



# ALTAIR

## **Altair Advisers LLC**

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## **12/31/2025**

## **Part 2A of Form ADV**

This brochure provides information about the qualifications and business practices of Altair Advisers LLC (“Altair” or “Altair Advisers”). If you have any questions about the contents of this brochure, Part 2A of Form ADV, please contact us at (312) 429-3000 or [info@altairadvisers.com](mailto:info@altairadvisers.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Altair Advisers is a registered investment adviser. Registration does not imply any level of skill or training. The oral and written communications of an adviser provide you with information which you may use to determine to hire or retain an adviser. Additional information about Altair also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may also find additional information within our Form CRS Disclosure about how we work with clients including a description of business practices and conflicts we face at [www.altairadvisers.com/disclosures](http://www.altairadvisers.com/disclosures).

Investment advisers including Altair face conflicts of interest in working with clients. We use this disclosure brochure, along with our Form CRS Disclosure, to communicate conflicts of interest which we believe could have a meaningful impact on you. We strive to disclose these conflicts of interest in a clear manner with sufficient information to allow you to understand their implications. We encourage you to review this disclosure brochure carefully and notify us if you have questions regarding the conflicts of interest identified.

No part of this brochure represents an offer to invest in any fund. Only authorized fund agents may solicit investors after delivering the relevant Confidential Private Placement Memorandum.

Altair Advisers LLC (“Altair” and/or “Altair Advisers”) is required to identify and discuss any material changes made to this brochure since the last annual update (dated as of December 31, 2024). Material changes since our last annual update:

Updates Previously Disclosed (August 2025 Interim Filing):

- Item 1: Altair moved to a new location as of August 4, 2025. Altair’s new mailing address is: 225 W. Washington Street, Suite 2400 Chicago, IL 60606
- Item 8: Removed the disclosure that described Altair’s role as a fiduciary when advising on retirement account rollovers, as the existing disclosures describe the conflicts Altair encounters when giving advice about retirement account rollovers.
- Item 10: Updated to note Altair will accept offers of free services and gifts from its vendors if Altair believes these offers will improve its business.

Updates Previously Disclosed (October 2025 Interim Filing):

- Item 4: Added disclosure that Altair serves as investment adviser, and Altair’s wholly owned subsidiary Rialta, LLC (“Rialta”) serves as the General Partner, to a proprietary private fund. Altair encourages investors to consider the Confidential Private Placement Memorandum as the authoritative source for information about the proprietary private fund and associated conflicts.
- Item 5: Added disclosure regarding the proprietary private fund’s fee structure and valuation practices, including a reference to the Confidential Private Placement Memorandum as the authoritative source regarding investor fees.
- Item 6: Added disclosure of future performance-based fees for non-client investors in the proprietary private fund.
- Item 7: Disclosed that Altair serves as the investment adviser to its proprietary private fund.
- Item 8: Added disclosure regarding the proprietary private fund’s investment style.
- Item 10: Disclosed Rialta LLC, a wholly owned subsidiary of Altair and General Partner to Altair’s proprietary private fund, as an affiliate.
- Item 10: Disclosed Altair’s practice of allowing select employees to serve on Limited Partner Advisory Committees for third-party private funds and advisory boards for third-party advisers.
- Item 11: Added disclosure that certain employees may invest in Altair’s proprietary private fund.
- Item 11: Clarified that Altair offers eligible clients the opportunity to invest in private funds ahead of Altair employees, and to redeem no later than employees when Altair recommends redeeming client investments from a private fund.
- Item 12: Disclosed Altair’s practice of offering third-party private equity investment funds to its proprietary private fund first.
- Item 13: Added disclosure that Altair’s Investment Committee monitors the proprietary private fund.
- Item 14: Noted that Rialta receives a fee for general partner services it provides to Altair’s proprietary private fund and Altair shares advisory board compensation with employees.

- Item 15: Added disclosure that Altair intends to deliver audited financial statements of the proprietary private fund within 180 days of the fiscal year end.

New Updates in this Annual Filing (December 2025):

- Item 4: Removed duplicative disclosure regarding class action litigation monitoring, as Altair discloses this service in Item 17.
- Item 8: Enhanced disclosure describing Altair's use of artificial intelligence-enabled tools within certain internal business processes and the related risks and oversight.
- Item 10: Added disclosure describing conflicts of interest arising from Altair's role as adviser to the Altair Funds, noting the independent governance and supervisory structure of these funds.
- Item 10: Added disclosure describing conflicts of interest associated with Rialta, LLC's role as general partner to Altair's proprietary private fund and the firm's policies and supervision designed to address those conflicts.
- Item 10: Enhanced disclosure describing Altair's policies and oversight related to employee participation on limited partner advisory committees and advisory boards, including fiduciary obligations and conflict management.
- Item 11: Enhanced disclosure clarifying Altair's policies governing business gifts and entertainment, including restrictions, limited exceptions, and conflict-of-interest considerations. Gifts or entertainment arising from pre-existing personal relationships or infrequent life events are not subject to Altair's gifts and entertainment limitations.
- Item 14: Added disclosure clarifying that certain Senior Client Service team members may earn a one-time bonus based on material net new contributions from existing clients (separate from the size of new client assets), that clients do not pay additional fees in connection with employee incentive compensation arrangements, and that such arrangements may apply to client investments in Altair's proprietary private fund, where permitted.
- Other Information: reorganized (but did not alter) the existing disclosures within this response for clarity, moving information on disaster recovery (Item 18), cybersecurity risks (Item 8), diminished capacity (Item 4), identity theft (Item 15), legal litigation (Item 17), and compliance oversight responsibilities (Item 10) to more logical locations.

We will provide you with a summary of any material changes to this and subsequent disclosure brochures annually. From time to time, we will provide other disclosure information about material changes as necessary.

Currently, our disclosure brochure may be requested by contacting Altair's Compliance Department at (312) 429-3000. Our disclosure brochure is also available on our website [www.altairadvisers.com/disclosures](http://www.altairadvisers.com/disclosures). You may also find additional information about how we work with clients including a description of business practices and conflicts we face on our website at [www.altairadvisers.com/disclosures](http://www.altairadvisers.com/disclosures). Additional information about Altair is also available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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Brochure Supplement(s)

*Altair provides objective, discretionary and non-discretionary investment advisory and financial planning services for wealthy individuals, families and foundations.*

## **History and Ownership**

Altair Advisers was formed on June 1, 2002. It was created with an exclusive focus on providing investment counsel to high net worth individuals, families and foundations. We believe that providing investment and financial advice is a separate and distinct business from the selling of investment products. Altair's principals formerly led the Investment Advisory Services practice of Arthur Andersen's Chicago office. We serve a nationwide base of clients who have entrusted us to oversee more than \$9.75 billion (as of December 31, 2025).

Altair is primarily employee-owned and committed to building long-term successful relationships by providing responsive and highly personal service. The employee group participates broadly in Altair's ownership. One of the firm's owners is an entity controlled by a client who helped fund the firm at its inception. The client which controls this entity does not, nor has it requested to, receive preferential treatment, aside from access to financial and operational information about the firm and other rights customarily provided to an investor in a business.

## **What We Do**

Altair's core investment consulting services include investment policy creation, asset allocation advice, investment manager due diligence and portfolio management services. We also provide performance reporting, capital sufficiency analysis and cash flow management for all investment consulting clients.

## **ALTAIR'S SERVICE APPROACH**

Altair first works with the client to develop an overall investment strategy. This phase of the process includes an analysis of financial goals, which generally considers advice regarding capital sufficiency and cash flow, retirement planning, income tax planning, education funding, corporate benefit decisions and consideration of estate planning. The result of this overall analysis serves as the foundation for a client's strategic investment plan, which includes investment education, portfolio design and preparation of an Investment Policy Statement.

After developing an overall strategy documented in a written Investment Policy Statement, for discretionary clients, Altair will be directly responsible for making investment decisions on behalf of those clients. For non-discretionary clients, Altair will obtain a client's consent before making an investment decision on behalf of those clients.

For both discretionary and non-discretionary clients, the client's assets will be invested with third-party investment managers, mutual funds (potentially including mutual funds for which Altair serves as investment adviser), Exchange Traded Funds ("ETFs"), private investments (potentially including Altair's affiliated private fund) and derivatives. For assets where there is not a predetermined list of investment options, Altair will only utilize those third-party managers, mutual funds, ETFs, private investments or derivatives after it has conducted due diligence on each recommendation for investment ("Altair assets"). For client assets that have pre-determined investment choices (e.g., inside a client's 401(k) plan), Altair will assist the client with regard to those choices to the extent permitted and practicable ("outside assets").

Altair serves as investment adviser to the Adara Smaller Companies Fund and Aquarius International Fund of the RBB Fund, Inc. (each an "Altair Fund" and collectively the "Altair Funds"), each an investment company registered under the Investment Company Act of 1940, as amended. Altair expects only select individuals and entities known to Altair to be shareholders of the Altair Funds, including Altair clients, employees and other related parties. Altair often recommends each Altair Fund as an investment vehicle for its clients, including

clients governed by the Employee Retirement Income Security Act (“ERISA”). Altair has adopted the following practices and controls in recommending each Altair Fund to its clients subject to ERISA:

- As more fully described in Item 5 below, Altair does not charge a separate fee for managing the Altair Funds;
- The ERISA plan will not pay any sales commission or redemption fee related to investments in the Altair Funds; and
- Altair will obtain approval to invest the client’s assets in each Altair Fund from an independent fiduciary of the ERISA plan after providing information about each Altair Fund to the independent fiduciary, including a description of: a) fees paid; b) Altair’s rationale for recommending each Altair Fund as a suitable investment; and c) any limitations related to the timing of purchases and withdrawals.

As described more fully within the prospectus, the Altair Funds utilize a “multi-manager” approach whereby the Altair Funds’ assets are allocated to one or more third-party advisers (“Sub-Advisers”) in percentages determined by Altair. Each Sub-Adviser acts independently from other Sub-Advisers and utilizes its own distinct investment style in selecting securities. However, each Sub-Adviser, under the oversight of Altair, operates within the constraints of each Altair Fund’s investment objective and strategies and the particular investment restrictions applicable to that Sub-Adviser.

Altair serves as investment adviser, and Altair’s wholly owned subsidiary Rialta, LLC (“Rialta”) serves as the General Partner, to a proprietary private fund. This fund invests in other unaffiliated private equity funds (each an “Underlying Fund”). Other than “Knowledgeable Employees” as described in Item 11, only qualified investors may invest in Altair’s proprietary private fund, as described in the Confidential Private Placement Memorandum. Altair encourages investors to consider the Confidential Private Placement Memorandum as the authoritative source for information about the proprietary private fund and associated conflicts.

Altair does not provide investment services related to specific securities or sectors other than: (a) to recommend third-party investment managers, mutual funds, ETFs, private investments and derivatives; and (b) in connection with its role as adviser to the Altair Funds and the proprietary private fund.

Altair will be responsible for arranging the execution of the investment decisions for its discretionary clients. For its non-discretionary clients, Altair will arrange the execution of the investment decision only after it receives authorization to do so from the client. Clients can impose restrictions with respect to specific securities or types of securities in the accounts managed by third-party investment managers.

In addition, Altair typically provides administrative services to both its discretionary and non-discretionary clients, including transferring assets between a client’s accounts. For clients who have invested their assets in private investment vehicles that make additional capital calls (including Altair’s proprietary private fund), Altair generally has limited discretion to respond directly to such capital calls without the need to first seek client authorization. Specifically, Altair will process the capital call by transferring assets to the investment vehicle directly from the client’s account. Further, should a client’s account not have sufficient cash to fund the capital call, Altair’s limited discretion would give it the ability to dispose of holdings/investments in the client’s account sufficient to meet the capital call.

Altair also provides consulting and investment advisory services to retirement plans, trusts, estates, charitable organizations, corporations or other business entities. Typical services provided to these clients are consistent with the process described above.

We are mindful that cognitive capacities can diminish over time, though not always as a result of age. We take our fiduciary responsibilities to our clients seriously and have implemented policies to help guide our employees when they suspect a client is experiencing diminished capacity, as these clients could through no fault of their own be susceptible to making decisions which are not in their long-term best interests. As generally requested by the custodian, we encourage all clients to name a trusted contact with whom we could speak if we identify a potential diminished capacity concern.

### **SERVICES FOR LIMITED FINANCIAL PLANNING CLIENTS**

Altair provides financial planning services in addition to investment advisory services. Financial planning services include an analysis of financial goals, which generally considers advice regarding capital sufficiency and cash flow, retirement planning, income tax planning, education funding, corporate benefit decisions and estate planning matters.

Altair is at times retained by a corporation to provide these financial counseling services to key officers and executives of the corporation and to provide financial planning seminars and other educational services to groups of employees.

### **PROJECTS**

Altair will provide other limited, negotiated services as an accommodation to clients, as agreed to by Altair.

### **ASSETS UNDER ADVISEMENT**

As of December 31, 2025, Altair had total assets under advisement of \$9,759,855,196. Of this total, \$5,152,558,386 were managed on a discretionary basis and \$4,607,296,810 were managed on a non-discretionary basis.

## **ITEM 5 – FEES AND COMPENSATION**

*Fees for Altair's services are documented in a written engagement contract at the inception of each engagement. While we generally do not negotiate fees, we will negotiate fees in certain circumstances based primarily on the size of the account and relationship with Altair.*

### **Fees for Investment Advisory Clients**

In the case of investment advisory services clients (i.e., for both Altair assets and outside assets), Altair will at times charge fees for the first phase of services, which includes developing a strategic investment plan. These fees are determined based on the complexity of the client's situation and the scope of the work involved. If there is a fee for this phase it is generally billed as a one-time project fee.

Fees for the second phase of services, including implementation and ongoing portfolio review, are generally calculated based on a percentage of client assets under advisement and are payable quarterly in advance. Assets under advisement include those mutually determined and agreed upon with the client and Altair.

Our current standard fee schedule is:

Fees as a Percentage of Assets	Assets Subject to Fee
0.80% on the first	\$5 million
plus 0.50% on the next	\$15 million up to assets of \$20 million
plus 0.35% on the next	\$30 million up to assets of \$50 million
plus 0.25% on the next	\$50 million up to assets of \$100 million
plus 0.10% on the assets above	\$100 million

Altair has had other fee schedules in effect during the time it has been in business that could be lower or higher than those outlined above. Certain clients continue to pay fees under those prior arrangements. Altair manages client accounts based on their investment goals, regardless of their fees. While Altair's fee schedule creates an incentive to encourage clients to remain invested and to invest additional assets, Altair follows investment guidelines created with the client and documented within an investment policy statement in advising that client.

Altair imposes a minimum annual fee of \$50,000 which increases by 3% every four quarters. This minimum will be reduced under certain limited circumstances and/or certain long-time clients are "grandfathered" under a prior fee arrangement.

Altair deducts fees directly from the client's account, unless otherwise mutually agreed upon. Altair generally does not take into consideration cash flows occurring during the subsequent quarter when calculating fees except in unusual circumstances (such as in connection with a new client account or a substantial new cash flow as agreed upon with the client). As agreed upon between Altair and the client, Altair generally consolidates fees for accounts under the same household for fee billing purposes.

Fees to Altair do not include any fees due to third-party investment managers, mutual funds, ETFs, private investments and derivatives, any fees due to brokers or to custodians of those assets or the fees associated with outside assets (e.g., 401(k) fund fees). Such charges, fees and commissions are exclusive of and in addition to Altair's fee, and these fees will vary based on the nature of the investment vehicle. Clients considering an investment in private investment funds offered by third-parties should consult the applicable offering documents as the authoritative source for a description of fees to be charged.

Altair strives to recommend that its clients invest in the lowest mutual fund share class available to the client, though that share class does not always represent the lowest share class available to other shareholders as determined by the mutual fund's sponsoring company.

Neither Altair nor any of its supervised persons receive any portion of the commissions or fees clients pay to any recommended investment manager, mutual fund, ETF, private investment or derivative broker or custodian. See Item 12 for a discussion of our brokerage practices. Owners of Altair are eligible to use its services free of charge, and some family members of employees receive fee discounts.

Clients could obtain access to these same investment managers, mutual funds, ETFs, private investments and derivatives directly without going through Altair. However, in order to do so, we believe they would likely have to invest at a higher minimum investment and/or pay higher management fees associated with such investments.

Other financial planning-related projects are billed in a manner agreed upon by Altair and the client. Accounts initiated or terminated during a calendar quarter are charged a prorated fee. Upon termination of any account, any prepaid, unearned fees are refunded to the client.

### **Fees for Limited Financial Planning Clients**

As described in Item 4, Altair also provides financial planning services. When we are retained by a corporation to provide financial counseling services to key officers and executives of the corporation (collectively, "executives"), fees are generally charged to the corporation based on a fixed-fee entitlement arrangement for each executive dependent on the scope and complexity of the services being performed. Altair's fees generally range from \$5,000 to \$30,000 per executive participant. When we are retained by a corporation to provide financial planning seminars and other educational services to groups of employees, fees for these services are based on fixed-fee arrangements as negotiated with the corporation.

## **Fund Fees**

Altair does not charge an investment management fee for serving as adviser to the Altair Funds or to the classes of the proprietary private fund in which clients invest. Altair charges a management fee to other non-client classes of its proprietary private fund, as described within the Confidential Private Placement Memorandum. Each Altair Fund's prospectus and the proprietary private fund's Confidential Private Placement Memorandum describe the fee structures. Altair created these vehicles for its clients to access investment managers or unaffiliated private funds otherwise unobtainable to some clients because of account minimums.

For the Altair Funds, each Sub-Adviser's management fee, as well as other expenses described within the prospectus (legal, compliance and record-keeping), are charged directly to each applicable Altair Fund, and such expenses are borne by all shareholders of that Altair Fund.

For the proprietary private fund, each Underlying Fund assesses a management fee to the proprietary private fund. Rialta charges the proprietary private fund a fee for general partner services it provides. Altair encourages investors in the proprietary private fund to consider the Confidential Private Placement Memorandum as the authoritative source regarding investor fees.

Altair includes client assets invested in the Altair Funds and the proprietary private fund in its fee calculation for ongoing investment advisory services.

## **Project Fees**

At times, fees are charged based on hourly rates, which vary from \$200 to \$500 per hour. At other times, fees are charged on a project basis. Project fees generally apply to all types of clients and will be negotiated for each unique engagement in advance of beginning project work.

## **Valuation Practices**

Altair uses market values for publicly-traded securities as provided by Altair clients' custodians to determine fees and investment performance returns. In determining the market value to use, Altair ranks client custodians by total client assets held, and uses the prices provided by the custodian with the largest amount of client assets held. If that custodian does not provide a price, Altair defers to other custodians within the hierarchy until a custodian offers a price deemed reasonable.

Altair handles the daily oversight of valuation matters for the proprietary private fund on behalf of Rialta. The primary method for valuing a proprietary private fund is to value its investments based on the net asset value ("NAV") reported in the most recent independent statement received from the administrator of each Underlying Fund. If an independent statement is not available, or if Altair deems the NAV reported to be unreliable, each fund will value its investments as the sum of capital contributions made, less any return of capital or distributions received.

Altair will establish a value for portfolio companies purchased through co-investments based on its knowledge of any factors deemed relevant. These factors can include financial statements provided by the portfolio company, knowledge of the portfolio company and the industry in which it operates, and general market conditions. Neither Altair, its proprietary private fund, nor any of its employees currently take part in co-investments alongside private funds to purchase portfolio companies.

For unaffiliated private funds, Altair obtains values of private funds deemed to be liquid from the investment manager or the private funds' administrators. Altair considers third-party private

funds to be liquid if the investor can routinely invest in or redeem from the fund subject to known constraints identified within the private fund's offering documents.

As a matter of policy, Altair does not determine the prices of third-party private funds considered to be illiquid in nature. Rather, Altair uses either; 1) capital balance statements provided by the private fund's investment manager once they are available (generally, after a few quarters following the first capital call); or 2) the sum of capital calls prior to a capital balance statement being made available by the investment manager. Given the inherent limitations associated with receiving the necessary information from the investment manager, the values provided by the unaffiliated investment manager often represent a lag of up to 150 days or more.

In the unlikely event an Altair pricing source outlined above cannot, or does not, provide a price for an asset held in client portfolios, Altair will value the asset via alternative sources deemed reliable, including external pricing sources or determining a fair value for the asset with input as appropriate from a Sub-Adviser or underlying private fund. In determining a fair value, Altair will strive to value the asset at a price Altair deems clients could reasonably be expected to receive upon sale of the asset.

Altair encounters inherent conflicts of interest when it participates in the valuation of client accounts, as higher values of client holdings increase market values, thereby enhancing performance results and increasing fees. Altair maintains various policies, procedures and controls (including a valuation policy, segregation of duties and the use of an unaffiliated fund administrator for its proprietary private fund) to mitigate such conflicts of interest.

#### **ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

While Altair does not currently charge a performance-based fee (fees based on a share of capital gains on or capital appreciation of the assets of a client), future non-client investors in Altair's proprietary private funds could pay a performance-based fee as carried interest. Altair intends to comply with the provisions outlined within Rule 205-3 when charging performance-based fees.

These performance-based fee arrangements would create an incentive for Altair to invest in a different manner than in an account without a performance-based fee, with the aim of increasing Altair's compensation.

Other than the allocation of limited investment opportunities described in Item 12, Altair does not presently encounter side-by-side issues in managing client accounts.

#### **ITEM 7 – TYPES OF CLIENTS**

As described in Items 4 and 5, Altair provides portfolio management services to high net worth individuals, families, foundations and endowments. In a few select cases where there is a direct client connection, Altair provides investment advisory services for corporate pensions, profit sharing plans and charitable organizations. Altair also serves as the investment adviser to its proprietary private fund and the Altair Funds.

Altair has an initial investment minimum of \$7 million and a minimum annual fee of \$50,000 for ongoing investment advisory services (which increases by 3% every four quarters). In certain circumstances, exceptions to these minimums are made; for example, where the owner of the account has a familial relationship with an existing client or where the prospective client is expected to meet the initial investment minimum in the near future. In addition, certain long-time clients are "grandfathered" under a prior fee arrangement. Third-party investment managers, mutual funds, ETFs, private investments and derivatives impose investment minimums that will

likely impact the client's investment selection process. Minimum investment requirements for investment in an Altair Fund are found in that Altair Fund's prospectus. The proprietary private fund's Confidential Private Placement Memorandum details the minimum investor account size.

Altair's investment management agreement with the client determines the protocol the client or Altair will follow in terminating accounts.

Altair and its personnel maintain separate relationships with certain clients and others, such as:

- Select clients, vendors or other service providers used by firm clients are family members or personal friends with firm personnel. As such, these clients maintain separate personal relationships with firm personnel. At times, firm personnel will engage in personal business dealings with these clients as a natural extension of their personal relationships.
- Some clients are affiliated with entities which have a business relationship with the firm (such as firm vendors or other service providers used by firm clients), and certain of these entities have engaged us to manage their investment portfolios.
- Subject to advanced clearance, Altair employees are permitted to invest in financial entities affiliated with clients, such as venture capital or similar funds.
- As noted within Item 11 below, Altair employees are permitted to accept gifts from certain vendors deemed to be lower risk in nature.

To address these potential conflicts of interests, all relationships with vendors are designed to be arms' length in nature, and gifts received are determined to not impact Altair's decision-making processes. Altair also maintains policies and procedures designed to promote the fair and consistent treatment of clients as summarized within this disclosure document. Further, all client relationships are managed following a team approach, with no single employee responsible for any individual client's account.

We have an incentive to encourage individual clients to rollover an employer retirement account into an Altair-managed Individual Retirement Account ("IRA"). The decision of whether to roll over an employer retirement account rests with the individual account owner, and we are committed to providing information to help a client make a decision that is in that client's overall best interests.

## **ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### **Methods of Analysis**

Rather than selecting individual stocks and bonds, Altair focuses on finding best-in-class investment managers, including Sub-Advisers to manage the Altair Fund's assets and Underlying Funds for the proprietary private fund. The process of selecting investment managers and funds is described below.

### **PROCESS FOR ALTAIR ASSETS (WHERE INVESTMENT CHOICES ARE NOT PRE-DETERMINED E.G., CLIENT-DIRECTED OR LIMITED OPTIONS WITHIN A 401(K) OR OTHER PLAN)**

#### **SETTING AN AGENDA**

Altair's Investment Committee begins by identifying and approving research projects for new or existing asset classes and oversees full reviews of our currently recommended investment managers, mutual funds, ETFs and private investments. A full review of each asset class is done regularly, generally every three years.

## **QUANTITATIVE SCREENS**

Once a particular search is initiated, Altair's research team pre-screens third-party databases to examine those strategies that meet basic quantitative requirements. We have a preference for investment managers, mutual funds, ETFs and private investments with relatively strong risk adjusted returns and generally at least five years of return history.

## **QUALITATIVE SCREENING**

We focus our efforts during this stage on the investment managers, mutual funds or private investments to remove those that have undesirable attributes, such as holding too many securities in their composite portfolio, poor historical after-tax returns, excessive assets relative to the strategy or insufficient total firm assets under management.

Those that pass the general qualitative screens are then examined more thoroughly. Considerations include the growth of the sponsoring firm's total assets over time and the fundamentals of the portfolio. These factors vary based on asset class. For example, when examining an equity product, these include price-to-equity ratio, price-to-book ratio and weighted-average market cap. A rolling returns-based style analysis is used to eliminate investment managers, mutual funds, ETFs or private investments that have changed in investing style over time. Then a detailed questionnaire is sent to potential candidates in order to gather more information.

After reviewing all data and information, the Investment Committee selects the candidate firms which it believes merits an onsite visit by an Altair investment professional. Ultimately, Altair's Investment Committee will be presented with finalists to be considered for potential inclusion on our recommended list.

In addition to the above, when evaluating private investments, we will review the legal structure of the investments, funding and withdrawal provisions. Altair uses an industry leading vendor in the field of investigative due diligence to delve into the background of the principals of the private investment firm. We also rely on the insights and opinions of consultants, appraisers, accountants, lawyers, and industry sources as needed.

## **PROCESS FOR OUTSIDE ASSETS (WHERE INVESTMENT CHOICES ARE PRE-DETERMINED E.G., CLIENT DIRECTION OR LIMITED OPTIONS WITHIN A 401(K) OR OTHER PLAN)**

Altair will assist clients with the selection of investment options where predetermined choices are provided as follows:

- We recommend any fund which is already subject to due diligence as described just above in "Process for Altair assets (where investment choices are not pre-determined e.g., client directed or limited options within a 401(k) or other plan)".
- If no investment choices exist which fulfill this requirement, then we will recommend index funds which complement a client's asset allocation.
- If no investment choices exist which fulfill this requirement, we will review the investment options and make a recommendation based on fit within the client's overall asset allocation strategy, historical performance and information known at the time about the fund.

Altair does not offer extensive and ongoing due diligence on the universe of predetermined options for each plan where we assist our clients by making an investment recommendation. We rely on clients to provide updated information on the list of predetermined investment options from time to time for review and recommendations. We include these outside assets in a client's performance report when a client agrees that these assets should be part of our engagement. We will recommend a change to a different option within the allowable investment choices when appropriate.

## Investment Strategies

Altair believes it is crucial to listen to clients and understand their goals and objectives prior to making any investment recommendations. We then create an investment portfolio designed to achieve those goals and objectives in a risk-controlled manner. When recommending a portfolio strategy, we recognize the importance of asset allocation and diversification but also consider the principles of behavioral finance and investor psychology. As historical events demonstrate so vividly, it is imperative to understand the relationship between risk and return and to understand the degree to which portfolio declines can be tolerated.

Altair's investment process can be described as a strategic asset allocation approach with a tactical overlay. We create and implement long-term strategic investment plans that are appropriate for each client's financial objectives, risk preference and constraints. However, on an ongoing basis we will recommend overweights and underweights to certain asset classes based on our proprietary research and valuation methodology. In other words, while we believe strategic asset allocation works best over long periods of time, we also believe allocation modifications are warranted under certain circumstances. Altair's Investment Committee is responsible for all investment recommendations with regard to both asset allocation and investment managers. The Investment Committee currently consists of five members with, on average, over 30 years of investment experience.

As described within the Confidential Private Placement Memorandum, the proprietary private funds seek capital appreciation by investing in a variety of third-party private equity funds focused on companies located primarily in the United States. Each Underlying Fund the proprietary private fund invests in is managed by an investment team or manager. The investment strategy of the proprietary private fund involves the disciplined selection of Underlying Fund managers.

Altair does not advertise that it will manage accounts or invest in securities based on Environmental, Social and Governance ("ESG") criteria. However, Altair will consider prospect or client-specific ESG guidelines or restrictions on a case-by-case basis.

## Risk of Loss

Any investing involves risk of loss that clients should be prepared to bear. We do not offer any products or services that guarantee rates of return on investments for any time period.

## MUTUAL FUNDS AND EXCHANGE TRADED FUNDS

Mutual fund and ETF shareholders are subject to various inherent risks applicable to all shareholders, including inherent risks associated with the individual issuers of each fund's underlying portfolio securities. Please see each fund's prospectus for a more detailed description of that particular fund's risks.

While shares of ETFs generally trade on the market at or near their most recent NAV, certain inefficiencies could cause ETF shares to trade at a premium or discount to the calculated NAV. ETFs redeem shares which are aggregated as creation units comprised of a minimum number of shares. As such, shareholders of ETFs would likely be limited in their ability to dispose of shares held if a liquid secondary market ceases to exist for shares of a particular ETF.

Closed-end funds, unlike open-end mutual funds, trade on the market, generally at a premium or discount to NAV based on various market factors. Purchasing shares of a closed-end mutual fund at a discount does not guarantee a profit, as there can be no assurance the closed-end mutual fund's market price will subsequently revert to the fund's calculated NAV.

### **THIRD-PARTY INVESTMENT MANAGERS**

While Altair conducts ongoing due diligence of third-party investment managers, the successful implementation of a client's objectives related to assets managed by a third-party investment manager is dependent upon the third-party investment manager's ability to successfully implement its investment strategies. In addition, Altair is not an affiliate of any third-party investment manager and, therefore, is not in a position to supervise the third-party investment manager's activities.

### **THIRD-PARTY PRIVATE POOLED INVESTMENT VEHICLES**

Managers of third-party private funds and other private pooled investment vehicles (including hedge funds and private equity funds) often have broad discretion in managing the portfolios, and such private funds are generally not registered with the SEC. Private funds are invested in a variety of financial instruments (including derivatives and other leveraged financial instruments) following a variety of strategies (including trading on margin with no obligation to diversify), resulting in potentially greater risks than publicly registered investment vehicles. Investors in such private pooled investment vehicles are advised to refer to each fund's offering documents for a greater description of the fund's risks. Altair is not an affiliate of these third-party private funds and, therefore, is not in a position to supervise each third-party private fund's activities.

### **PROPRIETARY PRIVATE FUND**

The Confidential Private Placement Memorandum of the proprietary private fund discusses the risk factors investors should consider when making an investment in the proprietary private fund.

### **EXCHANGE TRADED DERIVATIVES**

The use of exchange traded derivatives for a client account might create additional investment risk if the instrument does not correlate well with the index or if Altair's view of the market is incorrect. In addition, the use of derivatives might expose the client to leverage risk, which would likely magnify or otherwise increase the risk of investment losses.

### **ADARA SMALLER COMPANIES FUND AND AQUARIUS INTERNATIONAL FUND**

Clients investing in an Altair Fund should carefully read each prospectus for risks specific to that Altair Fund. Sub-Advisers will invest primarily in equities and equity-related instruments of small and micro-cap companies for the Adara Smaller Companies Fund and international securities for the Aquarius International Fund, including common stocks, preferred stocks, convertible securities, sponsored and unsponsored depositary receipts, warrants and rights.

### **MARKET RISKS**

The success of our recommendations depends to a great extent upon the future course of the financial markets' price movements of various investment vehicles, which are very much not within our control.

### **ARTIFICIAL INTELLIGENCE AND RELATED TECHNOLOGY RISKS**

Altair uses artificial intelligence-enabled tools, including large language models ("LLMs") and other tools, to enhance the efficiency of internal business processes, including administrative and operational tasks, client reporting and investment research. Altair uses these tools as productivity aids and does not rely upon them to make investment decisions or manage client portfolios. All outputs generated through such tools are subject to human review and oversight.

Also, third-party investment managers (including Sub-Advisers and managers to Underlying Funds) use artificial intelligence tools or similar technologies within their own investment management processes. While these tools enhance efficiency and provide valuable insights, they also present risks including the potential for inaccurate, incomplete, or biased outputs, data confidentiality and privacy concerns, and the risk of over-reliance on automated systems. While Altair maintains internal policies governing the approved use of artificial intelligence tools

and seeks to mitigate these risks through supervision and review, Altair cannot ensure that the use of such technologies will not result in errors or unintended outcomes.

## **INFLATION RISKS**

Inflation represents the increase of goods and services over time and acts to decrease the real value of your investments. We have no control over inflation, and there can be no assurance client investment portfolios will keep pace with the rate of inflation.

## **CYBERSECURITY**

Information security concerns impact every user of the internet, and investment advisers such as Altair are no exception. Altair recognizes the importance of protecting clients' personal information as well as the confidential and proprietary information of Altair and its employees, and has established a Cybersecurity Program designed to protect this information. The Cybersecurity Program incorporates routine employee education, identification and monitoring of information security risks, the use of third-party vendors to combat such risks and an established Incident Response Plan. While Altair employs resources (both internal and external) it deems reasonable relative to its size and complexity to protect this information, Altair cannot guarantee the protection of all such information, nor can Altair assure against all related losses, in consideration of the real and evolving cybersecurity risks in existence (now or in the future).

Altair believes clearly communicated information represents a critical control to identifying and managing cybersecurity risks, and has encouraged employees to communicate early and often regarding any potential cybersecurity risk. As such, Altair encourages all clients to communicate any information security risk or breach they have detected to their Altair consultant immediately.

## **ITEM 9 – DISCIPLINARY INFORMATION**

Altair has no events or information applicable to this Item.

## **ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

As described in Item 4 above, Altair serves as investment adviser to the Adara Smaller Companies Fund and Aquarius International Fund of the RBB Fund, Inc. Altair's role as adviser creates a business interest in the funds that could not align with the interests of all advisory clients, resulting in conflicts of interest. The RBB Fund, Inc. maintains its own independent governance and supervisory structure.

Altair also serves as the investment adviser to its proprietary private fund, for which Altair's wholly-owned affiliate, Rialta, serves as the General Partner. Even though Altair does not charge a separate management fee, these relationships create conflicts of interest, including an incentive to favor the proprietary private fund over other investment options. Altair addresses these conflicts through its compliance policies and supervision, as further described in this brochure and the proprietary private fund's offering documents.

Altair is not affiliated with other financial services entities. Some Altair employees hold all shares of Zembra Investments LLC ("Zembra"). Zembra serves no other purpose than to invest in units of Altair.

Select Altair employees serve on Limited Partner Advisory Committees ("LPACs") for third-party private funds, subject to advance approval and ongoing reporting obligations. Altair determined that permitting select employees to serve on LPACs would be in the best interests of the firm, its clients and the proprietary private fund's investors as each employee's LPAC involvement will provide additional insight into the fund and its manager's staff. Altair and Rialta reserve the right to prohibit employees from serving on LPACs for any reason. When serving on an LPAC, the employee's fiduciary duty remains with Altair and its clients, and not with the third-party private

fund or its manager. In evaluating whether to approve LPAC participation, Altair considers, among other factors, the adequacy of the third-party fund manager's compliance program and controls designed to limit the employee's access to proprietary or non-public information. Employees do not receive compensation and seek indemnification for LPAC service and abstains from voting or discussing matters where Altair or Rialta has a direct conflict of interest. Altair expects employees to resign from the LPAC upon fund divestment.

With advance approval, select Altair employees may serve on an advisory board for a third-party adviser. These roles usually involve compensation, and Altair works with the employee to determine the portion of any compensation Altair will retain. Altair reviews each arrangement for potential conflicts, including compensation, time commitment and competing duties. If Altair cannot address these conflicts to its satisfaction, it will not approve the arrangement. When providing input or advice in connection with an advisory board role, the employee acts in a professional capacity consistent with the standard of care Altair applies in its advisory activities.

Compliance considers the employee's role on an LPAC or advisory board when reviewing the employee's personal trading activity.

Altair at times receives reimbursement for employee travel costs from sponsors of conferences at which Altair employees are featured speakers or panelists. Altair will accept offers from its vendors if Altair believes these offers will improve its business. For example, Altair accepted an offer from a banking vendor to take part in a practice management conference without charge.

Altair's Chief Compliance Officer, Rebekah Kohmescher, also serves as Altair's Chief Executive Officer. Her other firm responsibilities will at times create an inherent conflict with Ms. Kohmescher's compliance responsibilities. Altair management is aware of this inherent conflict, and strives to maintain a strong compliance culture supported by processes and supervisory practices designed to minimize the risk that Ms. Kohmescher's other firm responsibilities could impact her obligations as Altair's Chief Compliance Officer.

## **ITEM 11 – CODE OF ETHICS**

Altair invests in money market funds, mutual funds and ETFs within its corporate reserve accounts to manage operating capital. Employees are eligible to (and do or plan to) invest with the third-party investment managers, mutual funds (including the Adara Smaller Companies Fund and Aquarius International Fund), ETFs, private investments (including Altair's proprietary private fund) and derivatives which Altair also recommends to clients. Our recommendations are not time sensitive and are intended to be durable in nature. We will recommend that clients who implement portfolios at different times invest with similar investment managers, mutual funds, ETFs and private investments. We are not concerned when an investment is made as we view each recommended investment as beneficial to the portfolio over the long term. Thus, the timing of an investment is not central to our recommendations or investment strategies. Though we will recommend underweighting and overweighting various asset classes from time to time, the underlying recommendation of investment managers, mutual funds, ETFs and private investments is relatively consistent across time.

Altair recommends investment opportunities with a limited supply, such as unaffiliated private investment funds available to qualified purchasers. As noted in Item 12, Altair maintains a policy of providing eligible clients with the option to invest in these limited investment opportunities. If the investment opportunity has sufficient supply remaining after offering the opportunity to eligible clients, eligible Altair employees (owners and directors) may purchase the unaffiliated private investment fund subject to advance clearance. These Altair employees are not subject to the same minimum investment levels that Altair imposes on client accounts when investing in these funds. Altair designed the third-party private fund investment minimums to protect the client's portfolio. Altair offers eligible clients the opportunity to invest ahead of Altair employees,

and to redeem no later than employees if Altair recommends clients liquidate holdings of the investment. Owners and directors often invest in unaffiliated private investment funds alongside clients.

Altair's "Knowledgeable Employees", as defined by Rule 3c-5 under the Investment Company Act of 1940, may invest in Altair's proprietary private fund without being a qualified investor, subject to advance approval. These "Knowledgeable Employees" include executive officers, directors and employees who, in connection with their regular functions or duties, take part in the investment activities of the proprietary private fund or Altair Funds. Altair permits other employees who are qualified investors to invest in the proprietary private fund. Altair offers eligible clients the opportunity to invest in its proprietary private fund ahead of employees, and to redeem their investment no later than employees when Altair recommends redeeming client investments from a private fund. For example, Altair does not permit employees to invest in the initial close of a proprietary private fund to help provide clients with priority access to the fund.

Altair has adopted a written Code of Ethics that governs the personal securities transactions of employees and officers. The Code of Ethics permits Altair's employees to engage in other securities transactions. Thus, officers and employees can purchase individual securities which are also purchased by the independent, third-party investment managers retained by Altair's clients (including Sub-Advisers to the Altair Funds).

Since our advice is not time-sensitive but intended to be durable and long-term in nature, Altair employees are permitted to purchase or sell any publicly-traded securities for their own accounts prior to, simultaneously with, or subsequent to any action taken in a client portfolio or in an investment manager account. Officers and employees, including members of the Investment Committee, are also permitted to invest their personal holdings in a manner which is not consistent with Altair's advice provided to clients. Further, Altair employees have no advanced knowledge of third-party investment manager trading activity. Since we are not portfolio managers in the traditional sense of buying and selling publicly-traded securities for client accounts and we do not have knowledge of trades placed by third-party investment managers until after they occur, we do not believe the personal investing activities of our officers and employees in publicly-traded securities create a conflict of interest with our clients.

Altair's Code of Ethics requires individuals to report required personal securities transactions on a quarterly basis to Altair's compliance personnel. Altair does not require employees to report transactions in certain types of investments, including direct obligations of the United States Government, accounts over which the employee has no discretionary authority, direct obligations of the United States Government, short-term instruments, automatic investment plans and direct investments in currency (including cryptocurrency).

Altair's inherent business model results in Altair employees periodically receiving material nonpublic information from clients regarding their employers. Altair's Code of Ethics restricts trading by employees in securities where clients are insiders.

Our Code outlines the standards of conduct we expect of Altair employees and includes limitations on outside business activities of employees and giving/receiving gifts. Outside Business Activities are generally prohibited; any exception requires advanced approval by Compliance.

While we believe the proper use of business entertainment and gifts creates goodwill and aids in the development of strong working relationships, as a matter of policy, we seek to avoid offering or accepting business entertainment or gifts that could be viewed as influencing investment decision-making or creating a sense of obligation. Altair's policy restricts the receipt of gifts from clients, prospective clients, brokers, third-party investment managers, and investment-focused vendors, except customary courtesy gifts of nominal value. Employees may accept gifts from non-investment management-focused vendors where the nature of the gift is

not extraordinary, extravagant, or aimed at making the employee feel beholden. Altair's policy permits limited exceptions for gifts arising from long-standing personal relationships that pre-date the business relationship and for infrequent life events, provided such gifts are not intended to influence business judgment or create a sense of obligation. The policy also prohibits employees from soliciting gifts, benefits, or gratuities, and places limitations on the giving of gifts in connection with Altair's business relationships.

A copy of the Code of Ethics will be furnished to any client or prospective client upon request.

## **ITEM 12 – BROKERAGE PRACTICES**

For clients that have provided Altair with trading authorization, we generally process transactions for the sale and/or purchase of securities and other investments in the client's account solely through the client's custodian-affiliated broker. Under these circumstances, Altair does not have any obligation to seek better execution services or prices from other possible brokers or dealers.

Altair generally does not aggregate client transactions for execution, which might cause the client to incur higher fees than they otherwise would have incurred if the trade had been affected in aggregation with other clients. However, Altair at times will choose to aggregate (or "block") trades within client accounts of the same family when aggregating trades is deemed to be in the best interest of participating clients. All accounts participating in the aggregated order receive an average share price with transaction costs shared pro rata based on each account's participation in the transaction.

Altair views each recommended investment as beneficial to the portfolio over the long term and, as such, the timing of an investment is not central to our recommendations or investment strategies. Altair arranges the execution of the investment decisions for non-discretionary clients only after it receives authorization to do so from the client. As such, non-discretionary client accounts will generally trade the same security after discretionary client accounts, and non-discretionary clients will likely pay more or less than other discretionary clients for the same security, due to market trading activity.

Principals of the firm often recommend that clients retain those custodians or brokers that have agreed to preferred pricing arrangements for Altair clients such that all negotiated terms directly benefit the client through enhanced services or reduced fees. Recommended brokers or custodians are not necessarily the lowest-cost provider, but are those that Altair believes are competitively priced for the level of service provided. Not all advisers recommend custodians or brokers to their clients, and a client is free to retain any custodian or broker dealer they choose. While Altair realizes operational efficiencies by having its clients' assets reside with a limited number of custodians, Altair-recommended brokers or custodians are selected based on Altair's consideration of the broker or custodian's general reputation, level of services provided, competitiveness of fees or special expertise.

Altair generally recommends custodians to clients that have demonstrated the ability to provide our clients with discounted transaction charges, preferred access to certain mutual funds, including lower sales charges than for direct purchases and lower minimum purchase amounts, and the ability to custody and safeguard derivative investments. These same benefits are made available to Altair's principals and employees. The benefits to Altair and its principals and employees are not a material factor in determining which brokers to recommend; rather, the primary considerations are the services provided to the client. Altair does not expect that clients will pay commissions to the custodian-affiliated brokers we recommend that are higher than those obtainable from other brokers for comparable client services, although there can be no assurance that clients will pay the lowest possible commissions available.

While we do not receive cash compensation or research (typically referred to as “soft dollar” payments) from custodian-affiliated brokers we recommend to clients, we receive other services from these entities, including:

- Complimentary admittance for our employees to attend seminars and conferences (though we do not receive travel or reimbursement for other expenses related to attending these conferences);
- Practice management consulting services paid for by the custodian (such as consulting firms which track client experiences); and
- Practice management communications generally available to advisers with clients on the custodian’s platform.

On occasion, Altair has received (and in the future may receive) additional payments from such custodians solely to reimburse Altair for the costs that Altair has incurred (or will incur) directly resulting from the custodian’s internal systems changes or updates that directly impacted (or will impact) Altair’s systems and its ability to service its client(s) that have selected that custodian. Such one-time payments do not impact Altair’s analyses as to whether to recommend (or not) that a client retain that custodian.

Altair will consider allocating eligible third-party private equity investment funds to its proprietary private fund first. If the Investment Committee determines the limited investment opportunity is not suitable for its proprietary private funds or if supply remains after Altair allocates the limited investment opportunity to its proprietary private funds, Altair will make the opportunity available to eligible clients through a randomized process to determine which eligible clients will receive allocations of the limited investment opportunity.

Altair maintains a policy to allocate these limited investment opportunities without regard to factors that solely benefit Altair, such as future proprietary private fund’s performance-based fee arrangements described within Item 6.

In the event Altair identifies a transaction error has occurred in a client’s account, Altair will work with the custodian promptly to correct, limit or mitigate the effect of the transaction error, with the objective of making the client whole. If necessary, Altair will reimburse clients following a transaction error committed by Altair, often by reducing or waiving future fees to be paid to Altair. Altair will pay former clients any remaining balance due upon termination of the client relationship. At other times, Altair will work with the client’s custodian to adjust the trades to the correct transaction error in the client account, with Altair settling any difference with the custodian outside of the client’s account.

Altair generally considers a “transaction error” to be the execution of a trade or transaction by Altair on behalf of a client on terms other than those intended by Altair or the client, as applicable. Altair faces an inherent conflict in addressing transaction errors, as transaction errors are often detected by Altair personnel who have an inherent incentive to mitigate such transaction errors in Altair’s favor, to the detriment of the clients. To address this risk, Altair logs and Altair management reviews all transaction errors. Altair believes these controls, along with Altair’s periodic employee training program, function to mitigate these inherent risks.

## **ITEM 13 – REVIEW OF ACCOUNTS**

Directors of Altair are responsible for reviewing the strategic investment plan, the client’s overall financial situation and the performance of the client’s portfolio. The number of clients assigned to each Director and Managing Director varies according to the complexities of each individual client account.

Accounts are reviewed on a quarterly basis, which includes the delivery of written performance reports to clients. These reports provide a review of the client's investment portfolio, including a review of asset allocation, performance comparisons for the client's investment managers and commentary on general market conditions.

Generally, each account is reviewed with the client at least semi-annually.

Altair, along with the Altair Funds' third-party service providers that provide compliance, administration and accounting services, actively monitors transactions and holdings for compliance with the Altair Funds' investment restrictions.

Altair's Investment Committee monitors the proprietary private fund on an ongoing basis.

#### **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

Other than as described in Item 5, the sharing of advisory board compensation with employees as described in Item 10, and the limited benefits received from client custodians disclosed in Item 12 above, Altair does not receive cash compensation or other economic benefits in connection with providing advice to clients.

We maintain relationships with various third parties (both individuals and entities such as attorneys or accountants), and we at times receive referrals from these third parties. We also periodically refer clients to other service providers when we believe a service provider would add value to the client and/or when a client requests such a referral. We have no compensation arrangement in place with these third parties. We at times provide relatively small gifts to the individual or entity as a sign of appreciation (such as a meal, gift certificate or a bottle of wine) for an introduction made to us.

We typically entertain or are entertained by these third parties as a natural extension of our ongoing business relationship. Any level of entertainment we provide or receive is designed to foster our broader relationship with the individual or entity, and not to compensate others for entrusting us with referrals made. We want to make you aware of the inherent conflict of interest that exists from our relationship with these individuals or entities, as these introductions are generally borne out of a larger relationship.

As disclosed in the Altair Funds' offering documents, the Altair Funds pay fees to broker-dealers and other financial institutions to include the Altair Funds on their distribution platforms. Altair also receives reimbursement to cover the costs of compliance oversight processes specific to the Altair Funds.

Rialta, the General Partner to Altair's proprietary private funds, receives a fee for general partner services it provides, including administration of the proprietary private fund, oversight of service providers, and the management of books and records. The fee provides payment for services rendered, at cost, based on the salaries and benefits of personnel responsible for the proprietary private fund's operations and books and records. The proprietary private fund's Confidential Private Placement Memorandum describes this fee.

All professionals (including investment and research professionals) are paid a base salary and a bonus based on firm profitability. Senior Client Service team members are eligible to earn an additional one-time bonus based on the size of new client assets reflecting their role in securing a new client relationship as well as material net new contributions from existing clients. All employees are eligible to receive a bonus for an introduction to a client, which is calculated as a percentage of the first year of fees generated. Research employees are paid a bonus based on the long-term performance of funds and managers used by Altair clients. Altair pays this

compensation from its general operating revenues, and clients do not pay additional fees to compensate employees for these efforts. These incentive compensation arrangements also apply to client investments in Altair's proprietary private fund, where permitted.

These compensation arrangements incent our employees to increase our assets under management which thereby increases our revenue generated. We feel our policies and procedures designed to promote the fair and consistent treatment of clients help to mitigate this inherent conflict. Also, all client portfolios are managed following a team approach, with no single employee responsible for any individual client's portfolio. Finally, any such compensation is subject to applicable eligibility requirements and compliance oversight.

## ITEM 15 – CUSTODY

Clients receive statements at least semi-annually from the broker dealer, bank or other qualified custodian that holds and maintains each client's investment assets. Altair urges clients to carefully review and compare these custodial records and statements to the reports that we provide. Our reports will at times vary from custodial statements based on accounting procedures, reporting dates, trade/settlement dates or valuation methodologies of certain securities.

Altair deducts advisory fees directly from clients' accounts held at custodians and maintains constructive custody over some accounts of its clients since it can access their custodial accounts (either directly or indirectly via a third-party vendor) to perform services requested by the clients. Subject to approval by Altair's Board of Managers and Compliance Committee, Altair also permits employees to serve as a trustee or similar role over certain client accounts. Finally, Altair has access to some clients' third-party accounts. These arrangements result in Altair having custody over those accounts. Altair maintains strict controls for any account over which it believes it has custody, including limiting access to those individuals who are required to have such access to perform their jobs, active oversight by Altair management and engagement of an independent accountant to perform routine audits of the accounts.

Altair owners will serve as trustee over other Altair owner's personal accounts. Some of these Altair owners' accounts are managed by Altair.

The Altair Funds' assets are maintained with a qualified custodian, as disclosed in each Altair Fund's prospectus.

Altair's wholly owned affiliate, Rialta, serves as the General Partner of Altair's proprietary private fund. This results in Altair having custody of the proprietary private fund's assets. An independent accountant registered with the Public Company Accounting Oversight Board audits the proprietary private fund. Altair will send copies of the audited financial statements to the proprietary private fund's investors within 180 days of the fiscal year end.

Altair recognizes the inherent risk all individuals face with respect to identity theft. Altair has created an Identity Theft Identification Program, primarily designed to help employees identify potential red flags indicating a client's identity could have been stolen. In addition to identifying potential red flags, this Identity Theft Identification Program outlines the actions employees and Altair will take in the event they believe a client's identity may have been stolen. Altair requests any client who suspects his/her identity has been compromised to immediately notify their Altair consultant, thereby permitting Altair to consider implementing additional controls around the client's account.

## ITEM 16 – INVESTMENT DISCRETION

At the inception of the client engagement, Altair documents its discretionary authority in a written engagement contract for those clients who choose to give Altair investment discretion. Altair is directly responsible for making investment decisions on behalf of discretionary clients following an overall strategy documented in a written Investment Policy Statement, signed by the client, that includes investment guidelines and restrictions. In all cases, however, such discretion is exercised in a manner consistent with the stated investment objectives for the particular client account.

Altair has discretionary authority to manage client assets invested in the Altair Funds and its proprietary private fund.

## ITEM 17 – VOTING CLIENT SECURITIES

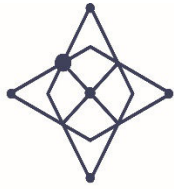
Altair does not vote proxies for securities on behalf of our clients, but third-party investment managers will vote proxies for client accounts as agreed upon between the third-party investment manager and client. With respect to the Altair Funds, each Sub-Adviser is authorized to vote proxies for securities on behalf of the Altair Funds, subject to the Altair Funds' proxy voting policies.

Altair periodically receives notifications of pending class action or similar legal litigation involving securities held within client accounts. As a matter of policy, we do not elect to participate in such lawsuits or other settlements on behalf of our clients; rather, we provide an option for the client to utilize a third party (Chicago Clearing Corporation) to investigate and make elections on the clients' behalf. The client makes a determination of whether to utilize Chicago Clearing Corporation within Altair's engagement letter, which discloses that Chicago Clearing Corporation keep a percentage of the recovered proceeds as compensation. Altair does not receive compensation from Chicago Clearing Corporation for these services, other than its negotiated advisory fees described in Item 5. Altair is not responsible for class action or similar legal litigation matters related to the Altair Funds.

## ITEM 18 – FINANCIAL INFORMATION

Altair has no known financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Altair maintains a Disaster Recovery Plan designed to support the prompt restoration of Altair's essential business functions following a disaster event. While Altair strives to establish and maintain comprehensive processes supporting this Disaster Recovery Plan, Altair cannot ensure it will be able to continue business operations during every disaster event, given the unknown nature and scope of future events. Such events could include acts of war, terrorism, accidents and sabotage. If there were to be an actual disaster event, Altair will make reasonable attempts to notify clients of the impact of the event on Altair and its clients.



# ALTAIR

## Brochure Supplement Part 2B of Form ADV

**Steven B. Weinstein**

**Altair Advisers LLC**

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## 12/31/2025

This brochure supplement provides information about Steven B. Weinstein that supplements the Altair Advisers LLC brochure. You should have received a copy of that brochure. Please contact [info@altairadvisers.com](mailto:info@altairadvisers.com) or (312) 429-3000 if you did not receive Altair Advisers LLC brochure or if you have any questions about the contents of this supplement.

## **Item 2 - Educational Background and Business Experience**

In general, investment advice will only be provided by principals and senior employees of Altair who have a minimum of a college education combined with either an advanced degree and/or financial designation (i.e., Chartered Financial Analyst® (CFA®), Certified Financial Planner™ (CFP®), Chartered Alternative Investment Analyst®, (CAIA®), Certified Public Accountant (CPA)), as well as meet certain ongoing requirements, including participation in continuing education programs and experience in providing personal financial planning and investment advisory services.

### **TO RECEIVE THE CFA® DESIGNATION, CANDIDATES MUST ATTAIN THE FOLLOWING:**

1. Have at least four years of professional investment experience.
2. Pass three rigorous six-hour exams.
3. Commit to abiding by CFA Institute's Code of Ethics and Standards of Professional Conduct.

*For more information on the CFA® designation, please visit.*

[http://cfainstitute.org/ethics/Documents/pw\\_sec.pdf](http://cfainstitute.org/ethics/Documents/pw_sec.pdf)

### **TO USE THE CFP® DESIGNATION, CERTIFICANTS MUST DO THE FOLLOWING:**

1. Pass the comprehensive CFP® Certification Examination
2. Pass CFP Board's Fitness Standards for Candidates and Registrants
3. Agree to abide by CFP Board's Code of Ethics and Professional Responsibility which puts clients' interests first.
4. Comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement.
5. Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct

*For more information on the CFP® designation, please visit*

<http://www.cfp.net/certificants/ADVexplanation.asp>

## **Item 3 – Disciplinary Information**

No information is applicable to this Item.

## **Item 4 – Other Business Activities**

No information is applicable to this Item.

## **Item 5 – Additional Compensation**

The supervised person listed in this supplement participates in a bonus plan where they are compensated based on the amount of additional assets and revenue that their efforts generate for Altair.

## **Item 6 – Supervision**

The supervised person listed in this supplement delivers advice to clients under the supervision of our Chief Investment Officer, Jason Laurie (312) 429-3030 and our Chief Executive Officer, Rebekah Kohmescher, (312) 429-3035.

**Steven B. Weinstein, CFA, CFP®**

**CHAIRMAN**

312-429-3013 [sweinstein@altairadvisers.com](mailto:sweinstein@altairadvisers.com)

Steven B. Weinstein founded the independent wealth advisory firm of Altair Advisers in June of 2002 and served as President and Chief Investment Officer until being named to the new position of Chairman in January 2018. Steve has been counseling wealthy families, business owners, and senior executives on their investment, tax, retirement, and estate planning matters for over 40 years. In his role as Chairman, Steve serves clients as well as provides strategic guidance and senior advisory leadership on Altair’s Board and Investment Committee.

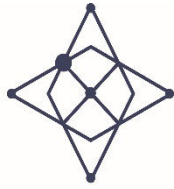
Prior to starting Altair, Steve spent nearly two decades with Arthur Andersen, where he was instrumental in designing, establishing, and growing its Investment Advisory Services and Personal Financial Planning practices, both in Chicago and nationwide.

As an industry leader, Steve has served as a member of the Board of Governors of the Certified Financial Planner Board of Standards and the CCH Financial and Estate Planning Advisory Board. He is currently active in the CFA Society of Chicago and the Chicago Estate Planning Council. He is a CFA charterholder and a CERTIFIED FINANCIAL PLANNER™ certificant. He is a member of the Illinois and California bars.

Steve graduated with Distinction in Political Science and Communication from Stanford University in 1974, where he was elected a member of Phi Beta Kappa, and earned both his MBA and JD degrees, with Distinction, from Northwestern University in 1978.

Steve is active on the Gift Planning Advisory Committee of the Art Institute of Chicago, the Northwestern Memorial Foundation’s Professional Council for Philanthropy, and the Pete Henderson Society of the Kellogg Alumni Council. He also serves as a board member of the Ravinia Festival, the Chicago Youth Centers and the Chicago Chapter of the American Jewish Committee and is a member of The Economic Club of Chicago.

<b>YEAR OF BIRTH</b>	<b>EDUCATION</b>	<b>BUSINESS BACKGROUND</b>	<b>PROFESSIONAL DESIGNATIONS</b>
05/27/1952	BA, Stanford University, Stanford, CA JD/MBA, Northwestern University, Evanston & Chicago, IL	2002 - to date, Altair Advisers LLC 1983 - 2002, Arthur Andersen LLP	2002 – NASD Series 7 1996 – Chartered Financial Analyst® 1995 – NASD Series 2 1995 – NASD Series 63 1994 – NASD Series 65 1989 – CERTIFIED FINANCIAL PLANNER™ 1979 – California Bar 1978 – Illinois Bar



# ALTAIR

## Brochure Supplement Part 2B of Form ADV

**Rebekah L. Kohmescher**

**Altair Advisers LLC**

225 W. Washington Street, Suite 2400

Chicago, Illinois 60606

312.429.3000

[www.altairadvisers.com](http://www.altairadvisers.com)

## 12/31/2025

This brochure supplement provides information about Rebekah L. Kohmescher that supplements the Altair Advisers LLC brochure. You should have received a copy of that brochure. Please contact [info@altairadvisers.com](mailto:info@altairadvisers.com) or (312) 429-3000 if you did not receive Altair Advisers LLC brochure or if you have any questions about the contents of this supplement.

## **Item 2 - Educational Background and Business Experience**

In general, investment advice will only be provided by principals and senior employees of Altair who have a minimum of a college education combined with either an advanced degree and/or financial designation (i.e., Chartered Financial Analyst (CFA), Certified Financial Planner™ (CFP®), Chartered Alternative Investment Analyst, (CAIA), Certified Public Accountant (CPA)), as well as meet certain ongoing requirements, including participation in continuing education programs and experience in providing personal financial planning and investment advisory services.

### **TO USE THE CFP® DESIGNATION, CERTIFICANTS MUST DO THE FOLLOWING:**

1. Pass the comprehensive CFP® Certification Examination
2. Pass CFP Board's Fitness Standards for Candidates and Registrants
3. Agree to abide by CFP Board's Code of Ethics and Professional Responsibility which puts clients' interests first.
4. Comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement.
5. Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct

*For more information on the CFP® designation, please visit*

<http://www.cfp.net/certificants/ADVexplanation.asp>

### **TO USE THE CPA DESIGNATION IN ILLINOIS, PROFESSIONALS MUST DO THE FOLLOWING:**

1. Hold an Illinois CPA certificate issues by the Illinois Board of Examiners which requires undergraduate hours of accounting as well as completion of a rigorous exam.
2. At least one year of relevant experience
3. Those not currently practicing must hold a registration license issued by Illinois Department of Financial and Professional Regulation which must be renewed every three years. Registration is renewable every three years.

*For more information on the CPA designation, please visit.*

<http://www.aicpa.org/InterestAreas/PersonalFinancialPlanning/Membership/DownloadableDocuments/ADV%20Part%202B%20Brochure%20Supplement.docx>

## **Item 3 – Disciplinary Information**

No information is applicable to this Item.

## **Item 4 – Other Business Activities**

No information is applicable to this Item.

## **Item 5 – Additional Compensation**

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## **Item 6 – Supervision**

The supervised person listed in this supplement delivers advice to clients under the supervision of our Chief Investment Officer, Jason Laurie (312) 429-3030 and our Board of Managers.

**Rebekah L. Kohmescher, CFP®, CPA**  
**CHIEF EXECUTIVE OFFICER & CHIEF COMPLIANCE OFFICER**  
312-429-3035 [rkohmescher@altairadvisers.com](mailto:rkohmescher@altairadvisers.com)

A founding partner of Altair at just 25 years old, Rebekah ‘Beka’ accepted the newly created position of Chief Executive Officer (CEO) on January 1, 2018, with responsibility for the overall management of the firm. Prior to becoming CEO, Beka spent her first eight years in a client service role, then shifted to an operational role, serving as Altair’s Chief Operating Officer (COO) since 2011. Under her leadership, the firm has redesigned entire aspects of the investment reporting processes, expanded online accessibility to account information for clients, and restructured internal workflows to best meet client needs and improve internal efficiencies.

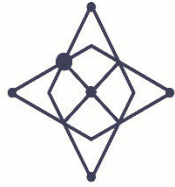
Additionally, Beka serves as the head of compliance for the firm, assisting with creating policies and filing annual reports with the SEC. She is also the direct supervisor for managers of the consulting, investment operation, client reporting, and office administration teams.

Before Altair’s formation, Beka was a consultant in Arthur Andersen’s Private Client Services practice.

Beyond her work at Altair, Beka has been a mentor to young women pursuing finance and accounting majors and has been an industry advocate for bringing more women into the financial advisory field.

Beka is on the Board of Directors and the Finance Committee of Community Health, a free clinic that provides high-quality health care to more than 12,000 uninsured people annually. She serves on the Senior Advisory Board of the L.E.A.D.S. (Leadership, Empowerment, Action, Development and Service) program at Benedictine University, is on the Board of Directors for the Civic Federation, an independent, non-partisan government research organization that provides analysis and recommendations on government finance issues for the Chicago region and State of Illinois, is a member of The Chicago Network and mentor through its Executive Women’s Mentorship Initiative program and serves on the Finance Committee of the St. Benedict Preparatory School on the north side of Chicago.

<b>YEAR OF BIRTH</b>	<b>EDUCATION</b>	<b>BUSINESS BACKGROUND</b>	<b>PROFESSIONAL DESIGNATIONS</b>
10/29/1976	BA, Xavier University, Cincinnati, OH	2002 to date, Altair Advisers LLC 1999 - 2002, Arthur Andersen LLP	2005 – CERTIFIED FINANCIAL PLANNER™ 2002 – NASD Series 65 1999 – Certified Public Accountant



# ALTAIR

## Brochure Supplement Part 2B of Form ADV

**Jason M. Laurie**

**Altair Advisers LLC**

225 W. Washington Street, Suite 2400

Chicago, Illinois 60606

312.429.3000

[www.altairadvisers.com](http://www.altairadvisers.com)

## 12/31/2025

This brochure supplement provides information about Jason M. Laurie that supplements the Altair Advisers LLC brochure. You should have received a copy of that brochure. Please contact [info@altairadvisers.com](mailto:info@altairadvisers.com) or (312) 429-3000 if you did not receive Altair Advisers LLC brochure or if you have any questions about the contents of this supplement.

## **Item 2 - Educational Background and Business Experience**

In general, investment advice will only be provided by principals and senior employees of Altair who have a minimum of a college education combined with either an advanced degree and/or financial designation (i.e., Chartered Financial Analyst® (CFA®), Certified Financial Planner™ (CFP®), Chartered Alternative Investment Analyst®, (CAIA®), Certified Public Accountant (CPA)), as well as meet certain ongoing requirements, including participation in continuing education programs and experience in providing personal financial planning and investment advisory services.

### **TO RECEIVE THE CFA® DESIGNATION, CANDIDATES MUST ATTAIN THE FOLLOWING:**

1. Have at least four years of professional investment experience.
2. Pass three rigorous six-hour exams.
3. Commit to abiding by CFA Institute's Code of Ethics and Standards of Professional Conduct.

*For more information on the CFA® designation, please visit.*

[https://www.cfainstitute.org/ethics/Documents/pw\\_sec.pdf](https://www.cfainstitute.org/ethics/Documents/pw_sec.pdf)

### **TO USE THE CFP® DESIGNATION, CERTIFICANTS MUST DO THE FOLLOWING:**

1. Pass the comprehensive CFP® Certification Examination
2. Pass CFP Board's Fitness Standards for Candidates and Registrants
3. Agree to abide by CFP Board's Code of Ethics and Professional Responsibility which puts clients' interests first.
4. Comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement.
5. Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct

*For more information on the CFP® designation, please visit.*

<http://www.cfp.net/certificants/ADVexplanation.asp>

## **Item 3 – Disciplinary Information**

No information is applicable to this Item.

## **Item 4 – Other Business Activities**

No information is applicable to this Item.

## **Item 5 – Additional Compensation**

The supervised person listed in this supplement participates in a bonus plan where they are compensated based on the amount of additional assets and revenue that their efforts generate for Altair.

## **Item 6 – Supervision**

The supervised person listed in this supplement delivers advice to clients under the supervision of our Board of Managers and our Chief Executive Officer, Rebekah Kohmescher (312) 429-3035.

**Jason M. Laurie, CFA, CFP®**  
**MANAGING DIRECTOR & CHIEF INVESTMENT OFFICER**  
312-429-3030 [jlaurie@altairadvisers.com](mailto:jlaurie@altairadvisers.com)

A founding partner and managing director, Jason, has chaired Altair's Investment Committee since 2011 and succeeded Steve Weinstein as the firm's Chief Investment Officer (CIO) in January 2018. As CIO, he is responsible for leading the strategic direction of the firm's investment advice in collaboration with Altair's Research Team. Jason also serves as the lead consultant on numerous client engagements.

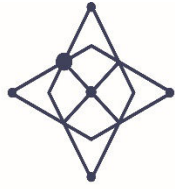
Jason helps clients achieve their long-term financial goals through the integration of investment management and financial planning. He works in close collaboration with his clients' broader team of professional advisers to create customized investment strategies that maximize wealth preservation while also taking advantage of wealth creation opportunities. With 20 years of client portfolio experience, he is particularly skilled at helping clients navigate transitional life events such as the sale of a business, the distribution of a trust, retirement, or divorce.

Jason has lectured before several professional groups including the World Presidents' Organization and is quoted in both the local and national media.

Prior to forming Altair, Jason was a manager in Arthur Andersen's Private Client Services practice. He oversaw engagements that coordinated investment advisory services with other wealth planning strategies. In addition to his work with high-net-worth individuals, Jason developed and conducted retirement investment planning seminars for employees of leading Chicago corporations. Prior to Andersen, Jason worked at the investment research firm Ibbotson Associates where he was in the group that developed and maintained asset allocation software.

Jason is a CFA charterholder and a CERTIFIED FINANCIAL PLANNER™ certificant. He is a member of the CFA Society of Chicago. Jason graduated cum laude from the University of Notre Dame, with a BBA degree in finance and concentration in computer applications.

<b>YEAR OF BIRTH</b>	<b>EDUCATION</b>	<b>BUSINESS BACKGROUND</b>	<b>PROFESSIONAL DESIGNATIONS</b>
4/28/1974	BBA, University of Notre Dame, South Bend, IN	2002 to date, Altair Advisers LLC 1997 - 2002, Arthur Andersen LLP 1996 - 1997, Ibbotson Associates	2006 – Certified Financial Planner™ 2000 – Chartered Financial Analyst® 1998 – NASD Series 65



# ALTAIR

## Brochure Supplement Part 2B of Form ADV

**Bryan R. Malis**

**Altair Advisers LLC**

225 W. Washington Street, Suite 2400

Chicago, Illinois 60606

312.429.3000

[www.altairadvisers.com](http://www.altairadvisers.com)

## 12/31/2025

This brochure supplement provides information about Bryan R. Malis that supplements the Altair Advisers LLC brochure. You should have received a copy of that brochure. Please contact [info@altairadvisers.com](mailto:info@altairadvisers.com) or (312) 429-3000 if you did not receive Altair Advisers LLC brochure or if you have any questions about the contents of this supplement.

## **Item 2 - Educational Background and Business Experience**

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### **TO RECEIVE THE CFA® DESIGNATION, CANDIDATES MUST ATTAIN THE FOLLOWING:**

1. Have at least four years of professional investment experience.
2. Pass three rigorous six-hour exams.
3. Commit to abiding by CFA Institute's Code of Ethics and Standards of Professional Conduct.

*For more information on the CFA® designation, please visit.*

[http://cfainstitute.org/ethics/Documents/pw\\_sec.pdf](http://cfainstitute.org/ethics/Documents/pw_sec.pdf)

### **TO USE THE CFP® DESIGNATION, CERTIFICANTS MUST DO THE FOLLOWING:**

1. Pass the comprehensive CFP® Certification Examination
2. Pass CFP Board's Fitness Standards for Candidates and Registrants
3. Agree to abide by CFP Board's Code of Ethics and Professional Responsibility which puts clients' interests first.
4. Comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement.
5. Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct

*For more information on the CFP® designation, please visit.*

<http://www.cfp.net/certificants/ADVexplanation.asp>

## **Item 3 – Disciplinary Information**

No information is applicable to this Item.

## **Item 4 – Other Business Activities**

No information is applicable to this Item.

## **Item 5 – Additional Compensation**

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## **Item 6 – Supervision**

The supervised person listed in this supplement delivers advice to clients under the supervision of our Chief Investment Officer Jason Laurie (312) 429-3030 and our Chief Executive Officer, Rebekah Kohmescher (312) 429-3035.

**Bryan R. Malis, CFA, CFP®**  
**MANAGING DIRECTOR**  
 312-429-3024 [bmalis@altairadvisers.com](mailto:bmalis@altairadvisers.com)

Bryan is a founding partner and Managing Director of Altair Advisers. For 35 years, he has worked with high-net-worth clients to provide financial planning, investment advice, and fiscal peace of mind to his clients, which include current and former business owners, corporate executives, professionals, and other people of wealth. Drawing upon his years of technical knowledge and advisory experience, Bryan is particularly skilled at guiding his clients through a complex maze of alternatives to provide practical solutions that fit each client’s particular needs, empowering his clients to make better decisions about their wealth.

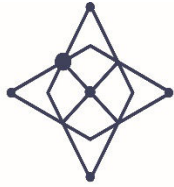
In addition to his work with clients, Bryan has been a leader within the firm since its founding, having served for over sixteen years on Altair’s Board of Managers, which has responsibility for oversight of firm policy, strategy, and operations. He also serves on Altair’s Investment Committee, the central decision-making body which approves recommended managers and determines tactical allocation changes.

Prior to founding Altair, Bryan held a senior position in the investment consulting practice Arthur Andersen, which he joined after several years in the financial counseling and investment consulting groups of Deloitte and Touche. His earlier experience came while at Mesirow Financial and Takaki Close & Associates.

Bryan is a CFA charterholder and a CERTIFIED FINANCIAL PLANNER™ certificant. He is a member of the CFA Society of Chicago. He is also a member Chicago Estate Planning Council where he served a long tenure on its board concluding as its president. Bryan received his bachelor’s degree in accountancy and finance from the University of Illinois at Urbana-Champaign.

Bryan’s philanthropic involvement includes a long tenure on the Board of Trustees of the Kohl Children’s Museum of Greater Chicago, where he is Treasurer, a member of the Executive Committee and Chairman of the Finance Committee.

<b>YEAR OF BIRTH</b>	<b>EDUCATION</b>	<b>BUSINESS BACKGROUND</b>	<b>PROFESSIONAL DESIGNATIONS</b>
05/24/1964	BS, University of Illinois, Urbana, IL	2002 to date, Altair Advisers LLC 1999 - 2002, Arthur Andersen LLP 1995 - 1999, Deloitte & Touche LLP 1993 - 1995, Takaki Close & Associates, Ltd. 1988 - 1993, Mesirow Financial Corp.	2004 – Chartered Financial Analyst® 1997 – NASD Series 65 1991, 1997 – NASD Series 63 1990 – CERTIFIED FINANCIAL PLANNER™ 1988 – NASD Series 7



# ALTAIR

## Brochure Supplement Part 2B of Form ADV

**Michael J. Murray**

**Altair Advisers LLC**

225 W. Washington Street, Suite 2400

Chicago, Illinois 60606

312.429.3000

[www.altairadvisers.com](http://www.altairadvisers.com)

## 12/31/2025

This brochure supplement provides information about Michael J. Murray that supplements the Altair Advisers LLC brochure. You should have received a copy of that brochure. Please contact [info@altairadvisers.com](mailto:info@altairadvisers.com) or (312) 429-3000 if you did not receive Altair Advisers LLC brochure or if you have any questions about the contents of this supplement.

## **Item 2 - Educational Background and Business Experience**

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### **TO RECEIVE THE CFA® DESIGNATION, CANDIDATES MUST ATTAIN THE FOLLOWING:**

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2. Pass three rigorous six-hour exams.
3. Commit to abiding by CFA Institute's Code of Ethics and Standards of Professional Conduct.

*For more information on the CFA® designation, please visit.*

[http://cfainstitute.org/ethics/Documents/pw\\_sec.pdf](http://cfainstitute.org/ethics/Documents/pw_sec.pdf)

### **TO USE THE CFP® DESIGNATION, CERTIFICANTS MUST DO THE FOLLOWING:**

4. Pass the comprehensive CFP® Certification Examination
5. Pass CFP Board's Fitness Standards for Candidates and Registrants
6. Agree to abide by CFP Board's Code of Ethics and Professional Responsibility which puts clients' interests first.
7. Comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement.
8. Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct

*For more information on the CFP® designation, please visit.*

<http://www.cfp.net/certificants/ADVexplanation.asp>

### **TO USE THE CAIA® DESIGNATION, CERTIFICANTS MUST DO THE FOLLOWING:**

1. Pass a self-directed, comprehensive course of study on risk-return attributes of institutional quality alternative assets and
2. Complete both the Level I and Level II CAIA® examinations.
3. Meet the prerequisites of at least one year of professional experience and a U.S. bachelor's degree or its equivalent, or four years of professional experience. Professional experience includes full-time employment in a professional capacity within the regulatory, banking, financial, or related fields.

*For more information on the CAIA® designation, please visit.*

<http://caia.org/media-center/news/caia-designation-secform-adv-brochure-supplement>

## **Item 3 – Disciplinary Information**

No information is applicable to this Item.

## **Item 4 – Other Business Activities**

No information is applicable to this Item.

## **Item 5 – Additional Compensation**

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## **Item 6 – Supervision**

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**Michael J. Murray, CFA, CFP®, CAIA®**  
**MANAGING DIRECTOR**  
312-429-3007 [mmurray@altairadvisers.com](mailto:mmurray@altairadvisers.com)

Michael J. Murray helps clients achieve their long-term financial goals through investment advice that is integrated with all other aspects of their financial planning. He works in close collaboration with his clients' broader team of professional advisers to create customized investment strategies that maximize wealth preservation while also taking advantage of wealth creation opportunities.

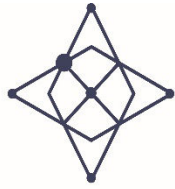
Mike enjoys finding creative solutions to complex financial situations. With more than 25 years of client portfolio experience, he is particularly skilled at helping clients navigate and make decisions during transitional life events such as the sale of a business, the distribution of a trust, retirement, or divorce.

While he works with a broad array of clients, Mike's personal experience as a business owner and firm leader gives him a unique ability to relate to the needs of entrepreneurs and c-suite executives. Prior to becoming a founding partner of Altair Advisers in 2002, he was a senior consultant in the Private Client Services practice at Arthur Andersen's Chicago office. In his tenure there, Mike was assigned to Arthur Andersen's London office to help lead the launch of the firm's investment consulting practice for the United Kingdom.

Mike was elected to serve on Altair's Board of Managers where he provides operational leadership for the firm.

Mike holds a BBA in accounting and finance from the University of Wisconsin – Madison in addition to multiple professional designations. He is a member of the CFA Society of Chicago and formerly served on the University of Wisconsin School of Business Dean's Advisory Board. He is an active board member on Noble School's Summer of a Lifetime program which creates awareness, provides funding, and supports over 1,000 high achieving, low-income students to participate in summer academic enrichment programs at colleges and universities nationwide.

<b>YEAR OF BIRTH</b>	<b>EDUCATION</b>	<b>BUSINESS BACKGROUND</b>	<b>PROFESSIONAL DESIGNATIONS</b>
10/31/1974	BBA, University of Wisconsin, Madison, WI	2002 to date, Altair Advisers LLC 1998 - 2002, Arthur Andersen LLP	2009 – Chartered Alternative Investment Analyst® 2005 – CERTIFIED FINANCIAL PLANNER™ 2004 – Chartered Financial Analyst® 2000 – NASD Series 65



# ALTAIR

## Brochure Supplement Part 2B of Form ADV

**Donald J. Sorota**

**Altair Advisers LLC**

225 W. Washington Street, Suite 2400

Chicago, Illinois 60606

312.429.3000

[www.altairadvisers.com](http://www.altairadvisers.com)

## 12/31/2025

This brochure supplement provides information about Donald J. Sorota that supplements the Altair Advisers LLC brochure. You should have received a copy of that brochure. Please contact [info@altairadvisers.com](mailto:info@altairadvisers.com) or (312) 429-3000 if you did not receive Altair Advisers LLC brochure or if you have any questions about the contents of this supplement.

## **Item 2 - Educational Background and Business Experience**

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3. Agree to abide by CFP Board's Code of Ethics and Professional Responsibility which puts clients' interests first.
4. Comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement.
5. Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct

For more information on the CFP® designation, please visit.

<http://www.cfp.net/certificants/ADVexplanation.asp>

### **TO USE THE CPA DESIGNATION IN ILLINOIS, PROFESSIONALS MUST DO THE FOLLOWING:**

6. Hold an Illinois CPA certificate issues by the Illinois Board of Examiners which requires undergraduate hours of accounting as well as completion of a rigorous exam.
7. At least one year of relevant experience
8. Those not currently practicing must hold a registration license issued by Illinois Department of Financial and Professional Regulation which must be renewed every three years. Registration is renewable every three years.

For more information on the CPA designation, please visit.

<http://www.aicpa.org/InterestAreas/PersonalFinancialPlanning/Membership/DownloadableDocument>

## **Item 3 – Disciplinary Information**

No information is applicable to this Item.

## **Item 4 – Other Business Activities**

No information is applicable to this Item.

## **Item 5 – Additional Compensation**

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## **Item 6 – Supervision**

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**Donald J. Sorota, CFP®, CPA**  
**MANAGING DIRECTOR**  
312-429-3040 [dsorota@altairadvisers.com](mailto:dsorota@altairadvisers.com)

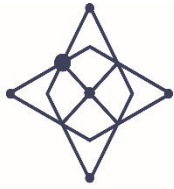
Donald J. Sorota has extensive experience in a broad range of wealth management areas. Since 1996, Don has been providing investment counsel to high-net-worth individuals, corporate executives, and family business owners. In consulting clients on their investment portfolios, Don takes into consideration their retirement, tax, and estate planning goals. Don is exceptionally skilled at helping clients with transitional life events such as the sale of a business, retirement, divorce, or the distribution of trust.

As a Founding Partner of Altair Advisers, Don serves as the lead consultant on client engagements. Don had the additional responsibility of serving as Altair's Finance Director for our first three years due to his tax expertise as a CPA and outstanding analytical skills. He is also a member of Altair's Investment Committee, the central decision-making body which sets investment direction, approves recommended managers, and determines tactical allocation changes.

Prior to forming Altair, Don was a manager in Arthur Andersen's Private Client Services practice, serving as an investment counselor and financial planner.

Don graduated with honors in Accounting from DePaul University and is a member of DePaul University's Ledger & Quill Board.

<b>YEAR OF BIRTH</b>	<b>EDUCATION</b>	<b>BUSINESS BACKGROUND</b>	<b>PROFESSIONAL DESIGNATIONS</b>
08/02/1974	BA, DePaul University, Chicago, IL	2002 to date, Altair Advisers LLC 1996 -2002, Arthur Andersen LLP	2003 – CERTIFIED FINANCIAL PLANNER™ 1998 – NASD Series 65 Certified Public Accountant



# ALTAIR

## Brochure Supplement Part 2B of Form ADV

**Timothy G. French**

**Altair Advisers LLC**

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Chicago, Illinois 60606

312.429.3000

[www.altairadvisers.com](http://www.altairadvisers.com)

## 12/31/2025

This brochure supplement provides information about Timothy G. French that supplements the Altair Advisers LLC brochure. You should have received a copy of that brochure. Please contact [info@altairadvisers.com](mailto:info@altairadvisers.com) or (312) 429-3000 if you did not receive Altair Advisers LLC brochure or if you have any questions about the contents of this supplement.

## **Item 2 - Educational Background and Business Experience**

In general, investment advice will only be provided by principals and senior employees of Altair who have a minimum of a college education combined with either an advanced degree and/or financial designation (i.e., Chartered Financial Analyst (CFA), Certified Financial Planner™ (CFP®), Chartered Alternative Investment Analyst, (CAIA), Certified Public Accountant (CPA)), as well as meet certain ongoing requirements, including participation in continuing education programs and experience in providing personal financial planning and investment advisory services.

### **TO USE THE CFP® DESIGNATION, CERTIFICANTS MUST DO THE FOLLOWING:**

1. Pass the comprehensive CFP® Certification Examination
2. Pass CFP Board's Fitness Standards for Candidates and Registrants
3. Agree to abide by CFP Board's Code of Ethics and Professional Responsibility which puts clients' interests first.
4. Comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement.
5. Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct

*For more information on the CFP® designation, please visit*

<http://www.cfp.net/certificants/ADVexplanation.asp>

### **TO USE THE CPA DESIGNATION IN ILLINOIS, PROFESSIONALS MUST DO THE FOLLOWING:**

1. Hold an Illinois CPA certificate issues by the Illinois Board of Examiners which requires undergraduate hours of accounting as well as completion of a rigorous exam.
2. At least one year of relevant experience
3. Those not currently practicing must hold a registration license issued by Illinois Department of Financial and Professional Regulation which must be renewed every three years. Registration is renewable every three years.

*For more information on the CPA designation, please visit.*

<http://www.aicpa.org/InterestAreas/PersonalFinancialPlanning/Membership/DownloadableDocuments/ADV%20Part%202B%20Brochure%20Supplement.docx>

## **Item 3 – Disciplinary Information**

No information is applicable to this Item.

## **Item 4 – Other Business Activities**

No information is applicable to this Item.

## **Item 5 – Additional Compensation**

The supervised person listed in this supplement participates in a bonus plan where they are compensated based on the amount of additional assets and revenue that their efforts generate for Altair.

## **Item 6 – Supervision**

The supervised person listed in this supplement delivers advice to clients under the supervision of our Chief Investment Officer Jason Laurie (312) 429-3030 and our Chief Executive Officer, Rebekah Kohmescher (312) 429-3035.

**Timothy G. French, CFP®, CPA**  
**MANAGING DIRECTOR & CHIEF CLIENT OFFICER**  
312-429-3018 [tfrench@altairadvisers.com](mailto:tfrench@altairadvisers.com)

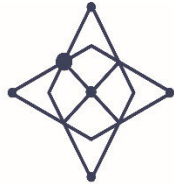
Timothy G. French provides investment advice to wealthy individuals, families, and foundations. In addition to his client-facing responsibilities, Tim serves as Altair's Chief Client Officer. In this role, Tim supervises Altair's Client Service professionals, and he works with the firm's Chief Executive Officer and Chief Investment Officer to ensure decisions made across the firm are in clients' best interests.

Tim has extensive experience in the areas of investment advisory, personal financial planning, individual, trust, estate and gift taxation, and estate planning. Prior to joining Altair, Tim was a manager in the Personal Financial Services group of PwC.

Tim is a Certified Public Accountant with a Personal Financial Specialist (PFS™) designation and a CERTIFIED FINANCIAL PLANNER™ certificiant. Tim received his bachelor's degree in accountancy and master's degree in accountancy (taxation) from the University of Illinois, where he graduated with highest honors.

Outside of Altair, Tim serves on the finance committee at his church and his children's school and on the development committee at a full-scholarship elementary school in Chicago's Austin neighborhood.

<b>YEAR OF BIRTH</b>	<b>EDUCATION</b>	<b>BUSINESS BACKGROUND</b>	<b>PROFESSIONAL DESIGNATIONS</b>
03/03/1983	BS, MS, Accountancy, University of Illinois	2013 to date, Altair Advisers LLC 2006-2013, PricewaterhouseCoopers	2009 – CERTIFIED FINANCIAL PLANNER™ 2006 – Certified Public Accountant



# ALTAIR

## Brochure Supplement Part 2B of Form ADV

**Rachael Halstuk Mangoubi**

**Altair Advisers LLC**

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## 12/31/2025

This brochure supplement provides information about Rachael Halstuk Mangoubi that supplements the Altair Advisers LLC brochure. You should have received a copy of that brochure. Please contact [info@altairadvisers.com](mailto:info@altairadvisers.com) or (312) 429-3000 if you did not receive Altair Advisers LLC brochure or if you have any questions about the contents of this supplement.

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### **TO USE THE CFP® DESIGNATION, CERTIFICANTS MUST DO THE FOLLOWING:**

1. Pass the comprehensive CFP® Certification Examination
2. Pass CFP Board's Fitness Standards for Candidates and Registrants
3. Agree to abide by CFP Board's Code of Ethics and Professional Responsibility which puts clients' interests first.
4. Comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement.
5. Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct

*For more information on the CFP® designation, please visit <http://www.cfp.net/certificants/ADVexplanation.asp>*

### **TO USE THE CPWA® DESIGNATION, CERTIFICANTS MUST DO THE FOLLOWING:**

1. Meet initial and on-going experience, ethical, education, and examination requirements for the professional designation, which is centered on private wealth management topics and strategies for high-net-worth clients.
2. Bachelor's degree from an accredited college or university or one of the following designations or licenses: CIMA®, CIMC®, CFA®, CFP®, ChFC®, or CPA license; have an acceptable regulatory history and five years of experience in financial services or delivering services to high-net-worth clients.
3. Report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through the Investments & Wealth Institute.

*For more information on the CPWA® designation, please visit <https://investmentsandwealth.org/certifications/>*

## **Item 3 – Disciplinary Information**

No information is applicable to this Item.

## **Item 4 – Other Business Activities**

No information is applicable to this Item.

## **Item 5 – Additional Compensation**

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## **Item 6 – Supervision**

The supervised person listed in this supplement delivers advice to clients under the supervision of our Chief Investment Officer Jason Laurie (312) 429-3030 and our Chief Executive Officer, Rebekah Kohmescher (312) 429-3035.

**Rachael Halstuk Mangoubi, CFP®, CPWA®**  
**MANAGING DIRECTOR**

312-429-3022 [rmangoubi@altairadvisers.com](mailto:rmangoubi@altairadvisers.com)

Rachael Halstuk Mangoubi works closely with her clients to identify their wealth goals and develop customized plans for meeting their long-term objectives as well as current lifestyle needs. Her ongoing monitoring and guidance enable clients to effectively evaluate their full financial picture and make more confident wealth decisions.

Rachael has been in the advisory industry since 2003. Prior to joining Altair, she provided wealth planning services to families and individuals at Mesirow Financial. She began her career in the investment banking field, providing mergers and acquisitions advice to family-owned, private-equity owned and public companies at Mesirow Financial and Raymond James. Rachael's experience working with executives of public and private companies in both mergers and acquisitions and wealth management gives her a deep knowledge of the complexities that her clients face. Rachael's colleagues elected her to serve on Altair's Board of Managers, allowing her to serve in a strategic leadership role at the firm.

Rachael is on the Board of Directors of The Alliance Française de Chicago and the Finance Committee of the Lycée Français de Chicago. She is also the 2026 Vice Chair of the JUF's Professional Women's Mentorship Program. She is a former member of the Duke Alumni Association Board of Directors, the former chair of the Duke Club of Chicago, and the co-founder of the Duke Women's Forum of Chicago. She holds a bachelor's degree in mathematics and Spanish from Duke. Rachael is a CERTIFIED FINANCIAL PLANNER™ professional as well as a Certified Private Wealth Advisor<sup>SM</sup> professional.

<b>YEAR OF BIRTH</b>	<b>EDUCATION</b>	<b>BUSINESS BACKGROUND</b>	<b>PROFESSIONAL DESIGNATIONS</b>
08/07/1981	BA, Mathematics and Spanish, Duke University	2016 to date, Altair Advisers LLC 2004-2016 Mesirow Financial 2003-2004 Raymond James	2017 – CERTIFIED PRIVATE WEALTH ADVISOR® 2014 – CERTIFIED FINANCIAL PLANNER™