

Client Relationship Summary (CRS)

Item 1: Introduction

Reaves Asset Management (“Reaves” or the “Firm”) is an investment adviser registered with the U.S. Securities Exchange Commission (the “SEC”). Registration, however, does not imply any special skill or training.

Brokerage and investment advisory services and fees may differ, and it is important for the retail investor 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 broker-dealers, investment advisers, and investing.

Item 2: What investment services and advice can you provide me?

Reaves provides its investment advisory clients with portfolio management services. Investment advisory client portfolios are invested primarily in listed companies which provide essential services and generally operate in infrastructure-related sectors such as utilities, communications, transportation, energy, and related [associated or supporting] sectors. Most of the companies selected for our managed portfolios have historical track records of consistently paying dividends and, in many cases, increasing these dividends. For more information about the types of securities in which we invest, please see Item 4 in our Form ADV Part 2A.

Reaves accepts written investment discretionary authority and responsibility to formulate investment strategy on behalf of clients, including deciding which securities to buy and sell, what amounts and when, in accordance with agreed upon client objectives and the client’s chosen investment strategy. Clients may impose restrictions on Reaves’ discretionary authority. Reaves account-opening minimum for individuals is \$1,000,000 and is negotiable.

Factors that may influence Reaves’ investment decisions could include, but are not limited to, specific client trade requests (i.e. tax harvesting), client restrictions, and capital gain or loss considerations of a particular holding. From time to time, retail clients may initiate trades or maintain security positions in their accounts that are not chosen by our Firm (“non-discretionary” transactions).

For additional information, please visit the SEC’s Investment Adviser Public Disclosure website: <https://adviserinfo.sec.gov/firm/summary/3140>.

Start a Conversation with Reaves using these questions:

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose an investment to recommend to me?*
- *What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?*

Item 3: What fees will I pay?

Compensation arrangements with Reaves can vary depending upon the nature of the client and the investment strategy selected. Reaves charges asset-based fees, meaning the more assets there are in a client’s advisory account, the more an investor will pay in fees. Conversely, the less assets there are in a client’s advisory account, the less an investor will pay in fees.

In general, advisory fees are charged quarterly, in arrears, and at the end of each calendar quarter, unless otherwise specified in the client's advisory contract. Fees are normally based on the total market value of the account, including accrued income, as of the close of business on the last business day of each calendar quarter. Additionally, fees are payable upon receipt of an invoice, which is usually mailed to clients within three weeks following the quarter end. Clients may elect to be billed directly for fees or, in some cases, authorize Reaves to arrange for a direct debit of fees from their accounts. The billing method may depend on the policies of the clients’ custodian. Reaves’ advisory fees are negotiable.

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. Please see Item 5 in our Form ADV Part 2A for more information about the Firm's fees and any conflicts arising out such fees.

Start a Conversation with Reaves using these questions:

- *Help me understand how these fees and costs might affect my investment. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? *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 some examples to help you understand what this means.*

Reaves is an investment manager to the Reaves Utilities Income Fund (symbol: UTG), a closed-end investment management company registered under the Investment Company Act of 1940; the Reaves Utilities and Energy Infrastructure Fund (symbol: RSRFX), an open-end mutual fund; the Reaves Utility Income UCITS Fund, a fund governed by the Central Bank of Ireland; and Virtus Reaves Utilities ETF (symbol: UTES), an exchange-traded fund that is distributed by ETF Distributors LLC, an affiliate of Virtus ETF Advisers LLC. For more information about these relationships, please see Item 7 of in our Form ADV Part 2A.

Reaves has clients with Wrap or Bundled Fee Sponsors. These sponsors collect fees that may include any combination of management, trading, custody, and other administrative fees. Reaves advisory fee is based on a fixed percentage of the client's managed assets.

The Firm also provides models in sub-advisory relationships (Unified Managed Accounts) where Reaves is the sub-adviser. In these cases, it is the Managing Adviser, and not Reaves, who has full discretion on the account.

Reaves manages its own Profit Sharing Trust, in which most employees and some former employees participate. It may invest in some of the same securities as those held in our clients' portfolios. Subject to Reaves' policies and procedures, Reaves employees may trade in the same securities as those held in our client's portfolios.

How do your financial professionals make money? Compensation paid to Reaves' financial professionals is designed to be competitive and attractive; it consists of a base salary plus a bonus. Individual compensation is designed to reward the overall contribution of portfolio managers and analysts to the performance of the Firm.

Start a Conversation with Reaves using these questions:

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

Item 4: Do you or your financial professionals have legal or disciplinary history?

Reaves and its financial professionals do not have any disciplinary history. Learn more at <https://www.investor.gov/CRS>, a free and simple search tool for investors.

Start a Conversation with Reaves using these questions:

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Item 5: Additional Information

For more information, please visit www.reavesam.com. Investors may also contact Reaves' marketing team at marketing@reavesam.com about our investment advisory services or Reaves' compliance team at compliance@reavesam.com for a copy of this client relationship summary.

Start a Conversation with Reaves using these questions:

- *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 a concern about how this person is treating me?*