



CANTON HATHAWAY

PALM BEACH • PROVIDENCE

ADV Part 2A, Firm Brochure Dated:

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This brochure provides information about the qualifications and business practices of Canton Hathaway, LLC. (hereinafter referred to as “us,” “our Firm,” or the “Advisor”). If you have any questions about the contents of this brochure, please contact us by telephone at (401) 433-7800 or by email at mcrudele@cantonhathaway.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Authority. Additional information about Canton Hathaway, LLC. is also available on the SEC’s website at www.adviserinfo.sec.gov.

Please note that the use of the term “registered investment advisor” and description of Wealth Management and/or our associates as “registered” does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm’s associates who advise you for more information on the qualifications of our firm and our employees.

Item 2: Material Changes

This Part 2A of Form ADV (“Firm Brochure”) contains information about our business practices as well as a description of potential conflicts of interest relating to our advisory business that could affect a client’s relationship with us. We are providing this material in accordance with Rule 204-3 of the Investment Advisers Act of 1940, which requires a registered investment adviser to provide a written disclosure statement upon entering into an advisory relationship.

The following changes have been made since last Annual Amendment filed on February 06, 2024:

- Item 4 has been updated to include the Assets Under Management as of July 31, 2024 and to reflect the correct fund names offered by the Firm. Additionally, more information has been provided regarding the Firm’s subadvisory services.
- Item 5 has been updated to disclose the fee billing practices of the Funds as it relates to those investors who have other assets managed by the Firm and those investors who only invest in the Funds. Information regarding the valuation methodologies used for thinly traded and illiquid investments was also added. We also disclosed additional fees that the Firm earns for acting as a liaison between direct investors in certain funds.
- Item 8 has been updated to add risk disclosures related to leveraged and inverse ETFs as well as the Canton Hathaway Funds.
- Item 11 has been updated to disclose that the Firm’s supervised persons may execute a trade that is in opposition to advice provided to clients.
- Item 12 has been updated to disclose the ability to place trades for accounts held at Bank of America through Fidelity, and the Firm’s discretion to purchase bonds for client accounts through UBS.

Full Brochure Available:

Clients shall receive annually an offer to deliver the Firm Brochure. Additionally, we will provide a new version of the Firm Brochure as necessary when updates or new information are added, at any time, without charge. To request a complete copy of our Firm Brochure, contact us by telephone at 401-433-7800 or by email to mcrudele@cantonhathaway.com.

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Item 4: Advisory Business

A. Firm Information

Canton Hathaway, LLC. (the “Advisor”, the “Firm”, “Canton Hathaway”, “we” or “us”) is a limited liability company formed on April 6, 2018, in the State of Rhode Island. Canton Hathaway is principally owned by Malcolm Chace, James Procaccianti, Kenneth Goodreau, Anthony Marcello and Nicholas Trotman, the Advisor’s Managing Members (the “Principals”).

As discussed below, Canton Hathaway offers to its clients (individuals, family groups, trusts, and charitable organizations) investment advisory services, outsourced CIO services, subadvisory services to other independent advisory firms and also administers its affiliated funds.

B. Investment Advisory Services

Investment Management Services

Canton Hathaway provides personalized investment advisory services primarily to individuals, family groups, trusts, and charitable organizations. Our clients are predominantly taxable entities, and tax consequences are included as part of the investment decision. Each account is individually managed, and investments for each account will be made primarily in liquid securities, including common stocks, government, corporate and municipal bonds, mutual funds, and exchange-traded funds. For our clients who are also accredited investors, we will explore investments in limited partnerships and private investment pools to the extent consistent with the investment program established in respect to such individual. We utilize proprietary factor-based models to manage risk in client portfolios in accordance with their investment policy statement.

Fund Management Services

We offer fund management services to our affiliates C-H Hotel Investment I, LLC, C-H Hotel Investment 2, LLC, CH PE Investment 1, LLC, CH Neon Inv., LLC (each a “Fund”). Each Fund is structured as a general partnership where investors in the Fund are limited partners. We provide fund management services which include determining what investment will be purchased and held by the Fund. Generally, the Funds are created for the purpose of investing into a single project, such as a property, or to invest in a private equity fund or an individual company.

Canton Hathaway advisors may recommend that clients who are accredited investors (as defined in Regulation D promulgated under the Securities Act of 1933) invest in a Fund. However, a client investment into any private placements is done on a non-discretionary basis. Clients will be provided with each Fund’s offering memorandum prior to any investment. The Funds may also accept investors that are do not receive investment management services from the Firm.

None of the funds are currently accepting new investors.

Outsourced CIO Service

We offer consulting and investment advisory services to pension plans and other institutions. As part of this service, we conduct quarterly meetings with the institution or pension plan to determine progress towards the plan’s goals and obligations. All advice is customized to the plan and needs of the client.

Subadvisory Services

We may serve as a subadvisor at times to other independently registered investment advisory firms. These firms place their clients in our proprietary strategy after gathering information about the client's investment objectives, risk tolerance and liquidity needs. They will then recommend that a portion of their clients' assets be managed by the Firm. In these cases, our fiduciary duty is limited.

C. Client Account Management

Canton Hathaway advises Clients based on their individual needs. All accounts are individually managed in consideration of the Client's current and future income needs, tolerance for taxes, and the ultimate disposition of the assets. Customarily, at the start of the advisory relationship we determine the asset allocation strategy to meet the risk and income requirements of the Client; we then manage the account accordingly. Periodically, we meet with the Client to make sure that the initial parameters still hold and adjust them as necessary. If a client imposes a restriction on investing in certain securities, we will abide by it or suggest that the Client seek another investment adviser if we feel that we are unable to work within the restrictions.

D. Wrap Fee Programs

Canton Hathaway does not participate in wrap fee programs.

E. Assets Under Management

As of July 31, 2024, Canton Hathaway manages assets totaling \$618,614,135 on a discretionary basis and \$33,178,959 on a non-discretionary basis.

Item 5: Fees & Compensation

A. Fees for Advisory Services

Investment Management Services

Investment management fees are payable monthly, at the end of each month, as delineated in the terms of the investment management agreement entered into between Canton Hathaway and each Client. Investment advisory fees are based on the market value of assets under management at the end of each month, pursuant to the following fee schedule:

Assets Under Management	Maximum Annual Fee
Less Than \$2,000,000	90bps.
\$2,000,000-\$5,000,000	80bps.
\$5,000,000-\$10,000,000	70bps.
Over \$10,000,000	60bps.

The investment advisory fee in the first month of service is prorated from the inception date of the applicable accounts to the end of the first month. Fees may vary from the above fee schedule depending on the nature and complexity of each Client relationship, types of investments held within an account, or with the inclusion of other services. Fees may be waived or reduced at the sole discretion of the Advisor. The

Client's fees will take into consideration the aggregate assets under management with Advisor, including any assets invested in the Firm's affiliated funds. All securities held in accounts managed by Canton Hathaway will be independently valued by the Custodian (as defined below) of said accounts. Canton Hathaway does review and will make good faith efforts to provide a valuation of illiquid or thinly traded assets held by Clients, including those investments made into funds managed by Canton Hathaway.

When valuing illiquid or thinly traded assets, common methods include: asset approach (book value), comparable company analysis (with adjustments for liquidity), liquidation value, precedent transactions analysis, discounted cash flow (DCF) with adjusted risk factors, and option pricing models; all of which take into account the difficulty of selling the asset quickly and may require significant adjustments based on the specific situation. For investments in the Funds, where the assets are real-estate based, an analysis of similar properties in the same or substantially similar neighborhoods will be reviewed to develop a valuation of the property.

- Asset approach: This method values an asset based on its balance sheet value, which is often considered a conservative estimate for illiquid assets as it doesn't account for potential market value fluctuations.
- Comparable company analysis: While comparing to similar publicly traded companies can be useful, significant adjustments need to be made to account for the illiquidity of the target asset by applying a liquidity discount.
- Liquidation value: This method estimates the value of an asset if it were to be sold quickly, often resulting in a lower value due to potential fire sale conditions.
- Precedent transactions analysis: Looking at recent sales of comparable assets can provide valuable insights, but these transactions may also have been done under unique circumstances.
- Discounted cash flow (DCF): This method requires carefully adjusting the discount rate to reflect the higher risk associated with illiquid assets.
- Option pricing models: These models can be useful for valuing illiquid assets with embedded options but require complex assumptions and may not be suitable for all situations.

Fund Management Service

Canton Hathaway only provides fund management services to our affiliated entities. The Firm receives management and administrative fees for managing the Funds. The Funds accept investors who invest directly into the Funds as well as those clients who have other assets managed by the Firm. However, direct investors in the Funds do not pay Fund management fees monthly. Rather, those fees accrue and are payable when there is a distribution or upon dissolution of the Fund. For Fund investors who have other assets managed by the Firm, the assets invested in the Fund would be counted towards the total assets under management subject to the investment management fees agreed to in the client's investment management agreement.

Investors in the Funds sign an investment management agreement with the Firm and are subject to the following fee schedule:

Assets Under Management	Maximum Annual Fee
Less Than \$2,000,000	90bps.
\$2,000,000-\$5,000,000	80bps.
\$5,000,000-\$10,000,000	70bps.
Over \$10,000,000	60bps.

Additionally, Fund investors will be required to pay a monthly administrative fee in the amount of \$500 (the “Administrative Fee”). The Firm may reduce or waive the management and administrative fees for the Funds in its sole discretion.

Outsourced CIO Services

Canton Hathaway assesses either a fixed fee or a fee based on a percentage of assets under management for Outsourced CIO Services. The maximum annual fee charged as a percentage of assets under management ranges from 0.05% - 0.50%. The fixed fee charged for our Outsourced CIO services ranges from \$50,000 to \$150,000 per year and may be reduced or waived in the Firm’s sole discretion. The ultimate fee charged is based on the scope and complexity of Canton Hathaway’s engagement with the Client. Fees for Outsourced CIO Services are billed monthly or quarterly in advance. If charging a percentage fee, the fee will be based on the value of the account(s) as of the last day of the previous billing period and payable in arrears.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated and due monthly in arrears. For accounts that use Fidelity for custody, Canton Hathaway’s fee is customarily deducted automatically from the client’s account, but clients can choose to be billed instead. Clients who use other Custodians will receive an invoice for their respective advisory fees. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total assets under management with Canton Hathaway at the end of each month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian’s brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Canton Hathaway to be paid directly from their account[s] held by the Custodian as part of the investment management agreement and separate account forms provided by the Custodian.

Fund Management Service

Canton Hathaway receives a management fee for the administration of its affiliated funds and reimbursement for any expenses paid on behalf of the funds. For those clients who also receive investment management services, fees are deducted automatically from the client’s account. While no separate fee is incurred for the assets invested in the Funds, the assets invested in the Fund would be counted towards the total assets under management subject to the investment management fees agreed to in the client’s investment management agreement. In these cases, the fees are payable monthly in arrears.

For those clients who do not have other assets under management with the Firm, the Fund management fee

is payable upon a distribution from or dissolution of the Fund. For more information, refer to the Fund's offering memorandum.

Outsourced CIO Services

Fees for Outsourced CIO Services are billed monthly or quarterly in arrears. If charging a percentage fee, the fee will be based on the value of the account(s) as of the last day of the previous billing period. If charging a fixed fee, the fee will be payable in equal installments monthly or quarterly, in arrears.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Canton Hathaway, in connection with investments made on behalf of the Client's accounts. The Client is responsible for all custody and securities execution fees charged by the Custodian, as well as margins, premiums, commissions, and other expenses described in the investment management advisory agreement between the Client and Canton Hathaway. The fees charged by Canton Hathaway are separate and distinct from these custody and execution fees. In addition, all fees paid to Canton Hathaway for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs, if applicable. These fees and expenses are described in each applicable mutual funds or ETF's prospectus. Canton Hathaway is not affiliated and does not expect to receive any fees from such mutual funds or ETFs. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. Please refer to Item 12 – Brokerage Practices for additional information.

Clients invested into one of Canton Hathaway's affiliated funds will pay tax, legal, and audit fees related to the Fund, as well as any other expenses as further detailed in the Fund's Offering Memorandum.

D. Payment of Fees and Termination

Investment Management Services

Canton Hathaway is compensated for its services at the end of the month after investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing one month advance written notice to the other party. The Client will incur charges for bona fide advisory services rendered up to the point of termination and such fees will be due and payable by the Client immediately. The Client's investment advisory agreement with the Advisor is generally non-transferable without the Client's prior approval.

Outsourced CIO Services

Canton Hathaway may be partially compensated for its services at the start of the engagement. Either party may terminate the applicable investment advisory agreement, at any time, by providing one month advance written notice to the other party. Upon termination, the Client shall be billed for actual services rendered to the point of termination. The Client's agreement with the Advisor is generally non-transferable without the Client's prior approval.

Fund Management Services

Withdrawal from a Fund is conducted pursuant to the Fund's Operating Agreement.

E. Compensation for Sales of Securities or Other Investment Products

The Firm receives a fee of 60 basis points for direct investments in the following funds:

- TPG Chatham Wayside JV, LLC
- TPG Hadley Fisher JV, LLC
- TPG PHF Keys JV, LLC
- TPG Boca Raton
- HighPost
- HIPstr Fund I

The Firm acts as a liaison between the investor and the fund, assisting in an administrative capacity.

Item 6: Performance-Based Fees & Side-By-Side Management

Canton Hathaway does not charge any performance-based fees.

Item 7: Types of Clients & Account Requirements

Canton Hathaway provides investment advisory services primarily to individuals, pension funds, estates, family groups, trusts, and charitable organizations. Canton Hathaway advises Clients based on their individual needs. All accounts are separately managed. In general, \$2.0 million in investable assets is required to open an account. We reserve the right to waive or reduce the minimum account requirement. We also reserve the right to decline to enter into an agreement with any prospective Client, even those meeting the minimum investable asset requirement.

Clients who opt into electronic delivery of statements or maintain at least \$1.0 million in assets at Fidelity will not be charged transaction fees by Fidelity for the purchase and/or sale of U.S. listed equities and exchange traded funds. Not all custodians offer this benefit, and each client should refer to their custodial statements for any additional transaction fees that may be rendered.

Item 8: Methods of Analysis, Investment Strategies & Risk of Loss

A. Methods of Analysis & Investment Strategies

Methods of Analysis

Canton Hathaway employs fundamental, technical, and quantitative research methods in a rules-based process to create customized investment portfolios for its Clients. In evaluating securities, the main sources of information used by Canton Hathaway include, but are not limited to, quantitative data provided by third party vendors, research materials prepared by third parties, financial media, corporate rating services, annual reports, prospectuses, filings with the SEC, company press releases, and meetings with management and analysts.

Fundamental Analysis. The analysis of a business's financial statements (usually to analyze the business's

assets, liabilities, and earnings), and its competitors and markets is known as fundamental analysis. When analyzing a stock, futures contract, or currency using fundamental analysis there are two basic approaches one can use: bottom up analysis and top down analysis. The terms are used to distinguish such analysis from other types of investment analysis, such as quantitative and technical. Fundamental analysis is performed on historical and present data with the goal of making financial forecasts. There are several possible forecasting objectives when analyzing an investment: (a) to conduct a company stock valuation and predict its probable price evolution; (b) to make a projection on its business performance; (c) to evaluate its management and make internal business decisions; (d) to calculate its credit risk.; and/or (e) to ascertain the intrinsic value of the share.

When the objective of the analysis is to determine what stock to buy and at what price, there are two basic methodologies investors primarily rely upon: (a) Fundamental analysis, as discussed above, maintains that markets may misprice a security in the short run but that the "correct" price will eventually be reached. Profits can be made by purchasing the mispriced security and then waiting for the market to recognize its "mistake" and reprice the security.; and (b) Technical analysis, as discussed further below, maintains that all information is reflected already in the price of a security.

Technical Analysis. Technical analysis is a security analysis methodology for forecasting the direction of prices through the study of past market data, primarily price and volume. As stated above, a fundamental principle of technical analysis is that a market's price reflects all relevant information, so the analysis looks at the history of a security's trading pattern rather than external drivers such as economic, fundamental, and news events. Since price action tends to repeat itself due to investors collectively tending toward patterned behavior –technical analysis focuses on the identifiable trends and conditions. Technical analysts also widely use market indicators of many sorts, some of which are mathematical transformations of price, often including up and down volume, advance/decline data and other inputs. These indicators are used to help assess whether an asset is trending, and if it is, the probability of its direction and of continuation. Technicians also look for relationships between price/volume indices and market indicators. Technical analysis employs models and trading rules based on price and volume transformations, such as the relative strength index, moving averages, regressions, inter-market and intra-market price correlations, business cycles, stock market cycles or, classically, through recognition of chart patterns. Technical analysis is widely used among traders and financial professionals and is very often used by active day traders, market makers and pit traders. The risk associated with this type of analysis is that analysts use subjective judgment to decide which pattern(s) a particular instrument reflects at a given time and what the interpretation of that pattern should be.

Quantitative Research. The use of models, or algorithms, to evaluate assets for investment is the hallmark of quantitative research. The process usually consists of searching vast databases for patterns, such as correlations among liquid assets or price-movement patterns (trend following or mean reversion). The resulting strategies may involve high-frequency trading. The results of the analysis are taken into consideration in the decision to buy or sell securities and in the management of portfolio characteristics. A risk in using quantitative analysis is that the methods or models used may be based on assumptions that prove to be incorrect.

Investment Strategies & Asset Classes

Equities. Canton Hathaway builds customized equity portfolios specific to each individual Client's investment objectives using individual equities, exchange traded funds, and mutual funds. Security selection is driven by fundamental, technical, and quantitative factors.

Fixed Income. Canton Hathaway builds customized fixed income portfolios specific to each individual Client's investment objectives. Generally, our Clients look to their fixed income portfolios for steady income and safety. Therefore, Canton Hathaway generally constructs such portfolios in a ladder approach typically using investment grade bonds over a specified maturity period. We may add relative value to our fixed income portfolios by focusing on certain sectors that offer more relative value than a bond of similar quality in a different sector. In selecting bonds, Canton Hathaway generally buys liquid, investment grade bonds and considers relative value among like credits within and across sectors. The Firm customarily employs a buy-and-hold ladder approach, with some opportunistic trading on a selective basis. The Advisor may sell bonds for several reasons, including a credit downgrade or a need to raise cash in a Client's portfolio, and may sell bonds at any time at its discretion, as with any other securities held in a discretionary account (unless restricted by the Client). On a client-by-client basis, lower quality bonds may be included in a fixed income portfolio if it is determined that the risk adjusted return is acceptable relative to the Client's investment objectives. Most of the Firm's Clients look to their fixed income portfolios as a source of income; thus, our strategic focus is primarily on yield(s). However, portfolios may be customized with a total return focus if income is not the current primary investment objective.

Alternatives (Private Placements). Accredited investors who are clients of Canton Hathaway may seek additional securities for income alternatives or capital appreciation. Alternative investments are generally considered illiquid and are not appropriate for all clients. For funds that Canton Hathaway manages, it conducts due diligence on all alternatives, including private placements and direct participation plans, for accredited clients seeking alternatives investments.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss, including a complete loss of their investment. Canton Hathaway will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet its investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, the use of said methods does not guarantee that an investment will increase in value or otherwise be profitable. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts."

Each Client engagement entails a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing that Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any

changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Below are some investment risks the Client should understand prior to investing any assets in an account managed by the Advisor.

Equity Risk: Common stocks are susceptible to general stock market fluctuations and, volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.

Fixed Income Securities Risk: Typically, the values of fixed-income securities change inversely with prevailing interest rates. Therefore, a fundamental risk of fixed-income securities is interest rate risk, which is the risk that their value will generally decline as prevailing interest rates rise, which may cause your account value to likewise decrease, and vice versa. How specific fixed income securities may react to changes in interest rates will depend on the specific characteristics of each security. Fixed-income securities are also subject to credit risk, prepayment risk, valuation risk, and liquidity risk. Credit risk is the chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of a bond to decline.

Liquidity Risk: The risk of being unable to sell your investment at a fair price at a given time due to high volatility or lack of active liquid markets. You may receive a lower price, or it may not be possible to sell the investment at all.

Credit Risk: Credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client.

Inflation and Interest Rate Risk: Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many types of fixed income investments to decline.

Horizon and Longevity Risk: The risk that your investment horizon is shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time that the markets are down, you may lose money. Longevity

Risk is the risk of outliving your savings. This risk is particularly relevant for people who are retired or are nearing retirement.

C. Recommendation of Specific Types of Investments

We recommend various types of securities and we do not primarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment. A description of the types of securities we may recommend to you and some of their inherent risks are provided below.

Money Market Funds. A money market fund is technically a security. The fund managers attempt to keep the share price constant at \$1/share. However, there is no guarantee that the share price will stay at \$1/share. If the share price goes down, you can lose some or all of your principal. The U.S. Securities and Exchange Commission ("SEC") notes that "While investor losses in money market funds have been rare, they are possible." In return for this risk, you should earn a greater return on your cash than you would expect from a Federal Deposit Insurance Corporation ("FDIC") insured savings account (money market funds are not FDIC insured). Next, money market fund rates are variable. In other words, you do not know how much you will earn on your investment next month. The rate could go up or go down. If it goes up, that may result in a positive outcome. However, if it goes down and you earn less than you expected to earn, you may end up needing more cash. A final risk you are taking with money market funds has to do with inflation. Because money market funds are considered to be safer than other investments like stocks, long-term average returns on money market funds tends to be less than long term average returns on riskier investments. Over long periods of time, inflation can eat away at your returns.

Bonds. Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

Stocks. There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, better-established companies ("large cap") tend to be safer than smaller start-up companies ("small cap"), but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Mutual Funds and Exchange Traded Funds. Mutual funds and exchange traded funds ("ETF") are professionally managed, collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund has a manager that trades the mutual fund's investments in accordance with

the fund's investment objective(s). While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds in that they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF's performance to match that of its Underlying Index or other benchmark, which may negatively affect the ETF's performance. In addition, an ETF may not have investment exposure to all of the securities included in its Underlying Index, or its weighting of investment exposure to such securities may vary from that of the Underlying Index. Some ETFs may invest in securities or financial instruments that are not included in the Underlying Index, but which are expected to yield similar performance.

Inverse and Leveraged Funds. Leveraged mutual funds and ETFs generally seek to deliver multiples of the daily performance of the index or benchmark that they track. Inverse mutual funds and ETFs generally seek to deliver the opposite of the daily performance of the index or benchmark that they track. Inverse funds often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward-moving markets. Some inverse funds are both inverse and leveraged, meaning that they seek a return that is a multiple of the inverse performance of the underlying index. To accomplish their objectives, leveraged and inverse funds use a range of investment strategies, including swaps, futures contracts, and other derivative instruments. Leveraged, inverse, and leveraged inverse funds are more volatile and riskier than traditional funds due to their exposure to leverage and derivatives, particularly total return swaps and futures.

Most leveraged funds are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis, and reset their leverage daily. A "single day" is measured from the time the leveraged fund calculates its net asset value ("NAV") to the time of the leveraged fund's next NAV calculation. The return of the leveraged fund for periods longer than a single day will be the result of each day's returns compounded over the period. Due to the effect of this mathematical compounding, their performance over longer periods of time can differ significantly from the performance (or inverse performance) of their underlying index or benchmark during the same period of time. For periods longer than a single day, the leveraged fund will lose money when the level of the index is flat, and the leveraged fund may lose money even if the level of the Index rises. Longer holding periods, higher index volatility, and greater leverage all exacerbate the impact of compounding on an investor's returns. During periods of higher index volatility, the volatility of the index may affect the leveraged fund's return as much as or more than the return of the Index itself. Therefore, holding leveraged, inverse, and leveraged inverse funds for longer periods of time increases their risk because of compounding and the inherent difficulty in market timing. Leveraged funds are riskier than similarly benchmarked funds that do not use leverage. Non-traditional funds are highly

volatile and not suitable for all investors. They provide the potential for significant losses.

Options Contracts. Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Investing in options can provide greater potential for profit or loss than an equivalent investment in the underlying asset. The value of an option may decline because of a change in the value of the underlying asset relative to the strike price, the passage of time, changes in the market's perception as to the future price behavior of the underlying asset, or any combination thereof. In the case of the purchase of an option, the risk of loss of an investor's entire investment (i.e., the premium paid plus transaction charges) reflects the nature of an option as a wasting asset that may become worthless when the option expires. Where an option is written or granted (i.e., sold) uncovered, the seller may be liable to pay substantial additional margin, and the risk of loss is unlimited, as the seller will be obligated to deliver, or take delivery of, an asset at a predetermined price which may, upon exercise of the option, be significantly different from the market value. Over-the-counter options that the Clients may use in their investment strategies generally are not assignable except by agreement between the parties concerned, and no party or purchaser has any obligation to permit such assignments. The over-the-counter market for options is relatively illiquid, particularly for relatively small transactions.

Private Placements and Limited Partnership. Clients need to be aware that investing in securities involves risk of loss that Clients need to be prepared to bear. The following risk factors do not purport to be a complete description of the risks involved in an investment into any private placement or limited partnership. For a more complete description of the risks involved in investing in the private placements and limited partnerships, please refer to the fund's Private Placement Memorandum.

Private Placement Risks. A private placement (non-public offering) is an illiquid security sold to qualified investors and are not publicly traded nor registered with the Securities and Exchange Commission. Private placements generally carry a higher degree of risk due to that illiquidity. Most securities that are acquired in a private placement are restricted securities, instruments that must be held for an extended amount of time, making them unsalable during the restricted period. The full range of risks is dependent on the nature of the private placement, as disclosed in the offering documents.

Limited Partnership Risks. A Limited Partnership is a business entity that consists of at least one General Partner and one or more Limited Partners. Typically, the General Partner is an experienced businessperson who provides both financial resources and daily management skills to the Limited Partnership. A Limited Partner is an individual or business that offers only capital or financial resources to that Limited Partnership.

Reliance on the General Partner and no Authority by Limited Partners: All decisions regarding the management and affairs of limited partnerships are made exclusively by the General Partner. Accordingly, no person should invest in a Limited Partnership unless such person is willing to entrust all aspects of management of that partnership to the General Partner. Limited Partners have no right or power to take part in the management of the Partnership. As a result, the success of the Partnership depends solely on the abilities of the General Partner.

Dependence on Key Personnel: The General Partner is dependent on the services of the Principal and there can be no assurance that it will be able to retain the Principal.

Limited Reporting: Limited Partnerships will provide quarterly unaudited reports of each Limited Partner's investment. Limited partners will not be able to evaluate the Funds results at shorter intervals. Additionally, as a result of side letter arrangements, questions, due diligence requests, meetings or other communications, certain Limited Partners may receive information that is not generally available or otherwise provided to other Limited Partners.

Accordingly, investors in a limited partnership should have a long-term investment horizon.

Real Estate. Real estate and related investments are being used more often as part of a long-term core strategy due to increased market efficiency and growing concerns about the future long-term variability of stock and bond returns. In fact, real estate investments are desirable for their ability to serve as a portfolio diversifier and inflation hedge. However, the asset class still bears a considerable amount of market risk. The real estate market is demonstrably cyclical, nearly mirroring the ups and downs of the overall economy. In addition to employment and demographic changes, the value of real estate is also influenced by changes in interest rates and the credit markets, which affect the supply and demand of capital and, thus, real estate values. Along with changes in market fundamentals, investors wishing to add real estate to their core investment portfolios should look for property concentrations by area and by property type. Because property returns are directly affected by local market basics, real estate portfolios that are too heavily concentrated in one area or property type can lose their risk mitigation attributes and bear additional risk by being too influenced by local or sector market changes.

Canton Hathaway Funds. There is a conflict of interest due to the different billing practices for those investors that have other assets managed by the Firm and those who don't. The Firm is incentivized to prioritize investors that have other assets managed by the Firm, as the Firm receives regular monthly advisory fees from these investors. Investors who do not have other assets managed by the Firm accrue their monthly fees. The Firm minimizes this potential conflict of interest by ensuring all investors were admitted on a first come, first served basis and all expenses are shared equally. Additionally, those investors whose fees accrue must pay these fees prior to receiving any distribution, which may be used to offset the accrued advisory fees. Additionally, no investor is entitled to priority over any other investor with respect to a return of its capital contributions.

The description set forth above is general and is not intended to be exhaustive. The risks of each Client's investments are substantial, and each Client could realize losses rather than gains from some or all the investments described herein. Investing in securities involves a risk of loss that clients should be prepared to bear.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. Canton Hathaway

and our personnel seek to maintain the highest level of business professionalism, integrity, and ethics.

Canton Hathaway was censured and ordered to pay a civil penalty to the U.S. Securities and Exchange Commission of \$25,000 on July 26, 2021, for failure to adhere to Section 204 of the Advisers Act, specifically Rules 204-1 and 204-5, which required Canton Hathaway to create, post and deliver Form CRS to all clients. We have since complied with the censure, having created and delivered Form CRS to all our clients.

None of Canton Hathaway's owners or management persons have any disciplinary information to disclose.

Item 10: Other Financial Industry Activities & Affiliations

A. Financial Industry Activities

Canton Hathaway is not a registered broker-dealer and does not have an application pending to register as a broker-dealer. Furthermore, none of Canton Hathaway's management or supervised persons is a registered representative of, nor has an application pending to register as a representative of, a broker-dealer.

B. Financial Industry Affiliations

Canton Hathaway is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, Canton Hathaway's management and supervised persons are not registered as and do not have an application pending to register as an associated person of the aforementioned entities.

C. Other Material Relationships

Jim Procaccianti is a Founding Partner of Canton Hathaway. Mr. Procaccianti is also the CEO of The Procaccianti Group ("TPG"), a real estate investment company which sponsors private placements, some of which may be recommended to Clients of Canton Hathaway. Mr. Procaccianti receives profits from Canton Hathaway and receives profits from investments into funds that he has control or management over. Private placements sponsored by TPG are subject to the same evaluation as other private placements recommended by the Firm, as detailed below. Canton Hathaway is required to act as a fiduciary and only recommend private placements it believes are in the best interest of its accredited investor clients. Canton Hathaway does not accept any referral fees or other compensation from TPG. Mr. Procaccianti is not involved in the selection of private placements nor is his affiliation taken into consideration when determining what types of investments to offer to clients. Clients are notified of the conflict of interest prior to investing in any private placement sponsored by TPG. Clients are not required to invest in any private placements sponsored by TPG, nor is Canton Hathaway required to exclusively offer private placements sponsored by TPG.

Anthony Marcello is licensed real estate agent. As such, he may receive normal and customary fees associated with real estate transactions. However, clients are under no obligation to engage Anthony Marcello for these services.

Anthony Marcello is a licensed insurance agent. As such, he may receive normal and customary commissions from insurance sales. Anthony Marcello has a conflict of interest to recommend insurance

products based on the compensation to be received. To mitigate this conflict, our firm will act in the client's best interest.

D. Other Investment Advisors

Canton Hathaway does not have any arrangements with other investment advisers that are material to its advisory clients.

Item 11: Code of Ethics, Participation, or Interest in Client Transactions & Personal Trading

A. Code of Ethics

The Advisor maintains an investment policy relative to personal securities transactions. This investment policy is part of Advisor's overall Code of Ethics (the "Code" or "COE"), which serves to establish a standard of business conduct for all of the Advisor's Representatives that is based upon fundamental principles of openness, integrity, honesty, trust and acting in the best interest of Clients at all times. A copy of the Firm's Code of Ethics is available upon request. In accordance with Section 204A of the Investment Advisers Act of 1940, as amended, the Advisor also maintains and enforces written policies and procedures reasonably designed to prevent the misuse of material non-public information by the Advisor or any person associated with the Advisor.

B. Personal Trading with Material Interest

Clients of Canton Hathaway who are also accredited investors may receive the recommendation to invest in privately-owned real estate investments sponsored by TPG, which is controlled by our Founding Partner, Jim Procaccianti. All private placements approved for use by Canton Hathaway undergo a due diligence process. Canton Hathaway does not give special consideration to any fund offered by TPG, nor does Canton Hathaway accept any compensation or referral fees from any fund sponsor. Mr. Procaccianti is not involved with any investment decisions or recommendations to Canton Hathaway clients. We also disclose this conflict to all clients investing in funds associated with TPG.

C. Personal Trading in Same Securities as Clients

Canton Hathaway allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (for purchase or sale) to a Client presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through implementation of certain policies and procedures. As noted above, we have adopted the Code to address insider trading (material nonpublic information controls) and personal securities reporting.

When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The Firm's supervised persons can make trades in their accounts that are in opposition to the advice provided to clients. The fiduciary duty to act in the best interest of its clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Canton Hathaway requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). We have also adopted written policies and procedures to detect the misuse of material, non-public information. When necessary, the Firm will add certain securities to its list of prohibited securities when it deems it necessary to mitigate conflicts of interest.

D. Personal Trading at Same Time as Client

While Canton Hathaway allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades will generally be aggregated with Client orders or traded afterwards. At no time will Canton Hathaway, favor its own securities transactions or its supervised persons' transactions over the transactions of any client.

Item 12: Brokerage Practices

A. Recommendation of Custodian(s)

Canton Hathaway does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize Canton Hathaway to direct trades to the Custodian as agreed in the investment advisory agreement. Further, Canton Hathaway does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

While Canton Hathaway does not exercise discretion over the selection of the Custodian, it may recommend a Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by Canton Hathaway. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not selected. Canton Hathaway may recommend a Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian's offices. Canton Hathaway will generally recommend that Clients establish their account[s] at National Financial Services LLC, Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity"), a FINRA-registered broker dealer and member SIPC. The following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. Canton Hathaway does not participate in soft dollar programs.
2. Brokerage Referrals – Canton Hathaway does not receive any compensation from any third party in connection with the recommendation for establishing an account.
3. Directed Brokerage – The Advisor may allow clients to direct brokerage outside of our recommendation(s). However, the Advisor might be unable to achieve the most favorable execution of client transactions, especially in instances where Client directed brokerage is more costly. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.
4. Trading – The Firm is able to trade in other accounts through a feature available through Fidelity. Fidelity allows trades to be placed in Fidelity for accounts held at Bank of America. These trades are sent to Bank of America for execution.

The Firm also works with UBS Financial Services Inc. (“UBS”) and has a limited authority to purchase bonds for client accounts. Any equity trading is conducted by UBS directly for the client.

B. Aggregating and Allocating Trades

To the extent that the Advisor provides investment management services to Clients, the transactions for each Client account generally are affected independently, unless the Advisor decides to purchase or sell the same securities for several clients at approximately the same time. The Advisor may (but is not obligated to) combine or “bunch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Clients differences in prices and commissions or other transaction costs that might have been levied had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among Clients in proportion to the purchase and sale orders placed for each Client account on any given day. The Advisor shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13: Review of Accounts or Financial Plans

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Principals of Canton Hathaway. Formal reviews are generally conducted quarterly, but no less frequent than annually (unless requested by the client), depending on the Client’s needs.

B. Causes for Reviews

Other factors that may trigger a review include, but are not limited to, major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account[s]. The Client is encouraged to notify Canton Hathaway if changes occur in the Client’s personal financial situation that might adversely affect the Client’s investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14: Client Referrals & Other Compensation

A. Compensation Received by Canton Hathaway

Canton Hathaway does not receive commissions or other compensation from product sponsors, broker-dealers or any unrelated third party. Except as disclosed in Item 5. Canton Hathaway may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Canton Hathaway may receive uncompensated referrals of new Clients from various third-parties.

B. Client Referrals from Promoters

Canton Hathaway does not engage paid promoters for Client referrals.

Item 15: Custody

Canton Hathaway does not accept or maintain direct custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a Custodian that is a "qualified custodian." Clients are required to engage a Custodian to retain their funds and securities and direct Canton Hathaway to utilize the Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Canton Hathaway to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices."

Although Canton Hathaway does not maintain direct custody of Client assets, we act as the general partner or managing member of certain private investment vehicles. Accordingly, the Firm is deemed by the SEC to have custody of those assets, because we serve in a capacity that provides us with access to the assets. In order to avoid any potential conflict of interest that indirect custody of Client assets may cause, private vehicles as described above are either maintained with a "qualified custodian" or audited annually by an independent auditor who is a member of and subject to inspection by the Public Company Accounting Oversight Board ("PCAOB"), with such audits delivered to investors in compliance with the SEC's Custody Rule.

Item 16: Investment Discretion

Canton Hathaway generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, and/or limitations previously set forth by the Client and agreed to by Canton Hathaway. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Canton Hathaway will be in accordance with each Client's investment objectives and goals.

Item 17: Voting Client Securities

Canton Hathaway does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18: Financial Information

Neither Canton Hathaway, nor its management, have any adverse financial situations that would reasonably impair the ability of Canton Hathaway to meet all of its obligations to its Clients. Neither Canton Hathaway, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Canton Hathaway is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months

or more in advance.



Privacy Policy and Procedures for Protecting Client Information

October 29, 2024

STATEMENT OF POLICY

The Adviser is committed to protecting the confidentiality and security of consumer, customer, and former customer information that it collects and will disclose such information only in accordance with Regulation S-P, any other applicable law, rules and regulations and this Privacy Policy.

I. Background

Regulation S-P limits the circumstances under which an adviser may disclose nonpublic personal information about a client to other persons and requires an adviser to disclose to all its clients the adviser's privacy policies. The Adviser has implemented the following Privacy Policy ("Privacy Policy") and Program for Protecting Client Information (the "Program") to comply with Regulation S-P.

II. Summary of Regulation S-P

Regulation S-P has four key features:

- An adviser must provide notice to its clients about its privacy policies;
- An adviser may only disclose nonpublic personal information about clients to a nonaffiliated third party if it provides an initial privacy notice and a notice giving the client the opportunity to "opt-out" from the adviser's disclosure of the information;
- A client may request that their nonpublic personal information not be disclosed to nonaffiliated third parties (although certain information required for processing transactions is still permitted to be disclosed); and
- An adviser must adopt a program reasonably designed to (i) ensure the security and confidentiality of client records and information; (ii) protect against any anticipated threats or hazards to the security or integrity of client records and information; and (iii) protect against unauthorized access to or use of client records or information that could result in substantial harm or inconvenience to any client.

III. Privacy Policy Scope

The Adviser has adopted this Privacy Policy, which applies to the Adviser. The Adviser conducts its business affairs primarily through its employees, to whom this Privacy Policy applies. To the extent that service providers are utilized in servicing accounts, confidentiality agreements that comply with Regulation S-P will be put into place.

Service Providers

The Adviser will obtain a representation from each service provider that the service provider will not disclose client and former client information of the Adviser other than to carry out the purposes for which the client and former client information was provided to the service provider. The Adviser will seek to obtain this representation from all third-party service providers in the contract for services. To the extent the Adviser has not previously obtained this representation from the service provider in the contract for services, the Adviser will seek to obtain such representation in substantially the form as set forth in

Attachment A.

Privacy Notices

Under Regulation S-P, the Adviser must provide an initial privacy notice to its customers at the time the advisory relationship is established and annually thereafter and provide an initial privacy notice to its “consumers” before it discloses nonpublic personal information.

Consumers. A “consumer” is an individual who obtains from an adviser, financial products that are to be used primarily for personal, family or household purposes, such as one-time investment advice. The Adviser must provide an initial privacy notice to its consumers before the Adviser discloses the consumers’ nonpublic personal information to a nonaffiliated third party (other than as necessary to process consumer transactions). The Adviser is not required to send a privacy notice to consumers if the Adviser discloses nonpublic information about its consumers to third parties only pursuant to certain exceptions. The Adviser may satisfy the initial notice requirement by sending a “short form” notice that explains how the consumer may obtain the adviser’s privacy notice.

Customers. A “customer” is a consumer who uses the product or service of the Adviser on an on-going basis (such as receiving continuous investment advice). The Adviser must provide an initial privacy notice when the Adviser establishes the customer relationship (such as when an investor enters into an advisory contract) and annually thereafter.

Content of Customer Privacy Notices

The initial and annual privacy notices must contain the following information:

- categories of nonpublic personal information collected by the Adviser;
- categories of nonpublic personal information disclosed by the Adviser;
- categories of affiliates and nonaffiliates to whom the Adviser discloses the nonpublic personal information;
- categories of nonpublic personal information about former customers disclosed by the Adviser and the categories of affiliates and nonaffiliates to whom it is disclosed;
- if nonpublic personal information is disclosed to third parties, an explanation of the right to “opt-out” of such disclosure; and
- a general description of the Adviser’s policies and practices with respect to protecting the confidentiality and security of nonpublic personal information.

The initial privacy notice will be delivered with Part 2 of the Adviser’s Form ADV, the investment advisory agreement for separate accounts or subscription agreement for private investment vehicle investors that is given to customers at the start of the advisory or investment relationship. The annual notice will be electronically delivered to each customer, generally accompanying the annual Part 2 delivery requirements. The Chief Compliance Officer or the delegatee will review and update the privacy notice at least annually.

Opt-Out Notice

If the Adviser plans to disclose nonpublic personal information (other than pursuant to certain exceptions), the Adviser will provide consumers and customers a reasonable means to “opt-out” of the disclosure of that information, in compliance with Regulation S-P. Once a consumer elects to opt-out, the Adviser must honor the election as soon as reasonably practicable. The opt-out election remains in effect until the consumer revokes it.

Document Destruction Policy

The Adviser is required to take reasonable measures to guard against access to information derived from credit reports or other customer information when disposing of it, such as shredding such information, entering into a contract with a company that is in the business of disposing of consumer information in a

manner consistent with Regulation S-P, destroying or erasing electronic documents that contain consumer information, and monitoring employee compliance with disposal and destruction procedures.

IV. Administration of Privacy Policy Designation of Responsibility

The Chief Compliance Officer or the delegee shall be responsible for implementing this Privacy Policy and all questions regarding this Policy should be directed to the Chief Compliance Officer or the delegee.

Amendment of the Privacy Policy

The Privacy Policy may be amended only by action of the Chief Compliance Officer or the delegee.

Non-Compliance

An employee will report to the Chief Compliance Officer or the delegee any material breach of this Privacy Policy of which the employee has become aware. Upon being informed of any such breach, the Chief Compliance Officer or the delegee is authorized to take any such action they deem necessary or appropriate to enforce this Privacy Policy and otherwise comply with Regulation S-P.

V. Program for Protecting Customer Information

The Chief Compliance Officer or the delegee are responsible for implementing and maintaining the Program.

Identifying Internal and External Risks

The Program is designed to identify foreseeable internal and external risks to the security, confidentiality, and integrity of customer information that could result in the unauthorized disclosure, misuse, alteration, destruction, or other compromise of such customer information. An assessment and evaluation will be made of the likelihood, and potential damage of these threats, the sufficiency of any safeguards in place to control such risks and, where appropriate, the Program will be revised to address such risks (the “Risk Assessment”). At a minimum, the Risk Assessment will include a consideration of the risks in each of the Adviser’s areas of operation, including:

- Employee training and management, including instructing and periodically reminding employees of the Adviser’s legal requirement and policy to keep customer information secure and confidential;
- Information systems, including network and software design, as well as information processing, storage, transmission, retrieval, and disposal; and
- Detecting, preventing, and responding to attacks, intrusions, or other system failures.

Design and Implementation of Safeguards

Information safeguards will be designed and implemented to control the risks identified through the Risk Assessment, and the effectiveness of the safeguards’ key controls, systems and procedures will be regularly tested or otherwise monitored.

Overseeing Service Providers

Reasonable steps will be taken to determine that the service providers¹ who have been selected and retained by the Adviser, at a minimum, maintain sufficient customer information safeguard procedures to detect and respond to security breaches. Moreover, reasonable procedures will be implemented to discover and respond to widely known security failures by service providers. Finally, all contracts with service providers must contain assurances that such service providers have implemented and will maintain such safeguards.

Evaluation and Maintenance of the Program

The Program will be periodically adjusted, as necessary or appropriate, based on: (i) results of testing and monitoring pursuant to the Program; (ii) any material changes to the business and operation of the Adviser; and (iii) any other circumstances that may have a material impact on the Adviser’s information security system.