

**Item 1:
Introduction**

Income Research + Management (“IR+M”) is a registered investment adviser with the U.S. Securities and Exchange Commission (“SEC”). Registration of an investment adviser does not imply any level of skill or training. IR+M is not registered nor does it have an application pending to register as a broker-dealer. Certain of IR+M employees (“Supervised Persons”) are registered representatives of a third-party SEC registered broker-dealer and IR+M maintains a branch office that reports into an office of supervisory jurisdiction at the third-party SEC registered broker-dealer. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker dealers, investment advisers, and investing.

**Item 2:
Relationship
and Services**

What investment services and advice can you provide me?

IR+M offers investment advisory services to retail investors through separate accounts or investment via mutual funds and private investment funds under our management. Our investment advisory business is predominantly focused on the investment grade portion of the U.S. fixed income universe, offering clients advice and services on broad and focused fixed income strategies. We monitor retail investors’ investments on a periodic basis as part of our standard services. IR+M typically has discretionary authority over retail investor accounts via an investment management agreement, which means we make investment decisions for your account subject to specific investment guidelines governing your account without consulting with you first. We work with each of our clients and/or their investment consultant to determine the appropriate strategy based on your investment objectives and individual needs. We make available investment opportunities in proprietary private funds and mutual funds sponsored by IR+M and non-affiliated entities. Minimum account sizes vary for retail investors; we generally require a \$50 million minimum for separately managed institutional fixed income portfolios, \$75 million for convertible bond and liability driven investment portfolios, and \$10 million for municipal portfolios. Our private investment funds have a \$5 million minimum investment. We waive minimum account sizes at our discretion.

Additional Information: More detailed information on the services we provide can be found in Items 4 through 8 in our Form ADV Part 2A: <https://adviserinfo.sec.gov/firm/summary/104863>.

Conversation Starters:

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

**Item 3:
Fees, Costs,
Conflicts,
and
Standard of
Conduct**

What fees will I pay?

We charge retail investors an investment management fee based on the assets under management for the advisory services we provide. We generally charge fees on a quarterly basis in arrears. Fees are typically prorated for each capital contribution and capital withdrawal made during the applicable calendar quarter. Upon termination of an advisory relationship, any earned unpaid fees are due and payable to us. The fee we charge generally depends on several factors, including client type, portfolio type, investment strategy, portfolio size, client service needs, pre-existing relationship, and other factors. All fee schedules are negotiable. The more assets there are in a retail investor’s advisory account, the more a retail investor will pay in fees, and the firm therefore has an incentive to encourage the retail investor to increase the assets in his or her account. The fees IR+M charges to separate account clients are solely for the investment management services we provide for your account. IR+M’s fee does not include any fees imposed by custodians, brokers, other third parties and the advisory fees and other fees paid for investments in mutual funds and private investment funds. IR+M does not receive any portion of fees imposed by third parties. Neither the private investment funds we manage nor any investor in such private investment funds pay any fee for routine professional services such as custody, audit, legal, or financial and tax preparation. All such fees are borne by us as the private investment fund’s investment manager.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. More detailed information on the fees we charge can be found in Item 5 in our Form ADV Part 2A: <https://adviserinfo.sec.gov/firm/summary/104863>.

Item 3: Fees, Costs, Conflicts, and Standard of Conduct (Continued)

Conversation Starters:

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

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means. As a retail investor:

- **Proprietary products:** The potential for conflict in our recommending investments that are issued, sponsored, or managed by IR+M (e.g., private investment funds and ETFs cosponsored by IR+M)
- **Research Received from Broker-Dealers:** The incentive to use a broker-dealer providing research to IR+M
- **Allocations of Investment Opportunities:** The potential for conflict when allocating limited investment opportunities across client accounts
- **Identification and Resolution of Trading Errors:** The necessity to analyze and address trading errors

Conversation Starters:

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

Additional Information: More detailed information on the conflicts of interest related to your account or relationship with us, can be found in our Form ADV Part 2A:

<https://adviserinfo.sec.gov/firm/summary/104863>.

How do your financial professionals make money?

Supervised Persons are generally compensated with a competitive salary, plus a multi-factor bonus that considers the revenue the firm earns, and are eligible to participate in our company-funded profit-sharing plan. Our Supervised Persons do not receive compensation based on the amount of client assets they service, the time and complexity required to meet a client's need, sales of products, and client referrals.

Item 4: Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No. Please visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Conversation Starters:

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

Item 5: Additional Information

Please see our Form ADV for more information about our firm and our investment advisory services by visiting: <https://adviserinfo.sec.gov/firm/summary/104863>. If you wish to receive a copy of this Relationship Summary or additional, up-to-date information, please contact IR+M at 617-330-9333 or email us at irm@incomeresearch.com.

Conversation Starters:

- *Who is my primary contact person?*
- *Is he or she a representative of an investment adviser or a broker-dealer?*
- *Who can I talk to if I have concerns about how this person is treating me?*