

Form CRS - November 21, 2023

Bryn Mawr Capital Management, LLC ("BMCM") is registered with the Securities and Exchange Commission as an Investment Adviser. Investment advisory and brokerage services fees differ, and it is important to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about investment advisers, broker-dealers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors. These services include investment management services, financial planning, and consulting. Investments consist primarily of mutual funds, ETFs, individual stocks and fixed income securities including Corporate Bonds and US Treasuries, and to a lesser extent Preferred Securities.

When providing our services, we will monitor your account performance as part of an ongoing process by judging your portfolio on the likelihood of it achieving the goal(s) set forth by you in a wholistic fashion. We perform regular account reviews and will provide you quarterly reporting. Our services are also offered through a coadvisory agreement with our affiliate, WSFS Bank, who will also periodically review any account under such agreement.

We will accept discretionary authority to manage your accounts. This authority allows us to view the account, select investments, and execute transactions without first having to seek your consent. You may limit our discretionary authority by restricting or limiting exposures to certain types of investments (e.g., fossil fuels, tobacco, firearms). Should an account or asset held with us be considered non-discretionary, you will be responsible for making the final decision(s) for that account and/or security.

With the integration of a thoughtful financial planning process, we meet clients' return and risk objectives through the creation of diversified portfolios using the best products available. We use outside mutual funds, ETFs, and internally managed separate accounts to meet each client's unique objectives. A long-term diversified strategic asset allocation guides the portfolio's structure over multiple market cycles, with adjustments made based on our 12-to-18-month market views.

To open an account with us, we generally impose a minimum portfolio size of \$500,000 to \$1,000,000. At our sole discretion, we can waive this minimum based upon certain criteria including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts account composition, pre-existing relationships, account retention, and pro bono activities.

For additional information on our services and types of clients, please see Items 4&7 of our Form ADV Part 2A Brochure: https://www.bmt.com/bmcm.

Conversation Starters:

- 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?

What fees will I pay?

You will be charged for investment advisory services based on a percentage of assets under management and fixed fees (other than subscription fees). We charge a quarterly annual fee in advance based upon a percentage of the market value of assets being managed on the last day of the previous quarter. Typically, the more assets there are in an account, the more you will pay in fees. We therefore have an incentive to encourage you to increase the assets in your account. In limited circumstances, we charge an hourly or flat fee for standalone financial planning. In addition to our fees, you will pay additional fees and costs (where applicable), including fees paid to third-party managers recommended by us, co-advisory fees paid to WSFS Bank (an affiliate of BMCM) for clients



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with a tri-party Investment Advisory Agreement between you, us and WSFS Bank, custodian fees, brokerage commissions, fees related to mutual funds, ETFs and variable annuities, and other transactional fees. In certain circumstances, fees may be charged for non-advisory services as agreed upon. 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 on our fees and compensation, billing practices, and other types of fees or expenses clients will pay in connection with advisory services, please see our Form ADV Part 2A Brochure, Item 5, 6 & 12.

Conversation Starter: 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 that we provide you. Here are some examples to help you understand what this means.

We charge an investment advisory fee based on the assets we manage. We have an incentive to recommend adding assets to an account that we manage that increases the fee you pay us. You will pay fees and costs whether you make or lose money on your investments.

Our employees are permitted to invest in the same securities we recommend for our clients. This creates the position for them to potentially benefit from our relationship with you by trading on the information they have about our recommendations.

We receive research and other services such as educational events, compliance tools, and operational efficiencies from certain brokers we select to execute client transactions. You do not pay any additional fees for our receipt of such services. However, this arrangement creates an incentive for us to recommend that you open an account with a broker that provides these services over one that does not.

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

For additional information about our conflicts of interest that can affect our advisory relationship with you, please see Items 4, 5, 6, 10, 11, 12, & 14 from our Form ADV Part 2A Brochure.

How do your financial professionals make money?

Our financial professionals receive a set salary and incentive bonus based on company profitability and individual employee performance. This compensation creates a conflict of interest because our financial professionals have incentive to increase the amount of client assets under management that generate a fee, which would increase firm profitability.

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

No, BMCM or our financial professionals do not have any legal or disciplinary history. A free and simple search tool to research us and our financial professionals is available at Investor.gov/CRS.

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

Additional information about our investment advisory services and a copy of the relationship summary is available by contacting us at (215) 731-1820.

Conversation Starter: 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?