

Harbour Investment Management (“Harbour”) is an investment adviser registered with the Securities and Exchange Commission. Investment advisory services and fees differ from brokerage services and fees and it is important for you to understand the differences in order to determine which type of account is appropriate for you. There are free and simple tools available to research firms and financial professionals at www.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, as well as financial planning, for an ongoing asset-based fee based on the value of cash and investments in your accounts. We will gain an understanding of your current financial situation, your short- and long-term goals, and risk tolerance. We use this information to recommend an investment portfolio specific to your investment objectives and needs.

We manage portfolios on a discretionary basis, which means we don’t need to call you before we buy or sell securities in your account. We obtain this authorization through our signed advisory agreement with you. This agreement will remain in place until you, or we, terminate the relationship. As part of our standard services, we review all client holdings and transactions daily. At least once each quarter, we review all client portfolios on a stand-alone basis. We conduct additional portfolio review whenever prompted by material changes in individual securities, the capital markets, individual client factors, or tax or other rules and regulations. Our minimum portfolio size is \$500,000 per investor. This minimum is comprised of the total of all investor’s accounts (taxable, trust and retirement accounts). However, in some cases this minimum is waived when assets are considered as part of a larger client relationship, or when a pre-arranged savings plan is agreed upon with the client to bring the account to the minimum size over time.

For more detailed information about our services, please request a copy of our Form ADV, Part 2A brochure.

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?

Fees and costs affect the value of your account over time. Please ask your adviser to give you personalized information on the fees and costs that you will pay. At the end of each calendar quarter, clients are billed in arrears in quarterly installments, based on total assets under management as of the end of each quarter. Our fee schedule begins at 0.80% on the first \$1 million, with breakpoints thereafter.

When we charge an asset-based fee, the more assets we manage, the more you’ll pay in management fees. We therefore have a financial incentive for you to increase the assets we manage for you. Our stand-alone financial planning fees are charged at our hourly rate of \$200 or on a flat fee project basis, typically starting at \$1,500.

The broker-dealer (custodian, Charles Schwab & Co. in our case) that holds your assets can charge you a transaction fee when we buy or sell an investment for you. The broker-dealer’s transaction fees are in addition to our advisory fee for our investment advisory service. You could also pay charges imposed by the broker-dealer holding your accounts for certain investments and maintaining your account, as well as fees for transactions such as wire transfers.

Some investments, such as mutual funds and exchange-traded funds, may charge additional fees such as management expenses, that will reduce the value of the growth of your investments over time. 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. Our Form ADV, Part 2A, available at <https://adviserinfo.sec.gov/firm/summary/111166>, contains more detailed information about fees and costs.

Conversation Starters

- 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 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. Our primary conflict of interest is our receipt of asset-based fees. For example, if you asked us for a recommendation about paying down outstanding debt or making charitable contributions, versus keeping those funds in your account with us, we have a conflict of interest in making the recommendation because we earn more advisory fees when you keep more assets in your account. While this is an example of our conflict of interest, we will always make the recommendation that we believe is in your best interest.

The only direct revenue we receive is from the advisory fees you pay to us. However, we have an incentive to recommend our clients use Charles Schwab because we receive other benefits from them, such as access to research, technology services, and seminars. Our Form ADV, Part 2A contains detailed information about our conflicts of interest.

Conversation Starters

- 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 owners of the firm and receive a salary plus a percentage of profits based on their ownership percentage of the firm. This creates a financial incentive to solicit and retain clients. You are encouraged to discuss this with your financial professional.

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

No, neither our firm nor our financial professionals have any legal or disciplinary history. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Conversation Starters

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

Additional information:

For more detailed information about our investment advisory services, or to request a copy of this Relationship Summary, please contact us at 425-742-1557 or 971-339-5701. You may also visit the SEC's public disclosure website at www.adviserinfo.sec.gov.

Conversation Starters

- Who is my primary contact person?
- Is he or she a representative of an investment adviser or broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?