



Nicholas H. Safford & Co., Inc.

Client Relationship Summary (Form ADV, Part 3) — March 30, 2022

- Nicholas H. Safford & Co., Inc. is federally registered with the Securities and Exchange Commission as an Investment Adviser.
- It is important to understand that the investment advisory services you receive from us and the services provided by brokerage firms are different, as are the fees charged.
- Free and simple tools are available for you to research firms and financial professionals at *Investor.gov/CRS*, which also provides educational materials about broker-dealers, investment advisers and investing.

What investment services and advice can you provide me?

Our firm offers investment advisory services to retail investors by giving advice on individual securities (including equities and fixed income securities), mutual funds and Exchange Traded Funds (ETFs). Our initial step with a new client is to consider appropriate investment goals, given current and future income requirements. After analyzing existing holdings, we recommend a suitable long-range plan, and make initial suggestions. If cash is available for investment, we also outline a program for its use. The plan is aimed at striking a sensible balance among such factors as growth objectives, income needs, safety of principal and relative inflation protection.

As part of our standard service, we monitor the investments in client portfolios on an on-going basis with a frequency determined by the client relationship and market conditions. Most of our retail accounts are non-discretionary and as such, the retail investor makes the ultimate decision regarding the purchase or sale of investments after we make recommendations. In our few discretionary accounts, we discuss portfolio objectives and parameters with the client at the beginning of the relationship and welcome updates to those objectives and parameters. Investment changes for discretionary accounts are then made by us as deemed appropriate when monitoring the accounts, consistent with the portfolio objectives and parameters then in effect.

We neither have nor offer advice regarding any proprietary products. We primarily research and recommend individual domestic and foreign securities that are available across publicly traded markets.

Our firm typically requires new clients to have a minimum account balance of \$5 million, but once established, retail investors are not required to maintain a minimum balance.

You can find more information about how we work with clients in our Form ADV Part 2 disclosure brochure, which is available by request or with the search tool at <https://adviserinfo.sec.gov>.

Questions you might ask of us or your other financial professionals:

“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?

Our asset-based fee is determined by a schedule applied to your assets under management and is shown on your contract with us. Typically, fees range from 0.6% of assets under management to 0.4% of assets under management, with the rate declining as the size of the account increases. We annually recalculate our fee based on your total managed assets as of each December 31st. This fee is then used for the next four quarterly periods, which are billed in arrears. Please understand that the more assets in your advisory account, the more you would pay in investment counsel fees, and our firm may therefore have an incentive to encourage you to increase the assets under management.

Investment transactions may require the payment of brokerage fees. ETFs and mutual funds have built-in management fees and may also have subscription charges. Some custodians charge account maintenance fees. **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.**

More information about fees and costs can be found in our Form ADV Part 2 disclosure brochure, available by request or with the search tool at <https://adviserinfo.sec.gov>.

You might ask us or your other financial professionals: “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 must 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.

We face potential conflicts of interest in connection with managing multiple portfolios simultaneously, however we implement policies that require we treat all clients fairly and objectively according to their needs and objectives. Also, our employees may trade within their own accounts in the same securities that are purchased and sold in your accounts. We have implemented policies and procedures in our Code of Ethics to avoid these conflicts which include employees never trading within 48 hours of a client transaction in the same security.

You might ask us or your other financial professionals: “How might your conflicts of interest affect me and how will you address them?”

More information about conflicts of interest can be found in Item 11 of our Form ADV Part 2 disclosure brochure, available by request or with the search tool at <https://adviserinfo.sec.gov>.

How do your financial professionals make money?

Our employees receive a salary that is not contingent on portfolio growth or transactions. Additionally, employees receive a distribution from the firm’s profits. No finder’s fees or commissions are paid for bringing in new clients or for selling any particular investment product.

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

No. You can research our firm and our financial professionals by visiting Investor.gov/CRS for a free and simple search tool.

You might ask us or your other financial professionals: “As a financial professional, do you have any disciplinary history? For what type of conduct?”

You can find additional information about our investment advisory services in our Form ADV Part 2. You can find this document with the search tool at <https://adviserinfo.sec.gov>. You may also request up-to-date information, a current copy of this client relationship summary and our Form ADV Part 2 disclosure brochure from our Chief Compliance Officer, Elizabeth Malcolmson, at (978) 546-2462.

You might ask us: “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?”
