

Item 1 – Cover Page

# **The Winthrop Corporation**

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**2 Corporate Drive**

**Suite 770**

**Shelton, Connecticut 06484**

**203.783.4400**

**[www.wrightinvestorsservice.com](http://www.wrightinvestorsservice.com)**

**March 2024**

**This Brochure provides information about the qualifications and business practices of The Winthrop Corporation. If you have any questions about the contents of this Brochure, please contact us at 203.783.4400. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.**

**Additional information about The Winthrop Corporation also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 – Material Changes**

There have not been any material changes since the last annual update of our Brochure, which occurred in March 2023.

This Brochure may be requested by contacting us at 203.783.4400.

Additional information about The Winthrop Corporation is available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with The Winthrop Corporation who are registered, or are required to be registered, as investment adviser representatives of The Winthrop Corporation.

### Item 3 -Table of Contents

Item 1 – Cover Page .....	i
Item 2 – Material Changes .....	ii
Item 3 – Table of Contents.....	iii
Item 4 – Advisory Business .....	1
Item 5 – Fees and Compensation .....	1
Item 6 – Performance-Based Fees and Side-By-Side Management .....	1
Item 7 – Types of Clients.....	1
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	1
Item 9 – Disciplinary Information .....	1
Item 10 – Other Financial Industry Activities and Affiliations .....	2
Item 11 – Code of Ethics .....	2
Item 12 – Brokerage Practices .....	2
Item 13 – Review of Accounts .....	2
Item 14 – Client Referrals and Other Compensation .....	2
Item 15 – Custody .....	2
Item 16 – Investment Discretion .....	3
Item 17 – Voting Client Securities.....	3
Item 18 – Financial Information.....	3

#### **Item 4 – Advisory Business**

Organized in 1955, The Winthrop Corporation (“TWC”) had been providing investment advisory services under the trade name Wright Investors’ Service since 1961. TWC is a wholly-owned subsidiary of Khandwala Capital Management, Inc. Early in 1996, management of TWC decided to incorporate Wright Investors’ Service, Inc. (“Wright”) as a wholly-owned subsidiary. Since all personnel remained employees of TWC, TWC became registered with the SEC under the related adviser exemption, Wright contracts with TWC for TWC employees to perform all work for Wright. TWC has zero regulatory assets under management as of December 31, 2023.

TWC’s only advisory client is Wright. In addition to leasing its employees to Wright, TWC also provides Wright with research services, which Wright uses in providing investment advisory services to its clients. This research includes financial information, profiles and analyses on over 46,000 of the world’s leading publicly owned companies. The data is updated continuously, providing a nearly real-time view of global corporate activity.

#### **Item 5 – Fees and Compensation**

TWC is reimbursed by Wright for the use of TWC’s employees.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

TWC does not manage assets and therefore does not charge any performance-based fees.

#### **Item 7 – Types of Clients**

TWC’s only investment advisory client is Wright, a federally registered investment adviser.

#### **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

One of TWC’s basic research tools is a database of corporate fundamental information, one of the most extensive databases in the investment industry. This database provides detailed financial information on the world’s leading publicly-owned corporations. In addition to generating profiles and analyses of these companies, TWC screens them using defined fundamental criteria. Most companies are assigned a Quality Rating, based on investment acceptance, financial strength, profitability and stability and growth. TWC does not implement any investment strategies.

#### **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 TWC. TWC has no information applicable to this Item.

## **Item 10 – Other Financial Industry Activities and Affiliations**

TWC is the parent company of Wright, a federally registered investment adviser. Wright is the sole member of another federally registered investment adviser, Wright Private Asset Management, LLC, which primarily serves individual clients. TWC is also the parent company of Wright Investors' Service Distributors, Inc. ("WISDI"), a SEC-registered Broker-Dealer and FINRA member. Certain executives, officers and employees of TWC are also registered representatives of WISDI.

## **Item 11 – Code of Ethics**

TWC's management is committed to the principles of integrity and honesty in all of its business transactions, and expects all of its officers, directors and employees to adhere to these ideals in practice. Since TWC's employees perform services for Wright, compliance with Wright's Code of Ethics is deemed compliance with TWC's Code of Ethics. Under the Code of Ethics, employees must, at all times, place the interests of Wright's clients first. Employees may not in any respect take advantage of client transactions. While personnel of Wright are permitted to invest in securities for their own accounts, most transactions are subject to many restrictions, including preclearance procedures and reporting requirements. Eligible trades that require pre-approval are reviewed by Wright's Chief Investment Officer or Chief Investment Officer of Fixed Income prior to an employee being allowed to place a trade. Wright's Chief Compliance Officer is charged with oversight of all aspects of the Code.

Currently, a copy of the Code of Ethics may be requested without charge by contacting us at 203.783.4400 or by writing to us at The Winthrop Corporation, 2 Corporate Drive, Suite 770, Shelton, CT 06484.

## **Item 12 – Brokerage Practices**

TWC does not select or utilize brokers.

## **Item 13 – Review of Accounts**

TWC does not review client accounts or financial plans.

## **Item 14 – Client Referrals and Other Compensation**

TWC does not receive economic benefits from non-clients for providing investment advice or other advisory services to clients.

## **Item 15 – Custody**

TWC does not maintain custody of client assets.

**Item 16 – Investment Discretion**

TWC does not accept discretionary authority to manage client assets.

**Item 17 – Voting Client Securities**

TWC does not and will not accept authority to vote client securities.

**Item 18 – Financial Information**

TWC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.