Zevin Asset Management, LLC (ZAM) is registered with the Securities and Exchange Commission as an investment advisor. Brokerage and investment advisory services and fees differ, and it is important for retail investors to understand the differences. There are free and simple tools available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investments advisers, and investing.

### What investment services and advice can you provide me?

- ZAM offers investment advisory services to retail and institutional investors. These services include customized portfolio management and portfolio management via model manager programs that utilize our select strategies.
- For customized portfolio management clients, we manage individually tailored investment accounts and monitor those accounts on a continuous basis. These services are offered as part of your standard services.
- Client portfolios using a model manager program have limited customization for specific financial and nonfinancial constraints, and clients using the model manager program are not able to purchase foreign securities or individual bonds as we typically purchase for our customized clients. Once subscribed, investors automatically buy, sell and own the same securities that are held in the model portfolio at the same percentage levels that are held in the model portfolio.
- If you select discretionary customized portfolio management, we will accept discretionary authority to determine which securities and the amounts of securities that are to be bought or sold for your account(s) until you terminate this authority by notifying us in writing. You may impose reasonable limitations on this discretionary authority and change/amend these limitations as desired by notifying us in writing. We will exercise the discretionary authority you grant us any time we decide to change the holdings in your account in accordance with your outlined investment objectives. You make the ultimate decision regarding the purchase or sale of investments when a non-discretionary portfolio management service or portfolio consulting service is selected.
- As part of our portfolio management services, clients may receive additional consulting and financial planning services. Unless agreed otherwise, these services will not incur additional fees.
- We do not make available or offer advice with respect to proprietary products. We do not limit investment options but will mostly invest client accounts in equity and fixed income securities.
- Our minimum account size for non-institutional customized accounts is $1.5 million with a minimum annual fee of $15,000. Minimum account sizes and/or minimum annual fees, if any, for model manager programs vary depending on which program is selected.
- When we provide investment advice to you regarding your retirement plan account or individual retirement account, our firm is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable. Please refer to Item 11 of our Form ADV Part 2A for additional information.
- More detailed information about our services can be found in our Form ADV Part 2A, including Item 4 and Item 8, which is posted on our website and on the Investment Adviser Public Disclosure website https://www.adviserinfo.sec.gov/IAPD/default.aspx.

### Conversation Starter

You are encouraged to ask a financial professional and start a conversation with the following additional questions:

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

### What fees will I pay?

- The specific way and amount of advisory fees are charged by ZAM is established in your written agreement.
- The annual fee for non-institutional customized portfolio management services will be based on the amount of assets under management or advisement in accordance with the following fee schedule:

<table>
<thead>
<tr>
<th>Assets in client account(s)</th>
<th>Annual fee rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>First $1 million</td>
<td>1.00%</td>
</tr>
<tr>
<td>Over $1 million through $10 million</td>
<td>0.75%</td>
</tr>
<tr>
<td>Over $10 million through $50 million</td>
<td>0.50%</td>
</tr>
<tr>
<td>Over $50 million</td>
<td>0.45%</td>
</tr>
</tbody>
</table>
- Fees for model manager programs vary depending on which program is selected.
- Customized portfolio management fees are directly debited from client accounts quarterly in arrears at the end of each calendar quarter based upon the value (market value or fair market value in the absence of market value), of the client's account at the end of that quarter. The way fees are charged and/or debited for model manager programs vary depending on which program is selected.
- Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that you incur. You may incur charges imposed by custodians, brokers, and other third parties such as fees charged by managers, model program sponsors, custodial fees, account maintenance fees, product-level fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and

---

March 30, 2022
other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees or distribution fees, which are disclosed in a fund’s prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fees.

- The more assets there are in your advisory account, the more you will pay in fees, and our firm may therefore have an incentive to encourage you to increase the assets in your account.
- You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amounts of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. More detailed information about our fees and other costs can be found in our Form ADV Part 2A, including Item 5 and Item 6.

### Conversation Starter

You are encouraged to ask a financial professional and start a conversation with the following additional questions about the impact of fees and costs on investments:

- **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 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 investment advice we provide you. Here are some examples to help you understand what this means.

- The more assets there are in a client’s advisory account, the more a retail investor will pay in fees, and our firm may therefore have an incentive to encourage the retail investor to increase the assets in his or her account.
- If we recommend that a client roll over retirement plan assets into an account to be managed by us, such a recommendation creates a conflict of interest if we will earn an advisory fee on the rolled over assets. No client is under any obligation to roll over retirement plan assets to an account managed by us.
- Although we do not currently have any formal soft-dollar arrangements, we do receive proprietary research from various broker dealers and may give these brokers dealers preference based, in part, on the quality of research received, as well as other factors, included but not limited to, price, execution quality and service quality.
- The benefits we receive through participation in programs administered by custodians/brokers selected by you may depend upon the amount of transactions directed to, or amount of assets custodied and may benefit you or us exclusively.
- We have an arrangement with a financial advisor whereby the advisor recommended certain clients open accounts with us at a model manager program and we provided those clients with access to our model managed portfolios at a reduced rate.
- More detailed information about our conflicts of interest can be found in our Form ADV Part 2A, More detailed information about our conflicts of interest can be found in our Form ADV Part 2A, including Item 5, Item 6, Item 10, Item 12 and Item 14, which is posted on our website and on the Investment Adviser Public Disclosure website [https://www.adviserinfo.sec.gov/IAPD/default.aspx](https://www.adviserinfo.sec.gov/IAPD/default.aspx)

### Conversation starter

You are encouraged to ask a financial professional and start a conversation with the following additional questions regarding conflicts of interest:

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

### How do your financial professionals make money?

Our financial professionals are compensated based on a combination of some or all of the following factors: base salary and bonus which is mostly determined based on the net income of our firm.

### Do you or your financial professional have legal or disciplinary history?

No. You may visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

### Conversation starter

You are encouraged to ask a financial professional and start a conversation with the following additional questions about the financial professional’s disciplinary history:

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

### Additional Information

You can find additional information about our investment advisory services in our Form ADV Part 2A, on our website at [https://www.zevin.com/](https://www.zevin.com/). You may request up-to-date information and/or a copy of our relationship summary by calling (617) 742-6666.

### Conversation starter

You are encouraged to ask a financial professional and start a conversation with the following additional questions about contacts and complaints:

- **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?**

---

**March 30, 2022**