

Disclosure Brochure for:

Beaumont Financial Partners, LLC

An Investment Advisor Registered with the Securities and Exchange Commission (SEC)

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This brochure (Form ADV Part 2) provides information about the qualifications and business practices of Beaumont Financial Partners, LLC (“Beaumont”). Please direct questions about the content of this brochure to Michael Snyder, the firm’s Chief Compliance Officer, at either the number above or by email at msnyder@bfpartners.com.

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 Beaumont is also available on the SEC’s website at www.adviserinfo.sec.gov.

Beaumont Financial Partners, LLC is an Investment Advisor registered with the Securities and Exchange Commission (SEC). Registration does not imply a certain level of skill or training.

March 2020

Item 2 – Material Changes

This section will only discuss material changes since last year's annual update and may not include all changes since the last update.

- Beaumont Financial Partners, LLC previously maintained a separate division, Beaumont Capital Management (BCM). As of December 31, 2019 BCM became an independent, newly formed firm no longer associated with Beaumont Financial Partners. This separation included Beaumont assigning its 20% ownership in the independent research firm Algorithmic Investment Models, LLC. to BCM. Neither Beaumont nor its members have any ownership or association with BCM or AIM.
- There was a change in ownership and to the control persons at Beaumont Financial Partners as of December, 31, 2019. A managing partner resigned to lead the newly formed company. His ownership stake in Beaumont has been reallocated proportionately to the remaining LLC members of the firm.
- Our ADV (Part I and Part II) has been modified to remove references to, and responses which included, the BCM division unless otherwise stated.
- The Assets Under Management (Item 5) were updated to be as of January 1, 2020 to reflect the current firm structure and does not include assets from the division that is no longer part of the firm.

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Item 4 – Advisory Business

A. Describe your advisory firm, how long you have been in business and identify principal owners.

Beaumont Financial Partners, LLC (“Beaumont”), an investment adviser registered with the Securities and Exchange Commission (“SEC”), organized in 1999. Its predecessor firm, Beaumont Trust Associates, became a registered investment adviser in 1981.

Beaumont delivers a comprehensive range of wealth management and family office services to affluent individuals and families, small businesses, and select institutions. Our seasoned tax preparation and financial planning capabilities and services complement our core investment management business.

The Class A member (managing partner) ownership includes Thomas J. Cahill and Lawrence A. Fiore, while Class B (non-voting) members are Philip Dubuque, James Oates and Richard Burnes Jr.

B. Describe the types of advisory services offered.

Beaumont provides investment management for its clients using one or more custodians. Each relationship typically begins by gathering information from prospective clients including, but not limited to the following:

- financial situation;
- investment objectives;
- income needs, risk tolerance, and time horizon;
- current investments and existing portfolio composition; and
- other factors pertaining to their unique situation and familial considerations.

Beaumont uses this information to develop a target asset allocation consistent with and appropriate for each clients’ response. From that point, Beaumont manages the client’s assets according to the agreed upon target investment allocation. Beaumont provides additional services to many investment clients, such as assistance with tax preparation and/or financial planning, typically for an additional fee. The individual needs and desire of each client determines the depth and formality of the planning process. Ongoing planning or plan updates are also available upon request.

C. Explain if, and how, you tailor your advisory services to the individual needs of clients. Also, explain if clients may impose restrictions on securities or types of securities.

Beaumont takes the opportunity to learn about the financial condition, needs, goals and objectives of each client. This information, combined with their risk tolerance, determines which of our investment profiles/target allocations are most appropriate for each client. Beaumont manages each account consistent with the clients’ goals, risk tolerance, overall financial situation and other factors in mind, however, reserves the right to invest their accounts more conservatively at any time.

A client’s actual holdings will vary from their long-term target allocations due to market fluctuation, investment gains/losses, contributions and/or withdrawals, non-managed securities, active management (by the client), client specific restrictions, client requests and other circumstances (i.e. tax loss selling).

Clients may impose restrictions, if done so in writing, on certain securities or types of securities. These restrictions would typically be documented in the clients’ initial paperwork and within their profile in our client relationship management (CRM) database. We follow the same process for restrictions added later in the relationship. In addition, as appropriate, the traders will add the client trade restriction into our trading software to make it easily identifiable when trading.

D. If you participate in wrap fee programs by providing portfolio management services, describe the differences, if any, between how you manage wrap fee accounts and how you manage other accounts, and explain that you receive a portion of the wrap fee for your services.

Beaumont invests client accounts in individual equities, bonds, mutual funds, ETFs, and other investment options. The Beaumont Investment Committee makes investment recommendations for Beaumont client accounts; individual relationship managers (RMs) ultimately decide how much, which, and when to buy or sell an investment for their clients’ accounts.

Beaumont periodically utilizes a “specialized” sub-advisor or money manager for a certain allocation of a client’s overall allocation. Any additional fees incurred by the client will be disclosed prior to the use of the sub-advisor/manager. These fees will vary depending on the sub-advisor used. Beaumont does not receive an additional fee in these arrangements.

E. Assets Under Management: discretionary and non-discretionary.

As of January 1, 2020, Beaumont had ~ \$2.222 B in total assets under management and assets under advisement:

Discretionary: ~\$1.65 B

Non-discretionary: ~\$574 M

Item 5 – Fees and Compensation

A. Describe how you are compensated for your advisory services. Provide a fee schedule and disclose if fees are negotiable.

The annual investment management fees for Beaumont Wealth Management clients are typically:

- charged as a percentage of assets under management
- between 0.60% to 1.00% for diversified accounts
- .50% for bond ladder only accounts

Beaumont fees are typically based on total client AUM, asset mix, complexity and other variables and circumstances. The managing partners reserve the right to waive a portion, or all, of a client’s fee and any minimum account size requirement.

Beaumont also offers financial planning services, tax preparation, and accounting services for an additional fee. The cost for these services varies depending on the complexity of the clients’ finances and attention given; with considerations provided if Beaumont manages the clients’ investment assets. Some clients elect to “bundle” the fees for multiple services into the management fee.

Beaumont also receives compensation through certain client relationships solely for providing them research, typically pertaining to alternative investments. The compensation structure varies for these relationships, including time spent, scope and limit of investment, reach, etc.; however, it is determined prior to the start of the relationship and services being provided.

Describe whether you deduct fees from clients’ assets or bill clients for fees incurred. Disclose if clients may choose which method they prefer. Explain how often clients are billed or have fees deducted.

The investment advisory agreement will identify if the client opted to have their fees deducted from their account or receive an invoice. For certain investments the fees will be deducted directly from the client account unless they request to be invoiced. Beaumont recommends having the ability to deduct fees directly from accounts to simplify the recordkeeping and payment process. Wealth management clients can opt to receive a quarterly billing notification (statement) showing the calculation used to determine their fee, or request one at any time, regardless of the payment method chosen. Custodial statements will reflect fees deducted from an account and any other activity during the period. Clients are encouraged to compare their billing notification (statement) with the fee that appears on their custodial statement to ensure accuracy.

Beaumont primarily bills clients’ investment management fees quarterly, *in arrears*, based on an average (available) daily market value of the portfolio for each calendar quarter. Fees are charged or refunded in a prorated manner to the end of the quarter upon inception or termination of an account. A client, or Beaumont, may end the relationship by providing 5-days written notice to the other party. The notice period is to allow any outstanding transactions (trades, outstanding checks, transfers, etc.) to settle. There are limited arrangements where a sub-manager deducts quarterly management fees in advance, however this would be disclosed to the client prior to utilizing that third-party manager.

B. Describe any other types of fees or expenses clients may pay in connection with your advisory services.

Beaumont clients should be aware that investments in mutual funds, ETFs, alternative investments and certain other securities result in the payment of multiple fees including the fees and expenses of the ETFs, alternative investments, and mutual funds

themselves (expense ratio, etc.). These fees and expenses are customary, and an inherent cost associated with investing. Trading fees are an additional cost incurred in the management of an account. These additional expenses are incurred directly at the investment/custodian/broker-dealer level; and Beaumont does not receive any compensation from these additional expenses, nor does it receive commissions for using specific investments.

It is important to note that other fees, including platform fees, mutual fund transaction fees, custodial and trading fees, apply at each custodian. Other fees that clients could pay include short-term trading fees, alternative investment fees, wire fees, and other miscellaneous fees as applicable. Commissions and fees are sometimes negotiable at each custodian. The custodian/broker keeps all commission and transaction fees. A platform sponsor or custodian may charge an additional fee if certain minimums, or other requirements, are not met. Beaumont will not receive any of the fees mentioned in this paragraph.

Additionally, Beaumont is permitted to “trade away” while seeking best execution. The firm will consider the trade-away fee charged by the custodian, security price and other factors prior to using this tactic. The fees and/or commissions vary by custodian and broker, and, because of these additional fees, may not be advantageous to the client. The typical fee, charged by a custodian or trading desk, for trading away ranges from ~\$10-50, or more, per transaction. Beaumont does not receive a fee, commission or other compensation for trading away.

See Item 12 for additional information about our Brokerage Practices.

C. Disclose if your *clients* either may or must pay your fees in advance, and how they may obtain a refund and how it would be calculated if the advisory contract is terminated.

See Item 5.A. for information about refund calculations and prorated fees.

D. Disclose if you or any of your *supervised persons* accepts compensation for the sale of securities or other investment products.

No compensation is tied directly to the sale of securities or other investment products.

See Item 6 for related information.

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

If you or any supervised person accept performance-based fees or manage accounts that are charged a performance-based fee and charged another type of fee.

Beaumont does not currently charge performance-based fees.

Item 7 – Types of Clients

Describe the types of clients to whom you generally provide investment advice.

Beaumont provides investment advice to many types of clients including:

- Individuals/families
- Trusts/estates
- IRAs
- Pension, profit sharing and retirement plans (i.e. defined benefit and defined contribution)
- Corporations, non-profits and college endowments
- Unaffiliated RIAs and broker/dealers
- Trust companies

A client relationship includes any family, professional or other logical association. Beaumont typically aggregates family accounts, of a client relationship, with respect to the fee schedules and the minimum client account requirements. There are client relationships, and their family members, grandfathered from current requirements based upon their original conditions for starting or maintaining their accounts.

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

A. Describe the methods of analysis and investment strategies you use in formulating investment advice or managing assets. Explain the risk of loss that *clients* should be prepared to bear.

Beaumont employs both technical and fundamental analytics when reviewing securities. In addition to these measures, our analysis includes studying, and the daily review of, numerous trade publications, brokerage research and corporate reports. We also utilize resources such as Bloomberg and Value Line. Additionally, Beaumont utilizes computer software programs in the preparation of financial plans and plan updates.

The analysts typically meet weekly, as part of the Investment Committee, to discuss investment opportunities believed to be worth pursuing as well as reviewing current holdings. Once the committee determines a security is appropriate for client accounts, the committee will discuss client strategies that are most suitable for that security to be allocated (given the clients' objective, risk tolerance, cash needs, etc.) and the appropriate weighting for the position. The RMs ultimately determine the suitability of the securities recommended by the Investment Committee for each of their clients (accounts).

It is important for investors to understand that investing in any type of security involves the risk of loss of principal. Equity securities (and similar vehicles) have typically experienced more volatility over time, while historically less-volatile securities, such as bonds (or cash), come with their own inherent risks including interest rate risk, credit risk, and/or inflation risk. The RMs discuss investment risks with clients at the onset of the relationship to ensure the investor understands the risks associated with their investment strategy before investing their money.

Instead of the simplistic cash-bond-stock breakdown, Beaumont uses a more encompassing method of security definition called *The Dominant Benefit Theory of Investing*. Using this theory, Beaumont categorizes investments into one of the following five distinct categories based on the dominant characteristics of the investment:

1. **Safety**: The goal is stability of the investment principal. Risk and commensurate reward are relatively low. Examples include money market funds, certificates of deposit and fixed annuities.
2. **Income**: The goal is current interest income. While principal risk exists, the dominant benefit is the anticipated steady income by the security. Examples include most types of bonds.
3. **Equity Income**: The goal is current, relatively high dividend income, with growth as a secondary objective. Capital appreciation/depreciation potential and risk are more correlated to Growth investments. Examples include preferred stock, private placement notes, alternative investments and real estate limited partnerships.
4. **Growth**: The goal is capital appreciation, any income paid provides a secondary benefit. Examples include common stocks with dividends, mutual funds containing growth stocks and alternative investments. Principal is at a higher risk of loss.
5. **Aggressive Growth**: The goal is to obtain significant capital appreciation. Typically, these types of securities do not provide income, and the risk of principal is higher than with the other categories. Examples include non-dividend paying stocks, aggressive growth mutual funds, alternative investments, most commodity-based investments and initial public offerings.

While the target allocations are a strategic, long-term guide that Beaumont uses to manage client accounts, Beaumont reserves the right to become more conservative, or significantly reduce exposure to any category, at any time. This would be more likely to occur when the firm's outlook on the market is not optimistic about Growth or Aggressive Growth investments. In doing so, Beaumont may shift assets into "Safety," Fixed Income or Equity Income investments as defined above. Beaumont may become more aggressive in the allocations, if appropriate, by notifying clients ahead of time.

In addition, Beaumont has a suite of portfolio allocations, with varying risk levels, to use depending on the client's risk profile. Each allocation starts with the Beaumont Dominant Benefit Theory of Investing, along with Beaumont's current allocation models, to create a portfolio mix comprised primarily of low-cost index mutual funds and exchange traded funds. The six portfolio allocation choices can range from 100% Equity/0% Fixed Income to 0% Equity/100% Fixed Income. While the portfolios are using the overall allocation as a strategic long term guide, each also utilizes various analytics to review the current state of the market and economy which can allow for the portfolio to become more defensive in times of market or economic weakness as the outlook warrants. The portfolio will also utilize traditional bond funds or a bond ladder approach using defined maturity ETFs for liquidity and diversification to manage the fixed income side with an eye towards income and capital preservation in a changing interest rate environment.

A client's actual position weighting may vary from their long-term target allocations due to market fluctuation, investment gains/losses, contributions and/or withdrawals, non-managed securities and client specific restrictions, client requests and

other circumstances. Beaumont asks clients to notify their RM promptly, in writing, of changes to their financial situation and/or their investment objectives that may warrant a change to their long-term target allocations. An investment approved by the Investment Committee may or may not be appropriate for all clients. Each RM determines the appropriateness of an investment for their individual client accounts.

For small and mid-sized accounts (typically under \$150,000), Beaumont often recommends employing a model portfolio consisting of either mutual funds, exchange-traded funds ("ETF") or a combination of the two. This approach seeks to minimize trading costs, reduce risks caused by having a less diversified smaller account, and helps ensure consistent management.

Beaumont, where appropriate, introduces the client to private placements, hedge funds and other alternative investment opportunities as part of a client's portfolio allocation. Some of these investments are only available through a 3rd party or separate investment advisor. The sponsor typically requires the client to complete subscription documents, or an application, prior to allowing them to participate in these investments. Beaumont does not receive additional compensation from the 3rd party sponsors for using or introducing clients to them; however, Beaumont would include these assets, as part of the client's quarterly Beaumont fee calculation, as a portion of their overall allocation. A separate fee structure may be used for recommending alternative or private placement investments. The RM will inform clients of additional risks associated with these investments (regulatory, liquidity, credit, principal, counterparty, etc.) to ensure they are aware of, and consider them prior to investing. These risks are included in the Limited Partnership Agreement and/or offering material furnished by the sponsor.

B. For each significant investment strategy or method of analysis used, explain the material risks involved. Explain any significant or unusual risk and disclose how, if applicable, frequent trading can affect performance.

Please see Item 8.A. above.

As with all investments, there are associated inherent risks, including loss of principal. Fixed income investments are subject to inflationary, credit, market and interest rate risks. Stock markets, especially foreign markets, are volatile and can decline significantly in response to adverse issuer, political, regulatory, market, or economic developments. Sector investments concentrate in a particular industry and its performance often depends heavily on the performance of that industry and be more volatile than the performance of less concentrated investment options and the overall market. Securities of companies with smaller market capitalizations tend to be more volatile and illiquid than larger company stocks. Smaller companies may have no, or relatively short, operating histories or be newly public companies. Foreign securities are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. Fixed income investments carry risks related to interest rate fluctuation, credit changes and inflation, while remaining in cash involves inflation risk.

ETFs typically trade like stocks and are subject to investment volatility and the potential for loss. The principal amounts invested in ETFs are not protected, guaranteed or insured. Diversification into many ETFs does not ensure a profit or protect an investor from loss. High frequency trading could result in lower returns due to an increase in trading costs, as well as an increase in realized capital gains/losses. Investments in mutual funds also incur the fund expenses. These are paid directly to the fund company and Beaumont does not receive any of these fees.

C. If you recommend primarily a particular type of security, explain the material risks involved.

Beaumont does not recommend a particular type of security. However, there are instances where clients are looking for investment opportunities with different features than those covered for typical Beaumont relationships. Beaumont employees research alternative investments, and other private investments, conduct due diligence and present ideas believed to offer opportunity to appropriate, eligible clients. Clients are responsible for reviewing provided documents, completing applications or other paperwork, and submitting them to participate in these opportunities. Beaumont will facilitate the process as a service to clients. These opportunities can be as, if not more, volatile as the stock market in general, and run the risk of losing the principal amount invested. These alternatives are generally less transparent and are not always priced or valued daily.

There are instances where existing Beaumont clients are the sponsor of, or associated with the sponsor of, alternative investments recommended to other clients. Beaumont does not receive compensation from the sponsor or the alternative investment for clients that subscribe to/invest in these opportunities. Conversely, these relationships have allowed additional Beaumont clients to participate in these investments via lower minimums, reduced fees or other benefits. RMs verbally inform clients of these relationships when introducing clients to these investment opportunities.

Item 9 – Disciplinary Information

Disclose any legal or disciplinary events that are material to a client’s or prospective client’s evaluation of your advisory business or the integrity of your management.

There are no legal or disciplinary events to report.

Item 10 – Other Financial Industry Activities & Affiliations

A. Disclose any registrations as a broker-dealer or a registered representative.

Beaumont is *not* registered with the Financial Industry Regulatory Authority ("FINRA") as a broker-dealer, nor is any associate licensed as a Registered Representative with a broker/dealer.

B. Disclose any registrations (i.e. futures commission merchant, commodities, etc.).

There are no registrations to report.

C. Describe any relationship or arrangement, material to your advisory business or to your clients, that you or any of your management persons have with any related person listed below:

- | | |
|---|---|
| 1. Broker-dealer, municipal securities dealer, or government securities broker or dealer | 4. Futures commission merchant, commodity pool operator, or commodity trading advisor |
| 2. Investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund) | 5. Banking or thrift institution |
| 3. Other investment adviser or financial planner | 6. Accountant or accounting firm |
| | 7. Lawyer or law firm |
| | 8. Insurance company or agency |
| | 9. Pension consultant |
| | 10. Real estate broker or dealer |
| | 11. Sponsor or syndicator of limited partnerships |

Please reference previous Items for additional information.

Beaumont offers and provides various financial planning and tax preparation services. Lawrence Fiore is the Director of Beaumont's tax practice. Mr. Fiore and Thomas Cahill are both members of the Massachusetts Society of CPAs. Mr. Cahill is also a member of the AICPA. Beaumont has two associates who are dedicated to the tax department, with other Beaumont associates, and/or outside accountants, assisting the tax department during peak times.

Beaumont also has less than half-dozen solicitor arrangements. The firm does not receive additional compensation due to this relationship, other than through fees generated from additional client AUM, nor does the client pay additional fees because of these arrangements. The compensation would be between Beaumont and the solicitor and not affect the client fee. The solicitor is required to provide notice and certain required documentation to the client prior to referring them to Beaumont.

D. Disclose if you receive compensation, directly or indirectly, for recommending or selecting other investment advisors for your clients.

Beaumont does not receive compensation for recommending or selecting other advisors. The sub-advisors request custodians to deduct fees directly and submit to them.

Please reference Item 8.A and 8.C for additional information.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. If you are an SEC-registered advisor, briefly describe your code of ethics adopted pursuant to SEC rule 204A-1 (or similar state rule). Explain that you will provide a copy of your Code of Ethics to any client or prospective client upon request.

As an SEC-registered advisor, Beaumont has a Code of Ethics (the “Code”) which is reviewed and revised, as necessary, on an ongoing basis. As summarized by the SEC, rule 204A-1 states:

The codes of ethics must set forth standards of conduct expected of advisory personnel and address conflicts that arise from personal trading by advisory personnel. Among other things, the rule requires advisers’ supervised persons to report their personal securities transactions...

New Beaumont employees receive training and sign an acknowledgement of their understanding of the Code upon starting with the firm. Additionally, each year all employees recertify their understanding and compliance of the Code. The Code specifically addresses employee trading, conflicts of interest and compliance protocol to better educate employees to ultimately prevent wrongdoing. It also includes a section regarding Compliance review of initial employee holdings and the quarterly review all employees’ personal trades to ensure preapproval was obtained (when necessary).

Subsequent items addressed include, but are not limited to, employees reporting violations they discover, insider trading, employee education and acknowledgement, and record keeping requirements.

Beaumont will provide a copy of its Code of Ethics, upon request, to any client or prospective client. Submit requests by email (msnyder@bfppartners.com) or by phone (781-400-2800).

B. If securities in which you or a related person has a material financial interest are recommended to clients, or bought or sold for client accounts, describe your practice and discuss the conflicts of interest it presents.

Client fees are not based on the securities bought or sold in their accounts; nor is employee compensation based on the investments made on behalf of clients or by recommending or using specific investment companies. We have policies in place to address front-running when buying or selling a security could impact others that are invested in a specific security. However, most names are large and publicly traded reducing the likelihood of our ability to move a market or have a financial impact to others invested in a specific holding.

C. If you or a related person invests in the same securities, or related securities, that you recommend to clients, describe your practice and discuss the conflicts of interest this presents.

Beaumont associates can and often do invest in the same securities or strategies we use for client accounts. When this situation arises, the traders will aggregate (block) like buy and sell transactions resulting in clients and associates receiving the same daily average buy/sell price for that security. When an employee submits a trade for pre-approval, and no trades are scheduled for client accounts, the compliance officer has the option of holding the employee’s trade until trades will be made in client accounts or allowing it to be traded when requested. Alternatively, depending on the type of security and size of trade, Compliance has the option to approve the trade request with instruction to execute over several days to keep it from having a negative impact on the security for clients if it is a less liquid or thinly traded name. Compliance attempts to avoid approving trades that will violate, or give the appearance of violating, the rules of front running or other regulation. The clients’ best interest is the primary consideration before approving or executing employee trades.

Beaumont associates can place trades in certain investments, such as mutual funds, without compliance approval, given the inability of an individual to affect its market price and the price being determined at the market close each day.

Beaumont client trades will normally receive a common, aggregate price with other clients participating in transactions of the same security executed on the same trade date (and with the same custodian). Client trades at different custodians will likely receive different trading prices due to time of execution, size of order, commission, etc.; however, they will typically be

aggregated/blocked with like client trades at the same custodian. Clients requesting same day settlement or other priority services exclude them from being included in aggregated, block trades.

Beaumont will introduce alternative investments to appropriate clients, which in many instances employees or other clients have already invested. However, there is no benefit, financial incentive or return that would be received by those already invested by having a new client participate.

D. If you or a related person recommends securities to clients, or buys or sells securities for client accounts, at or about the same time that you or a related person buys or sells the same securities for their own account, describe your practice and discuss the conflicts of interest it presents.

See response to Item 10 and Item 11.C.

Beaumont's persons are permitted to, and often do, invest in the same names as those being purchased for client accounts through their personal accounts. Employees are required to have their personal trades pre-approved and aggregated (blocked) with like client trades. The aggregation of trades is an important process utilized by Beaumont. Aggregation means that clients and associates receive an identical, (average) buy/sell price for each security traded, (bought or sold) on the same business day.

Beaumont has several policies, including a Code of Ethics, to address the potential for conflicts of interest, which may arise through personal trading. Compliance may restrict the timing that employees may trade a security under consideration by the Investment Committee for client accounts. In addition, the firm has policies and procedures intended to address and prevent insider trading.

Item 12 – Brokerage Practices

A. Describe the factors that you consider in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation

1.a-f – Related to research and soft dollar benefits, markups or markdowns.

Beaumont receives research from Morgan Stanley and others based on the relationship between the firms. Other research received, from various firms, may be from a relationship with a Beaumont employee prior to their joining Beaumont. Compensation is not paid to or from Beaumont for research and there are no stipulated markups or markdowns of commission related to this exchange.

See Item 5.A. and Item 10.D. for more information.

2.a-b – Disclose any potential incentives in recommending a specific broker-dealer.

Beaumont does not have a direct incentive to recommend a specific broker-dealer.

Beaumont participates in the Fidelity Wealth Advisor Solutions Program where Fidelity makes information about investment advisors and financial planners who custody assets at Fidelity available to affluent and high net-worth investors. Beaumont is under no contractual obligation to buy any product or service offered by Fidelity, or its affiliates, as a condition of participation in this program. Fidelity may have selected Beaumont for participation in this program from existing relationships between the companies. Beaumont uses the same criteria for brokerage/custody selection for clients referred through the Fidelity Wealth Advisor Solutions Program that they use for Beaumont clients that did not participate in the program.

Beaumont negotiated its Fidelity commission schedules aside from these arrangements and we believe our schedules to be favorable to clients given the quality and services provided. Beaumont does not receive *direct* compensation, in any form, to participate in this program; however, it obtains additional assets and accounts resulting in additional revenue via an increase in AUM.

Please also see Item 14.B for additional information.

Beaumont's participation in the program may present potential conflicts of interest or give the appearance that Beaumont has an incentive to recommend clients to custody their assets with Fidelity. However, Beaumont uses Fidelity as the custodian for most new and existing clients due to the beneficial cost, execution and level of service provided. Beaumont will typically trade with the brokerage houses holding the accounts because the prime brokerage/trade-away fees would outweigh any savings that could result in trading through another broker.

With multiple custodians and broker choices available, Beaumont is not obligated to use a specific custodian or broker for client accounts and trade activity. Clients can always inquire about other custodians Beaumont uses and have the option of moving their accounts to any of them. We are open to exploring additional relationships to increase the choices, and benefits, for our clients.

The selection and recommendation of custodians and broker-dealers by Beaumont and its clients will vary by previous association, client needs versus the services provided, the expenses of each custodian (including fund management fees, prime brokerage/trade-away fees, and commissions paid), product offerings, service to Beaumont (including electronic data support) and client preference. Beaumont also considers the quality and quantity of products offered, and services provided by brokers and custodians. Beaumont considers several relevant factors when seeking best execution including, but not limited to:

- full range and quality of the services provided, as appropriate,
- responsiveness to Beaumont regarding software and other technological support,
- general execution and operational capabilities,
- reputation, reliability and experience,
- fee schedule, and
- integrity, financial strength and stability.

3. – Directed brokerage

Beaumont has a relationship with Morgan Stanley for clients seeking a full-service broker. Beaumont has clients who request to have accounts and assets maintained at a specific custodian, including Morgan Stanley, regardless of the potentially higher cost associated with the full service, brokerage fee schedule. These clients' requests may be due to a previous relationship between the client and the custodian and broker, unique product offerings, reporting capabilities, or that custodian being a full-service provider. Clients directing Beaumont to use a specific custodian may pay a higher commission and may not receive best execution for all transactions, due to the custodian's full-service fee schedules.

Beaumont's investment advisory clients have a negotiated trading commission schedule on the Morgan Stanley, full service, retail platform that we believe to be competitive. This information is available to clients and prospects upon request. The fee schedules provided in each fund's prospectus disclose mutual fund fees and expenses.

B. Discuss whether and under what conditions you aggregate the purchase or sale of securities for various client accounts.

As stated in Item 11.C. Beaumont client trades will normally receive a common, aggregate price with other clients participating in a transaction, in the same direction (buy/sell), of the same security executed on the same trade date (and with the same custodian). Transactions at different custodians will likely receive different trading prices due to time of execution, size of order, commission, etc.; however, they will typically be aggregated/blocked with like client trades at the same custodian. There are exceptions when a trade would not be aggregated, such as if there was a need for same day settlement, client directed trades or similar circumstances.

Beaumont would likely use a specific broker dealer to purchase a security, i.e. an initial public offering (IPO), secondary offerings and certain bonds if it is not available through multiple brokers or if only available in limited quantity. In these instances, Beaumont would allocate to client accounts at other custodians, as appropriate. Beaumont uses several methods to allocate securities to clients in an equitable manner in these instances and may include alphabetical, reverse alphabetical,

percent of portfolio held in cash, or other means, to help ensure that the same client accounts are not repeatedly participating when there are limited quantities available, or if a security is being bought/sold over multiple days.

When deciding to invest in equity IPO shares for its clients, Beaumont will allocate the shares to appropriate, eligible Beaumont high net worth clients that have a preference and tolerance for high-risk investments. Equity IPOs are typically only available to clients who have accounts established with the broker-dealer underwriting each IPO. Client accounts must meet minimum requirements to be considered for an allocation of IPO shares, the client must typically have:

- 1) A Fidelity, Schwab or Morgan Stanley account with a market value of at least \$150,000;
- 2) A liquid net worth of at least \$1,000,000; and
- 3) Accounts in good standing with the clients' respective custodian, including complete paperwork, etc., and meet other applicable criteria as set forth by the custodian.

When supply of a desired security is available at only one of the broker-dealers listed above, Beaumont may purchase large blocks and transfer all or part of the desired security from one custodian to another to make the security available to other eligible clients.

Please also see Item 10.C. for additional brokerage information and Item 11.C. and Item 11.D. for additional aggregation practices.

Item 13 – Review of Accounts

A. Indicate the frequency of review of client accounts and the nature of the review.

The nature and frequency of Beaumont client account reviews varies greatly; however, RMs give attention to client accounts regularly. The most common review occurs when the Investment Committee recommends the purchase or sale of a security. With each recommendation by the Investment Committee, the relationship/portfolio manager is to review each of their clients' allocation, cash position, etc. to determine the proper action, if any, to take in an account. RMs conduct these and other periodic reviews of client accounts to ensure that their asset allocation is consistent with the agreed upon allocation guidelines or if adjustments are necessary. Operations can help the RMs by providing cash reports showing the amount of cash held in each client account.

The RMs also review client accounts for capital gains and losses, large deposits or withdrawals, assess income needs and ensure funds are available as needed. Sudden economic, political or other macro events may also cause more frequent or immediate review of accounts and their allocation. Additional reviews may occur due to changes in the personal financial circumstances of a specific client. The frequency of more formal reviews is determined by each client and may occur by mail, phone or in person. Clients are encouraged to contact their RM at any time if they have any questions or would like to discuss their account(s) (i.e. target allocation, investment strategy, change in financial situation, etc.).

B. If you review client accounts on other than a periodic basis, describe the factors that trigger a review

See Item 13.A.

C. Describe the content and indicate the frequency of regular reports you provide to clients regarding their accounts. State whether these reports are written.

The reporting frequency will vary, and evolve over time, based on the client's preference. Clients have the option to elect their review frequency as time goes on, while many clients prefer not to have formal meetings. A report for a formal review may include, but is not limited to:

- various portfolio metrics,
- individual account, group (personal, retirement, etc.) and/or total portfolio performance,
- a review of the asset allocation and holdings of each portfolio,
- if applicable, will suggest timely, pertinent investment advice,

- an opportunity to discuss changes in financial situation, life events or other needs.

Clients receive quarterly or monthly statements from their custodian(s). Depending on the custodian, clients will have the opportunity to receive their statements electronically or have a physical, paper copy sent to them. Clients are encouraged to review these statements and contact their RM if they have any questions or concerns.

Our portfolio accounting software receives daily electronic file downloads from the multiple custodian relationships we have and contains transaction, position and pricing data. These files are reconciled daily by the software provider and are available to Beaumont via the Black Diamond application.

Item 14 – Client Referrals and Other Compensation

A. If someone who is not a client provides an economic benefit to you for providing investment advice or other advisory services to your clients, generally describe the arrangement.

Nothing additional to what has already been disclosed via solicitor arrangements (via increased AUM) or sub-advisory relationships.

B. If you or a related person directly or indirectly compensates any person who is not your supervised person for client referrals, describe the arrangement and compensation.

Beaumont has solicitation arrangements with unaffiliated third parties in accordance with Rule 206(4)-3 under the Investment Advisers Act of 1940. Please also see Item 12.2(a-b) for additional, relevant information on this topic.

- Clients are informed of any such arrangements, and the nature of the relationship as applicable, at the time of the referral and prior to entering into an advisory agreement with Beaumont.
- The solicitor will provide a copy of Beaumont's Disclosure Document (Form ADV Part 2) to the client.
- Beaumont will not sign a contract with a client referred by a solicitor until proof that the required solicitor's disclosures (including this ADV Part 2) has been provided to the client is given to Beaumont by the solicitor.
- The solicitor's disclosure will fully identify any additional fees, if any, the client would be pay.

Beaumont has employees who are investment advisory agents of the firm. Beaumont pays these employees additional compensation for their efforts in bringing in new clients and servicing existing clients. Beaumont pays Fidelity Personal and Workplace Advisors LLC (FPWA), a Fidelity company, an annual fee as a percentage of retained client assets for referrals from the Fidelity Wealth Advisor Solutions (WAS) Program. Beaumont has agreed to pay FPWA an annual minimum fee for participation in the program and may be responsible for any difference between the annual minimum fee prescribed by the agreement and actual fees paid for referrals. Beaumont, not the client, is responsible for any referral fees paid to Fidelity. There is no affiliation between Beaumont and FPWA or Fidelity (FMR LLC). FPWA does not supervise, nor does it have oversight responsibility for Beaumont. Beaumont must meet minimum participation criteria to receive referrals from the WAS Program. Alternatively, Beaumont could be selected for the WAS Program due to its other business relationships with FPWA and its affiliates, including Fidelity Brokerage Services, LLC ("FBS"). Beaumont may have, or be perceived to have, a potential conflict of interest, as a result of its participation in the WAS Program, with respect to its decision to use certain affiliates of FPWA, including FBS, for execution, custody and clearing for client accounts. Advisor may also have a potential incentive to suggest the use of FBS and its affiliates to its advisory clients, regardless if those clients were referred through the WAS Program.

Item 15 – Custody

If a qualified custodian sends quarterly, or more frequent, account statements directly to your clients, explain that clients will receive them, and that they will also receive account statements from you. Include a statement urging clients to compare the account statements.

Beaumont Financial Partners, LLC does not directly maintain physical custody of client funds or securities, nor does it accept the delivery of funds or securities in the form of cash or in the name of the firm.

Custodians send, or make available, monthly or quarterly statements, depending on the custodian, directly to clients. These statements include details about the account balances, market value of securities held, and include all individual transactions

executed in the account during the period. Confirmations are provided by each custodian to clients based on the delivery method selected, which often includes the client's ability to sign up for continuous electronic account access.

Clients are encouraged to review their custodian account statements and confirmations closely, and contact Beaumont promptly if they have any questions. The calculated values may vary slightly between Beaumont and custodians. This may occur if one side bases the value on trade date where the other could value securities based on the settlement date, again, causing a nominal difference in value. If a client notices any major discrepancies or suspicious activity while reviewing their statements from the custodian or report received directly from Beaumont, they should contact their RM or Beaumont's Chief Compliance Officer immediately at 781-400-2800.

There are instances where a Beaumont partner or associate is named an account signatory, Trustee or Executor of client trusts, estates or wills, granted check writing authority, or as custodian of a Uniform Gifts to Minors Account (UGMA). This arrangement is not encouraged, however in view of these relationships, the firm is deemed to have custody of these accounts. In order to comply with the regulatory requirements pertaining to custody (SEC Custody Rule 206(4)-2), Beaumont has an annual surprise exam conducted by an independent accounting firm. This is to ensure that Beaumont maintains the funds of these (custody) accounts legitimately and are not falsified or used unethically.

Item 16 – Investment Discretion

Describe the procedures you follow before you assume discretionary authority to manage client accounts and any limitations the client may place on this authority.

Beaumont accepts discretionary authority to manage client accounts and the underlying securities on clients' behalf through an Advisory Agreement. Clients and a firm representative sign this Agreement prior to the firm assuming discretionary authority of any client account. The Advisory Agreement also gives Beaumont authority to select and use sub-advisors.

See Item 4.C. for additional information about our process and limitations clients can impose.

Item 17 – Voting Client Securities

A. Do you have, or will accept, authority to vote *client* securities, and briefly describe your voting policies and procedures, including those adopted pursuant to SEC rule 206(4)-6. Explain to *clients* that they may obtain a copy of your proxy voting policies and procedures upon request.

Beaumont *does not* vote proxies on behalf of its clients. While our Investment Advisory Agreements grant the firm the legal ability to do so, we are not required to act. If our current proxy policy changes, we will promptly notify our clients.

B. If you do not have authority to vote *client* securities, disclose this fact. Explain whether *clients* will receive their proxies or other solicitations directly from their custodian or a transfer agent or from you.

Clients who have their assets at Morgan Stanley will receive their proxies directly from the custodian. For clients using other custodians, the account application gives the client the option to have proxy ballots sent directly to them or to their advisor, although the latter is discouraged, as Beaumont will not vote on their behalf. Clients are encouraged to contact their RM with any proxy related questions.

Item 18 – Financial Information

A. If you require or solicit prepayment of more than \$1,200 in fees per *client*, six months or more in advance, include a balance sheet for your most recent fiscal year.

B. Note: If you are a sole proprietor...

C. Note: If you have not completed your first fiscal year, include a balance sheet dated not more than 90 days prior to the date of your *brochure*.

D. Exception: You are not required to respond to Item 18.A of Part 2A if you also are: (i) a qualified custodian as defined in SEC rule 206(4)-2 or similar state rules; or (ii) an insurance company.

E. If you have *discretionary authority* or *custody* of *client* funds or securities, or you require or solicit prepayment of more than \$1,200 in fees per *client*, six months or more in advance...

- F. **Note: With respect to Items 18.A and 18.B, if you are registered or are registering with one or more of the *state securities authorities*...**
- G. **If you have been the subject of a bankruptcy petition...**

18.A. – 18.G. are not applicable.

Item 19 – Requirements for State-Registered Advisers

- A. **If you are registering or are registered with one or more *state securities authorities*...**
- B. **Describe any business in which you are actively engaged**
- C. **In addition to the description of your fees in response to Item 5 of Part 2A, if you or a *supervised person* is compensated for advisory services with performance-based fees, explain how these fees will be calculated.**
- D. **If you or a *management person* has been *involved* in one of the events listed below:**
1. **An award or otherwise *found* liable in an arbitration claim alleging damages in excess of \$2,500**
 2. **An award or otherwise *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding***
- E. **In addition to any relationship or arrangement described in response to Item 10.C. of Part 2A, describe any relationship or arrangement that you or any of your *management persons* have with any issuer of securities that is not listed in Item 10.C. of Part 2A.**

19.A. – 19.E. are not applicable as Beaumont is not a State-Registered Advisor.

Item 20 – Other, Miscellaneous Items

Handling of Trade Errors

Beaumont will make a client account whole for client losses resulting solely from a trade error Beaumont causes. Beaumont will use its discretion if the trade error results in a gain. Scenarios when Beaumont may “keep” the gain include, if in its judgment, doing so is in the best interest of the client, including but is not limited to: the amount of the gain is less than trading cost, client would incur an unwanted short-term redemption fee, avoid a wash sale, sale of restricted securities, tax implications, etc. Additionally, for errors caused by the client, or an advisor at another firm, the error may not be corrected, and the client not be made whole. This could occur if the client initiates a trade directly with a broker or custodian, or they initiate a withdrawal from the account without making Beaumont aware of their action. This could result in a short position or over-investment of the account. If another advisor initiates money movement from the account without making Beaumont aware, and trades placed assuming the funds are there, the account may not be made whole. Gains may be kept if the amount is nominal, or under \$100. In addition, Beaumont is often required to follow certain trade error procedures implemented by custodians, limiting their discretion when correcting an error. If a loss occurs greater than \$100, Beaumont will make the account whole. Beaumont will maintain the loss or gain if the resulting trade correction is not remedied in the client account, and it is under \$100, to minimize and offset administrative time and expense. Generally, if related trade errors result in both gains and losses in a client account, they will be netted. In the event the Beaumont trade error account has a positive value at the end of the quarter, the (primary) custodian distributes that amount to a charitable organization.

Beaumont’s Office Locations

The Beaumont home office is located at 250 1st Avenue, Suite 101, Needham, MA 02494. Beaumont has additional presence in Houston, TX; Irving, TX and New York, NY.

Class Action Settlements

Periodically the securities held in client accounts may be the subject of class actions lawsuits. Beaumont has no obligation to determine if the securities held by clients are subject to a pending or resolved class action lawsuit, nor any duty to evaluate a client's eligibility to participate in the proceeds of a securities class action settlement. Furthermore, Beaumont has no obligation or responsibility to initiate litigation, submit a claim or recover damages on behalf of clients who may have been impacted because of actions, misconduct, or negligence by corporate management of issuers whose securities are/were held in client accounts.

Beaumont retained the services of Financial Recovery Technologies ("FRT") in 2011 to improve this process by electronically filing all class action claims on behalf of all our clients. As a result, any class action claim that each client is eligible to file will be handled for them automatically. Fees for this service are on a contingency basis, so there will be no charges against client accounts. FRT will absorb the costs to provide this service and will deduct their fee of 17.5% from any awards recovered from claims they have filed on behalf of our clients. FRT will also attempt to recover claims for any account held at certain custodians where Beaumont has electronic transaction and position data available. Beaumont may not be able to provide holding or transaction information to FRT for trades that were executed prior to the client engaging Beaumont. There are certain financial loss criteria that need to be met for a client to receive a payment.

As a Beaumont client and recipient of this service, clients will no longer need to take any action in order to be eligible to receive awards of class action settlements. Clients will likely continue to receive class action notices from claims administrators for securities held in their account(s), however there would be no need to take any action.

Clients will automatically be registered for this service unless they actively opt out *by notifying Beaumont in writing*. The amount of awarded settlements each client is entitled to will be deposited directly into their account and noted on their next statement. FRT services are only available for clients who have active accounts under management with Beaumont. Clients can also be assured that any personal information provided to FRT on your behalf is protected under our Privacy Policy and Cybersecurity Program.

CLIENT PRIVACY POLICY NOTICE

This informational notice covers how Beaumont Financial Partners, LLC (“Beaumont”) safeguards your nonpublic personal and financial information. Protecting the privacy of client information is one of our fundamental responsibilities. This notice summarizes our policy regarding the confidentiality and non-disclosure of client information. We do not sell or rent any personal information we gather from clients and will only share such information with others as stated in this notice.

Personal Information Collected

Beaumont clients provide their personal information and information about their family to Beaumont. Information we may request includes:

- Name, address, phone number, social security number, tax identification number and date of birth.
- Assets, employment history, income, liabilities, retirement goals and legal documents.
- Account balances, account numbers, statements and custodians.
- Beaumont or the custodian may require a photocopy of a valid driver’s license, passport, green card or military identification when opening new accounts for clients. Many financial institutions in the United States require a copy of at least one of these documents to comply with Uniting and Strengthening America by Protecting Appropriate Tools Required to Intercept and Obstruct Terrorism, also known as the USA PATRIOT Act.

Beaumont often receives client information from custodians including:

- Duplicate copies of monthly statements and trade confirmations
- Daily electronic downloads of clients’ account information (e.g. all transactions and positions).

The custodian must receive authorization from the client before sharing the aforementioned information with Beaumont. This is part of the account opening process.

Why We Collect Personal Information

The personal information we collect is necessary to help us provide informed investment management, financial planning and/or tax services to you.

How We Handle Your Personal Information

As emphasized above, we do not sell, rent or distribute information about current or former clients or their accounts to third parties. We do not share such information with anyone, except as needed in the normal course of business, such as to open accounts, satisfy required compliance reviews, and complete transactions in your accounts.

For example:

- In order to open accounts or complete transactions for you, it may be necessary to provide identifying information to custodians, companies, individuals, or groups not affiliated with Beaumont. In addition, Beaumont may provide the custodian with a copy of the Investment Advisory Agreement with the client.
- At times, we contract with non-affiliated companies to perform services for us (i.e. CPAs for tax preparation and Financial Recovery Technologies for class action recovery). As necessary, we share information we collected from you to these third parties. We only release the information necessary for the third party to complete its assigned responsibilities. In addition, we require these third parties treat your personal information with the same high degree of confidentiality as Beaumont.
- We will release information about you if you request us to do so or if we are compelled to do so by law. If you decide to close your account(s) or your account becomes inactive, we will continue to adhere to our privacy policy.

It is always our intent to protect and maintain the integrity of any client information collected or received during the relationship. Beaumont has contractual agreements with third party vendors stipulating the limitations of any information to which they may have access. In short, all non-public client information is kept confidential and not shared, sold, copied or otherwise used. However, Beaumont clients have the option to opt-out of having their information shared with any third parties. If you are a client, or once you become a client, and would like to opt-out of having your information shared please contact your RM or call the number at the end of this notice.

Confidentiality and Security Procedures

Beaumont emphasizes the importance of confidentiality through operating procedures, employee training and our client privacy policy. We also maintain electronic, physical and procedural safeguards to help protect your nonpublic personal information.

How You Can Protect Your Information

If you access your accounts on-line, you should confirm that the anti-virus software and firewall/spyware protection is current on the computer(s) that you use. Avoid using public computers, such as at a library, internet café, hotel, etc. to access your accounts whenever possible. We also strongly recommend that you select a unique User ID and Password that **does not** contain any personal information (i.e. SSN, DOB, Name, phone #, etc.) and is not identical to other passwords you use. An additionally best practice is to not provide any of your account information, including online account usernames or passwords, to anyone, especially if you receive the request via email or over the phone by an unfamiliar source. We also suggest that you regularly review the activity on your brokerage statements, particularly withdrawals and transfers. Please contact us immediately if you notice any suspicious or irregular activity relating to your account(s); or if you believe your information has been compromised.

Annual Notification

As required by federal law, Beaumont provides an annual notification of its client privacy policy to clients. Beaumont reserves the right to amend this policy at any time. We will promptly provide clients an updated copy of this policy if we make material changes.

MASSACHUSETTS DISCLOSURE

Massachusetts law (Sec. 203A) requires disclosure that information on disciplinary history and the registration of the adviser and its associated persons may be obtained by contacting the Public Reference Branch of the U.S. Securities and Exchange Commission at (202) 551-8090 or the Massachusetts Securities Division, One Ashburton Place, 17th Floor, Boston, Massachusetts 02108 or (617) 727-3548.

COMPLIANCE WITH PRIVACY REQUIREMENTS

Beaumont maintains compliance with Massachusetts requirement 201 CMR 17.00 and applicable federal guidelines. The firm has a designated Information Security Manager, as defined in its Written Information Security Program (WISP). This Program is consistent with the stringent requirements of Massachusetts and outlines the responsibilities of the firm and its personnel to protect client data. Although the WISP requirements only pertain to residents of Massachusetts, the firm extends these standards to all clients. Beaumont is also aware of and considers the stipulations set forth by individual states. In addition, the Securities and Exchange Commission's (SEC), Regulation S-P provides further guidance and requirements for handling and protecting non-public client information (NPI). Beaumont adheres to and applies these standards to its business and handling of client information.

NOTIFICATION OF BEAUMONT FINANCIAL PARTNERS, LLC'S PROXY POLICY

In accordance with SEC Rule 206(4)-6 of the Investment Advisers Act of 1940 relating to Proxy Voting, Beaumont is notifying you of its Proxy Policy: As a matter of current policy, Beaumont Financial Partners, LLC, *does not* vote proxies on behalf of its clients. While all Beaumont's Investment Advisory Agreements grant the firm the legal ability to do so, we are not required to. If our current proxy policy changes, we will promptly notify our clients.

ANNUAL FORM ADV OFFERING

Federal law, through the U.S. Securities and Exchange Commission (SEC), requires Beaumont Financial Partners, LLC to provide clients with either (1) *a complete, Disclosure Document (Form ADV, Part 2A); or (2) a summary of material changes to the Disclosure Document since the last update and also offer to provide a copy of the full Document upon request, without charge.* This is required per Rule 204-3 of the Investment Advisor's Act of 1940 and be completed within 120 days of the firm's fiscal year end. If at any time you would like a complete copy of our Disclosure Document, please call or write, using the following information, and we will be sure to send you a copy. *Beaumont Financial Partners, LLC – 250 1st Avenue, Suite 101 – Needham, MA 02494 – (781) 400-2800.* Additionally, our Disclosure Document is available via our website, www.bfpartners.com.

No action is required as a result of this notice. however, please contact us if you have any questions.