

FORM ADV PART 3: FORM CRS

Item 1. Introduction

Promethos Capital, LLC is a **Registered Investment Adviser** with the U.S. Securities and Exchange and is not affiliated with a broker-dealer. Investment advisory and brokerage services and fees <u>differ</u> and it is important for you to understand the differences. Free and simple tools are available at <u>https://www.investor.gov/CRS</u>, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

We provide *discretionary and non-discretionary* portfolio management services to institutional and retail clients including individuals, trusts, estates, foundations, charitable organizations, corporations, pension, retirement, and profit-sharing plans. We offer a number of investment strategies that include global and U.S. equity portfolios that employ values/faith-based, socially responsible and ESG (environmental, social and governance) investment strategies.

Under a *discretionary arrangement* ("Discretionary Account"), we have full discretion to select which securities to buy, sell or hold. We select broker-dealers to execute transactions and determine the commissions to be paid without consulting you. You may impose limits.

Under a **non-discretionary arrangement** ("Non-Discretionary Account"), we provide model portfolios and provide buy, sell, and hold recommendations. You or your financial advisor are responsible for deciding whether to act on our recommendations, selecting the broker-dealer to execute the transaction and negotiating commissions.

We continuously monitor the investments in Discretionary Accounts and Model Portfolios. We do not monitor the investments in Non-Discretionary Accounts; you or your financial advisor are responsible for monitoring your account.

We generally require an account minimum of \$10,000,000 which may be waived in certain situations.

Conversation Starter. Ask your financial professional:

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

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?

Our Obligations to You. As your investment adviser and fiduciary, we are required to act in your best interests at all times. This fiduciary standard covers our entire investment advisory relationship with you. Our interests can conflict with your interests. We must eliminate these conflicts or tell you about them in a way you can understand, so that you can decide whether or not to agree to them.

Conversation Starter. Ask your financial professional:

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

March 30, 2024

Our revenue is derived from the advisory fees we collect from your account. Neither we nor any of our employees receive compensation for the sale of securities to our clients or from any fund manager or other third-party for the investments selected for client accounts. We do not receive any commissions in connection with providing investment advice to clients.

How do your financial professionals make money? Our financial professionals are paid salaries and may receive a bonus based on their contributions and profitability of the firm; some are also owners of the firm and participate in an increase in the firm's value.

Item 3. Fee, Costs, Conflicts, and Standard of Conduct

What fees will I pay? We charge clients an **asset-based fee** based on the total value of the account, including cash. Advisory fees may be negotiable depending on the value of the account and services we provide. Fees are computed as a percentage of the account's market value at each calendar quarter end and are payable quarterly in arrears. The advisory fees paid generally do not vary based on the type of investment. The fees reduce the value of the account and will be deducted from your account. The more assets in the account the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees.

Description of Other Fees and Costs: None that are charged by our firm. However, you will pay brokerage commissions, fees charged by your financial advisor, custodian, and others. If we use mutual funds or exchange-traded funds to fill specific portfolio needs, you will incur the fund's management and administrative fees, plus our investment management fees. We benefit from the advisory services we provide to you.

Additional information: 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 our web site, <u>www.promethoscapital.com</u> for a copy of our Form ADV disclosure documents that includes the details of the fees and costs of doing business with our firm.

Conversation Starter. Ask your financial professional:

- Help me understand how these fees and costs might affect my investments?
- If I give you \$500,000 to invest, how much will go to fees and costs, and how much will be invested for me?

Item 4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history?"

No, neither we nor our financial professionals do not have a legal or disciplinary history. **Search Tool:** In order to verify the background information for a financial professional, please visit <u>www.investor.gov/CRS</u>.

Conversation Starter. Ask your financial professional:

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

Item 5. Additional Information

If you would like additional, up-to-date information, please call our office at 617 535 9240 or visit our website at: <u>www.promethoscapital.com</u>. You can find additional information about our firm's investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching CRD #300915

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 else can I talk to about my portfolio(s)?