

Reynders, McVeigh Capital Management, LLC, which includes our division Fresh Pond Capital, is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ. It is important for you to understand the differences. Free and simple tools to research firms and financial professionals, and educational materials about broker-dealers, investment advisers and investing are available at www.investor.gov/CRS.

What Investment Services and Advice Can You Provide Me?

We offer investment advisory services to retail investors mainly via separately managed accounts (“SMAs”).

Scope of Our Services and Investment Authority

Most clients’ SMAs are “discretionary,” meaning that we are allowed to buy and sell investments in your SMA without obtaining your consent for the specific transaction in advance, subject to any reasonable restrictions you may impose in your agreement with us.

Monitoring

As part of our standard SMA services, your SMA investments are reviewed at least quarterly. Material changes in the market or your circumstances can trigger more frequent reviews.

Investment Offerings and Limitations

Our investment philosophy is growth at a reasonable price, guided by “ESG” (Environmental, Social and Governance) principles. Our investment advice focuses primarily on equity securities (stocks) and fixed income investments (bonds). We also research and recommend “Impact Investments” (some are not traded publicly) to those clients who express interest in such types of investments. You must sign a separate agreement before buying certain Impact Investments.

Minimum Requirements

We generally require a minimum investment of \$1,000,000 (across all of client’s managed accounts) to open or maintain an investment advisory relationship. We reserve the right to waive or reduce this minimum.

- We occasionally make available, as an accommodation to a small number of retail clients, and subject to additional internal approval, SMAs which are “**non-discretionary**,” meaning that **we recommend** specific transactions for your SMA, subject to any reasonable restrictions you may impose in your agreement with us, **but the ultimate investment decisions** for the purchase or sale of securities in the SMA **will be yours**.
- At the request of clients who meet the minimum investment requirement for SMA accounts, we offer **financial planning** and **retirement planning**, on a **non-discretionary** basis only. We do not monitor investments with respect to which we provide such planning services only (i.e., investments that are held outside of your SMA).

Please refer to [Items 4, 7, and 13](#) in our Form ADV Part 2A (“Brochure”) for more information.

***You are encouraged to start a conversation with your financial professional.**

Given my financial situation, should I choose an investment advisory service? 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?

***ASK US**

What Fees Will I Pay?

We charge SMAs an “**SMA Management Fee**,” quarterly and in advance, unless other arrangements are agreed upon. The fee is negotiable depending on the scope of our services and other factors and is outlined in your agreement with us.

- The **standard** SMA Management Fee is an **asset-based fee**, at an annual rate of 1% of the first \$3 million and 0.75% of assets in excess of \$3 million.
- Flat fee arrangements apply in some legacy relationships only.
- We have an incentive to encourage adding assets to your SMA, which would increase our asset-based fee.
- We do not currently charge separate fees for financial planning or retirement planning services.

You will also pay other fees and expenses, including fees charged by brokerage firms for purchasing or selling investments, exchange fees on the sale of investments, and any fees paid to the custodian you choose to hold your assets.

- If you hold shares of any mutual fund, exchange traded fund, or private equity fund in your SMA, you pay the SMA's share of that **fund's internal fees and expenses**.
- We manage a mutual fund ("our Fund"), which we often recommend as an SMA investment for accounts not large enough to hold a diversified portfolio. Our Fund's annual rate for internal fees and expenses is set forth in its [prospectus](#), available at <https://www.reyndersmcveighfunds.com>. **We do not charge the asset-based SMA Management Fee on assets invested in our Fund.**

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.

Please refer to [Item 5](#) in our Brochure for more information.

***ASK US**

Help me understand how these fees and costs might affect my investments. If I give you \$10,000 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 must 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 investment advice we provide to you.

Here are some examples to help you understand what this means:

- We have a financial incentive to recommend or purchase shares of our Fund for clients that pay us a flat fee, or an SMA Management Fee that is lower than the fee our Fund pays us.
- Having different compensation structures for accounts managed using similar strategies incentivizes us to favor accounts that generate more revenue.
- We participate in a client referral program and share a portion of the fees we get from referred accounts with the third party who referred them and serves as their custodian. We have a financial incentive to maintain a strong working relationship with that custodian, which would include recommending them to clients for custody and brokerage services.

Please refer to [Items 6, 10, and 14](#) in our Brochure for more information.

***ASK US**

How might your conflicts of interest affect me, and how will you address them?

How Do Your Financial Professionals Make Money?

Most of our financial professionals are paid a salary, plus discretionary bonuses based on the firm's profitability and the individual's overall employee performance rating. Those financial professionals who introduce clients to the firm are paid a direct percentage of the fees we receive from those clients.

- Both arrangements **incentivize** our financial professionals **to maximize the revenue** they generate for us.

Do You or Your Financial Professionals Have Legal or Disciplinary History?

No. Free and simple tools are available to research us and our financial professionals at www.investor.gov/CRS.

***ASK US**

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

Additional Information

Please visit reyndersmcveigh.com or call (617) 226-9999 for more information about our firm and our services, or to request a printed copy of our Client Relationship Summary. Our Form ADV Part 1A and Brochure are also available on the Investment Adviser Public Disclosure website at <https://www.adviserinfo.sec.gov/IAPD/default.aspx>.

***ASK US**

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 the person is treating me?