



## **Polaris Advisors, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 28, 2023**

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Polaris Advisors, LLC ("Polaris" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (508) 481-2299.

Polaris is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Polaris to assist you in determining whether to retain the Advisor.

Additional information about Polaris and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD # 127217.

**Polaris Advisors, LLC**  
**615 Concord St., Suite 5, Framingham, MA 01702**  
**Phone: (508) 481-2299 \* Fax: (508) 655-4066**  
<http://www.polarisadv.com>

## **Item 2 – Material Changes**

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Polaris. For convenience, the Advisor has combined these documents into a single disclosure document.

Polaris believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Polaris encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor has updated its principal place of business to 615 Concord St., Suite 5, Framingham, MA 01702.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 127217. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (508) 481-2299.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Polaris Advisors, LLC (“Polaris” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the Commonwealth of Massachusetts. Polaris was founded in October 2003 and is owned and operated by Fredric Weldon, CFA, Managing Director and Chief Compliance Officer. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Polaris.

### **B. Advisory Services Offered**

Polaris offers investment advisory services to individuals, high net worth individuals and charitable organizations (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Polaris’ fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Wealth Management Services

Polaris may provide Clients with wealth management services, which generally includes a broad range of comprehensive financial planning services in connection with discretionary management of investment portfolios. These services are described below.

*Investment Management Services* - Polaris provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and related advisory services. Polaris works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Polaris will either construct a portfolio or place Client assets into one of Polaris’ model portfolios to achieve the Client’s investment goals, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client’s legacy portfolio fit and/or tax considerations.

Polaris’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Polaris will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Polaris evaluates and selects investments for inclusion in Client portfolios or placement into a model portfolio only after applying its internal due diligence process. Polaris may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Polaris may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Polaris may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Polaris accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the investment advisory agreement. Please see Item 12 – Brokerage Practices.

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client’s best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

#### *Use of Independent Managers*

Polaris may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers’ strategies and target allocations remain aligned with its clients’ investment objectives and overall best interests. The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided with the Independent Manager’s Form ADV 2A (or a brochure that makes the appropriate disclosures).

*Financial Planning Services* - Polaris will typically provide a variety of financial planning services to Clients as a part of its wealth management services. Financial plans are offered in several areas of a Client’s financial situation, depending on their goals and objectives.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, and other areas of a Client’s financial situation.

A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Polaris may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations poses a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

### **C. Client Account Management**

Prior to engaging Polaris to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

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- Establishing an Investment Strategy – Polaris, in connection with the Client, will develop a strategy that seeks to achieve the Client's investment goals and objectives.
- Asset Allocation – Polaris will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Polaris will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Polaris will provide investment management and ongoing oversight of the Client's investment portfolio.

#### **D. Wrap Fee Programs**

Polaris does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Polaris.

#### **E. Assets Under Management**

As of December 31, 2022, Polaris manages \$175,834,171 in Client assets, \$133,001,432 of which are managed on a discretionary basis and \$42,832,739 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

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

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

#### **A. Fees for Advisory Services**

For Clients engaged for comprehensive wealth management services, the Client will be charged a single combined investment advisory fee for investment management and financial planning services based on the market value of assets under management. The Advisor does not charge a separate fee for financial planning engagements.

Wealth management fees are paid quarterly in advance, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior quarter. Wealth management fees are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
Up to \$3,000,000	1.25%
\$4,000,000 to \$5,000,000	1.00%
Over \$5,000,000	0.75%

Certain Clients may be subject to a legacy fee schedule. The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. In certain instances, the Advisor may not charge the Client a fee for the first quarter of service, where the Client's assets may not have been fully invested. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Polaris will be independently valued by the Custodian. Polaris will conduct periodic reviews of the Custodian's valuations.

The Advisor's fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. The Advisor will allocate a portion of the advisory fee collected to the Independent Manager pursuant to the terms of the executed agreement between the Advisor and the Independent Manager. In certain circumstances, the Independent Manager will not charge a fee.

#### **B. Fee Billing**

Wealth management fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Polaris at the end of the prior quarter. Certain legacy accounts will be charged in a manner that differs from above. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by Polaris directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

#### Use of Independent Managers

For Client accounts implemented through an Independent Manager, the Client's overall fees will include the Advisor's investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager, as applicable. The Advisor will assume the responsibility for calculating the Client's fees and deducting all fees from the Client's account[s].

#### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Polaris, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all securities execution and custody fees charged by the Custodian, if applicable. The Advisor's recommended Custodian typically charges securities transaction fees for mutual funds and other types of investments in Client accounts. The investment advisory fee charged by Polaris is separate and distinct from these custody and execution fees.

In addition, all fees paid to Polaris for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Polaris, but would not receive the services provided by Polaris which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Polaris to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

Polaris is compensated for its services in advance of the quarter in which advisory services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the wealth management agreement within the first month of signing the Advisor's agreement at no cost to the Client. After the first calendar month, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

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#### Use of Independent Managers

In the event that a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. Polaris will assist the Client with the termination and transition as appropriate.

#### **E. Compensation for Sales of Securities**

Polaris does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

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Polaris does not charge performance-based fees for its investment advisory services. The fees charged by Polaris are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Polaris does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Item 7 – Types of Clients**

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Polaris offers investment advisory services to individuals, high net worth individuals and charitable organizations in the Commonwealth of Massachusetts and other states. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Polaris generally requires a minimum relationship size of \$100,000, which may be waived at the sole discretion of the Advisor.

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

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##### **A. Methods of Analysis**

Polaris primarily employs a fundamental and cyclical analysis methods in developing investment strategies for its Clients. Research and analysis from Polaris is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that Polaris is recommending. The risks with cyclical analysis are similar to those of technical analysis.

Manager analysis occurs when Polaris utilizes mutual fund securities. It analyses the capabilities of the management of these funds by examining such factors as long-term track records, stated investment processes, personnel hiring, training and firing procedures, stability of employment and ownership of the sponsoring organization, and third-party reviews such as Morningstar and management fees paid to the advisors.



As noted above, Polaris generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Polaris will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Polaris may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Polaris will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Following are some of the risks associated with the Advisor's investment approach:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

The performance of a mutual fund is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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### **There are no legal, regulatory or disciplinary events involving Polaris or any of its Supervised Persons.**

Polaris and its Advisory Persons value the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 127217.

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

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### Tax Services

The Advisor may also assist Clients in the preparation of federal and state tax returns. Depending on the terms of the agreement with each Client, the cost for these services may or may not be included in the Advisor's fees. The Advisor may elect to have a third party prepare the Client's tax return, at no additional cost to the Client. The Advisor receives no additional income derived from tax preparation services. Clients are under no obligation to engage the Advisor for tax preparation services.

### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described in Item 5.A. The Advisor will assume the responsibility for calculating the Client's fees and deducting all fees from the Client's account[s] and will portion out the investment advisory fee collected from the Client to the Independent Manager.

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

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### **A. Code of Ethics**

Polaris has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Polaris ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Polaris and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Polaris's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (508) 481-2299.

### **B. Personal Trading with Material Interest**

Polaris allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Polaris does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an investment company. Polaris does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

Polaris allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Polaris requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

#### D. Personal Trading at Same Time as Client

While Polaris allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Polaris, or any Supervised Person of Polaris, transact in any security to the detriment of any Client.**

### Item 12 – Brokerage Practices

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#### A. Recommendation of Custodian[s]

Polaris does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Polaris to direct trades to this Custodian as agreed in the investment advisory agreement. Further, Polaris does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Polaris does not exercise discretion over the selection of the Custodian, the Advisor may recommend the Custodian[s] to the Client for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by Polaris. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Polaris may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices. Polaris does not receive research services, other products, or compensation as a result of recommending a particular broker-dealer/custodian that may result in the Client paying higher commissions than those obtainable through other broker-dealer/custodians.

Polaris will generally recommend that Clients establish their account[s] at Fidelity Clearing & Custody Solutions and related entities of Fidelity Investments, Inc. (collectively "Fidelity"), a FINRA-registered broker-dealer and member SIPC. Fidelity will serve as the Client's "qualified custodian." Polaris maintains an institutional relationship with Fidelity, whereby the Advisor receives economic benefits from Fidelity. Please see Item 14 below.

Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a custodian not recommended by Polaris. Fidelity is independent and unaffiliated SEC-registered broker-dealers and FINRA members. Fidelity offers independent investment advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Polaris receives certain benefits from Fidelity through its participation in the program. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Polaris does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - Polaris does not receive any compensation from any third-party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Polaris will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian, unless otherwise directed by the Client. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Polaris will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Polaris will execute its transactions through the Custodian as authorized by the Client, unless otherwise directed in writing by the Client.

Polaris may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Weldon, Chief Compliance Officer of Polaris and delegates. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A. above, each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Polaris if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by Polaris**

#### Participation in Institutional Advisor Platform

The Advisor has established an institutional relationship with Fidelity, whereby accounts are custodied through Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment advisory services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from Fidelity creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of Fidelity over one that does not furnish similar software, systems support, or services. Additionally, the Advisor may receive the following benefits from Fidelity: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

## **B. Compensation for Client Referrals**

Polaris does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

### **Item 15 – Custody**

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Polaris does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Polaris to utilize the Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Polaris to ensure accuracy, as the custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

### **Item 16 – Investment Discretion**

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Polaris generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Polaris. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Polaris will be in accordance with each Client's investment objectives and goals.

### **Item 17 – Voting Client Securities**

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Polaris does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

### **Item 18 – Financial Information**

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Neither Polaris, nor its management, have any adverse financial situations that would reasonably impair the ability of Polaris to meet all obligations to its Clients. Neither Polaris, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. Polaris is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Fredric E. Weldon, CFA®  
Managing Director and Chief Compliance Officer**

**Effective: March 28, 2023**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Fredric E. Weldon, CFA®, (CRD# 2351652) in addition to the information contained in the Polaris Advisors, LLC ("Polaris" or the "Advisor", CRD # 127217) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Polaris Disclosure Brochure or this Brochure Supplement, please contact us at (508) 481-2299.

Additional information about Mr. Weldon is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2351652.



## Item 2 – Educational Background and Business Experience

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Fredric E. Weldon, CFA®, born in 1952, is the Managing Director and Chief Compliance Officer of Polaris. Mr. Weldon earned a Master's in Business Administration degree in Accounting and Finance from Kellogg Graduate School of Management in 1977. Mr. Weldon also earned a Bachelor's degree in Mechanical Engineering from Union College in 1974. Additional information regarding Mr. Weldon's employment history is included below.

### Employment History:

Managing Director, Polaris Advisors, LLC	05/2003 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	10/2003 to 09/2019
Registered Representative, Fector, Detwiler & Co., Inc.	10/2001 to 10/2003
Financial Planner, Financial Perspectives Planning Services, Inc.	02/1998 to 10/2003

### Chartered Financial Analyst ("CFA®")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. CFA® is a trademark owned by CFA Institute.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Weldon.*** Mr. Weldon has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Weldon.

Securities laws require an advisor to disclose any instances where the advisor or its Advisory Persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Weldon.***

However, we do encourage you to independently view the background of Mr. Weldon on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2351652.

## Item 4 – Other Business Activities

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Mr. Weldon is dedicated to the investment advisory activities of Polaris' Clients. Mr. Weldon does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Weldon is dedicated to the investment advisory activities of Polaris' Clients. Mr. Weldon does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Weldon serves as the Managing Director and Chief Compliance Officer of Polaris. Mr. Weldon can be reached at (508) 481-2299.



Polaris has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Polaris. Further, Polaris is subject to regulatory oversight by various agencies. These agencies require registration by Polaris and its Supervised Persons. As a registered entity, Polaris is subject to examinations by regulators, which may be announced or unannounced. Polaris is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Robert E. Whitney, ChFC®, EA®**  
**Investment Advisor Representative**

**Effective: March 28, 2023**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Robert E. Whitney (CRD# 4296689) in addition to the information contained in the Polaris Advisors, LLC ("Polaris" or the "Advisor", CRD# 127217) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Polaris Disclosure Brochure or this Brochure Supplement, please contact us at (508) 481-2299.

Additional information about Mr. Whitney is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4296689.

## Item 2 – Educational Background and Business Experience

Robert E. Whitney, born in 1967, is dedicated to advising Clients of Polaris as an Investment Advisor Representative. Mr. Whitney earned an Associates Degree from Newbury College in 1996. Additional information regarding Mr. Whitney's employment history is included below.

### Employment History:

Investment Advisor Representative, Polaris Advisors, LLC	12/2021 to Present
President, Whitney & Gore Financial	11/1997 to Present
Registered Representative, Cetera Advisor Networks LLC	09/2013 to 12/2021
Registered Representative, Walnut Securities	08/2003 to 08/2013
Agent, Nathan & Lewis Securities, Inc.	10/2000 to 08/2003

### Chartered Financial Consultant™ (“ChFC®”)

The Chartered Financial Consultant™ (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals, and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments, and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course-specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

### Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines, namely, estate planning, retirement planning, or non-qualified deferred compensation.

### Enrolled Agent™ (“EA®”)

An Enrolled Agent™ (EA®) is a federally-authorized tax practitioner who has technical expertise in the field of taxation and who is empowered by the U.S. Department of the Treasury to represent taxpayers before all administrative levels—examination, collection, and appeals—of the Internal Revenue Service. In addition to taxpayer representation, Enrolled Agents™ often provide tax consultation services and prepare a wide range of federal and state tax returns.

## Item 3 – Disciplinary Information

***There are no legal, civil or disciplinary events to disclose regarding Mr. Whitney.*** Mr. Whitney has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Whitney.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Whitney.***

However, we do encourage you to independently view the background of Mr. Whitney on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4296689.

#### **Item 4 – Other Business Activities**

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##### Accounting and Tax Services

Mr. Whitney also serves as the President for Whitney & Gore Financial Services, Inc, located in Framingham, MA. Clients of Whitney & Gore may enlist Mr. Whitney for investment management referral services. Clients of the Advisor are under no obligation to implement any recommendations made by Mr. Whitney or the Advisor.

##### Insurance Agency Affiliations

Mr. Whitney is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Whitney's role with Polaris. As an insurance professional, Mr. Whitney will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Whitney is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Whitney or the Advisor. Mr. Whitney spends approximately 1% of his time per month in this capacity.

#### **Item 5 – Additional Compensation**

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Mr. Whitney has additional business activities where compensation is received that are detailed in Item 4 above.

#### **Item 6 – Supervision**

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Mr. Whitney serves as an Investment Advisor Representative of Polaris and is supervised by Fredric Weldon, the Chief Compliance Officer. Mr. Weldon can be reached at (508) 481-2299.

Polaris has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Polaris. Further, Polaris is subject to regulatory oversight by various agencies. These agencies require registration by Polaris and its Supervised Persons. As a registered entity, Polaris is subject to examinations by regulators, which may be announced or unannounced. Polaris is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Michael P. Gore, CPA, PFS®  
Investment Advisor Representative**

**Effective: March 28, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Michael P. Gore (CRD# 3181476) in addition to the information contained in the Polaris Advisors, LLC (“Polaris” or the “Advisor”, CRD# 127217) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Polaris Disclosure Brochure or this Brochure Supplement, please contact us at (508) 481-2299.

Additional information about Mr. Gore is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 3181476.

## Item 2 – Educational Background and Business Experience

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Michael P. Gore, born in 1970, is dedicated to advising Clients of Polaris as an Investment Advisor Representative. Mr. Gore earned an Accounting Degree from Boston College in 1994. Additional information regarding Mr. Gore's employment history is included below.

### Employment History:

Investment Advisor Representative, Polaris Advisors, LLC	12/2021 to Present
CPA/Partner, Whitney & Gore Financial Services, Inc.	11/1997 to Present
Registered Representative, Cetera Advisor Networks LLC	09/2013 to 12/2021
Investment Advisor Representative and Registered Representative, Cetera Advisor Networks	07/2016 to 12/2021
Mass Transfer, Walnut Street Securities, Inc.	08/2003 to 08/2013
Registered Representative, Nathan & Lewis Securities, Inc.	11/1999 to 08/2003
Registered Representative, Money Concepts Capital Corp	01/1999 to 11/1999
Accountant, Gore & Associates, CPA's	12/1993 to 01/1999
Accountant, Whitney Tax Service	12/1989 to 12/1994

### Certified Public Accountant™ ("CPA")

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants™ (AICPA®) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's® Code of Professional Conduct within their state accountancy laws or have created their own.

### Personal Financial Specialist™ ("PFS®")

The PFS® credential demonstrates that an individual has met the minimum education, experience, and testing required of a CPA® in addition to a minimum level of expertise in personal financial planning. To attain the PFS® credential, a candidate must hold an unrevoked CPA® license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of individual financial planning CPE® credits, pass a comprehensive financial planning exam and be an active member of the AICPA®. A PFS® credential holder is required to adhere to AICPA's® Code of Professional Conduct and is encouraged to follow AICPA's® Statement on Responsibilities in Financial Planning Practice. To maintain their PFS® credential, the recipient must complete 60 hours of financial planning CPE® credits every three years. The PFS® credential is administered through the AICPA®.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Gore.*** Mr. Gore has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Gore.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Gore.***

However, we do encourage you to independently view the background of Mr. Gore on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 3181476.

#### **Item 4 – Other Business Activities**

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##### Accounting and Tax Services

Mr. Gore also serves as a CPA and Partner for Whitney & Gore Financial Services, Inc, located in Framingham, MA. Clients of Whitney & Gore may enlist Mr. Gore for investment management referral services. Clients of the Advisor are under no obligation to implement any recommendations made by Mr. Gore or the Advisor.

##### Insurance Agency Affiliations

Mr. Gore is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Gore's role with Polaris. As an insurance professional, Mr. Gore will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Gore is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Gore or the Advisor. Mr. Gore spends approximately 1% of his time per month in this capacity.

#### **Item 5 – Additional Compensation**

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Mr. Gore has additional business activities where compensation is received that are detailed in Item 4 above.

#### **Item 6 – Supervision**

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Mr. Gore serves as an Investment Advisor Representative of Polaris and is supervised by Fredric Weldon, the Chief Compliance Officer. Mr. Weldon can be reached at (508) 481-2299.

Polaris has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Polaris. Further, Polaris is subject to regulatory oversight by various agencies. These agencies require registration by Polaris and its Supervised Persons. As a registered entity, Polaris is subject to examinations by regulators, which may be announced or unannounced. Polaris is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



## Privacy Policy

**Effective:** March 28, 2023

### Our Commitment to You

Polaris Advisors, LLC ("Polaris" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Polaris (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Polaris does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Polaris does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Polaris or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Polaris does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### State-specific Regulations

Massachusetts	In response to Massachusetts law, the Client must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the Client’s execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.
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### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (508) 481-2299.