Introduction

Anchor Capital Management, LLC ("ACM") is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. The SEC offers free and simple tools to research firms and financial professionals at <u>Investor.gov/CRS</u> which also provides information tailored to educate retail investors about financial professionals.

What investment services and advice can you provide me?

Portfolio Management Services - We provide investment advisory service to retail investors including portfolio management services, financial planning and consulting services. ACM manages client advisory accounts on a discretionary or nondiscretionary basis. When engaged on a discretionary basis, we will implement transactions without seeking prior client consent on an ongoing basis until you notify us in writing to switch. You can impose reasonable restrictions. When engaged on a non-discretionary basis, you make the ultimate decision regarding the purchase or sale of investments. These accounts are supervised on a regular and continuous basis. **Financial Planning/Consulting Services -** ACM offers clients a broad range of services, which can include portfolio management services and consulting. This service is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. ACM can advise on any investment asset, our investment recommendations are primarily related to investments in exchange listed securities, ETF's, no load and load waived and load bearing mutual funds, corporate debt securities, pooled investment vehicles, structured notes and security of foreign issuers. *Our investment recommendations are not limited to any specific product or service*

For additional information, please see Items 4 and 7 of our Form ADV, 2A Brochure (Part 2A) available at: http://adviserinfo.sec.gov

Conversation Starters. Ask your financial professional...

- Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not?
- > How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What fees will I pay?

For ACM's **Portfolio Management Services**, we charge an annual fee not to exceed 1.20% based on the amount of assets under management. The portfolio management fee is billed in advance at the beginning of each quarter, based upon billable balance on the last day of the previous calendar quarter. For ACM's **Financial Planning Service**, we charge an initial first-meeting deposit of \$500 and subsequently, a minimum fixed quarterly retainer of \$3,000. No refunds are given for initial deposits or quarterly retainers. At the outset of services, we will provide an estimate of hours; clients will provide a 50% deposit of this estimated price. For ACM's **Consulting Service**, we charge an initial first-meeting deposit of \$500 and subsequently, an hourly fee, of \$300. Some fee arrangements create conflicts of interest described in more detail in our Form *ADV*, *Part 2A*. It is important to understand that the more assets held in a retail client's account, the more the client will pay in fees. We therefore have an incentive to encourage a client to increase the assets in his/her account. There are other fees and costs related to our investment advisory services and investments in addition to the principal fees and costs listed above that you will pay directly or indirectly. You should understand that the fees discussed above are specific to what we charge and do not include certain charges imposed by third parties, such as custodial fees, exchange traded or mutual fund fees and expenses, brokerage fees and commissions, and other fees and taxes on brokerage accounts and securities transactions.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For additional information, please see Item 5 of our Form ADV, 2A Brochure (Part 2A) available at: http://adviserinfo.sec.gov.

Conversation Starter. Ask your financial professional...

Help me understand how these fees and costs might affect my investments. If I give you \$100,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have 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. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice we provide you.

Here are some examples to help you understand what this means. Our financial professionals have an incentive to encourage you to increase your assets in your accounts, recommend our advisory services to you, and recommend you purchase investments that result in additional compensation to them. For more information about our conflicts of interest, we recommend reading our ADV Part 2A, Items 4 and 10. *In addition, our minimum account size is negotiable under certain circumstances and at our discretion. Should we agree to waive this minimum account size, we would receive less compensation for services provided. We, therefore, have a disincentive to waive this minimum. We only generate revenues from our asset management and financial planning services as described above.*

Conversation Starter. Ask your financial professional...

How might your conflicts of interest affect me, and how will you address them? For additional information, please see our Form ADV, 2A Brochure (Part 2A) available at: http://adviserinfo.sec.gov.

How do your financial professionals make money?

Our IAR's are compensated through a portion of revenue we received for the advisory services we provide. The portion paid to your IAR generally does not vary based on the type of investments that are recommended.

Do your financial professionals have legal or disciplinary history?

No, our firm and our financial professionals have no disciplinary history. Visit <u>www.investor.gov/CRS</u> for a free and simple search tool to research us and our financial professionals.

Conversation Starter. Ask your financial professional...

➢ As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

If you would like additional information or a copy of this disclosure or our Form ADV, Part 2A, please call (607) 272-0004.

Conversation Starter. Ask your financial professional...

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?