



PARSONS | Capital Management, Inc.

A tradition in money management

10 Weybosset Street, Suite 1000
Providence, RI 02903
(401) 521-2440
www.parsonscapital.com

September 28, 2022

This brochure provides information about the qualifications and business practices of Parsons Capital Management, Inc. If you have any questions about the contents of this brochure, please contact Stacey L. Sternberg, Chief Compliance Officer, at (401) 521-2440. 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.

Parsons Capital Management, Inc. is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information from which you can make a determination to hire or retain an adviser.

Additional information about Parsons Capital Management, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

The SEC requires that if there are any significant or material changes within Parsons Capital Management, Inc. (PCM), either in the make up of the company or the manner in which business is conducted, these changes must be summarized in this space. Further, the SEC requires that the ADV Part 2A, also known as the Brochure, be updated to reflect these changes and distributed to all clients.

Robert W. Parsons no longer holds the title of Vice President but remains Managing Director.

PCM may fee on the aggregate household in order for clients to benefit from threshold fee discounts. Please see *Item 5* of this brochure for additional information.

PCM now offers investment management services for held away accounts (such as 401(k) and 529 Plans) using the third-party Pontera platform. Please see *Items 4 and 5* of this brochure for additional information.

PCM has no additional material changes to report.

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Item 4 – Advisory Business

Advisory Firm

Parsons Capital Management, Inc. (PCM) is an SEC registered investment adviser, which is principally owned by PCM Holdings Inc. The firm was founded in 1993 and is headquartered in Providence, Rhode Island. The firm maintains a satellite office in Hobe Sound, Florida and a small satellite office in Denver, Colorado. PCM also has two residential satellite offices in Fishers Island, New York. John H. Mullen, President, joined the firm in 2008. John B. Trevor IV, Secretary, joined the firm in 2011, and, C. Bateman Parsons, Treasurer, joined the firm in 2016. Stacey Sternberg is the Chief Compliance Officer and has been with the firm since 2007.

Investment Management and Advisory Services

Parsons Capital Management, Inc. provides investment advisory and investment management services, consulting services and financial planning services to its clients.

In investment management services, PCM consults with each client to define the client's financial and investment objectives. When necessary, PCM will consult with a client's outside advisers, such as attorneys and accountants, to assist in defining these objectives. During this process, PCM will assist the client in determining their income or principal needs, investment time horizon, specific investment limitations, tax circumstances and tolerance for risk. After the objectives are determined, PCM will work with clients to plan and implement a specific investment program and strategy tailored to that individual client.

PCM manages investment portfolios that may comprise of domestic and international stocks, preferred stocks, convertible securities, government and agency bonds, tax-exempt bonds, corporate bonds, exchange traded funds, mutual funds, master limited partnerships, limited partnerships and money market funds.

Upon the request of a client, assets managed by PCM may be coordinated with assets not managed by PCM. These assets may include but are not limited to: 401(k) plans, 529 plans, trust accounts, defined benefit plans and deferred compensation plans. By monitoring the outside assets of a client, PCM helps maintain consistent and productive strategies for investment portfolios, helping to achieve the client's long-term goals and objectives.

In addition, PCM sometimes provides advice to clients not specifically related to investments. This advice may include matters relating to financial planning, tax issues or estate planning. PCM will generally provide such consulting services inclusive of its advisory fee, although exceptions could occur based upon assets under management, special projects or stand-alone planning engagements for which PCM may charge a separate or additional fee. PCM does not

serve as an attorney, accountant or insurance agent, and no portion of our services should be construed as such. PCM does not prepare legal documents, tax returns or sell insurance products. If requested by a client, PCM may recommend other professionals for non-investment related services (i.e., attorneys, accountants or insurance agents). The client is free to accept or reject any recommendation from PCM or any of its representatives. The engaged licensed professional and not PCM shall be responsible for the quality and competency of their services provided.

Further, PCM may engage in consulting services related to portfolio asset allocation, portfolio evaluation or security analysis. On occasion, PCM has been asked to provide services as expert witnesses in a legal action.

Finally, PCM offers financial planning services with an in-depth evaluation and analysis of clients' current financial picture.

As of December 31, 2021, PCM managed 1,678 discretionary accounts with a market value of \$1,840,674,520, and 12 non-discretionary accounts with a market value of \$18,890,499 for a total of 1,690 accounts and a total market value of \$1,859,565,019.

Written Acknowledgment of Fiduciary Status

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title 1 of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We are required to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. We must give prudent and loyal advice, avoid misleading statements regarding fees, investments, and conflicts of interest, give advice that is in your best interest, and charge a reasonable fee for our service.

Retirement Rollovers & Potential Conflict of Interest

A client or prospective client leaving an employer typically has four options regarding an existing retirement plan. A client or prospective client may choose one or a combination of the options below:

1. Leave the money in the former employer's plan, if permitted;
2. Roll over the assets to the new employer's plan, if one is available and rollovers are permitted;
3. Roll over to an Individual Retirement Account ("IRA");
4. Cash out the account value, which could, depending upon the client's age, result in adverse tax consequences.

If PCM recommends that a client roll over their retirement plan assets into an account to be managed by PCM, such a recommendation creates a conflict of interest if PCM will earn new, or increase its current, compensation as a result of the rollover. No client is under any obligation to roll over retirement plan assets to an account managed by PCM.

Investment Advisory Services for Held Away Accounts

PCM uses a third-party platform to facilitate discretionary management of held away assets such as, but not limited to, 401(k) plans or 529 plans. The platform allows PCM to avoid being considered to have custody of client funds since the firm has no direct access to client log-in credentials. PCM is not affiliated with the platform in any way and receives no compensation from them for using their platform. A link will be provided directly to the client allowing them to connect the account(s) to the platform. This allows the adviser to review the current account allocations, rebalance the account according to the client's investment goals and objectives and tailor the account to the specific needs of the client. These accounts will be regularly monitored and rebalanced as needed.

Item 5 – Fees and Compensation

Investment Management Fee Schedule

The basic fee schedule for Investment Management Services is as follows:

- 1.00% per year up to \$3 million
- 0.80% per year for amounts over \$3 million
- 0.80% per year for charitable accounts

PCM's fees may vary and may be negotiable depending on a client's unique situation – such as the size of the total relationship, composition of the portfolio, anticipated future additional assets, family holdings, related accounts, grandfathered fee schedules, courtesy accounts, low-cost basis securities, certain passively managed investments and pre-existing relationships with clients. PCM may also choose to charge a lesser investment advisory fee than the basic fee, charge a flat fee or waive its fee entirely based upon, but not limited to, the above criteria. PCM, where appropriate, may also combine household accounts and fee on the aggregate value to benefit from threshold fee discounts, while some accounts may be charged on an individual account basis based on their fee schedule. This means that similar clients could pay different fees. Advisory services may also be available from other investment advisers for similar or lower fees.

Payment of Compensation

The client generally authorizes PCM to debit fees directly from the client's account at the custodian; however, if the client would like to be billed directly for fees incurred, they have that option. Most fees are calculated based on the value of a portfolio at the close of each calendar quarter and are charged in arrears. Historically, some managers have charged their fees monthly, and they have chosen to retain that schedule for their existing and new clients. For client accounts that receive quarterly reports, PCM sends a copy of the invoice to the client stating the amount of the fee, the value of the client's assets on which the fee was based, and the specific manner in which the fee was calculated. Clients who have their fees taken out monthly do not receive copies of invoices.

An account may be terminated at any time by written or oral notification. Accounts initiated or terminated within the billing cycle will be charged a prorated fee.

Custodian Charges & Additional Fees

As discussed in Item 12 below, when requested to recommend a custodian for a client, PCM generally recommends Charles Schwab or Fidelity. PCM's fees do not include certain charges imposed by third parties (i.e. Schwab, Fidelity or other brokerage firms) which can differ depending on the brokerage firm and may include the following: custodial fees such as wire fees and prime broker "trade away" fees, brokerage commissions, platform fees or fees paid to sub advisors, mark-ups or mark-downs charged for fixed income transactions, mutual fund and exchange traded fund fees/expenses, money market management fees, 12b-1 fees and sub transfer fees, administrative expenses, IRA and qualified retirement plan fees and other charges required by law. The type of fees as well as the amount of these fees may differ depending on the custodian.

When beneficial to the client, individual fixed-income and/or equity transactions may be effected through broker-dealers with whom PCM and/or the client have entered into arrangements for prime brokerage clearing services, including effecting certain client transactions through other SEC registered and FINRA member broker dealers. The client generally will incur both the transaction fee charged by the executing broker-dealer and a "trade away" fee charged by Schwab or Fidelity.

Mutual funds and exchange traded funds (ETFs) have varying operating expenses that are included in the funds "expense ratio" – separate from any PCM fees. This fee information along with any additional fee information is included in the fund's prospectus. While there could be occasions where clients' own funds with higher expense ratios (i.e., legacy holdings with capital gains consequences, minimum purchase requirements, accounts that cannot hold certain share classes, etc.), PCM strives to select funds that have the lowest expense ratios for its clients.

PCM does not receive any portion of these fees.

The custodian sends a statement to the client, at least quarterly, indicating the value of and all amounts disbursed from the account including the amount of advisory fees paid directly to PCM. Though PCM will assist the client in establishing and maintaining accounts at the custodian, PCM shall have no responsibility or liability with respect to custodial arrangements or the acts, omissions or other conduct of the custodian.

Consulting Services

PCM may provide consulting services including analysis of portfolios held outside PCM, security analysis, financial planning or expert witness services.

Fees for consulting services may be charged on an hourly basis (ranging from \$100 to \$500 per hour) or on a fixed fee basis (ranging from \$1,000 to \$20,000). Consulting fees are generally paid in arrears when all work is complete.

Financial Planning

The standard fee for financial planning services ranges from \$1,000 to \$5,000 depending on the size of the assets and complexity of the issues involved.

Trusteeship

PCM officers and employees may act as trustee(s) for trusts of clients and non-clients. If a PCM officer or employee acts as a trustee for non-client accounts, a trustee fee may be charged to that trust.

PCM may be engaged to provide discretionary investment advisory services to trustee directed retirement plans, whereby PCM shall manage Plan assets consistent with the investment objective designated by the Plan trustees. PCM will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 (“ERISA”). PCM will generally provide services on an “assets under management” fee basis per the terms and conditions of a written agreement.

PCM may also provide investment advisory and consulting services to participant directed retirement plans per the terms and conditions of a written agreement between PCM and the plan. For such engagements, PCM shall assist the Plan sponsor with the selection of an investment platform from which Plan participants shall make their respective investment choices (which may include investment strategies devised and managed by PCM), and, to the extent engaged to do so, may also provide corresponding education to assist the participants with their decision-making process.

Neither PCM nor any management person at PCM receives any compensation for the sale of securities or other products.

Margin Accounts & Risks/Conflicts of Interest

PCM does not recommend the use of margin for investment purposes. A *margin account* is a brokerage account that allows investors to borrow money to buy securities. The custodian charges the investor interest for the right to borrow money and uses the securities as collateral. By using borrowed funds, the customer is employing leverage that will magnify both account gains and losses. Should a client determine to use margin, PCM will include the entire market value of the margined assets when computing its advisory fee. Accordingly, PCM's fee shall be based upon a higher margined account value, resulting in PCM earning a correspondingly higher advisory fee. As a result, the potential of conflict of interest arises since PCM may have an economic disincentive to recommend that the client terminate the use of margin. The use of margin can cause significant adverse financial consequences in the event of a market correction.

Investment Advisory Services for Held Away Accounts

The maximum annual fee charged for this service will not exceed 1%. Fees to be assessed will be outlined in the advisory agreement executed by the client. Fees are billed on a pro-rata basis quarterly and in arrears based on the value of the account on the last day of the previous quarter. Fees are negotiable. It is impossible for PCM to directly debit the fee from held away accounts. Therefore, PCM will assign these fees to the client's taxable accounts. If the client does not have a taxable account, an invoice will be sent to the client for payment.

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

PCM does not use any performance-based fees. PCM does not participate in side-by-side management.

Item 7 – Types of Clients

PCM provides investment management services to high-net-worth individuals, qualified retirement plans, corporate pension and profit-sharing plans, charitable institutions, endowments, trusts, estates, foundations and corporations.

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

Sound portfolio management is the result of investment management experience gathered over numerous market cycles, an in-depth analysis of the current securities markets, and a thorough understanding of the financial needs and risk tolerance of our clients. Our objective is to construct unique portfolios structured to meet the individual goals and objectives of each client. After

evaluating the income and principal needs, time horizon, tax issues and risk tolerance of each client as well as reviewing the historical relationship between asset classes, their potential returns and risks, we recommend appropriate asset class targets and manage the portfolio within specific ranges around those targets.

All portfolio managers share in the investment process. The cornerstone of our investment process is research – fundamental, quantitative and technical. We use an array of digital and printed media from well-respected global research institutions to supplement our in-house economic and market outlooks. Our research is reinforced with direct contacts with company management and top-rated industry analysts.

We use a disciplined investment approach to strategically allocate assets among cash equivalents, fixed income securities, common stocks and, where appropriate, alternative investments.

Our equity selection process is focused on the long term and blends earnings-driven growth forecasts with quantitative value screens from a broad universe of large, mid and small capitalization stocks, both domestic and international.

Our fixed income selection process may utilize either an active or passive investment style. From interest rate anticipation to sector weighting, we strive to build high-quality bond portfolios to meet our clients' total return objectives.

Investing in common stocks can expose one to certain risks. Stock markets are volatile and can decline significantly in response to adverse issuer, political, regulatory, market, or economic developments. Different sectors of the market can react differently to these developments.

Foreign markets can be more volatile than the U.S. market due to increased risks of adverse issuer, political, regulatory, market, economic, or currency developments and can perform differently from the U.S. market.

Investing in fixed income securities also carries certain security and market risks. Generally, the risk associated with a specific bond is relative to its type (government, corporate, municipal, etc.), sector of the economy (financial, industrial), quality of the issuer, coupon, price and length to maturity. In addition, there are fixed income market risks including but not limited to the level and direction of interest rates, political trends, monetary policy, fiscal policy and currency factors.

The value of an individual security or a particular type of security can be more volatile than, and can perform differently from, the market. It should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance levels.

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 PCM or the integrity of PCM's management.

Neither PCM nor any manager or employee of PCM has been involved in any legal or disciplinary actions.

Item 10 – Other Financial Industry Activities and Affiliations

Neither PCM nor any management person at PCM is registered or has an application pending to register as a broker-dealer, registered representative of a broker dealer, futures commission merchant, commodity pool operator, commodity trading advisor or an associated person of the foregoing entities.

Neither PCM nor any management person at PCM has any relationship or arrangement that is material to our advisory business with any broker-dealer, investment company, other investment advisor, futures commission merchant, commodity fund, hedge fund, bank, accounting firm, law firm, insurance company, pension consultant, real estate broker or sponsor of a limited partnership.

Neither PCM nor any management person at PCM recommends or selects other investment advisors for our clients and receives compensation for such recommendations.

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

Code of Ethics

PCM is a fiduciary and therefore has the responsibility to render professional, continuous and unbiased investment advice. Fiduciaries owe their clients a duty of honesty and loyalty, good faith and fair dealing. As a fiduciary, PCM must act, at all times, in the client's best interest and must avoid or disclose any conflicts of interest. PCM employees are required to comply with a Code of Ethics. The Code contains provisions necessary to deter misconduct and conflicts of interest and to detect any violation. The Code's key provisions include:

- Statement of General Principles
- Policy on Personal Securities Transactions and Reporting
- Policy on IPO's and Private Placements
- Code of Conduct
- Insider Trading
- Annual Acknowledgements

Failure to comply with the requirements of the Code of Ethics may result in disciplinary action, including termination of employment. PCM will provide a copy of its Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

With respect to the purchase and sale of securities, PCM requires that its employees never knowingly purchase or sell securities, directly or indirectly, for themselves in any way or at any time that could be detrimental to any client. No employee shall receive a more favorable price on the same day that a client trades in the same security. Covered Persons may execute a security transaction in their personal or their “household” accounts on the same day during which PCM executes a transaction of the same security for any client. Any trade where a Covered Person’s personal account(s) or “household” account(s) receives a better price than a client, the trader will average the prices of those specific security transactions at the end of the trading day. This will ensure a Covered Person will never receive a better price than the client.

A “household” account is defined as any account of any family member of a Covered Person living at the same address.

On a quarterly basis, securities trading by PCM managers and employees in personal or “household” accounts is reviewed by the Chief Compliance Officer, and a random sample are tested.

Principal or Agency Cross Transactions

Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

PCM does not engage in any principal or agency cross security transactions for client accounts. However, on a limited basis, PCM does engage in cross trades between client accounts, solely for fixed income securities. PCM is not registered as a broker-dealer.

Item 12 – Brokerage Practices

Brokerage Selection

If a client requests that PCM recommend a broker-dealer/custodian, PCM generally recommends Schwab and/or Fidelity. Prior to engaging PCM, the client will be required to enter into a formal Investment Management Agreement with PCM setting forth the terms and conditions under which PCM shall advise on the client's assets, and a separate custodial agreement with the designated broker-dealer/custodian.

PCM's considerations when recommending Schwab, Fidelity or any other broker-dealer/custodian include historical relationship with PCM, financial strength, well-established reputation, trading expertise, execution capabilities, timeliness, pricing, research and service. Although the transaction fees paid by PCM's clients shall comply with PCM's duty to obtain best execution, a client may pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where PCM determines, in good faith, that the transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, transaction rates and responsiveness. Accordingly, although PCM will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions. The transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, PCM's investment advisory fee.

Directed Brokerage

Clients shall have the right to direct PCM in writing to use a particular broker-dealer to execute some or all transactions for client's account. In that case, the client will negotiate terms and arrangements with that broker-dealer. PCM will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution with other accounts managed by PCM. As a result, the client acknowledges that they may pay higher commissions or other transaction costs or receive less favorable net prices on transactions and this could adversely impact account performance.

Soft Dollar Policy

PCM does not maintain any Soft Dollar Accounts.

Non-Soft Dollar Research & Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, PCM can receive from Schwab, Fidelity or another broker-dealer/custodian without cost support services and/or products. These services and products can assist PCM to better monitor and service client accounts. Included within the support services that can be obtained by PCM can be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance-related publications, discounted or complimentary consulting services and attendance at conferences and other educational and/or social events, computer hardware and/or software and/or other products used by PCM in furtherance of its investment advisory business operations.

PCM's clients do not pay more for investment transactions effected and/or assets maintained at Schwab or Fidelity as the result of this arrangement. There is no corresponding commitment made by PCM to Schwab, Fidelity, or any other any entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

Order Aggregation

Transactions for each client account generally will be effected independently, unless there is a decision to purchase or sell the same securities for several clients at approximately the same time. PCM may, but is not obligated to, combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among PCM's client's differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day.

As stated in Item 11 (*Participation or Interest in Client Transactions*), any employee "household" account that receives a better price than the client will be averaged at the end of the day to ensure the employee never receives a better price than the client.

PCM shall not receive any additional compensation or remuneration as the result of such aggregation.

Item 13 – Review of Accounts

Review of Accounts

Client investment accounts are reviewed on at least a quarterly basis. Each individual portfolio manager is responsible for reviewing the investment accounts under his/her management. In addition, reviews may be triggered by capital additions or withdrawals, changes in market outlook or investment strategy or the sale or purchase of a security.

Reviewers include J. Geddes Parsons – Managing Director; Robert W. Parsons – Managing Director; Peter M. Hunt – Managing Director; Edwin G. Fischer, Jr. – Managing Director; David von Hemert – Managing Director; Ruth K. Mullen – Managing Director; John H. Mullen – President and Managing Director; John B. Trevor, IV – Secretary and Managing Director; C. Bateman Parsons – Treasurer and Managing Director; Joan M. Caine – Managing Director.

The reviewers have responsibility for portfolio management and account maintenance. This includes communication with clients and their tax advisers, asset allocation, portfolio management and selection of individual securities.

In addition, PCM clients receive quarterly reports which typically include a portfolio evaluation, a fee calculation invoice (except for portfolios that pay fees monthly), an economic and market outlook, and a letter from the portfolio manager.

Most custodians send trade confirmations from the broker executing trades for the client's account. PCM receives or has access to client statements and trade confirmations generated by the custodian.

Item 14 – Client Referrals and Other Compensation

As indicated at Item 12 above, PCM can receive from Schwab, Fidelity or any other broker-dealer/custodian without cost, support services and/or products. PCM's clients do not pay more for investment transactions effected and/or assets maintained as a result of this arrangement. There is no corresponding commitment made by PCM to Schwab, Fidelity or to any other broker-dealer/custodian, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

PCM does not maintain solicitor arrangements/pay referral fee compensation to any non-employee new client introductions.

Item 15 – Custody

PCM shall have the ability to deduct its advisory fee from the client's custodial account. Clients are provided with transaction confirmation notices, and account statements directly from the custodian (i.e., Schwab or Fidelity) at least quarterly. To the extent that PCM provides clients with quarterly account statements or reports, the client is urged to compare any statement or report provided by PCM with the account statements received from the custodian. The custodian does not verify the accuracy of PCM's advisory fee calculation.

PCM engages in certain custody-related services (i.e., trustee service, powers of attorney, and asset transfer authorizations) that are disclosed in Item 9 of Form ADV Part 1. These services and practices are subject to an annual surprise CPA examination.

Item 16 – Investment Discretion

For discretionary accounts, PCM retains full authority to select securities to be bought and sold and the amount of securities to be bought and sold. While there are no specific limits on this authority, PCM endeavors to meet the clients' goals by considering the investment objectives and risk parameters of that account which has been discussed with and approved by the respective client. If necessary, PCM will accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on an account must be presented to PCM in writing.

For non-discretionary accounts, PCM will advise and make recommendations to the client on which securities to be bought and sold. However, PCM cannot execute any such trades without getting prior approval from the client.

Item 17 – Voting Client Securities

Proxy Voting

PCM does not vote proxies for its clients and recommends that clients individually exercise their right to vote. Some clients request not to receive company-related material which includes proxy statements, and this material is sent directly to PCM. Proxy material that is sent directly to PCM at the clients' request will not be voted by PCM; proxy materials will be discarded. Any client who elects to have proxy material sent to PCM must acknowledge this policy in writing.

Item 18 – Financial Information

PCM 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.

Any Questions

PCM's Chief Compliance Officer, Stacey Sternberg, remains available to address any questions regarding this Part 2A.

John H. Mullen
Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about John H. Mullen that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

John H. Mullen

Year of Birth: 1984

Education Background:

Fairfield University
Providence College
Master's in Finance

Business Background:

Parsons Capital Management, Inc.	2008 – Present
President and Managing Director	
Ocean State Asset Management	2006 – 2008
Managing Director	

Item 3 – 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 each supervised person providing investment advice.

John H. Mullen has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

John H. Mullen serves on the Board of Trustees of Providence Country Day School.

John H. Mullen is not engaged in any other investment-related business or occupation. Mr. Mullen is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

John B. Trevor IV, CFP®

Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about John B. Trevor IV that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

John B. Trevor IV

Year of Birth: 1967

Education Background:

University of Colorado

University of Rhode Island

Master's in Business Administration

Business Background:

Parsons Capital Management, Inc.

2011 – Present

Secretary and Managing Director

Slocum Gordon & Co. LLP

2007 – 2011

Portfolio Manager/Advisor

Item 3 – 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 each supervised person providing investment advice.

John B. Trevor IV has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

John B. Trevor IV is Trustee of the IGWE Investment Club, Treasurer of St. John's Church of Fisher's Island, Investment Committee Member of Gordon School, and Board Member of Providence Mutual Fire Insurance Co, as well as Chair of the Governance Committee. John also serves on the Endowment Funds Board of Central Congregational Church.

John B. Trevor IV is not engaged in any other investment-related business or occupation. Mr. Trevor is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

The CERTIFIED FINANCIAL PLANNER™, CFP® designation is granted to individuals who have achieved proficiency in the following areas: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning and estate planning. Prior to becoming certified, applicants must complete a board-certified education program, pass the comprehensive CFP® Certification Exams, agree to abide by the CFP code of ethics and have at least three years of financial planning experience.

Charles Bateman Parsons
Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about Charles Bateman Parsons that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Charles Bateman Parsons

Year of Birth: 1987

Education Background:

University of Denver

University of Denver

Master's in Finance

Business Background:

Parsons Capital Management, Inc.

2016 – Present

Treasurer and Managing Director

Capital Value Advisors, LLC

2013 – 2016

Analyst

Item 3 – 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 each supervised person providing investment advice.

Charles Bateman Parsons has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

Charles Bateman Parsons is a Member of the Investment Committee of Gordon School, and the Treasurer of the Fisher's Island Sportsmen Club.

Charles Bateman Parsons is not engaged in any other investment-related business or occupation. Mr. Parsons is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

Peter M. Hunt
Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about Peter M. Hunt that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Peter M. Hunt

Year of Birth: 1953

Education Background:

Brown University

Business Background:

Parsons Capital Management, Inc.	1995 – Present
Managing Director	
Former President	

Item 3 – 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 each supervised person providing investment advice.

Peter M. Hunt has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

Peter M. Hunt serves as President and Director to a closely held family holding company, Meehan Fund, Inc., and Trustee of the Meehan Foundation. Mr. Hunt receives a fee for consulting on the Meehan Fund investment portfolio along with other consultants. Parsons Capital Management has no business relationship with the Meehan Fund, Inc.

To avoid any potential conflict of interest, all trading in the Meehan Fund, Inc. investment portfolio is reviewed each quarter along with all the personal trading of the investment managers and employees at Parsons Capital Management.

Peter M. Hunt is not engaged in any other investment-related business or occupation. Mr. Hunt is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

Robert W. Parsons
Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about Robert W. Parsons that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Robert W. Parsons

Year of Birth: 1949

Education Background:

University of Denver

Business Background:

Parsons Capital Management, Inc.	1994 – Present
Managing Director	
Former Vice President and Secretary	

Item 3 – 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 each supervised person providing investment advice.

Robert W. Parsons has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

Robert W. Parsons is not engaged in any other investment-related business or occupation. Mr. Parsons is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

J. Geddes Parsons
Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about J. Geddes Parsons that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

J. Geddes Parsons

Year of Birth: 1956

Education Background:
Bucknell University

Business Background:
Parsons Capital Management, Inc. 1994 – Present
Managing Director
Former Treasurer

Item 3 – 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 each supervised person providing investment advice.

J. Geddes Parsons has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

J. Geddes Parsons is a Board Member of the Fisher's Island Utility Company, General Partner of JABCO L.P., a member of St. John's Church Investment Committee as well as an Investment Committee member of the Town of Jupiter Island.

J. Geddes Parsons is not engaged in any other investment-related business or occupation. Mr. Parsons is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

David von Hemert, CFA
Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about David von Hemert that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

David von Hemert

Year of Birth: 1950

Education Background:

Lake Forest College
Harvard University

Business Background:

Parsons Capital Management, Inc.	1999 – Present
Managing Director	

Item 3 – 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 each supervised person providing investment advice.

David von Hemert has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

David von Hemert serves as a Board Member and also a member of the Investment Committee for the RI Philharmonic Orchestra & Music School.

David von Hemert is not engaged in any other investment-related business or occupation. Mr. von Hemert is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

The CHARTERED FINANCIAL ANALYST, CFA designation denotes membership in a global association of investment professionals dedicated to the promotion of the highest educational, ethical, and professional standards in the investment industry. The CFA designation is awarded to candidates who successfully complete a three-year course of study and annual examinations in the fields of portfolio management, security analysis, accounting and ethics.

Ruth K. Mullen
Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about Ruth K. Mullen that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Ruth K. Mullen

Year of Birth: 1949

Education Background:

Vassar College
New School for Social Research

Business Background:

Parsons Capital Management, Inc.	2008 – Present
Managing Director	
Ocean State Asset Management	2003 – 2008
Principal	

Item 3 – 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 each supervised person providing investment advice.

Ruth K. Mullen has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

Ruth K. Mullen is a Member of the Board of Overseers of the Providence Children's Museum, Member of the Board, Chair of the Investment Committee and Member of the Finance Committee of Save the Bay, a Member of the Finance Committee of Community Music Works, and Member of the Investment Committee of the Providence Art Club.

Ruth K. Mullen is not engaged in any other investment-related business or occupation. Ms. Mullen is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

Edwin G. Fischer, Jr.
Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about Edwin G. Fischer, Jr. that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Edwin G. Fischer, Jr.

Year of Birth: 1966

Education Background:

Hobart College

Business Background:

Parsons Capital Management, Inc.	1998 – Present
Managing Director	
Former Vice President	

Item 3 – 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 each supervised person providing investment advice.

Edwin G. Fischer, Jr. has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

Edwin G. Fischer, Jr. is a Managing Partner of Halidon House LLC, and a Member of the Finance Committee of Meeting Street School.

Edwin G. Fischer, Jr. is not engaged in any other investment-related business or occupation. Mr. Fischer is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

Stacey L. Sternberg, IACCP®
Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about Stacey L. Sternberg that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Stacey L. Sternberg

Year of Birth: 1972

Education Background:

Roger Williams University

Business Background:

Parsons Capital Management, Inc.	2007 – Present
Chief Compliance Officer and Relationship Manager	

Item 3 – 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 each supervised person providing investment advice.

Stacey L. Sternberg has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

Stacey L. Sternberg is not engaged in any other investment-related business or occupation. Mrs. Sternberg is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

The NRS Investment Adviser Certified Compliance Professional® (IACCP®) designation is awarded to knowledgeable, experienced individuals who complete an instructor-led program of in-person and/or online study, pass a certifying examination, and meet its work experience, ethics and continuing education requirements. The designation signifies intermediate-level knowledge of investment adviser regulation and compliance best practices, and adherence to nationally recognized professional standards and ethical leadership.

Exhaustive certification and course development, together with expert instructors and facilitators from the compliance, legal, regulatory, financial industry, and academic sectors, help ensure that individuals earning the IACCP designation have been trained, tested and certified to meet high industry professional standards.

Linda J. Jamison
Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about Linda J. Jamison that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Linda J. Jamison

Year of Birth: 1961

Education Background:

University of Rhode Island

Business Background:

Parsons Capital Management, Inc.	1999 – Present
Client Service Officer	

Item 3 – 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 each supervised person providing investment advice.

Linda J. Jamison has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

Linda J. Jamison is Treasurer for the Taxpayers Association of Jamestown, and Secretary for the Jamestown Republican Town Committee. Linda is also a Committee Participant for the Jamestown School Strategic Planning Committee.

Linda J. Jamison is not engaged in any other investment-related business or occupation. Mrs. Jamison is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

Joan M. Caine, CFA

Parsons Capital Management, Inc.

10 Weybosset Street, Suite 1000
Providence, RI 02903

(401) 521-2440

September 28, 2022

This brochure supplement provides information about Joan M. Caine that supplements the Parsons Capital Management, Inc. brochure. You should have received a copy of that brochure. Please contact Stacey L. Sternberg, Chief Compliance Officer, if you did not receive Parsons Capital Management's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Joan M. Caine

Year of Birth: 1963

Education Background:

Boston College

Loyola College

Master's in Finance

Business Background:

Parsons Capital Management, Inc.

Managing Director

2020 – Present

Washington Trust Investors

Senior Portfolio Manager

2010 – 2020

Item 3 – 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 each supervised person providing investment advice.

Joan M. Caine has not been involved in any legal or disciplinary actions.

Item 4 – Other Business Activities

Parsons Capital Management employees sometimes serve on boards or committees of charitable agencies and may also be involved with that agency in an investment advisory capacity.

Joan M. Caine currently serves on Lifespan's Investment Committee.

Joan M. Caine is not engaged in any other investment-related business or occupation. Ms. Caine is not registered nor has an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, or a commodity trading advisor.

Item 5 – Additional Compensation

Neither Parsons Capital Management nor any of its supervised persons receives any compensation for the sale of securities or other products. Parsons Capital Management also does not use any performance-based fees.

Item 6 – Supervision

Once every quarter the Chief Compliance Officer randomly selects two portfolios from each of the investment managers at Parsons Capital Management. The portfolios are reviewed to verify that client's goals and objectives are being met, the appropriateness of the asset allocation and the suitability of all investments.

The CHARTERED FINANCIAL ANALYST, CFA designation denotes membership in a global association of investment professionals dedicated to the promotion of the highest educational, ethical, and professional standards in the investment industry. The CFA designation is awarded to candidates who successfully complete a three-year course of study and annual examinations in the fields of portfolio management, security analysis, accounting and ethics.