

Uniform Application for Investment Adviser Registration

OMB APPROVAL	
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Name of Investment Adviser: Harrington Investments Incorporated					
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code	Telephone Number
1001 Second Street, Suite 325	Napa	CA	94559	(707)	252-6166

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any governmental authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

1. A. Advisory Services and Fees. (check the applicable boxes)For each type of service provided, state the approximate
% of total advisory billings from that service.

(See instruction below.)

Applicant:

- | | | | | |
|-------------------------------------|-----|---|-----------|---|
| <input checked="" type="checkbox"/> | (1) | Provides investment supervisory services | <u>95</u> | % |
| <input checked="" type="checkbox"/> | (2) | Manages investment advisory accounts not involving investment supervisory services | <u>4</u> | % |
| <input checked="" type="checkbox"/> | (3) | Furnishes investment advice through consultations not included in either service described above | <u>1</u> | % |
| <input type="checkbox"/> | (4) | Issues periodicals about securities by subscription | _____ | % |
| <input type="checkbox"/> | (5) | Issues special reports about securities not included in any service described above | _____ | % |
| <input type="checkbox"/> | (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities | _____ | % |
| <input type="checkbox"/> | (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities | _____ | % |
| <input type="checkbox"/> | (8) | Provides a timing service | _____ | % |
| <input type="checkbox"/> | (9) | Furnishes advice about securities in any manner not described above | _____ | % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

- | | | |
|----|---|--|
| B. | Does applicant call any of the services it checked above financial planning or some similar term? | Yes No
<input type="checkbox"/> <input checked="" type="checkbox"/> |
|----|---|--|

C. Applicant offers investment advisory services for: (check all that apply)

- | | | | | | |
|-------------------------------------|-----|--|-------------------------------------|-----|-------------------|
| <input checked="" type="checkbox"/> | (1) | A percentage of assets under management | <input type="checkbox"/> | (4) | Subscription fees |
| <input checked="" type="checkbox"/> | (2) | Hourly charges | <input type="checkbox"/> | (5) | Commissions |
| <input type="checkbox"/> | (3) | Fixed fees (not including subscription fees) | <input checked="" type="checkbox"/> | (6) | Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of Clients — Applicant generally provides investment advice to: (check those that apply)

- | | | | | | |
|-------------------------------------|----|----------------------------------|-------------------------------------|----|---|
| <input checked="" type="checkbox"/> | A. | Individuals | <input checked="" type="checkbox"/> | E. | Trusts, estates, or charitable organizations |
| <input type="checkbox"/> | B. | Banks or thrift institutions | <input checked="" type="checkbox"/> | F. | Corporations or business entities other than those listed above |
| <input type="checkbox"/> | C. | Investment companies | <input checked="" type="checkbox"/> | G. | Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> | D. | Pension and profit sharing plans | | | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

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Applicant:
Harrington Investments Incorporated

SEC File Number:
17932
801-

Date:
09/30/2010

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|---|---|
| <p>A. Equity securities</p> <p><input checked="" type="checkbox"/> (1) exchange-listed securities</p> <p><input checked="" type="checkbox"/> (2) securities traded over-the-counter</p> <p><input checked="" type="checkbox"/> (3) foreign issuers</p> <p><input checked="" type="checkbox"/> B. Warrants</p> <p><input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper)</p> <p><input checked="" type="checkbox"/> D. Commercial paper</p> <p><input checked="" type="checkbox"/> E. Certificates of deposit</p> <p><input checked="" type="checkbox"/> F. Municipal securities</p> <p>G. Investment company securities:</p> <p><input type="checkbox"/> (1) variable life insurance</p> <p><input type="checkbox"/> (2) variable annuities</p> <p><input checked="" type="checkbox"/> (3) mutual fund shares</p> | <p><input checked="" type="checkbox"/> H. United States government securities</p> <p>I. Options contracts on:</p> <p><input checked="" type="checkbox"/> (1) securities</p> <p><input type="checkbox"/> (2) commodities</p> <p>J. Futures contracts on:</p> <p><input type="checkbox"/> (1) tangibles</p> <p><input type="checkbox"/> (2) intangibles</p> <p>K. Interests in partnerships investing in:</p> <p><input checked="" type="checkbox"/> (1) real estate</p> <p><input type="checkbox"/> (2) oil and gas interests</p> <p><input type="checkbox"/> (3) other (explain on Schedule F)</p> <p><input type="checkbox"/> L. Other (explain on Schedule F)</p> |
|---|---|

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|---|
| (1) <input type="checkbox"/> Charting | (4) <input type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (8) <input checked="" type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input checked="" type="checkbox"/> Option writing, including covered options, uncovered options, or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No
☒ ☐

(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- | | |
|-----------------|--|
| ● name | ● formal education after high school |
| ● year of birth | ● business background for the preceding five years |

7. Other Business Activities. (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment adviser | <input type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer |
| <input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? Yes No
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☐ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☐ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes No
☒ ☐

(If yes, describe on Schedule F.)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Each portfolio manager reviews his or her assigned client accounts on a weekly basis or more frequently if prompted by specified price movements, market conditions or other developments. At least one portfolio manager, together with Mr. Harrington, review each client account on a semi-annual basis. Mr Harrington assigns client accounts to portfolio managers based upon a number of factors, including but not limited to seniority, expertise with specific client portfolio objectives, work load and client preferences.

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

The Adviser prepares quarterly written performance reports and annual written portfolio evaluations for each client account. The Adviser is available at least twice each calendar year to review, preferably in person with each client, the client's investment objective and goals. Upon a client's written request, the Adviser will consult with a client's accountants or tax preparers to coordinate these objectives and goals with the client's tax planning.

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Applicant:
Harrington Investments Incorporated

SEC File Number:
801-17932

Date:
09/30/2010

12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- | | Yes | No |
|--|-------------------------------------|--------------------------|
| (1) securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of the securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (4) commission rates paid? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? ☒ Yes ☐ No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | | |
|---|--|--------------------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
 - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? ☐ Yes ☒ No

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Harrington Investments Incorporated		IRS Empl. Ident. No.: 94-3041075
Item of Form (identify)	Answer	
z-Bottom of Form;	<p>Harrington Investments, Inc. (the "Adviser") provides investment supervisory services and investment advice consulting services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.</p> <p>The Adviser acts as a Sub-Adviser for Everest Asset Management, AG. (EAM), a United States/Swiss-based Registered Investment Advisory firm offering investment products to clients of the Adviser. Sub-advisory services provided by the Adviser include client asset allocation parameters, currency denomination choices, and approval of EAM securities based on social and environmental criteria.</p> <p>The Adviser acts as a Sub-Adviser for JML Portfolio Management, Ltd., a Swiss-based Registered Investment Advisory firm offering investment products to clients of the Adviser. Sub-advisory services provided by the Adviser include client asset allocation parameters, currency denomination choices, and approval of JML securities based on social and environmental criteria.</p> <p>The Adviser is a principal owner of HLM, LLC, a California based Limited Liability Company. HLM, LLC is the manager of Community Commercial Ventures, LLC (CCV, LLC), a Limited Liability Company formed to purchase, develop, operate, and sell commercial real estate in San Francisco and Oakland. The Adviser markets investment opportunities in CCV, LLC to qualified individuals and receives a management fee from investors. The fee structure and investment requirements for CCV, LLC are described in the Private Placement Memorandum, which is given to all perspective clients.</p>	
z-Bottom of Form;	<p>For individually managed client accounts, the Adviser's standard annual investment management fee is (a) 1% of Assets up to \$2 million, plus (b) 0.75% of Assets greater than \$2 million dollars up to \$5 million, plus (c) 0.50% of Assets greater than \$5 million. For portfolios consisting of fixed income securities only, the Adviser's standard annual investment management fee is (a) 0.75% of Assets of up to \$2 million, plus (b) 0.50% of Assets greater than \$2 million up to \$5 million, plus (c) 0.25% of Assets greater than \$5 million. For portfolios consisting of mutual shares only, the annual fee is 1% of Assets. The foregoing investment management fees are negotiable, primarily for client Assets in excess of \$10 million.</p> <p>A client's investment management fee to the Adviser is determined in accordance with the above standard fee structure, with exceptions negotiated on a case-by-case basis at the Adviser's discretion. Any deviations from the standard fee structure are based upon a number of factors including the amount of work involved, the amount of assets placed under management and the attention needed to manage the Account.</p> <p>The Adviser's fee is payable in arrears at the end of each calendar quarter. Generally the Adviser causes such fees to be deducted directly from the client's Assets upon written notice to the client. Alternatively, clients may pay the Adviser's fee directly within ten (10) days of receiving the Adviser's invoice. If the Adviser provides service for less than one full calendar quarter, the Adviser pro-rates its fee based on the number of days of the quarter the Adviser provided its services. Either the Adviser or the client can terminate the client's investment management agreement upon written notice at any time, and if a client terminates an agreement within five (5) business days after signing the agreement, the Adviser charges no fees for the period between signing and terminating.</p>	
z-Bottom of Form;	<p>The Adviser generally requires a minimum of \$1,000,000 to open a new client account. This Adviser reserves the right to waive this minimum.</p>	

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Harrington Investments Incorporated		IRS Empl. Ident. No.: 94-3041075
Item of Form (identify)	Answer	
z-Bottom of Form;	<p>In providing investment advice consulting services, the Adviser charges a minimum hourly fee of \$250.</p> <p>The Adviser believes that its fees are competitive with the fees charged by other investment advisers for comparable services. However, comparable services may be available from other sources for lower fees than those charged by the Adviser.</p> <p>Clients whose assets are invested in bonds purchased directly from an underwriter may pay a sales credit or sales concession to the underwriter on the trade (in lieu of a sales commission) ranging from 0% - 2% of the par value of the bond.</p>	
z-Bottom of Form;	<p>Mutual funds, closed end funds, exchange traded funds and private pooled investment vehicles are investment vehicles and the investment strategies, objectives and types of securities held by such funds vary widely. In addition to the advisory fee charged by the Adviser, clients indirectly pay for the expenses and advisory fees charged by the funds in which their assets are invested.</p> <p>All such funds incur operating expenses in connection with the management of the fund. Investment funds pass some or all of these expenses through to their shareholders (the individual investors in the funds) in the form of management fees. The management fees charged vary from fund to fund. In addition, funds charge shareholders (individual investors in the funds) other types of fees such as early redemption or transaction fees. These charges also vary widely among funds. As a result, clients will still pay management fees and other "indirect" fees and expenses as charged by each mutual fund (or other pooled investment vehicle) in which they are invested. The Adviser only charges fees as outlined in Item 1.</p>	
z-Bottom of Form;	<p>Methods of Analysis.</p> <p>The Adviser provides investment advice on the social and economic impact of investing and, in addition to fundamental and technical analyses, uses other social and economic analyses of a company's impact upon society. The Adviser obtains social analytical through a subscription to SOCRATES, a software program developed and maintained by Kinder, Lydenberg, Domini & Co., Inc.</p>	
z-Bottom of Form;	<p>Other Sources of Information.</p> <p>The Adviser also uses other social and economic corporate sources of information that include, without limitation, publications and newsletters and special reports from the Investor Responsibility Research Center, The Data Center, The Interfaith Center for Corporate Responsibility, and other non-profit organizations in this field.</p>	
z-Bottom of Form;	<p>Each member of the Adviser's professional staff is evaluated on the basis of his or her education and work experience. Prior related business experience, a specialized business or technical skill or applicable undergraduate/post-graduate work are required. In addition, any associated persons involved in determining investment strategy or giving investment advice to clients must meet the examination or experience requirements of the states in which they provide investment advisory services.</p>	
z-Bottom of Form;	<p>Education and Background:</p>	

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Harrington Investments Incorporated		IRS Empl. Ident. No.: 94-3041075
Item of Form (identify)	Answer	
z-Bottom of Form;	<p>John C. Harrington, Forrest Hill, Dale Wannen, and Susan K. Bogar make the investment decisions for, and dispense investment advice to, clients of the Adviser and constitute the Adviser's Investment Committee.</p> <p>Mr. Harrington, President and a portfolio manager of the Adviser since 1982, was born in 1945. He earned a B.A. degree in Political Science from Sonoma State University, Rohnert Park, California, in 1970 and has taken postgraduate studies in Economics, African and Southern African Studies at Sacramento State University, Sacramento, California, the University of California at Los Angeles, California, the University of York, in York, England, and received a M.A. degree in Humanities from Dominican University of California in 2006.</p> <p>Forrest Hill joined Harrington Investments in June 2007 and serves as the senior portfolio manager. He specializes in creating custom portfolios focused on sustainable investments for individual and institutional investors. Dr. Hill has a PhD in Biological Oceanography from the Massachusetts Institute of Technology and a Master's degree in Biology from the University of Massachusetts at Boston. He has published 15 scientific papers in peer reviewed journals on topics ranging from physiology and genetics, to mathematical ecology and marine biology. He holds his Series 7 and 66 NASD licenses.</p> <p>Dale Wannen joined Harrington Investments in 2007 as a portfolio manager for individuals wishing to use Socially Responsible Investment practices as part of their overall financial plan. He holds a BA in Economics from Rowan University. Mr. Wannen has over 10 years experience in the banking and financial services sector. He holds his Series 7 and 66 NASD licenses.</p> <p>Jack Ucciferri is our Research and Advocacy Director (RAD) and Investment Committee Member. He was the founder and CEO of Giants Foot Surf, a surf lodge and surf tour provider located in southwestern Nicaragua. Mr. Ucciferri sits on the Board of Directors for Project Waves of Optimism, a community development NGO that works in Latin American beach communities and is based in Palo Alto, CA. He holds his Series 66 NASD licenses.</p> <p>Susan Bogar was born in 1937 and earned a B.A. degree from Cornell University, Ithaca, New York, in Economics. Ms. Bogar has served as a portfolio manager for Harrington Investments from 1996 - 2007. She now works as a consultant for the Adviser.</p> <p>The Adviser and its related persons from time to time buy or sell securities that the Adviser also recommends to clients. However, the Adviser does not buy securities from, or sell securities to, clients. While the Adviser and its portfolio managers ("access persons") are permitted to trade in the same stock as the Adviser's clients, such trades are subject to certain restrictions outlined in the Insider Trading Policy that place client interests first. For example, except in the case of block trading, an access person may not knowingly purchase a security within one day of the Adviser's trades in that same security (except companies with a market capitalization of \$1 billion or more).</p> <p>The Adviser, its employees and their immediate families (sometimes collectively "employees") are permitted to buy and sell securities for their personal investment accounts. The Adviser has adopted employee personal trading policies and procedures</p>	

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Harrington Investments Incorporated		IRS Empl. Ident. No.: 94-3041075
Item of Form (identify)	Answer	
	<p>and a Code of Ethics to govern Firm and employee trading practices. The Adviser's members, officers and employees are required to report all personal securities transactions to the Firm on a regular basis. Employees are required to sign a certification agreeing to abide by the Firm's personal trading practices and Code of Ethics. The Firm will provide a copy of its Code of Ethics to any client or prospective client upon request.</p> <p>The Adviser may trade in the same securities traded for clients. However, it is the policy of the Adviser not to give preference to orders for personnel associated with the Firm regarding such trading. The Adviser and/or its employees may personally invest in the same securities that are purchased for client accounts and may own securities that are subsequently purchased for client accounts. From time to time, trading by the Adviser and/or its employees in particular securities may be restricted in recognition of impending investment decisions on behalf of clients. If a security is purchased or sold for client accounts and the Adviser and/or its employees on the same day, either the Adviser and/or its employees will pay or receive the same price as the client account, or the client account will receive the more favorable price. If purchased or sold on different days, it is possible that the Adviser and/or its employees' personal transactions might be executed at more favorable prices than were obtained for clients.</p> <p>The Adviser and/or its employees may buy and sell different investments, based on personal investment considerations, which the Adviser may not deem appropriate to buy or sell for clients. It is also possible that the Adviser and/or its employees may take investment positions for their own accounts that are contrary to those taken on behalf of clients. The Adviser and/or its employees may also buy or sell a specific security for their personal account based on personal investment considerations aside from company or industry fundamentals, which are not deemed appropriate to buy or sell for clients. This can occur when securities which are not suitable for clients at the time of purchase (e.g., speculative stocks, micro-cap stocks, penny stocks) are purchased by the Adviser and/or its employees. If these securities subsequently appreciate, these personal transactions could be viewed as creating a conflict of interest.</p> <p>Conversely, the Adviser and/or its employees may liquidate a security position which is held both for their own account and for the accounts of the Adviser's clients, sometimes in advance of clients. This occurs when personal considerations (i.e., liquidity needs, tax planning, industry/sector weightings) deem a stock sale necessary for individual financial planning reasons. If the security subsequently falls in price, these personal transactions could be viewed as creating a conflict of interest.</p> <p>The Adviser has established and maintains a Code of Ethics which incorporates the Insider Trading Policy referenced above. The Code of Ethics is intended to ensure that the financial best interests of the client are always placed above those of the Adviser, or any officer, director, or employee of the Adviser.</p> <p>The Adviser's Code of Ethics addresses the following areas of portfolio management and supervisory oversight:</p> <ul style="list-style-type: none">- Insider Trading: Intended to monitor trading activity made by access persons in the same security that is being purchased or sold at the same time for clients to ensure that there is no conflict.- Insider Information: Prohibition on the dissemination of insider (restricted) information which may favor one client over another, or an access person over a client.	

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Harrington Investments Incorporated		IRS Empl. Ident. No.: 94-3041075
Item of Form (identify)	Answer	
	<p>- Training and Reporting: Distribution of the Code of Ethics to all employees; training and supervision of all employees; disclosure requirements for all employees.</p> <p>The Adviser's Board of Directors has approved the Code of Ethics and has appointed a Chief Compliance Officer who is responsible for the implementation and administration of the Code. The Chief Compliance Officer is charged with monitoring all portfolio management activities of the Adviser and reporting any potential conflicts between personal and advisory account activity or any other material violations of the Code to the Adviser's Board of Directors. Any violation of the Code may result in disciplinary action ranging from warning / censure to termination of employment.</p> <p>Trade Aggregation and Allocation Policies:</p> <p>The Adviser may aggregate orders of more than one client if it is determined that aggregation is in the best interests of the clients. Trade aggregation is usually sought to obtain lower commissions and costs or a better transaction price. The Adviser does not aggregate securities transactions for client accounts unless it believes that aggregation is consistent with its duty to seek best execution and is consistent with the investment objectives and guidelines for the client accounts participating in the trade.</p> <p>When orders are aggregated, the price paid by each account is the average price of the order. Transactions costs are allocated to each client on a <i>pro rata</i> basis, based upon the ratio of the amount of particular issue of securities allocated to the account to the overall amount of that issue purchased. It is our policy that trades are not allocated in any manner that favors one group of similarly-situated clients over another. Client transactions may be aggregated according to custodial relationship in consideration of execution charges that may be imposed if trades are directed to a non-custodial broker-dealer for execution. Aggregated trades placed with different brokers may be priced differently.</p> <p>Because the Adviser manages more than one client account, there may be a conflict of interest over the allocation of investment opportunities among all accounts managed by the Adviser. The Adviser will attempt to resolve all such conflicts in a manner that is generally fair to all of its clients. It is the Adviser's policy, to the greatest extent practicable, to allocate investment opportunities over a period of time on a fair and equitable basis relative to all clients. The Adviser is not obligated to acquire for any client account any security that the Adviser or its owners, officers, members, employees or affiliated persons may acquire for their own accounts or for the account of any other client, if in the discretion of the Adviser based upon the client's financial condition and investment objectives and guidelines, it is not practical or desirable to acquire a position in such security for that account.</p> <p>Trade Error Policy:</p> <p>The Adviser 's procedures require its personnel to carefully implement investment management decisions. Nevertheless, if a trade error occurs, it is our policy that the error be corrected as soon as possible and in such a manner that the affected client is not disadvantaged and bears no loss. The Adviser's policy prohibits staff from requesting an executing broker to accept financial responsibility for a trade</p>	

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z-Bottom of Form;	error caused by the Adviser in exchange for the promise of future compensation through commissions. This policy applies only to trade error made by the Adviser and its employees.	
	The Adviser may give advice and take action with respect to any of its clients that may differ from advice given or the timing or nature of action taken with respect to any other client based upon individual client circumstances.	
	Investment or Brokerage Discretion.	
	Subject to the written investment objectives, goals and restrictions agreed upon in writing by the Adviser and the client, the Adviser has the authority to determine, without obtaining specific client consent, (1) the securities to be bought or sold, (b) the amount of the securities to be bought or sold, (c) the broker-dealer to be used, and (d) the commission rates paid.	
	In selecting brokers to effect portfolio transactions for clients, the Adviser generally allocates such transactions to such brokers and/or dealers for execution on such markets, at such prices and at such commission rates (which may be in excess of the prices or commission rates that might have been charged for execution on other markets or by other brokers or dealers) as in the good faith judgment of the Adviser are appropriate. The Adviser takes into consideration in the selection of such brokers and/or dealers not only the available prices and rates of brokerage commissions, but also other relevant factors which may include (without limitation): (a) the execution capabilities of the brokers and/or dealers, (b) research (including economic forecasts, investment strategy advice, fundamental and technical advice on individual securities, valuation advice and market analysis), custodial and other services provided by such brokers and/or dealers which are expected to enhance the Adviser's general portfolio management capabilities, (c) the size of the transaction (d) the difficulty of execution, (e) the operational facilities of the brokers and/or dealers involved, (f) the block trading, block positioning capabilities and risk in positioning a block of securities, (g) the broker and/or dealer's reputation, (h) its financial strength and stability, (i) efficiency of error resolution, (j) its willingness to execute related or unrelated difficult transactions in the future, (k) its order of call, (l) its offerings to the Adviser on-line access to computerized data regarding clients' accounts and (m) other matters involved in the receipt of brokerage services generally.	
	The Adviser may cause a client's account to pay a broker or dealer an amount of commission for effecting a transaction for the client's account in excess of the amount of commission another broker or dealer would have charged for effecting that transaction if the Adviser determines in good faith that the amount of commission is reasonable in relation to the value of the brokerage and research services provided by the broker or dealer, viewed in terms of either the particular transaction or the Adviser's overall responsibilities with respect to the accounts as to which the Adviser exercises investment discretion.	
	In addition to execution quality, the Adviser may consider the value of various products and services a broker-dealer may provide. Selecting a broker-dealer in recognition of services or products other than simply transaction execution is know as paying for those services or products with "soft dollars." Because many of those services could be considered to provide some benefit to the Adviser, and because the "soft dollars" used to acquire them will be assets of the Adviser's clients, the Adviser could be considered to	

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	<p>have a conflict of interest in allocation client brokerage business. That is, the Adviser could receive valuable benefits by selecting a particular broker or dealer to execute client transactions and the transaction compensation charged by that broker or dealer might not be the lowest compensation the Adviser might otherwise be able to negotiate. In addition, the Adviser could have an incentive to cause clients to engage in more securities transactions than would otherwise be optimal in order to generate brokerage compensation with which to acquire products and services.</p> <p>The Adviser's policy is to limit its use of such soft dollar arrangements to those falling within the safe harbor of Section 28(e) of the Securities and Exchange Act of 1934, as amended. Only <i>bona fide</i> research and brokerage products and services that provide assistance to the Adviser in the performance of its investment decision-making responsibilities are permitted.</p> <p>Although not currently a party to any such arrangements, the Adviser may in the future enter into arrangements whereby an executing broker-dealer, including Schwab, would provide or purchase on its behalf research services, economic and market information, portfolio strategy advice, research conferences, periodical subscription services, computer hardware and software and other similar brokerage or research products or services (know as "soft dollar" products or services). These brokerage and research products or services would be provided by various sources and used by the Adviser for the benefit of all its clients, including clients whose securities transactions are not executed by the broker-dealer that provides the services and research. In exchange for these services the Adviser might direct client trades to the providers of such services and research.</p> <p>The Adviser might pay a brokerage commission in excess of that which another brokerdealer might charge for effecting the same transaction in recognition of the value of the brokerage and research products and services received. In such cases, however, the Adviser would determine in good faith whether such commission is reasonable in relation to the value of the brokerage or research products and services provided, viewed in terms of either the specific transaction or the Adviser's overall responsibilities to the accounts over which it exercises investment authority.</p> <p>In addition to the factors described above, the Adviser may select a broker or dealer to execute transactions in recognition of that broker's or dealer's referral of clients, or in anticipation of future referrals. As with soft dollar payments for research or other services or products, in some cases the transaction compensation paid in connection with such a selection might be higher than that obtainable from another broker-dealer who did not provide (or undertake to provide) referrals. However, the Adviser will always seek "best execution."</p> <p>Consistent with the foregoing, the Adviser has entered into an investment manager service agreement with Schwab Institutional, a division of Charles Schwab & Co., Inc., a leading national financial services firm and broker-dealer ("Schwab"), with respect to client accounts at Schwab. Under this arrangement, Schwab provides the Adviser products and services designed specifically for investment managers and their clientele, including without limitation product and account services, Schwab's equity, fixed income and mutual fund trading teams, secure electronic coverage of detailed account information and on-line electronic access to a broad range of independent research and information services. Schwab also provides the Adviser's clients with client account statements, transaction confirmations, reports and other "back-office" and technical</p>	

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	<p>support. Because of the arrangement, the Adviser generally has the ability to place client orders at discounted commission rates. As a result, the Adviser places the majority of client orders with Schwab. If a client directs the Adviser to use a specific broker other than Schwab, the Adviser will not negotiate the terms and conditions (including, but not limited to, commission rates) relating to the services provided by such broker. By so directing the Adviser, the client expressly will be acknowledging and agreeing that the Adviser would not have any responsibility for obtaining for the client from any such broker the execution, including without limitation the best prices or any particular commission rates with or through any such broker and that the client may not be obtaining rates as low as it might otherwise obtain if the Adviser had discretion to select broker-dealers other than those chosen by the client.</p>	
z-Bottom of Form;	<p>Additional Compensation</p> <p>The Adviser serves as a Sub Adviser for certain clients' ("Shared Clients") assets managed by Everest Asset Management, AG., an investment adviser registered with the SEC ("EAM"). For such sub-advisory services, the Adviser receives half of each individual client fee charged by EAM. EAM and the Adviser's 50/50% share arrangement does not increase the overall fee charged by EAM. EAM provides the client with written disclosure of the 50/50% share fee arrangement and requires the client to acknowledge receipt of same prior to the commencement of management services.</p> <p>The Adviser serves as a Sub Adviser for certain clients' ("Shared Clients") assets managed by JML Portfolio Management Ltd., an investment adviser registered with the SEC ("JML"). For such sub-advisory services, the Adviser receives half of each individual client fee charged by JML. JML and the Adviser's 50/50% share arrangement does not increase the overall fee charged by JML. JML provides the client with written disclosure of the 50/50% share fee arrangement and requires the client to acknowledge receipt of same prior to the commencement of management services.</p> <p>The Adviser may direct a certain amount of client portfolio transactions to a broker in return for the broker's referral of prospective investment advisory clients for the Adviser. The direction of brokerage to a broker in exchange for investor referrals may create a conflict of interest in that the Adviser will have an incentive to refer its clients' brokerage business to brokers to which it might not otherwise direct brokerage transactions. To the extent that the Adviser so directs brokerage, the Adviser will regularly review the commission rates paid by its advisory clients to determine that they are competitive with commissions paid by clients of investment advisers that provide services similar to the Adviser's services.</p> <p>From time to time, the Adviser also may employ solicitors to whom it may pay cash or a portion of the advisory fees paid by clients referred to it by those solicitors. In such cases, this practice will be disclosed in writing to each client solicited by the solicitor in compliance with the requirements of Rule 206(4)-3, under the Advisers Act.</p>	
z-Bottom of Form;	<p>The Adviser will vote all proxies in advisory accounts unless the client reserves the right to vote its securities. Proxies over which the Adviser has voting authority shall be voted in a manner consistent with the Adviser's social and economic criteria and the best economic interest of the client. A <i>Summary of Proxy Voting Guidelines</i> is published on the Adviser's web site. Copies of the Adviser's <i>Proxy Voting Policy Guidelines</i>, upon which the <i>Summary</i> is based, as well as the Adviser's proxy voting record, are available</p>	

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z-Bottom of Form;	<p>The Adviser will not disclose client personal information to anyone unless it is required by law or directed by the client. The Adviser maintains a Privacy Policy which addresses the protocols followed by the Adviser to protect client privacy. The Privacy Policy is submitted to clients annually for informational purposes and to allow a client to add, amend, or delete individuals from their individual list of persons with whom we can share information.</p> <p>At any time on request, every client may obtain a copy of the Adviser's most current Form ADV Part II. This document serves as our "brochure" to our clients and contains information and disclosures as required by law. In addition, once a year we offer to send our Form ADV Part II to our clients.</p>	