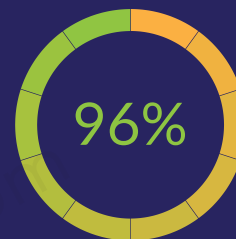


Polaris Capital Management

TRUST SCORE



Polaris Capital Management, federally registered in 1993, is a Registered Investment Advisor (RIA) in 1 state(s) with a licensed staff of 4 advisors. Polaris Capital Management manages \$12 billion and provides investment advisory services for 11 clients (1:3 advisor/client ratio).

Polaris Capital Management requires a \$500,000,000 minimum investment and charges 0.75% for ongoing portfolio management services, depending on the size of the portfolio.

BENEFITS

- Firm uses a transparent fee-only model
- There is one licensed advisor for every 3 clients (industry average 1:50)
- Firm has \$1B or more in assets under management
- Firm has been federally registered for 26 years
- Communications sent to the firm's website are secure and encrypted
- Firm does not have a disciplinary history
- Firm does not have any misdemeanor convictions
- Firm does not have any felony convictions
- Firm does not have an insurance agent conflict
- Firm does not have an attorney conflict
- Firm does not privately manage or own the products they recommend

CONSIDERATIONS

- Firm serves fewer than 1,000 clients
- Firm accepts performance-based fees and may be incentivized to take inappropriate risks to beat their performance benchmark
- Firm performs side-by-side management with accounts that have differing fee structures. Investment Advisors may be incentivized to favor clients that pay higher fees over others
- Firm may receive soft-dollar benefits that could incentivize them to push trades through broker-dealers that provide advantages to the firm instead of through broker-dealers that could provide the best execution for their clients
- Custodian is unknown

BENEFITS (cont.)

Firm does not offer proprietary products

CONSIDERATIONS (cont.)