



Form ADV Part 3: Client Relationship Summary

March 31, 2025

Guardian Partners Inc. (“GPI”, “we”, “our”, “us”) is an investment adviser registered with the United States Securities and Exchange Commission. Services and fees offered by investment advisory firms like GPI differ from those offered by brokerage firms. We believe it is important for retail investors (“you”) to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about investment advisers, broker-dealers, and investing.

Effective December 31, 2024 (the “Effective Date”), GPI acquired all of the assets of its affiliate, Guardian Capital Advisors LP (“GCALP”). GPI and GCALP were direct and indirect, respectively, wholly owned subsidiaries of Guardian Capital Group Limited. As of the Effective Date, GPI assumed the investment management agreements of GCALP clients and will oversee all the investment management services previously managed by GCALP, which will continue to operate as Guardian Capital Advisors (“GCA”), one of two divisions of GPI. GPI’s existing business will continue as the Guardian Partners (“GP”) division of GPI.

What investment services and advice can you provide me?

Description of Services: We offer investment advisory and discretionary management services to retail clients (particularly high net worth investors and families) and institutional clients. Our investment professionals may consider a wide spectrum of investments to determine which particular securities are appropriate to implement your investment policy statement. We use exchange-listed securities, securities traded over the counter, foreign securities, fixed-income securities, pooled funds, and alternative investments, all in an effort to accomplish your objectives. Furthermore, GPI’s service offerings include its Outsourced Chief Investment Officer (“OCIO”) Services to provide clients with objective advice using independent, third-party investment strategies and products. GPI is also the portfolio manager, investment fund manager and trustee of the four proprietary multi-strategy pooled fund investment offerings. These offerings are also used to implement a client’s investment strategy for specific reasons including simplicity, cost effectiveness, timeliness of actions, or to gain certain exposures.

Discretionary Authority: We accept discretionary authority to manage securities accounts on your behalf. This means we buy and sell securities we determine best fit your investment objectives, in an amount and in the timeframe that we determine is appropriate. We may also delegate discretionary authority to sub-advisers who will make these decisions. You may impose certain restrictions on investing in certain investment strategies, securities or types of securities.

Monitoring: As part of our standard investment advisory and discretionary management services, we monitor your account(s) on a continuous basis including holdings, changes in your investment objectives, and account deposits and withdrawals. Please inform us of any changes in your investment objectives and/or financial situation.

Account Minimums and Other Requirements: At the start of our relationship, we require you to sign an Engagement Letter (GP division) or Investment Management Contract (GCA division) which authorizes us to advise your portfolio. The minimum annual fee varies depending upon whether you receive services from the GP division or the GCA division. Exceptions can be made at our discretion.

Additional Information: More detailed information about our services is included in Items 4, 7, and 13 of our Form ADV, Part 2A, available at <https://adviserinfo.sec.gov/firm/summary/324189>.

“Conversation Starters” represent questions the SEC thinks you should consider asking your financial professional.

Conversation Starters – ask Guardian:

- Given my financial situation, should I choose investment advisory services? 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?

We charge fees on the basis of a percentage of your total account’s and/or household’s assets under management, including cash balances, measured in Canadian dollars. Guardian Capital Advisors’ fees vary based on your specific investment program and generally range from 0.75% to 1.25% per annum. Guardian Partners’ annual fee for Discretionary Management Services is: first \$25 million @ 0.40% per annum, plus next \$25 million @ 0.25% per annum, plus 0.10% per annum on assets greater than \$50 million plus the annual investment management fees charged by underlying sub-advisers and/or our proprietary pooled funds. You will also pay any commissions, transaction fees, custodial fees, and other related costs and expenses that are charged by trade counterparties or custodians. Our investment advisory annual fee is: first \$20 million 0.40% per annum, plus next \$20 million 0.25% per annum, plus 0.10% per annum on assets greater than \$40 million. Fees are billed quarterly in arrears based upon your account’s asset value at the end of the quarter and are pro-rated for partial periods. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the 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 are included in your written agreement and our Form ADV Part 2A (Item 5), available at <https://adviserinfo.sec.gov/firm/summary/324189>.**

Conversation Starters – ask Guardian:

- 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 examples to help you understand what this means: our employees are permitted to buy and sell the same securities owned by our clients. Furthermore, when we allocate client assets to a proprietary pooled fund, we will earn a management fee while we or an affiliated company may be entitled to a share in the profits of the pooled funds.

Conversation Starters – ask Guardian:

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

How do your financial professionals make money?

Our financial professionals earn a base salary, with the potential to earn a bonus and share in a portion of management fees received from clients gained. Factors impacting compensation include overall firm revenue, investment performance, feedback from clients, and client retention. No employee is compensated for the sale of securities. The more assets we manage for you, the greater our fee and so we have an incentive to encourage you to increase account assets. This presents a conflict because as revenues grow, we and our financial professionals have an opportunity to make more money. To learn more about

our conflicts and how we address them, go to: <https://adviserinfo.sec.gov/firm/summary/324189>.

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

No, there are no legal or disciplinary events to report. We invite you to visit Investor.gov/CRS for a free and simple search tool to research the firm and our financial professionals.

Conversation Starters – ask Guardian:

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

To obtain additional information about our services or to request an up-to-date copy of this Client Relationship Summary, please call us (416) 840-8001.

Conversation Starters – ask Guardian:

- 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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