

Item 1 – Cover Page

The Winthrop Corporation

2 Corporate Drive

Suite 770

Shelton, Connecticut 06484

203.783.4400

www.wrightinvestorsservice.com

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

Additional information about The Winthrop Corporation also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

There have not been any material changes since the last annual update of our Brochure, which occurred in March 2020.

This Brochure may be requested by contacting us at 203.783.4400.

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

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Item 4 – Advisory Business

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

TWC’s only advisory client is Wright. In addition to leasing its employees to Wright, TWC also provides Wright with research services, which Wright uses in providing investment advisory services to its clients. This research includes financial information, profiles and analyses on over 39,000 of the world’s leading publicly owned companies. The data is updated continuously, providing a nearly real-time view of global corporate activity.

Item 5 – Fees and Compensation

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

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

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

Item 7 – Types of Clients

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

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

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

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of TWC. TWC has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

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

Item 11 – Code of Ethics

TWC's management is committed to the principles of integrity and honesty in all of its business transactions, and expects all of its officers, directors and employees to adhere to these ideals in practice. Since TWC's employees perform services for Wright, compliance with Wright's Code of Ethics is deemed compliance with TWC's Code of Ethics. Under the Code of Ethics, employees must, at all times, place the interests of Wright's clients first. Employees may not in any respect take advantage of client transactions. While personnel of Wright are permitted to invest in securities for their own accounts, most transactions are subject to many restrictions, including preclearance procedures and reporting requirements. Wright's Chief Compliance Officer is charged with oversight of all aspects of the Code.

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

Item 12 – Brokerage Practices

TWC does not select or utilize brokers.

Item 13 – Review of Accounts

TWC does not review client accounts or financial plans.

Item 14 – Client Referrals and Other Compensation

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

Item 15 – Custody

TWC does not maintain custody of client assets.

Item 16 – Investment Discretion

TWC does not accept discretionary authority to manage client assets.

Item 17 – Voting Client Securities

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

Item 18 – Financial Information

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