

ITEM 1 – COVER PAGE

Greycourt & Co., Inc.

Investment Adviser Brochure (Form ADV: Part 2A)

SEC File Number 801-60297

November 11, 2021

This brochure provides information about the qualifications and business practices of Greycourt & Co., Inc. If you have any questions about the contents of this brochure, please contact us at 412-361-0100 or info@greycourt.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about Greycourt & Co., Inc also is available on the SEC’s website at www.adviserinfo.sec.gov. Registration with the SEC as an investment adviser does not imply a certain level of skill or training.

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ITEM 2 – MATERIAL CHANGES

This section contains a discussion of material changes to the brochure since the last Brochure update on March 31, 2021. Since that time, Greycourt & Co., Inc. has made the following updates to this Brochure:

- Enhanced descriptions regarding its Advisory Services (Item 4), including adding language distinguishing assets under advisement from assets under management.
- Enhanced descriptions regarding its Fees and Compensation (Item 5) to better describe the fees and expenses of underlying investments and additional services.
- Enhanced disclosures in Brokerage Practices (Item 11), to describe Greycourt’s policy for handling trade errors.

Minor additional updates and clarifications occur throughout this document and we encourage you to review read the complete Brochure.

Greycourt & Co., Inc. will continue to update this Brochure: 1) annually, and 2) promptly when certain information becomes materially inaccurate. Greycourt & Co., Inc. will provide its clients with a summary of any material changes to the Brochure promptly after making such changes.

You can request our current Brochure and or Client Relationship Summary (Form CRS) at any time by contacting Gretchen Shoup, Chief Compliance Officer, at 412-665-1146 or gshoup@greycourt.com.

Information about Greycourt & Co., Inc also is available on the SEC’s website at www.adviserinfo.sec.gov. Additionally, free and simple tools are available to you to review Greycourt & Co., Inc. and its financial professionals at Investor.gov/CRS, which also provides free educational materials about broker-dealers, investment advisers, and investing.

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ITEM 4 - ADVISORY BUSINESS

Greycourt & Co, Inc. (“Greycourt” or “the Firm”) was founded in 1988. Gregory D. Curtis is the principal owner of Greycourt and owns over 25% of the firm. Greycourt’s services include: 1) asset allocation and portfolio design, 2) research on traditional and non-traditional (“alternative”) strategies and managers, 3) portfolio implementation services, 4) portfolio monitoring and reporting services, 5), and 6) customized consulting services.

Greycourt and its Principals have been providing comprehensive investment advice to sophisticated investors for over 30 years. Prior to founding Greycourt, Greg Curtis served for many years as president of a \$1B+ family office that was established in 1858. At Greycourt’s founding in 1988, we were among the first entirely open architecture investment advisory firms focused on private clients, with an approach and culture tightly focused on delivering advice from an unencumbered and independent platform.

Greycourt is managed by its Management Committee (MC), comprising eight managing directors who oversee staffing, budgeting, and strategic planning for all functional areas of our firm: Advisory, Manager Research, and Operations. Greycourt’s CEO has principal decision-making authority and reports to the firm’s Board of Directors.

Greycourt has over 40 employees, more than a quarter of which are investment professionals with significant career experience. Detailed biographies of our investment team can be found on Greycourt’s website, www.greycourt.com/our-team/.

Greycourt offers investment advisory services to ultra-high net worth families and family offices, including foundations controlled by client families. Our service offerings are delivered in one of two ways depending on the needs of the client: (1) Investment Advisory Services and (2) Collaborative Solutions.

Investment Advisory Services (IAS)

Our Investment Advisory Services offering is delivered on a non-discretionary and discretionary basis and entails fully integrated strategic portfolio design, strategy and manager idea generation and research, comprehensive client service support, and portfolio analytics and performance reporting. Our IAS client service model is designed to create a high-touch and personal relationship with each client in a customized manner.

Collaborative Solutions (CS)

Collaborative Solutions is designed for family offices who work with us in a cooperative fashion on specific investment matters and is non-discretionary. We work with our CS clients in a peer-to-peer framework, where our frontline investment professionals interact directly with investment professionals who helm and/or staff single- or multi-family offices. The scope of work is typically focused in three main areas: capital markets research; idea generation and manager research; and customized mandates and projects related to portfolio structure, risk, and/or modeling.

Advisory Services

Greycourt provides asset allocation analysis, strategic and tactical asset allocation, and specific investment recommendations for clients across asset classes, employing a broad range of implementation strategies.

Greycourt primarily recommends third-party investment managers, including those operating in public and private segments of equity, fixed income, and real estate and real assets capital markets. Greycourt's investment advice is not limited to these types of investments and may include advice on any investments a client holds at the start of the advisory relationship. Greycourt also provides guidance on 1) asset custody, 2) closely held business issues, 3) philanthropy, and 4) family dynamics and intergenerational issues.

Greycourt generally provides its investment advice on a non-discretionary basis. This means that Greycourt facilitates and implements the recommendations approved by a client. Less frequently, Greycourt provides investment advice on a discretionary basis, where the client has authorized Greycourt to execute transactions on the client's behalf.

Greycourt tailors its advisory services to the individual needs of each client, and clients may impose restrictions on investing in certain securities or types of securities. Clients should contact Greycourt if there is ever a change in their individual circumstances or if they want to impose any reasonable restrictions upon Greycourt's management services or on investing in certain securities or types of securities.

Generally, Greycourt reviews existing portfolios and investment strategies and discusses with clients their specific goals, objectives, risk tolerances, and special family needs in the development of investment recommendations. Depending on the nature and scope of the engagement, Greycourt can provide: 1) a written evaluation which includes its recommendations on long-term strategies, portfolio design, and asset allocation and 2) a written action plan which includes specific managed investment products recommended by Greycourt. The action plan takes into consideration the costs of these investments such as expected taxes, trading costs, and market timing risks. Greycourt provides supervision and continuous advice to a client based on the client's stated objectives subject to the terms of a written advisory agreement. Greycourt's services vary and the elements described may be more or less prominent depending on the nature of the specific engagement.

As of December 31, 2020, Greycourt has Regulatory Assets Under Management ("RAUM") of \$5,731,454,084 of which \$449,321,495 was advised on a discretionary basis and \$5,282,132,589 was advised on a non-discretionary basis.

Greycourt provides consulting or other advice on assets in addition to RAUM, identified as "assets under advisement" or "AUA." AUA adds to RAUM the assets of clients for whom Greycourt provides, individually or in combination, ongoing asset allocation, ongoing manager research and due diligence, individual implementation or sourcing recommendations and other specialized consulting services that are not included in RAUM. This includes certain Collaborative Solutions services and instances where Greycourt serves in a manager-of-managers capacity for clients who are invested in separately managed accounts. The total AUA, including RAUM, is \$13,676,327,898 as of December 31, 2020.

Greycourt is the sponsor and General Partner of the Greycourt Partners Fund L.P. (“the Fund”), a fund-of-funds organized and managed by Greycourt which closed effective 12/31/2020 and is in liquidation.

ITEM 5 - FEES AND COMPENSATION

Greycourt’s fee is based on the services provided to the client, the amount of client assets advised by the Firm (which may include cash and assets held in money market funds) and on the degree of complexity of the engagement. The degree of complexity is affected by various factors including the number of family units and generations involved, the complexity of the estate planning vehicles, the presence or absence of endowed foundations, the presence of a closely held company, and the number of face-to-face meetings expected.

Fee rates are negotiable and memorialized in the written advisory agreement executed with each client. Advisory fees can be structured as asset-based or flat annual retainers. Asset-based fee arrangements are guided by Greycourt’s standard asset-based pricing schedule, and fixed fee arrangements are based on the complexity of the assignment and negotiated between Greycourt and each client. As of [DATE] the maximum asset-based fee rate in effect is 0.50% per year.

Project-based fees may be charged where appropriate for the services provided, including research projects, performance reporting services and certain Collaborative Solutions or other consulting projects. Greycourt typically receives 50% of a fixed project fee as a retainer at the beginning of an engagement, with the remainder is due upon delivery of the completed project.

Greycourt’s fees do not usually include out-of-pocket expenses for travel, meals, and lodging, which may be billed separately subject to the terms of the written advisory agreement. Greycourt’s standard fee rates generally presume the receipt of direct data feeds from a client’s custodian and the preparation by Greycourt of a single performance report. The need for manual tracking of client holdings or customized reporting can entail additional fees.

Non-project client fees are generally charged quarterly in advance, although some older client relationships may be charged fees in arrears. Greycourt typically submits the first invoice at the beginning of the relationship and bills the client pro-rata for the days remaining in that calendar quarter. Clients can choose to have fees directly deducted from their investment account or to have fees invoiced by Greycourt

A client advisory agreement can be canceled at any time, by either party, for any reason subject to written notification periods that vary with the complexity of the relationship as detailed in each client’s written advisory agreement. Upon termination, fees are prorated based on the days remaining in the period and any prepaid, unearned fees are refunded by Greycourt, and any earned, unpaid fees are due and payable. If a client terminates an agreement for fixed-fee services, Greycourt is generally compensated for the portion of the engagement completed and refunds any balance or invoices any portion due. Greycourt typically permits its clients to terminate an agreement without penalty within a short period of time after entering into an agreement.

Advisory fees paid to Greycourt are in addition to the advisory fees and other expenses charged by the third-party investment managers recommended by Greycourt. The managers of private placements, including private equity funds and hedge funds, as well as mutual funds and ETFs each charge an advisory fee. These products also incur other expenses, which can include incentive fees, commissions or other transaction costs, custodial fees, accounting fees and other administrative costs. Where clients invest in a fund-of-funds structure, there may be multiple layers of these fees and expenses within the fund. Clients will pay most fees and costs regardless of whether recommended investments are profitable. Fees and costs will reduce any amount of money clients make on investments over time. Clients should review both the fees charged by these managed investment products and the fees charged by Greycourt to fully understand the total amount of fees being paid.

Where Greycourt conducts trading on behalf of client accounts, clients pay brokerage and other transaction costs. Greycourt's brokerage practices are described in Item 12 below. Clients also pay charges to other third parties such as custodial fees, transfer taxes, wire transfer and electronic fund fees.

For Greycourt Partners Fund, L.P., Greycourt received an annual fee of 1% of an investor's capital account, paid on a pro-rata basis monthly in arrears, based on the value as of the last day of the immediately preceding month. The Greycourt Partners fund closed effective 12/31/2020 and is in liquidation.

Neither Greycourt nor its employees receive compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds, for recommendations made to advisory clients.

ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Greycourt does not charge performance-based fees.

ITEM 7 - TYPES OF CLIENTS

Greycourt offers its services to individuals, including high net worth individuals, trusts, estates, charitable organizations, family offices, and corporations. Greycourt also provides investment advice to the Greycourt Partners Fund, L.P., which closed effective 12/31/2020 and is in liquidation.

Greycourt does not have an explicit minimum account size but maintains minimum annual fees of \$200,000 for discretionary management and \$150,000 for non-discretionary advisory services.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

General Approach

Greycourt provides asset allocation analysis, strategic and tactical asset allocation, and specific investment recommendations for clients across asset classes, employing a broad range of implementation strategies. Greycourt utilizes information from a broad range of sources, including economic and market analysis, adviser databases, and news sources, among others. However, Greycourt relies most heavily on its own analysis, particularly in its efforts associated with capital markets forecasting and manager due diligence.

Investment recommendations at Greycourt must be approved by a majority of our Investment Committee (IC), where voting members comprise the senior ranks of the client advisor, associate advisor, and manager research teams.

- Manager recommendations to the IC are based on rigorous research and follow a detailed process of identifying investment ideas, vetting potential managers, and documenting our work. The IC has ultimate responsibility to approve the hiring and firing of managers that are available for use by clients.
- The IC also considers and votes on critical inputs related to our asset allocation work, including oversight of idea generation, quarterly reviews of our tactical allocation outlook, and periodic deep-dive reviews of our strategic assumptions.

The IC will seek input from Greycourt's subject matter experts as well as the broader IC on these matters. Critically, however, we do not approve any firm-wide model portfolios. Each client advisory team works with the raw materials reviewed and approved by our IC to construct a customized asset allocation and deployment plan for each client.

Selection and sizing of managers within client portfolios is, as with asset allocation, highly customized for each client. The advisory team working for a client is responsible for recommendations on inclusion, removal (other than for reasons of manager termination), or re-sizing.

Greycourt bases its implementation recommendations on each manager's investment philosophy, investment disciplines, risk controls, experience, ownership structure, incentives, organizational stability, client base, personal integrity, and any other characteristics.

Once we have designed a long-term asset allocation plan—a strategic portfolio design—we typically review the strategic portfolio design formally every one to three years.

Portfolio Design

The process of designing a portfolio typically involves several steps which can be summarized as follows:

1. Gather critical portfolio information including:
 - Existing investment assets,
 - Relevant tax and estate planning information for the portfolio,

- Anticipated cash flow needs, and
 - The characteristics of any operating businesses, concentrated stock positions and/or other directly-held investments that would influence the allocation of investable assets.
2. Develop several recommended portfolios employing a proprietary portfolio optimization model fed by Greycourt's forward-looking long-term return, risk and correlation assumptions and adjusted for the expected impacts of taxes and fees.
 3. Adjust optimized model output to reflect qualitative judgement regarding asset classes and prudent diversification.
 4. Examine the implications of various target portfolios by employing a Monte Carlo simulation that incorporates tax, fee, spending and inflation assumptions.
 5. After selecting a desired target allocation, create an investment policy statement that documents the portfolio objectives and both the quantitative and qualitative rationale underpinning the selection.
 6. Prepare a granular asset transition plan that reflects the embedded tax costs of selling existing positions as well as Greycourt's prevailing tactical views on asset classes and strategies.
 7. Review recommended managers and proposed sizing.

Tactical and Opportunistic Recommendations

When strategic portfolio design has been determined, there will be a target exposure for each asset class and a range around that target. In non-discretionary accounts Greycourt will make recommendations to opportunistically rebalance above or below the target, depending on Greycourt's tactical outlook. Out-of-balance portfolios may be rebalanced back to the minimum or maximum ranges or back to the target exposure, depending on valuations/dislocations in that sector of the market. Greycourt believes in a disciplined variance (within established ranges) from strategic targets based on three key investing principles:

- Extraordinary high returns in an asset class do not continue indefinitely and tend to be followed by below-average returns and vice versa,
- Active outperformance requires contrarian and counter-emotional investing,
- Price counts and relative valuations drive our assessment of asset class and manager attractiveness.

We generally use tactical allocation primarily within the context of portfolio rebalancing. However, on occasion when we see large dislocations in the market, we will seek to more opportunistically position client portfolios. We believe good tactical adjustments can help in extreme markets. This includes moving asset class allocations to the high or low side of their strategic ranges. It also could involve making manager changes, e.g., shifting to a manager whose methods has historically done better in the expected market phase.

Risks

Investing in securities involves the risk of loss that clients should be prepared to bear. These risks include general economic and market risks; risks related to engaging third-party portfolio managers and certain investment vehicles; and risks related to particular trading strategies. Examples of some of these risks are discussed below; however, risk exposures can vary widely across the range of implementation options available and this overview should not be considered either comprehensive or applicable to a particular recommendation. Clients should always review the prospectus or other offering documents, including third-party investment manager disclosures, for a description of any investment strategy and implementation vehicle and the related risks prior to committing funds.

General economic and market risks. A client's investment portfolio will be affected by general economic and market conditions, such as interest rates, availability of credit, inflation rates, economic recession, changes in laws and national and international political circumstances.

Risks related to engaging third-party portfolio managers and certain investment vehicles. Below are common risks with respect to investing in managed investment products.

- Greycourt does not control the investment decisions of recommended investment managers.
- Investing in multiple investment managers could cause a client to hold opposite positions in an underlying investment. This decreases or eliminates the possibility of positive returns from such investment despite incurring expenses.
- Some investment managers, such as private funds, are illiquid. In addition, these private funds may themselves invest in illiquid securities (such as real estate or real assets, private companies or other private funds). This means that redemptions may not be permitted and could be delayed depending on the nature of the private fund. Similarly, current valuations may not be readily available and/or may be subject to revision. Managers often do not refund (or rebill) fees based on the updated valuations.

Risks related to manager trading strategies. Managers recommended by Greycourt engage in a variety of trading strategies including frequent trading, short sales, margin transactions, and the use of options, among other strategies. Greycourt strives to remain conversant on and communicate to clients the risks, advantages, and disadvantages of these strategies.

- Higher frequency trading. Managers employing frequent trading, or having high portfolio turnover, typically incur brokerage commissions and other transaction expenses that exceed, sometimes significantly, those of other investment strategies.
- Short sales. Short selling, used where a manager believes a security is overvalued and likely to decline over time, involves the sale of borrowed securities. Selling securities short creates the risk of losing an amount greater than the initial investment and the theoretically unlimited risk of an increase in the market price of the securities sold short. There is also the risk that the securities borrowed would need to be returned to the lender on short notice, compelling the manager to replace borrowed securities at a disadvantageous time. Short selling also can involve significant borrowing and other costs which can reduce profits or result in losses.

- Leverage; Interest Rates; Margin. Managers may use leverage to amplify returns. The use of borrowings poses certain risks. For example, should the securities that are pledged to brokers to secure borrowings decline in value, then the manager could be subject to a “margin call,” pursuant to which the manager must either deposit additional funds or suffer mandatory liquidation of the pledged securities in a declining market at relatively low prices.
- Options and other derivatives. Managers may use options or other derivatives for both speculative and hedging purposes. Although such techniques can increase investment returns, they can also involve a high level of risk. For example, the writing (selling) of uncovered options involves a theoretically unlimited risk of a price increase or decline in the underlying security. Premium costs, as well as the cost of covering options written, can reduce or eliminate position profits or create losses. A manager’s ability to close out a position is dependent upon the existence of a liquid secondary market which, particularly in times of crisis, may not be present.

There can be no assurance that the investment objective of any investment strategy or vehicle will be met.

Cybersecurity Risk. Although Greycourt has taken measures to decrease the risks associated with a cybersecurity event, the computer systems, networks, and devices used by the Firm, its recommended investment managers, and its service providers potentially can be breached. A client and/or investor could be negatively impacted as a result of a cybersecurity breach. A cybersecurity breach could result in a failure to maintain the security, confidentiality, or privacy of sensitive data, including personal information of clients and/or investors. A cybersecurity breach may also cause disruptions and impact business operations potentially resulting in a financial loss to a client and/or investor.

ITEM 9 - DISCIPLINARY INFORMATION

Greycourt and its employees do not have legal or disciplinary events to disclose.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Neither Greycourt nor any of its management persons are registered, or have an application pending to register, as a broker-dealer, futures commission merchant, commodity pool operator, a commodity trading advisor, or as a registered representative or associated person of such entities.

Greycourt and its employees do not have any financial industry activities or affiliations that are material to its advisory business. Greycourt does not receive any compensation from investment managers that it recommends or, in fact, receive compensation for providing investment advice from any source other than its clients.

ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Greycourt and its employees have a fiduciary duty to place their clients' interests above their own or the Firm's interests. Greycourt has a written code of ethics, adopted pursuant to SEC rule 204A-1, that sets forth policies regarding standards of business conduct, compliance with federal securities laws, employee personal securities transactions, the receipt of gifts and entertainment, and employee political donations. In addition, Greycourt has policies and procedures with respect to protecting client information and not sharing this information with nonaffiliated third parties.

Employees invest and transact in securities (or related securities, e.g., warrants, options, or futures) that Greycourt also recommends to clients. Further, employees may transact in a security for their personal accounts at or about the same time that Greycourt recommends or invests in that same security for clients. Where Greycourt is able to negotiate more favorable terms on behalf of clients for managed investment products, Greycourt employees also may invest in those managed investment products on the more favorable terms (e.g., reduced investment minimums, etc.) than would be available to the employee if Greycourt had not recommended the managed investment product to clients. The ability to invest alongside clients can create a conflict of interest. Where investment opportunities are limited, available interests are allocated first to Greycourt's clients. Employees must report their personal investment holdings and securities transactions to Greycourt. The Chief Compliance Officer reviews these reports for compliance with the firm's policies and procedures and the code of ethics.

Greycourt will provide a copy of its Code of Ethics to any client or prospective client upon request. To request our current Code, please contact Gretchen Shoup, Chief Compliance Officer, at 412-665-1146 or gshoup@greycourt.com.

ITEM 12 - BROKERAGE PRACTICES

General Approach

Greycourt does not exercise discretion in the selection of broker-dealers for client transactions. Where Greycourt does have investment discretion or otherwise recommends individual securities (generally limited to passive ETFs or passive mutual funds), clients select the broker-dealer to be used. As Greycourt does not have discretion to select the broker-dealer, the Firm does not negotiate commissions, obtain volume discounts, or seek best price and execution. Consequently, the brokerage commissions paid by Greycourt's clients differ.

Where Greycourt recommends or selects third-party investment managers or their sponsored offerings, Greycourt does not exercise discretion in the selection of broker-dealers. With regard to separately managed accounts, either the managers select the broker-dealers to execute transactions on behalf of clients or clients make such elections on their own behalf. In some cases, the election of a broker-dealer may be limited to broker-dealers associated with a client's chosen custody platform.

Where the Firm recommends or selects third-party investment managers or their sponsored offerings, Greycourt considers the manager's efforts in pursuing best execution on behalf of clients as a part of its due diligence efforts. These efforts typically include the periodic review of policies, procedures and disclosures related to best execution, the use of "soft dollar" research, and other trading practices.

Upon request, Greycourt assists clients in the selection of a broker-dealer. In providing such assistance, Greycourt will consider any client-specific considerations, such as the need for custody or other services, as well as a firm's ability to properly execute orders (based on factors such as size and complexity) and the operational aspects of brokerage firms' back office, custodial or other administrative services.

Specific Matters

Soft Dollars Section 28(e) of the Securities Exchange Act of 1934, as amended, permits an adviser to engage in the industry practice of paying higher commissions to broker-dealers who provide brokerage and research services than it does to broker-dealers who do not provide such research services, if such higher commissions are deemed reasonable in relation to the value of research services provided.

Greycourt does not exercise discretion in the selection of broker-dealers for client transactions and thus is not in a position to negotiate higher commission rates with broker-dealers to receive research services. Greycourt does receive products and services from clients' broker-dealers that assist it in managing and administering clients' accounts. However, the products and services do not depend on the number of transactions or amount of assets under the broker-dealer's custody. These products and services are provided at no cost and include software and other technology that: 1) provide access to client account data (such as trade confirmations and account statements), 2) provide research, pricing, and other market data, 3) facilitate payment of Greycourt's fees from its clients' accounts, and (4) assist with back-office functions, recordkeeping, and client reporting. These products and services benefit Greycourt and may not directly benefit client accounts. Further, these products and services may be used to service all client accounts and not strictly those accounts maintained at the broker-dealer providing the products or services.

Greycourt considers the nature, cost and quality of custody and brokerage services when recommending broker-dealers for clients. Greycourt also considers the availability of the products and services described above. This can create a conflict of interest because Greycourt could have an incentive to recommend or use broker-dealers that provide products or services that it would otherwise have to pay for rather than based on the quality of the services provided to clients.

Trade Errors. While Greycourt endeavors to avoid trade errors entirely, where such errors occur Greycourt seeks to ensure that any trade error is identified and corrected in an expeditious manner and that reasonable steps are taken to mitigate the consequences to each affected client. When an error is made on behalf of a client account, Greycourt will use its best efforts to break or otherwise correct the trade. Where a trade error is caused by a third party, such as a broker-dealer, the Firm will use commercially reasonable efforts to hold the third party responsible and recover losses resulting from the error. Where an error results in both gains and losses to a client account, Greycourt will net the gains and losses. Typically, a trade error that results in a net gain to a client will remain with the client and any trade errors that result in a loss to the client are indemnified by the Firm.

Trade Aggregation. Aggregation, or blocking, of client transactions describes the grouping of client orders in an effort to reduce overall transaction costs and is consistent with meeting the fiduciary responsibility to maximize the value of client portfolios. As Greycourt does not select client broker-dealers, and given the individualized nature of client portfolios, Greycourt does not expect to have regular opportunity to aggregate orders and thus will not seek to do so. Where a given trade may have been aggregated and Greycourt does not do so, any potential benefit would not be realized in terms of execution quality or cost reduction.

Allocation of Limited Investment Opportunities. Greycourt does not permit the allocation of trades or investment opportunities in a manner that favors affiliated accounts, or any particular client or group of clients over other clients. If an investment opportunity is suitable for more than one client account, and Greycourt is unable to obtain the full amount desired, Greycourt will allocate the investment on a pro-rata basis in accordance with the initial recommended amount where possible, taking into account the timing of accepted recommendations. If this results in a client receiving a de minimis allocation (e.g., below the minimum investment required by a private fund, etc.), the particular client will likely not be able to participate in the investment and the investment is reallocated among the participating clients on a pro-rata basis. Where related persons of Greycourt seek to invest alongside clients and investment opportunities are limited, available interests are allocated first to Greycourt's clients. Any exceptions to this policy are reviewed and approved by the Chief Compliance Officer with the goal of ensuring fair allocation of investment opportunities across clients over time.

Brokerage for Client Referrals. Greycourt does not direct brokerage in exchange for of client referrals.

ITEM 13 - REVIEW OF ACCOUNTS

Greycourt reviews client portfolios on at least a quarterly basis, or more frequently as is consistent with the written advisory agreement. The reviews cover asset allocation, manager performance and/or overall results, consistent with the scope of the advisory services provided. In addition, reviews may be triggered by cash flow events, client requests or significant changes in capital markets. Senior consultants assigned to the client relationship supervise account reviews.

Reporting is customized to the scope of the advisory services provided. Clients may receive a written evaluation of their current portfolio, a written plan of action to move from their current portfolio to the portfolio recommended by Greycourt, and/or a written investment policy statement. Investment Advisory Services and some Collaborative Solutions clients also receive written quarterly performance reports, capital markets reviews, and manager research updates.

Project or consulting-related engagements, including those associated with Collaborative Solutions engagements, have reporting, reviews and client communications that occur at various cadences, including annually or semi-annually.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

As described in Item 12, Greycourt receives products and services from brokers. Greycourt does not receive any other economic benefit from a non-client for providing investment advisory services. Greycourt does not compensate any person who is not a Greycourt employee for client referrals.

ITEM 15 - CUSTODY

Client assets, including stocks, bonds and cash are held by third-party custodians. In addition, Greycourt is considered to have control of client assets to the extent that Greycourt has authority granted to it by clients to directly deduct its fees from client accounts, or where Greycourt has control of client assets such as in acting as general partner of the Greycourt Partners Fund, LP., which closed effective 12/31/2020 and is in liquidation. The Greycourt Partners Fund, L.P. is audited by an independent public accountant and audited financial statements are distributed to investors within 180 days of the Fund's fiscal year end.

Clients should receive account statements at least quarterly from their custodian. Greycourt urges all clients to carefully review the custodian's statements and compare the official custodial records to Greycourt reporting. Greycourt statements may vary from custodial statements based on accounting procedures, reporting dates, unsupervised (non-fee paying) assets held by the qualified custodian, or valuation methodologies of certain securities. Especially with regard to cost basis, Greycourt recommends that clients rely on the statements of their qualified custodian. If a client has a question about an entry on a Greycourt report, please contact Gretchen Shoup, Chief Compliance Officer, at 412-665-1146 or gshoup@greycourt.com.

ITEM 16 - INVESTMENT DISCRETION

Greycourt enters into a written agreement with each client. The agreement sets forth the terms and conditions of the engagement, including whether services are provided on a discretionary or non-discretionary basis. If Greycourt has discretionary authority, the client can impose limitations on this authority. If Greycourt does not have discretionary authority then Greycourt will provide to the client its recommendations or other services, as described in the written agreement, and the client makes the ultimate decision regarding the purchase or sale of investments.

ITEM 17 - VOTING CLIENT SECURITIES

Greycourt does not vote proxies for clients and does not provide advice as to how to vote client securities. Clients will receive proxies directly from the issuer of the security or our custodian. Clients can vote their own proxies or arrange for a third-party to vote proxies on their behalf. To obtain

information regarding Greycourt's proxy voting policies and procedures, contact Gretchen Shoup, Chief Compliance Officer, at 412-665-1146 or gshoup@greycourt.com.

ITEM 18 - FINANCIAL INFORMATION

Greycourt is financially capable of meeting all contractual commitments to its clients.