



Form ADV Part 3 – Client Relationship Summary

Date: 06/30/2024

Item 1: Introduction:

Barometer Capital Management Inc. is registered with the Securities and Exchange Commission (SEC) as an investment adviser by offering advisory and portfolio management services. This document gives you a summary of the types of services and fees we offer. Please visit <http://www.investor.gov/CRS> for free, which provides simple tools to research firms and for educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services:

Conversation Starter: 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, education and other qualifications? What do these qualifications mean?

What investment services and advice can you provide me? Our firm primarily offers portfolio management services to both retail and institutional clients by predominately focusing on growing and the preserving client's capital. Our services would be represented into three categories: separately managed accounts, wrap accounts and mutual funds. As a standard service, we monitor and review all client's portfolios, investment strategies and overall investment vehicles, daily.

We understand that not all investment vehicles are appropriate for our clients, whether it be the type of investment or economic cycle. We at Barometer are an active portfolio manager and this strategy allows us to capture market opportunities through an various economic cycles, by using our proprietary risk models. We implement this strategy through a top-down and bottom-up approach. The top-down approach allows us to access market opportunities daily by identifying sectors that are showing leadership throughout the market. The bottom-up approach is used to screen companies that will outperform their peers in sectors we have identified as sector leaders. This strategy provides us full flexibility and discretionary management over the client's investment portfolios.

It also allows us to limit the type of investments that are held and recommended to clients to ensure the most appropriate portfolio is constructed for clients. Our minimum client portfolio is \$2 million. Please also see our Form ADV Part 2A ("[Brochure](#)"), specifically Items 4 & 7.

Item 3: Fees, Costs, Conflicts and Standard of Conduct

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

What fees will I Pay? Our fees charged will vary depending on the services you receive and are calculated as a percentage of net assets under management. The amount of assets held will also impact the total dollar amount paid to us. In addition, there a small portion of the fees, which is paid to cover the transaction cost when executing a trade. Our incentive is to grow your assets held within our firm in order to increase our fee charged. Portfolio management fees are typically charged quarterly. You would pay the fee regardless of transaction activity and the type of investment vehicles held. Please also see Items 4, 5, 6, 7 & 8 of our [Brochure](#) for more details.

Third Party Costs: Some investments (i.e., mutual funds, wrap accounts, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. You will also pay fees to a custodian that will hold your assets. For the wrap fee program, you will not typically pay additional transaction fees, and therefore our advisory fee is higher than if you paid transaction fees separately. 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. See our [Brochure](#) for additional details.

Conflicts of Interest: When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the structure of our business model, creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide to you.

How do your financial professionals make money? Primarily, we and our financial professionals, benefit from the advisory services we provide to you because of the advisory fees charged. This compensation may vary based on different factors, as described above.

Item 4: Disciplinary History

Conversation Starter: As a financial professional, do you have any disciplinary history? For what type of conduct? Do you or your financial professionals have legal or disciplinary history?

Do you or your financial professional have legal or disciplinary history? We do not have legal and disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Item 5: Additional Information

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?

For additional information on our advisory services, see our [Brochure](#) available at <https://adviserinfo.sec.gov/firm/summary/156409> and any individual brochure supplement your representative provides. If you have any questions, need additional up-to-date, or want another copy of this Client Relationship Summary, then please contact us at 1-866-601-6888.