory's investment strategies are designed to provide clients with access to a fully diversified, efficient portfolio. Five model portfolios are available, in both onshore and offshore versions, allowing clients to select a portfolio aligned with their individual risk tolerance and tax residency. The primary objective of these portfolios is capital preservation, while long-term capital investment activity to comply with applicable FINRA and appreciation is the secondary objective. Portfolios are composed of ETFs, mutual funds, Cayman-registered mutual funds, and private funds with active management. Mutual funds are utilized

not constitute "account monitoring" or an ongoing advisory service. Clients remain responsible for monitoring their own brokerage accounts unless they have separately engaged an investment advisory program that expressly provides for account monitoring services.

IPG Brokerage does offer investment recommendations, securities, currencies, options, equities, mutual funds, fixed income securities, and alternative investments. While the Firm does not offer an array of proprietary products, it does have offshore private funds and Cayman-registered mutual funds for which its affiliated investment adviser serves as manager. Recommendations involving private funds and Caymanregistered mutual funds are limited to investors who meet applicable suitability requirements. The affiliated adviser manages offshore private funds, Cayman-

registered mutual funds, and onshore (domestic) private

offering documents, eligibility standards, and applicable

funds, and any investment in such funds is subject to

risk disclosures.

Because these investment vehicles are managed by an affiliate of IPG, investments in such products involve inherent conflicts of interest, including common ownership and management. As a result, IPG and its affiliates have a financial incentive to recommend these products over others. The Firm seeks to mitigate these conflicts through its supervisory review process, adherence to regulatory standards of conduct, and by providing clients with full disclosure of fees, risks, and

potential conflicts prior to any investment.

The Firm and its registered representatives are compensated for brokerage services primarily through commissions, markups/markdowns, placement fees, or similar transaction-based compensation. The specific fees and charges applicable to each transaction will be disclosed to clients and may vary by product type, market, or investment structure. Certain products, such as alternative investments, structured products and private placements, may involve higher fees or compensation arrangements, and clients should carefully review the relevant offering documents before making an investment decision.

in asset classes where IPG considers active management likely to add value over passive benchmarks. Passive ETFs are utilized in asset classes where IPG considers there to be a low likelihood of active management adding value on a net-of-fee, after-tax basis.

For discretionary accounts, IPG IA Advisory makes the final investment decisions based on the client's financial situation, investment objectives, risk tolerance, liquidity needs, and time which may include advice on both domestic and offshore horizon, collectively comprising the client's Investment Policy Statement. For non-discretionary accounts, clients are asked to provide information regarding their financial profile, investment objectives, and risk tolerance, and IPG IA Advisory will recommend an investment strategy and allocation mix, with the client approving or rejecting each recommendation.

> IPG IA Advisory generally requires a \$300,000 minimum account balance, although lesser amounts may be accepted on a case-bycase basis. Fees are negotiable based on the investment strategies selected and the complexity of the account. IPG IA Advisory provides advice across a broad range of investments, including both domestic and offshore investments, currencies, options, equities, mutual funds, Cayman-registered mutual funds, fixed income securities, private funds, and alternative investments. The Firm does not offer an array of proprietary products; however, it may recommend interests in offshore and domestic private funds or Cayman-registered mutual funds managed directly by IPG IA Advisory, subject to applicable investor suitability and eligibility requirements.

> As part of its regulatory obligations, IPG IA Advisory conducts periodic supervisory reviews of investment recommendations and account activity to comply with applicable SEC requirements and fiduciary obligations. These supervisory reviews are conducted solely for compliance and risk management purposes and do not constitute "account monitoring" or an ongoing advisory service. Monitoring of client accounts is not a standard part of our advisory business. Clients remain responsible for the ongoing monitoring of their own accounts unless they have entered into a separate written agreement with IPG IA Advisory that expressly provides for account monitoring services, which will be subject to internal review and approval before implementation.

For additional information, please see Regulation Best Interest Disclosures, Form ADV, Part 2A brochure, and other applicable documents.

Conversation Starters. Ask your financial professional—

- Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? 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?

IPG Brokerage assesses commission charges on each of the investment. In certain transactions, such as trades in fixed income securities, IPG Brokerage may assess a markup or markdown in addition to or instead of a commission.

assesses certain account-level fees, which may include annual account maintenance fees, wire transfer fees, and other administrative charges. Please refer to our the Customer Account Fee Schedule available at www.investipg.com for more detail.

Clients may also incur fees charged by third parties, such as our clearing firm or custodian. These fees may include custodian fees, settlement and transfer fees, document delivery fees, clearing firm product fees (e.g., Corestone Debit Card annual fees), confirmation and statement production fees, paper surcharges, and other fees. In addition, when investing in certain products such as mutual funds, alternative investments, or private placements, clients may bear indirect costs such as management fees, performance-based compensation, or expense allocations at the product level, as described in the applicable prospectus or offering memorandum. Not all fees will apply to all clients, and other firms may offer the same services at lower costs.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs reduce the value of your account over time. It is important that you understand the fees and costs Other firms or custodians may provide comparable services at you are paying, and you should carefully review our fee schedule, as well as offering documents and prospectuses for any investment product recommended to you.

Since IPG Brokerage is primarily compensated through transaction-based charges such as commissions, markups, and markdowns, the Firm has a financial incentive to encourage more frequent trading in client more they trade, which creates a conflict of interest. In addition, when recommending products managed by an affiliate such as offshore private funds or Caymanregistered mutual funds the Firm has an incentive to recommend these products because it or its affiliate will earn additional management fees or compensation. These conflicts are addressed through supervisory review, regulatory standards of conduct, and full disclosure of fees and risks prior to any investment.

IPG IA Advisory fees for discretionary and non-discretionary transaction. Commissions vary depending on the type of investment advisory services are negotiated individually with each security, the complexity of the transaction, and the size client and are typically charged as a percentage of assets under management ("AUM"). Advisory fees generally range within a stated percentage schedule depending on account size, program type, and level of service. Fees are assessed quarterly or monthly and charged in arrears (i.e., in the month following the end of the quarter or month in which services were provided). Minimum In addition to transaction-based charges, IPG Brokerage account fees may apply and are disclosed in the client's advisory agreement. In addition to advisory fees paid to IPG IA Advisory, clients may incur other costs, including:

- Transaction-based costs: When trades are executed through IPG Brokerage, commissions, annual account maintenance charges, and wire fees may apply.
- Custodian and clearing fees: For accounts custodied at Pershing, LLC or at other unaffiliated custodians, clients may be charged custodian fees, settlement and transfer fees, document delivery charges, product-level platform fees (e.g., Corestone debit card), confirmation and statement production fees, paper surcharges, and other administrative fees.
- Product-level expenses: Certain investments, such as mutual funds, ETFs, Cayman-registered mutual funds, offshore and domestic private funds, and alternative investments, bear internal management fees, expense ratios, incentive allocations, or performance fees. These costs are embedded in the product and reduce the investment's returns, in addition to the advisory fee charged by IPG IA Advisory. Clients should carefully review the fund prospectus or offering memorandum for details.

lower overall costs.

Since advisory fees are based on AUM, IPG IA Advisory and its investment adviser representatives have a financial incentive to encourage clients to increase the assets in their accounts. In addition, when IPG Brokerage provides execution services for advisory accounts, the Firm and its owners receive additional commissions and fees, which creates a further conflict of interest. Conflicts also arise when recommending affiliated products such accounts. As a result, a retail investor may pay more the as offshore private funds, domestic private funds, or Caymanregistered mutual funds managed by IPG IA Advisory because the Firm and its affiliates earn additional compensation from managing these products. These conflicts are addressed through supervisory review, adherence to fiduciary and regulatory standards, and full disclosure of fees, costs, and conflicts before any investment recommendation or transaction is made.

> You will pay fees and costs whether you make or lose money on your investments. Fees and costs reduce the value of your account over time. Please make sure you understand the fees and costs you are paying.

For additional information, please see IPG IA Advisory's Form ADV Part 2A Brochure, the Customer Account Fee Schedule available at www.investipg.com, your investment agreement, account statements, and the offering documents and disclosures for any specific investment product.

Conversation Starter. Ask your financial professional— 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?

What are your legal obligations to me when providing recommendations as my broker-dealer or investment adviser? How else does your firm make money and what conflicts of interest do you have?"

When we provide you with a recommendation as your broker-dealer or act as your investment adviser, we are required to act in your best interest and not put our interests ahead of yours. However, the way we and our affiliates earn money creates conflicts of interest because it may influence the recommendations and advice we provide. You should understand these conflicts, because they can affect the investment advice you receive.

We earn compensation through transaction-based charges such as commissions, markups/markdowns, and advisory fees based on assets under management. In addition, we may receive third-party payments from product sponsors, such as 12b-1 fees or ongoing "trail" compensation from mutual funds and other investments, which gives us an incentive to recommend products that pay higher compensation. We also share in revenue generated by custodians from services such as margin interest, credit balances, wire transfers, and certain product-related fees. These arrangements create a financial incentive for us to encourage margin borrowing, trading activity, or the selection of certain products over others.

Because IPG Brokerage and IPG IA Advisory are under common ownership, our financial professionals are often dually registered, and may recommend either a brokerage account or an advisory account depending on your situation. This creates a conflict because the type of account recommended will determine how we and our representatives are paid. Similarly, we sometimes recommend affiliated products such as offshore private funds, domestic private funds, or Cayman-registered mutual funds that are managed by IPG IA Advisory. These products create inherent conflicts of interest because of common ownership and compensation to our affiliates.

Additional conflicts may arise when IPG provides forgivable loans or transition assistance to financial professionals, which incentivizes them to generate higher revenues or retain accounts at IPG.

In limited circumstances, we may engage in principal trading, where we buy or sell securities directly with clients. These transactions may create conflicts because we are on the opposite side of your trade; however, when conducted for advisory accounts, they require written client consent and are subject to compliance oversight.

We also from time to time recommend proprietary products, primarily in the form of private funds, where IPG or its affiliates act as manager. These recommendations are only made when suitable and in your best interest, but they nonetheless create an incentive for us because we earn compensation from managing these funds. We seek to mitigate these conflicts through supervisory review, adherence to regulatory standards of conduct, and full disclosure of fees, costs, and conflicts before any recommendation or transaction.

For further details related to the way we make money and applicable conflicts of interests see the Third-Party Compensation and Related Conflicts of Interest on https://investipg.com/disclosures-regulation-bi/.

Conversation Starter. Ask your financial professional — **How might your conflicts of interest affect me, and how will you address them?**

For additional information, please see <u>Regulation Best Interest Disclosures</u>, Form ADV, Part 2A brochure and other applicable documents.

How do your financial professionals make money?

IPG's financial professionals are paid through commissions on brokerage transactions and advisory fees based on assets under management. They may also receive ongoing compensation from mutual funds ("trailers"), which creates an incentive to recommend products with higher or continuing fees. In some cases, they may receive non-cash compensation from product sponsors, such as training or seminars, which may also influence recommendations. Representatives can earn higher payouts based on overall production, which incentivizes them to generate more revenue. Although commission rates do not vary by product type, certain products pay ongoing compensation, which creates a potential conflict of interest. **For additional information,** please see IPG's Disclosure Brochure (ADV 2A) and Regulation Best Interest Disclosures.

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

Yes, IPG Brokerage has disclosures in Form BD, and some of our financial professionals report disciplinary events in their Form U4. While IPG IA Advisory does not have its own disciplinary history, it reports "Yes" in Form ADV because of its affiliation with IPG Brokerage. For more information about these matters, you can review firm and individual records at www.brokercheck.finra.org, or use the free research tool at www.investor.gov/CRS.

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

Additional Information

For additional information about our services, You may find additional information about our firm and services at www.investipg.com or you may direct your inquiries to our e-mail: compliance@ipgsd.com. For additional information about our brokerage services, visit BrokerCheck. Finra.org. For our Advisory Services information visit www.adviserinfo.sec.gov. You may also request a copy of the Firm's Form CRS by calling 619-326-1221 for the Firm's Chief Compliance Officer or emailing the Firm's compliance department at compliance@ipgsd.com.

Conversation Starter. Ask your financial professional— 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?