

EQUITY INVESTMENT CORPORATION

ADV PART 3: Form CRS

June 2020

INTRODUCTION (ITEM 1)

Equity Investment Corporation (“EIC,” the “Firm,” “we,” “us,” or “our”) is an SEC registered independent investment advisor incorporated in the State of Georgia. Investment advisory fees and brokerage services fees differ, 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 investment advisers, broker-dealers, and investing.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME? (ITEM 2.B)

EIC offers retail investors All-Cap Value, Large-Cap Value, and Mid-Cap Value equity strategies on a discretionary basis through Separate Accounts with a minimum investment of \$250,000. In addition, we offer portfolios that combine our equity strategies with fixed income and other diversifying securities. EIC also serves as a sub-advisor to numerous other registered investment advisory organizations and non-affiliated broker-dealers who sponsor wrap account/SMA programs (“Wrap Programs”). Wrap Program sponsors determine the required minimum investment. Additionally, EIC provides non-discretionary recommendations via an investment model to assist Unified Managed Account Program (“UMA Program”) sponsors in determining a portfolio suitable for their UMA Program accounts. UMA Program sponsors determine the required minimum investment. Accounts over which EIC exercises investment discretion are reviewed on an on-going basis and are monitored for consistency across all accounts.

FOR ADDITIONAL INFORMATION, please see [EIC’s ADV Part 2A \(https://adviserinfo.sec.gov/firm/summary/283930\)](https://adviserinfo.sec.gov/firm/summary/283930), Item 4 concerning the advisory services we offer and Item 7 for the types of clients we serve.

Conversation Starters

- ▶ *Given my financial situation, should I choose an investment advisory service?*
- ▶ *How will you choose the 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? (ITEM 3.A)

Your Separate Account managed by EIC is charged a fixed percentage of your portfolio assets according to the size of the account, account servicing needs, administrative requirements, and overall relationship size. Management fees on Separate Accounts range from .30% to 1% per annum of assets managed and are subject to negotiation. Your written investment advisory agreement with us establishes the manner in which management fees are charged. Generally, you are billed quarterly for fees payable in advance. You may elect to be billed directly or you may authorize us to invoice the custodian for payment direct from your account. EIC’s management fees for Separate Accounts are exclusive of brokerage commissions, transaction fees, and other related costs and expenses. However, you may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, and other fees and taxes on brokerage accounts and securities transactions. Where we serve as sub-advisor to a Wrap Program, we receive a portion of the bundled wrap fees that you pay to the sponsoring firm as a fee for our advisory services to your account. We negotiated our fee with the sponsor rather than with you, and it can vary from sponsor to sponsor. Similarly, where we provide a model portfolio to a UMA Program sponsor, the management fee we receive from your account is negotiated by us with the sponsor rather than with you, and it can vary. Generally, because our fees will increase as the value of the assets in your account increases, we have an incentive to encourage you to increase the assets in your account.

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 ABOUT OUR FEES, please see [EIC's ADV Part 2A](#) (see Internet address above), Item 5.

Conversation Starters

- ▶ *Help me understand how these fees and costs might affect my investments.*
- ▶ *If I give you \$250,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISER? HOW ELSE DOES YOUR FIRM MAKE MONEY, AND WHAT CONFLICTS OF INTEREST DO YOU HAVE? (ITEM 3.B)

When we act as your investment adviser, we have to 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 examples to help you understand what this means:

- The more assets in your advisory account, the more you will pay in fees, which can be an incentive to encourage you to increase the assets in your account. ■ Conflicts can also arise from personal trading by EIC officers, directors and employees of securities that are recommended to and/or purchased for our clients.

As an investment adviser, our fiduciary duty to clients is comprised of a duty of care and a duty of loyalty, which means that we must act in your best interest at all times during the course of the relationship and we may not subordinate your interests to those of our own. EIC's Code of Ethics ("Code") describes our high standards of conduct for meeting our fiduciary duty to you and alleviating conflicts of interest.

FOR ADDITIONAL DETAILS WITH RESPECT TO EIC'S CONFLICTS OF INTEREST WITH RETAIL CLIENTS AND OUR ADOPTION OF A CODE IN MEETING OUR FIDUCIARY DUTY TO OUR CLIENTS, please see [EIC's ADV Part 2A](#) (see Internet address above), Item 10 and Item 11, respectively.

Conversation Starter

- ▶ *How might your conflicts of interest affect me, and how will you address them?*

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY? (ITEM 3.C)

EIC's financial professionals are compensated with salary and discretionary bonuses.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY? (ITEM 4)

No. Please go to investor.gov/CRS for a free and simple search tool to research our financial professionals.

Conversation Starters

- ▶ *As a financial professional, do you have any disciplinary history?*
- ▶ *If so, for what type of conduct?*

WHERE CAN I GET ADDITIONAL INFORMATION? (ITEM 5)

You can find additional information about EIC and the services we offer on the SEC's website at www.adviserinfo.sec.gov by clicking on the FIRM tab and then searching CRD #283930. Also, you may visit our website at www.eicatlantna.com. To request a copy of our ADV Part 2A, Form CRS, and Privacy Notice, you may call 404-239-0111 / 877-342-0111 or email us at info@eicatlantna.com.

Conversation Starters

- ▶ *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?*