

Client Relationship Summary

Threesixty Elements S.A. dba Raison Asset Management (“Raison AM”) is registered with the Securities and Exchange Commission as an investment adviser. Investment advisory services and fees differ from those of a broker-dealer, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about the differences between investment advisers and broker-dealers, as well as basic tutorials on investing.

What investment services and advice can you provide me?

- Raison AM is a fiduciary and offers investment advisory. We specialize in managing funds and segregated portfolios for private clients, corporations and trusts. Our investment objective is to generate long-term capital growth with absolute returns in all market environments.
- As part of our standard account management services, we will discuss your goals with you and help choose a strategy to achieve them. We regularly monitor your portfolio and meet with you at least annually to address any changes in your financial situation and review recommended changes to your portfolio.
- You may allow us to buy and sell investments in your account(s) without asking you in advance (a “discretionary relationship”), or we may give you advice and you make the ultimate decision regarding what investments to purchase or sell (a “non-discretionary relationship”). If we have a discretionary relationship with you, we will seek your consent prior to substantially changing the agreed upon investment strategy or asset allocation for your account. You may also contact us to impose reasonable restrictions on the management of your account.
- In general, we require a minimum of \$25,000 to \$100,000 depending on a product to open and maintain an investment portfolio.

For additional information, please see Items 4 and 7 of our Form ADV, Part 2A Brochure

<i>Conversation Starter:</i>	<ul style="list-style-type: none"> • Given my financial situation, should I choose an investment advisory service? Why or why not? • How will you choose investments to recommend to me? • What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?
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What fees will I pay?

- We generally charge an asset-based fee (a percentage of the assets in your accounts) and typically bill on a quarterly basis, subject to negotiation.
- The more assets you have under our management, the more you will pay in fees, so we may have an incentive to encourage you to increase your assets under our management. This presents a potential conflict of interest because it may increase the amount of assets under our management and subject to our billing.
- We may charge by additional agreement hourly fees as additional payments which are typically range from \$200 - \$800 per hour.
- We also charge performance-based fees which are based on a share of capital gains (growth of capital).
- Clients may also expect to pay the following fees to third parties (not Raison AM): a) brokerage fees for securities transactions; b) fees charged by ETFs, mutual funds, and any other investment companies in which they invest; and c) fees to third-party advisers if they engage one.
- You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For additional information, please see Item 5 of our Form ADV, Part 2A Brochure.

<i>Conversation Starter:</i>	<ul style="list-style-type: none"> • Help me understand how these fees and costs might affect my investments. If I give you \$50,000 to invest, how much will go to fees and costs, and how much will be invested for me?
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What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

- Certain custodians and brokers pays us referral fees and provide free services available to us, including consulting, access to research etc. These may give Raison AM an incentive to recommend that clients open or maintain accounts with these institutions.

For additional information, please see Items 10, 11, and 12 of our Form ADV, Part 2A Brochure

<i>Conversation Starter:</i>	<ul style="list-style-type: none"> • How might your conflicts of interest affect me, and how will you address them?
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How do your financial professionals make money?

Our advisors are either Partners or employees of Raison AM. Employees are paid a cash salary and may receive additional compensation based on a variety of factors, including business development. Partners are paid from firm profits (derived from advisory fees less expenses). Generally, compensation is related to the amount of client assets serviced by our professionals. This presents a potential conflict of interest in that our professionals are incentivized to encourage you to increase the amount of assets in your account(s) managed by us or to otherwise transition accounts/assets to our management. Certain of our employees also receive commissions for selling Raison AM products, and thus have an incentive to recommend the sale of these insurance products versus other investments that do not pay commissions.

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

No. None of our professionals have legal and disciplinary history. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals. Please be aware that Raison AM is regulated by the U.S. SEC plus foreign regulator – BVI Financial Services Commission, also we are applying for Russian Central Bank Investment adviser license. Given the scope and breadth of our activities and the number of regulators with jurisdiction over us, we believe our regulatory record are excellent.

<i>Conversation Starter:</i>	<ul style="list-style-type: none"> • As a financial professional do you have any disciplinary history? For what type of conduct?
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Additional information

For additional information about our investment advisory services or to request a copy of our latest Client Relationship Summary, please visit our website at raison.am or call us at +372 602 6855 (Tallinn), +7 495 109 0055 (Moscow) or email to front@raison.am.

Our representatives are employed by Raison AM, which is an investment advisor, not a broker-dealer and not. If you have any concerns regarding the service that you receive, you can contact us by phone or email as provided above.

<i>Conversation Starter:</i>	<ul style="list-style-type: none"> • Who is my primary contact person? • Is he or she a representative of an investment adviser or a broker-dealer? • Who can I talk to if I have concerns about how this person is treating me?
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