# Oak Ridge Investments, LLC Form CRS Customer Relationship Summary March 31, 2023

#### Introduction

Oak Ridge Investments, LLC ("ORI") is registered with the Securities and Exchange Commission ("SEC") as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at <a href="https://www.lnvestor.gov/CRS">www.lnvestor.gov/CRS</a>, which also provides educational materials about broker-dealers, investment advisers, and investing.

## What investment services and advice can you provide me?

We offer investment advisory services, through separately managed accounts, to retail clients directly and through managed account programs ("programs") (wrap fee and dual contract) sponsored by brokerdealers and other financial intermediaries ("program sponsors"). Our investment advisory services are based on which of our particular investment strategies you select and can be subject to account restrictions and guidelines you would like to apply, provided we agree. A program sponsor's program usually limits our menu of investment strategies available in their program. You and/or your program sponsor are responsible for determining if the strategy, services and program you select are appropriate given your overall financial situation and investment objectives, and for providing us with any relevant account information and/or investment restrictions. When we manage an account on a discretionary basis, we decide which securities to buy and sell for the strategy (subject to any restrictions and guidelines from you or your program sponsor we agreed to follow) and we direct trading for your account. Although we provide most advisory services on a discretionary basis, we also provide advice on a nondiscretionary basis, where we provide (typically model-based, through unified managed accounts) advice to a program sponsor but the program sponsor makes the ultimate decision to buy or sell investments and directs the trading for your account. As part of our standard services, we continuously monitor the discretionary accounts we manage for compliance with the stated investment strategy guidelines, and we generally review deviations on an exception basis. Our account minimums and other requirements vary depending on the strategy and the particular program and generally have some flexibility and are described further in ORI's Form ADV Part 2A.

**For additional information,** please see Items 4, 7 and 13 of <u>ORI's Form ADV Part 2A brochure</u> accompanying this Form or (available at <a href="https://adviserinfo.sec.gov/firm/brochure/107066">https://adviserinfo.sec.gov/firm/brochure/107066</a>).

## Conversation Starters. Ask your financial professional -

- "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?"

# What fees will I pay?

Our standard advisory fees are based on a percentage of assets under our management (asset-based fees) and are generally payable quarterly. The more assets there are in your account, the more you will pay in fees, so we therefore have an incentive to encourage you to increase the assets in your account. ORI does not sponsor any wrap fee programs. Clients may pay other expenses in addition to the fees paid to us. For example, clients may pay costs such as brokerage commissions, transaction fees, custodial fees, transfer taxes, wire transfer fees, and other fees and taxes charged to accounts and securities transactions, which are unrelated to the fees collected by us. ORI participates as a portfolio manager in wrap fee programs, and we receive a portion of the wrap fee for our services. Asset-based fees associated with the wrap fee program will include most transaction costs and fees to a brokerdealer or bank that has custody of these assets, and therefore are higher than a typical asset-based advisory fee. If you are in a wrap fee program, you pay a bundled fee for services the program sponsor provides, including custody, advisory and certain equity trading, and ORI's investment advisory services are included and usually paid to us by the program sponsor. If you are in a dual contract program where you sign separate agreements with a program sponsor and ORI, you typically pay separate fees to ORI, the program sponsor and your custodian. Clients generally bear trading costs and fees (payable to broker-dealers) except when trading equities with a program sponsor in a wrap fee program. For example, many clients in ORI equity strategies in wrap fee programs will typically continue to incur some transaction fees, generally in the form of mark-ups, mark-downs and spreads, earned by the relevant third-party securities broker-dealer (not ORI or an ORI affiliate) in addition to the wrap fee payable to the program sponsor if trades occur away from the program sponsor. These fees are typically built into the price of the securities and generally are not shown separately in a trade confirmation or account statement. For dual contract accounts, clients will generally incur trading costs and fees directly.

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 ORI's Form ADV Part 2A brochure accompanying this Form (or available at https://adviserinfo.sec.gov/firm/brochure/107066). Conversation Starter. Ask your financial professional -"Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?" When we act as your investment adviser, we have to act in your best interest and not put our What are your interest ahead of yours. At the same time, the way we make money creates some conflicts with your legal interests. You should understand and ask us about these conflicts because they potentially can obligations to affect the investment advice we provide you. Here examples to help you understand what this me when means. acting as my investment We may have affiliated individuals with managed accounts. We treat their accounts from an adviser? How investment priority and trading priority identical to your account, although there could be an else does your incentive to prioritize those accounts. Since we are paid based on assets under management there firm make could be an incentive to deviate from our investment style to attempt to achieve higher money and performance. We use an investment team approach and other means to monitor adherence to our what conflicts investment style. Security recommendations or trades for our client accounts creates potential of interest do conflicts as employees may invest in securities owned by clients. As such, our employees may you have? have an incentive to give themselves priority when trading. For additional information, please see our Part 2 brochure accompanying this Form (or available at https://adviserinfo.sec.gov/firm/brochure/107066). Conversation Starter. Ask your financial professional -"How might your conflicts of interest affect me, and how will you address them?" Please consult your program sponsor or its representatives to find out how the financial How do your professionals who advise you about our products and services make money. financial professionals Our financial professionals who manage your account are paid a base salary and benefits and make money? annual bonus. In addition, financial professionals typically participate in profits/ownership interests and other incentive plans that seek to align the interests of our investment team members with the success of both our clients and the firm. No. Visit www.Investor.gov/CRS for a free and simple search tool to research us and our financial Do you or your professionals. financial professionals have legal or Conversation Starter. Ask your financial professional – disciplinary history? "As a financial professional, do you have any disciplinary history? For what type of conduct?" For additional information about our investment advisory services, please visit our website Additional at www.oakridgeinvest.com or the SEC's website at www.adviserinfo.sec.gov. If you would like Information additional, up-to-date information or a copy of this disclosure, please contact us at (312) 857-1040 or (800) 825-6226. Conversation Starter. Ask your financial professional –

person is treating me?"

"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

## Oak Ridge Investments, LLC APPENDIX A

## Summary of material changes to Form CRS as of March 31, 2023

This Customer Relationship Summary (Form CRS) was updated on March 31, 2023. The material changes to this

Form CRS from its prior version dated March 31. 2022, include an update to the following sections:

### What fees will I pay?

We updated disclosure to state:

Clients may pay other expenses in addition to the fees paid to us. For example, clients may pay costs such as brokerage commissions, transaction fees, custodial fees, transfer taxes, wire transfer fees, and other fees and taxes charged to accounts and securities transactions, which are unrelated to the fees collected by us. ORI participates as a portfolio manager in wrap fee programs, and we receive a portion of the wrap fee for our services. Asset-based fees associated with the wrap fee program will include most transaction costs and fees to a broker-dealer or bank that has custody of these assets, and therefore are higher than a typical asset-based.

### How else does your firm make money and what conflicts of interest do you have?

We updated disclosure to clarify that our employees may invest in securities owned by clients. As such, our employees may have an incentive to give themselves priority when trading.

## How do your financial professionals make money?

We do not pay an incentive payment to third party wholesaling teams who sell our services to program sponsors and advisors. We removed any reference to such payments from this section.