

**Item 1: Cover Page**

**WRAP FEE PROGRAM BROCHURE**  
***(PART 2A APPENDIX 1 OF FORM ADV)***

**BEACON INVESTMENT ADVISORY SERVICES**

BEACON INVESTMENT ADVISORY SERVICES

163 MADISON AVENUE

MORRISTOWN, NJ 07960

973-206-7100

[www.beacontrust.com](http://www.beacontrust.com)

**This wrap fee program brochure provides information about the qualifications and business practices of Beacon Investment Advisory Services. If you have any questions about the contents of this brochure, please contact the Chief Compliance Officer at 973-206-7100 or by email at: [Kenneth.Lenskold@BeaconTrust.com](mailto:Kenneth.Lenskold@BeaconTrust.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. Registration with the SEC or a state securities authority does not imply a certain level of skill or training.**

**Additional information about Beacon Investment Advisory Services also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2: Material Changes**

The annual amendment to Part 2A of Form ADV dated March 24, 2020 contains no material changes since the firm's last annual amendment dated March 29, 2019:

**Item 3: Table of Contents**

Item 1: Cover Page .....	1
Item 2: Material Changes .....	2
Item 3: Table of Contents .....	3
Item 4: Services, Fees & Compensation.....	4
Item 5: Account Requirements & Types of Clients.....	9
Item 6: Portfolio Management Selection and Evaluation.....	9
Item 7: Client Information Provided to Portfolio Managers.....	13
Item 8: Client Contact with Portfolio Managers.....	13
Item 9: Additional Information.....	13

## **Item 4: Services, Fees & Compensation**

### **I. Firm Description**

Beacon Investment Advisory Services (“BIAS” or “Beacon Trust”) has been in business as a registered investment adviser since April 2015. BIAS does business under the name, Beacon Trust. Beacon Trust is owned by Beacon Trust Company which is a New Jersey limited purpose trust company. Beacon Trust Company is owned by Provident Bank which is owned by Provident Financial Services, Inc. a publicly traded company. The firm seeks to guide its clients through the lifecycle of wealth creation, wealth management, and intergenerational wealth transfer.

Beacon Trust provides financial planning, consulting, tax preparation, and asset management services to its clients. Prior to engaging Beacon Trust to provide any investment advisory services, the client is required to enter into one or more written agreements with Beacon Trust setting forth the terms and conditions under which Beacon Trust renders its services (collectively the “Agreement”).

As of December 31, 2019, Beacon Trust managed approximately \$3.4 billion of regulatory assets under management on a discretionary basis in the Funds.

### **II. Services**

Beacon Trust offers the Core, Income and Appreciation, HI-DIV and Factor Information Return (“FIRM”) portfolios, as well as ETF strategies, fixed income strategies and open architecture using separate account managers as a wrap fee program (“Wrap Program”) through Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as described below. Beacon Trust is the sponsor of the Wrap Program and the party responsible for marketing it. Generally, the clients in the Wrap Program include high net worth individuals and trusts. Please note there are not different tiers of fee structure for these accounts. If a client wants an account that is non-discretionary, that can be accommodated, if reasonable to the firm, and suitable to the client, at a different fee structure.

The description of the Wrap Program herein is a summary and a copy of our Wrap Fee Program Brochure is provided to clients and prospective clients and is also available upon request without charge.

The Beacon Trust portfolio management group pursues investment strategies as follows:

The ‘Core Strategy’ portfolio seeks to own shares of the best businesses defined by compelling financial characteristics and disruptive catalysts to drive sustainable long-term price appreciation. The portfolio is optimized for companies with high returns on equity (ROE), high free cash flow yields, robust revenue growth and an overall valuation similar to that of the S&P 500. The strategy maintains a long-term time frame of five years, resulting in low turnover and allowing time for companies to reach their full potential. It is managed using a long-term constructive view of the economy and stock market. While the management of Core does

not involve market timing, the presence of a flat or inverted yield curve will signal a more defensive stance away from the long-term strategy.

The 'Income and Appreciation' portfolio is comprised of highly rated stocks according to Beacon Trust's multifactor models. A blend of growth and value, the portfolio holds about 40 stocks with a minimum capitalization of \$2 billion. There is an emphasis to generate a dividend yield significantly higher than the S&P 500. The Income and Appreciation portfolio is actively managed with constant portfolio manager oversight, risk management and a process-driven trading strategy. It includes: Current Income, Capital Appreciation and Total Return. In stock selection, we attempt to be cognizant of portfolio risk characteristics.

The 'HI-DIV' portfolio recognizes the historical importance of dividends within the total return compounding process. It holds high quality companies that we believe are committed to appropriate capital deployment activities, including competitive dividend payouts to shareholders. Holdings will have one of the following three attributes: above average current dividend yield; attractive dividend growth potential; or prospective dividend growth in excess of market expectations. The strategy maintains a long term time horizon which generally results in low portfolio turnover.

The 'FIRM', an acronym for Factor Information Return Model, utilizes factors in the portfolio construction process. Factors are underlying exposures that explain and drive stock returns. The factor approach provides opportunity to replicate the best parts of the market, can provide diversification, avoids overexposure to growth and large-cap biases, and avoids poorly compensated risks. It utilizes three transparent factors that have historically driven above-average stock returns: Quality: Low volatility in earnings per share (EPS) and low debt to equity; Valuation: Low price to earnings (P/E) ratio; and Size: Small market capitalization. The portfolio is constructed from the S&P 500 universe by ranking the aforementioned factors independently utilizing a screening process. The monthly reconstitution process replaces stocks falling short of the factor standards with higher ranking stocks in each quartile. The process is predominantly quantitative, thereby reducing fundamental judgments and portfolio manager biases in stock selection.

Beacon Trust constructs household level portfolios of mutual funds, ETFs, managed accounts, hedge funds and other private investments for our clients.

The ETF portfolios process was developed by Beacon Trust's investment committee based upon the principals of behavioral finance. The result is a portfolio that is specifically matched to a client's risk tolerance. Beacon Trust does this by optimizing the portfolio based upon the expected return, volatility and correlation of the underlying components. Beacon Trust considers the following factors rooted in behavioral finance when determining a client's economic and emotional risk tolerances:

1. Investment objective
2. Portfolio risk definition
3. Reaction to levels of loss
4. The risk/return trade off
5. Potential losses vs. potential gains
6. Anxiety of losses vs. the satisfaction of gains

7. Investment performance time horizon
8. Stability of Returns
9. Personal goals vs. benchmark comparison
10. Spending or gifting levels

**Conservative Model:** tends to hold a larger percentage of fixed income assets compared to equity and alternative assets;

**Balanced Model:** tends to hold similar amounts of equity and fixed income assets, although this may change depending on our macroeconomic outlook;

**Aggressive Model:** tends to hold a larger percentage of equity assets compared to fixed income and alternative assets.

Beacon Trust's fixed income strategies invest individual client portfolios using direct ownership of bonds and other fixed income securities in an individual account, allowing for customized restrictions and tax management. Beacon Trust's philosophy in trading fixed income for our clients is to avoid risk at all costs, finding safety in big names with high credit quality.

**Taxable Fixed Income:** seeks to deliver a high proportion of the return and yield of the broad bond market with reduced risk and volatility. The process emphasizes liquidity, principal preservation, income stability and portfolio diversification. Beacon Trust favors large companies with high credit quality (always investment grade) and dependable cash flow generation. Beacon Trust may also buy CDs with the greatest spread to comparable Treasury.

**Tax Exempt Fixed Income:** features a bottom up, value-oriented approach focused on the preservation of principal and current income. Beacon Trust seeks to minimize risk and maximize liquidity by emphasizing diversification, high quality and maturity selection appropriate to our interest rate outlook. Customization is essential, as Beacon Trust considers the client's state of residence, tax bracket, state tax rates and availability of securities and pricing. Beacon Trust also looks for high credit quality, typically general obligations, essential service, and a maturity profile of 4-7 years to call. State backing is also a plus.

Clients may pursue any of these strategies through the Wrap Program under which clients will pay a single fee (i.e., wrap fee) to Beacon Trust and Beacon Trust will then be responsible for all brokerage expenses. By enrolling in the Wrap Program clients are choosing the brokerage services of Schwab. Assets placed in the Wrap Program are managed on a fully discretionary basis by Beacon Trust.

### **III. Fee Schedule**

The fee schedule for the Wrap Program is set forth below, however each month fees are payable by the client in the middle of each month. The wrap fee is computed on the last day of the month, based on the average daily market value of each of the securities in the account during the prior month, and as

- A) For Beacon Trust Wrap Fee Program clients the following fee schedule applies:

1.25%	for the first		\$2,000,000
1.00%	for	\$2,000,001	to \$5,000,000
0.90%	for	\$5,000,001	to \$10,000,000
0.75%	for	\$10,000,001	to \$15,000,000
	Negotiated for	\$15,000,001	and above

#### Fixed Income

0.65%	for the first	\$3,000,000
0.55%	for	\$3,000,000 and above

#### Special Needs Trusts

1.50%	for the first	\$3,000,000
1.00%	for	\$3,000,001 to \$5,000,000
0.50%	for	\$5,000,001 and above

- B) The total amount paid using this schedule may be more or less than the amount charged by Beacon Trust under other fee schedules offered to other clients.
- C) Fees are subject to negotiation in certain cases.
- D) 100% of the wrap fee is paid to Beacon Trust, which then pays any brokerage charges incurred by the client. Brokerage charges can vary widely from period to period and client to client based on market events, contributions and withdrawals by a client

#### **IV. Mutual Fund Fees and Expenses**

Client assets may be invested by Beacon Trust in one or more mutual funds. All fees paid to Beacon Trust for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. All clients will be invested in the most advantageous share class available.

A client could invest in a mutual fund directly, without the services of Beacon Trust. In that case, the client would not receive the services provided by Beacon Trust which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by Beacon Trust to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

#### **V. Additional Information about Fees and Services; Conflicts of Interest**

In considering the investment programs described in this brochure, a prospective client should be aware that the Wrap Program may cost a client more or less than purchasing the actual investment management and brokerage services separately. The factors that should be considered by a prospective client in analyzing the

cost structure of the Wrap Program include the size of a client's portfolio, the nature of the investments to be managed, average commission costs, custodial expenses, if any, the anticipated level of trading activity and the amount of advisory fees and commissions that would be charged for managing the client portfolio outside of a wrap structure.

Beacon Trust receives compensation from clients to whom it recommends the Wrap Program. The amount of compensation charged by Beacon Trust and its representatives as a result of the client's participation in the Wrap Program may be more or less than what the client would pay if it paid separately for investment advice and brokerage services. Beacon Trust and its representatives may have a financial incentive to recommend the Wrap Program over other advisory programs or services in that Beacon Trust may receive higher compensation under the Wrap Program than it does for providing portfolio management where the client pays the brokerage costs.

Advisory fees may vary among Beacon Trust's clients based upon a number of factors, including the size of the client's account, the types of investments, the nature of related services provided, and the length of the advisory relationship with a client, among other things. Beacon Trust may "household" or group together multiple accounts of one client relationship for purposes of calculating its fee.

Clients should understand that the fees not included in the advisory fee for our wrap services are charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, fees for trades executed away from custodian, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions.

In addition, clients should understand that similar advisory services may be available from other registered investment advisers for lower fees. In addition, clients should note that the wrap fee structure may create a potential conflict of interest for Beacon Trust in managing accounts, in that less frequent trading will result in fewer commissions to Schwab and a higher net fee for Beacon Trust. Inasmuch as Beacon Trust pays the custodian's transaction execution fees, Beacon Trust may have a disincentive to trade securities in an account. Clients should consider this potential conflict in analyzing the program.

Beacon Trust may recommend/require that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although Beacon Trust may recommend/require that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Beacon Trust is independently owned and operated and not affiliated with Schwab. Schwab provides Beacon Trust with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon Beacon Trust committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.



For Beacon Trust client accounts maintained with Schwab, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Schwab Institutional also makes available to Beacon Trust other products and services that benefit Beacon Trust but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of Beacon Trust's accounts, including accounts not maintained at Schwab. Schwab's products and services that assist Beacon Trust in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of Beacon Trust's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

## **Item 5: Account Requirements & Types of Clients**

Our Wrap Program is designed and suited for our individual and high net worth individual clients with over \$500,000 in cash or eligible securities to invest in our Wrap Program.

## **Item 6: Portfolio Management Selection and Evaluation**

As the sponsor of the Wrap Program, Beacon Trust provides the advisory services. Unlike a wrap fee program for which the broker is the sponsor, other advisers will not be considered or retained (except through mutual funds). Clients desiring a different manager must make that decision themselves and withdraw from the Wrap Program. Within Beacon Trust, the Wrap Program will be managed by the Beacon Trust Portfolio Management group. Beacon Trust will periodically review the performance of as it does with all of its employees. Performance is not reviewed by Charles Schwab or any third party.

### **I. Methods of Analysis and Investment Strategies**

Beacon Trust's investment objective is to seek consistent superior returns primarily through long-term capital appreciation, while also attempting to preserve capital and mitigate risk through diversification of investments, proper position sizing and limiting exposure to less liquid investments. The focus will be on purchasing securities which it believes, based on fundamental research, to be available for purchase at a considerable discount to the intrinsic value of the underlying assets or business. Beacon Trust has strategies that will invest in companies of any market capitalization, geographic location or market sector. The result of this focused process is a portfolio that is specifically matched to the client's risk tolerance. This is done by optimizing the portfolio based on the expected return, volatility and correlation of the underlying components.

The Beacon Trust portfolio management group pursues investment strategies as follows:

The 'Core Strategy' seeks to own shares of the best businesses defined by compelling financial characteristics and disruptive catalysts to drive sustainable long-term price appreciation. The portfolio is optimized for companies with high returns on equity (ROE), high free cash flow yields, robust revenue growth and an overall valuation similar to that of the S&P 500. The strategy maintains a long-term time frame of five years, resulting in low turnover and allowing time for companies to reach their full potential. It is managed using a long-term constructive view of the economy and stock market. While the management of Core does not involve market

timing, the presence of a flat or inverted yield curve will signal a more defensive stance away from the long-term strategy.

The 'Income and Appreciation' portfolio is comprised of highly rated stocks according to Beacon Trust's multifactor models. A blend of growth and value, the portfolio holds about 40 stocks with a minimum capitalization of \$2 billion. There is an emphasis to generate a dividend yield significantly higher than the S&P 500. The Income and Appreciation portfolio is actively managed with constant portfolio manager oversight, risk management and a process-driven trading strategy. It includes: Current Income, Capital Appreciation and Total Return. In stock selection, we attempt to be cognizant of portfolio risk characteristics.

The 'FIRM', an acronym for Factor Information Return Model, utilizes factors in the portfolio construction process. Factors are underlying exposures that explain and drive stock returns. The factor approach provides opportunity to replicate the best parts of the market, can provide diversification, avoids overexposure to growth and large-cap biases, and avoids poorly compensated risks. It utilizes three transparent factors that have historically driven above-average stock returns: Quality: Low volatility in earnings per share (EPS) and low debt to equity; Valuation: Low price to earnings (P/E) ratio; and Size: Small market capitalization. The portfolio is constructed from the S&P 500 universe by ranking the aforementioned factors independently utilizing a screening process. The monthly reconstitution process replaces stocks falling short of the factor standards with higher ranking stocks in each quartile. The process is predominantly quantitative, thereby reducing fundamental judgments and portfolio manager biases in stock selection.

'HI-DIV' recognizes the historical importance of dividends within the total return compounding process. It holds high quality companies that we believe are committed to appropriate capital deployment activities, including competitive dividend payouts to shareholders. Holdings will have one of the following three attributes: above average current dividend yield; attractive dividend growth potential; or prospective dividend growth in excess of market expectations. The strategy maintains a long term time horizon which generally results in low portfolio turnover.

In addition, Beacon Trust constructs household level portfolios of mutual funds, ETFs, managed accounts, hedge funds and other private investments for its clients.

The ETF portfolios process was developed by our investment committee based upon the principals of behavioral finance. The result is a portfolio that is specifically matched to a client's risk tolerance. Beacon Trust does this by optimizing the portfolio based upon the expected return, volatility and correlation of the underlying components. Beacon Trust considers the following factors rooted in behavioral finance when determining a client's economic and emotional risk tolerances:

- Investment objective
- Portfolio risk definition
- Reaction to levels of loss
- The risk/return trade off
- Potential losses vs. potential gains

- Anxiety of losses vs. the satisfaction of gains
- Investment performance time horizon
- Stability of Returns
- Personal goals vs. benchmark comparison
- Spending or gifting levels

**Conservative Model:** tends to hold a larger percentage of fixed income assets compared to equity and alternative assets;

**Balanced Model:** tends to hold similar amounts of equity and fixed income assets, although this may change depending on our macroeconomic outlook;

**Aggressive Model:** tends to hold a larger percentage of equity assets compared to fixed income and alternative assets.

Additionally, Beacon Trust's fixed income strategies invest individual client portfolios using direct ownership of bonds and other fixed income securities in an individual account, allowing for customized restrictions and tax management. Beacon Trust's philosophy in trading fixed income for our clients is to avoid risk at all costs, finding safety in big names with high credit quality.

**Taxable Fixed Income:** seeks to deliver a high proportion of the return and yield of the broad bond market with reduced risk and volatility. The process emphasizes liquidity, principal preservation, income stability and portfolio diversification. Beacon Trust favors large companies with high credit quality (always investment grade) and dependable cash flow generation. Beacon Trust may also buy CDs with the greatest spread to comparable Treasury.

**Tax Exempt Fixed Income:** features a bottom up, value-oriented approach focused on the preservation of principal and current income. Beacon Trust seeks to minimize risk and maximize liquidity by emphasizing diversification, high quality and maturity selection appropriate to our interest rate outlook. Customization is essential, as Beacon Trust considers the client's state of residence, tax bracket, state tax rates and availability of securities and pricing. Beacon Trust also looks for high credit quality, typically general obligations, essential service, and a maturity profile of 4-7 years to call. State backing is also a plus.

Clients may elect to pursue these strategies through the Wrap Program, under which clients will pay a single fee to Beacon Trust, and Beacon Trust will then be responsible for all brokerage expenses (i.e., a wrap fee). By enrolling in the Wrap Program, clients are choosing the brokerage services of Schwab. Assets placed in the Wrap Program are managed on a fully discretionary basis by Beacon Trust.

## II. Risk of Loss

No assurance can be given, however, that Beacon Trust will achieve its objective, and investment results may vary substantially over time and from period to period. Investing in securities involves risk of loss that the

clients must be prepared to bear. Beacon Trust makes no representations or warranties of any kind nor are any intended or should be inferred with respect to the economic return from, or the tax consequences of, a prospective investment.

Listed below are additional or further explanations of material risks involved in connection with our investment strategy:

#### *Stock Portfolios*

Client accounts will be subject to the risks associated with any equity investment strategy. Sharp downward market moves will adversely impact account positions and result in client account losses. Losses may also be incurred on individual positions as a result of issuer-specific matters such as unexpectedly disappointing earnings, lawsuits, patent issues, analyst action or other matters. Equity returns are volatile and may fluctuate substantially over time.

#### *Mutual Funds and ETFs*

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV. All clients will be invested in the most advantageous share class available.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more).

The client will receive a mutual fund prospectus and/or other documents explaining such risks.

#### *Options*

Options allow investors to buy or sell a security at a contracted "strike" price (not necessarily the current market price) at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge (limit) losses in an attempt to reduce risk or to

speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

As the sole manager in and sponsor of the Wrap Program, Beacon Trust has full access to all client information provided by the client upon enrollment in the Wrap Program. Beacon Trust shares such information with Charles Schwab to the extent necessary to place trades for the client, including client name, address and social security number. Charles Schwab is not responsible for monitoring or approving the Wrap Program in any way. Clients are direct clients of Beacon Trust and may contact and consult with Beacon Trust at any time.

Wrap Program accounts will be formally reviewed at least annually to determine that the account holdings are consistent with the investor profile, investment restrictions and risk objectives. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, the market, and political or economic environment. Wrap Program clients will receive account statements, at least quarterly, and transaction confirmations directly from Charles Schwab. Beacon Trust may arrange for periodic performance reports to be delivered to the client or made available to the clients in other electronic forms.

### **Item 7: Client Information Provided to Portfolio Managers**

Beacon Trust has full access to all client information, including but not limited to investment objectives, financial circumstances, risk tolerance, name, address and social security number, provided by the client upon enrollment in the Wrap Program. Beacon Trust shares such information with the portfolio managers and custodian to the extent necessary to execute trades and manage the client's assets. Any updated client information is provided to the portfolio managers to the extent such information is necessary in order for the portfolio managers to manage the client's assets.

### **Item 8: Client Contact with Portfolio Managers**

There are no restrictions placed on a client's ability to contact and consult with their Beacon Trust portfolio managers in the Wrap Program.

### **Item 9: Additional Information**

Beacon Trust employees or members do not have any legal or disciplinary events to report.

Beacon Trust maintains the following relationships that are material to its advisory business or to its clients with certain related persons.

### **Affiliated Trust Company**

Beacon Trust is owned by Beacon Trust Company (“Beacon Trust”). Beacon Trust is a full service wealth management firm. Beacon Trust provides customized wealth management planning and other services. There is a conflict of interest where Beacon Trust recommends the services of Beacon Trust to clients. Beacon Trust will only make such a recommendation if it is in the best interest of that client.

**Affiliated Bank**

Beacon Trust is owned by Provident Bank which provides a full suite of banking solutions to businesses and individuals. There is a conflict of interest where Beacon Trust recommends the services of the Provident Bank to clients. Beacon Trust will only make such a recommendation if it is in the best interest of that client.

As a matter of firm policy and practice, our firm will not charge or earn advisory fees in excess of \$1,200 more than six months in advance of the services rendered.

Also, our firm and its principals have no financial events or proceedings to disclose.

Additional information about Beacon Trust, advisory services, non-wrap strategies, advisory fees, conflicts of interest, and Code of Ethics, among other things, other than our Wrap Program is available in our Form ADV 2A which is available upon written request to prospective clients and our clients.