Granite Value Capital, LLC February 9, 2024

FORM CRS

Granite Value Capital, 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, 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:

Account Monitoring: For those clients to whom we provide investment management services, we monitor those portfolios as part of an ongoing process while regular account reviews are conducted on at least a quarterly basis. We will provide you with a written report that may include such relevant account and/or market-related information such as an inventory of account holdings and account performance no less than semi-annually.

<u>Investment Authority:</u> We provide investment management services on a discretionary basis, where we have the authority to determine the timing, type of and amount of securities to be bought or sold, taking into your investment objective.

<u>Investment Offerings:</u> We primarily offer advice on equity securities, corporate debt securities (other than commercial paper), municipal securities, United States government securities, money market funds, mutual funds, and exchange traded funds ("ETFs"). We may advise you on any type of investment that we deem appropriate based on your stated goals and objectives.

<u>Account Minimums and Requirements:</u> In general, we require a minimum portfolio of \$1,500,000 to establish an advisory relationship. We have the right to terminate your account if it falls below a minimum size which, in our sole opinion, is too small to manage effectively.

Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Items 4, 7, and 8 by clicking this <u>link</u>.

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.

Asset Based Fees - Payable quarterly in arrears. Since the fees we receive are asset-based (i.e. based on the
value of your account), we have an incentive to increase your account value which creates a conflict especially for
those accounts holding illiquid or hard-to-value assets;

Examples of the most common fees and costs applicable to our clients are:

- Custodian fees:
- Account maintenance fees:
- Fees related to mutual funds and exchange-traded funds;
- Transaction charges when purchasing or selling securities; and
- Other product-level fees associated with your investments

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 detailed information, refer to our Form ADV Part 2A, Items 5 and 6 by clicking this link.

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 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.

Because our revenue is derived from asset-based fees, we have an incentive to grow your account as much as
possible. This could cause us to take overly aggressive positions in conflict with your interests in an attempt to
grow your account, or could incentivize us to inflate the valuations of illiquid investments held in your account.

Key Questions to Ask Your Financial Professional

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

Refer to our Form ADV Part 2A by clicking this link to help you understand what conflicts exist.

How do your financial professionals make money?

The financial professionals servicing your account(s) are compensated based on assets under management. Compensation paid to our financial professionals involves a conflict of interest because they have a financial incentive to refer clients to our 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 research tool.

Key Questions to Ask Your Financial Professional

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

You can find additional information about your investment advisory services and request a copy of the relationship summary at 603-643-0770 or click the <u>link</u> provided.

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?

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Exhibit to Form CRS

Granite Value Capital, LLC is required to update its Form CRS when information in the Form CRS becomes materially inaccurate. This Exhibit summarizes the following material changes to the firm's Form CRS.

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