

Bainco International Investors LLC is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ, and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. This document is a summary of the services and fees we offer to “retail” investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

What investment services and advice can you provide me?

We offer the following investment advisory services to retail investors: Portfolio Management Services, Wealth Planning and Family Office Services, Asset Allocation and Advisory Consulting Services. Detailed information regarding our services can be found in our Form ADV Part 2A (see Items 4, 7, and 8) by clicking this link:

<https://adviserinfo.sec.gov/firm/brochure/106053>

Account Monitoring

As part of our core offering, we develop investment strategies and an appropriate asset allocation that is aligned with each clients’ investment objectives and constraints. Accounts are managed individually and reflect our deep understanding of each clients’ wealth. We monitor all accounts on a continuous basis to ensure attentive management of assets and to develop a strategy around wealth which constantly evolves as family, business and economic circumstances change.

Investment Authority

We manage investment accounts on a discretionary basis whereby we decide which investments to buy or sell for your account. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in accordance with the agreed upon Investment Policy Statement (IPS). The IPS summarizes your investment strategy, asset allocation, liquidity needs, tax considerations, time horizon of investments, risk tolerance, return objectives and source of funds. This document is developed at the outset of your relationship and reviewed at least annually, or when a change of circumstance warrants making any modifications. Bainco manages some assets on a non-discretionary basis whereby we will provide advice, but you will ultimately decide when to transact those assets and you have an unrestricted right to decline to implement any advice provided by our firm. These non-discretionary assets are always part of a larger discretionary relationship.

Investment Offerings

We offer advice on the following types of investments: equity securities, ETF’s, mutual fund shares, corporate debt securities (other than commercial paper), municipal securities, United States government securities, options contracts on securities, REITs, money market funds and private equity. In specific situations, we may offer advice on variable life insurance, variable annuities, and real estate.

Account Minimums and Requirements

In general, we require a minimum account size of \$5 million to open and maintain an advisory account, which may be waived in our discretion.

Key Questions to Ask Your Financial Professional

- 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?

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. For detailed information, refer to our Form ADV Part 2A (see Items 5 and 6) via this link:

<https://adviserinfo.sec.gov/firm/brochure/106053>

- **Asset Based Fees** - Payable to Bainco quarterly in advance. Since the fees we receive are asset-based (i.e. based on the value of your account), the more assets there are in your advisory account, the more you will pay in fees, and the firm may

therefore have an incentive to grow the assets in your account and to encourage you to increase the size of your account by adding additional assets.

- **Other Fees** - There are costs associated with transaction charges for purchasing or selling securities that are paid directly to the custodian and/or broker. Examples of other costs applicable to our clients are custodial fees, fees related to mutual funds and exchange-traded funds, transaction charges and commissions when purchasing or selling securities.

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.

Key Questions to Ask Your Financial Professional

- 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.

- **Proprietary Products (Private Fund Affiliation):** We serve as the general partner or are affiliated with one or more private funds and pooled investment vehicles in which you may be solicited to invest. Our firm, certain members of its management, and other knowledgeable employees may acquire, directly or indirectly, investment interests in our fund or have other financial interests (e.g. General Partner, Officers, Board Members, etc.) in the funds. This presents a conflict of interest because we have investments in and/or are compensated by the private funds.

Refer to our Form ADV Part 2A for more detailed information regarding our conflicts by clicking this link:

<https://adviserinfo.sec.gov/firm/brochure/106053>

Key Questions to Ask Your Financial Professional

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

How do your financial professionals make money?

The financial professionals servicing your account(s) are compensated in the form of salary and bonus. The primary factors driving financial professionals' salary and bonus are experience and quality of work. Financial professionals can earn additional compensation based on a percentage of new business referred to the firm.

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

No, our firm and our financial professionals currently do not have any legal or disciplinary history to disclose. Visit Investor.gov/CRS for a free and simple tool to research our firm and its financial professionals.

Key Questions to Ask Your Financial Professional

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

Access our Form ADV Part 2A for additional information about our investment advisory services at:

<https://adviserinfo.sec.gov/firm/brochure/106053>

or request up-to-date information and a copy of the relationship summary at **617-536-0333**.

Key Questions to Ask Your Financial Professional

- 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?