



## Annual Notices 2020

### Anti-Money Laundering (AML) Notice

It is the policy of the Compass Capital Corporation to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities

See our web site posting at <http://compasscapital.co> and select the “Resources” tab, then the “Disclosures” tab for a more complete description of our [AML Program](#), or contact us to request a written copy.

In addition to the information we must collect under FINRA Rules, we or our custodians will, at a minimum:

- Verify, to the extent reasonable and practicable, the identity of any customer seeking to open an account
- Maintain records of information used to verify a customer's identity
- Check that a customer does not appear on government terrorist lists, such as the list on Treasury's Office of Foreign Assets Control (OFAC) Web Site. The kinds of information that we will collect before opening different types of accounts are listed below.

#### Risk-Based Information On Various Account Types

Compass Capital will collect the following information for all accounts, if applicable, for any person, entity or organization who is opening a new account (or is being granted trading authority over a new or existing account) and whose name is on the account or has authority over the account:

- The name and mailing and residential (or principal place of business) street address of the customer
- The customer's date of birth
- For U.S. persons, the customer's Social Security number or taxpayer identification number (including U.S. tax forms), or, for non-U.S. persons without a taxpayer identification number, an alien identification card number or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or other biometric safeguard.

Recognizing that different types of accounts pose different risks and trigger different requirements under the rules, we will gather the additional information specified below for each of the following categories of accounts we provide.

**Compass Capital will identify customers and verify their identity by requesting that the customer provide us with an unexpired picture ID suitable for copying for our files and will delegate further identification procedures to our clearing firms who will check the names against the appropriate databases.**

#### Customers Who Refuse To Provide Information

If a potential or existing customer either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, **our firm will not open a new account and, after considering the risks involved, consider closing any existing account.** In either case, our AML Compliance Officer will be notified so that we can determine whether we should report the situation to FinCEN.

### Verifying Information

Based on the risk, and to the extent reasonable and practicable, we will ensure that we have a reasonable belief that we know the true identity of our customers by using risk-based procedures to verify and document the accuracy of the information we get about our customers. In verifying customer identity, we will analyze any logical inconsistencies in the information we obtain.

We or our custodians will verify customer identity through documentary evidence, non-documentary evidence, or both.

### Client Identification Procedures

As part of Compass Capital Corporation's AML program, the firm has established procedures to ensure that all clients' identities have been verified before an account is opened.

Before opening an account for an individual client, Compass Capital Corporation will require satisfactory documentary evidence of a client's name, address, date of birth, social security number or, if applicable, tax identification number. Before opening an account for a corporation or other legal entity, Compass Capital Corporation will require satisfactory evidence of the entity's name, address and that the acting principal has been duly authorized to open the account. The AML Compliance Officer will retain records of all documentation that has been relied upon for client identification for a period of five years

Thank you for your patience understanding and support as we conduct our business in a compliant manner and do our part to deny terrorist groups and criminals access to America's financial system.

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### **Annual Notice of Contact Information Regarding Customer Complaints**

Any customer who has a complaint regarding any transaction by or the conduct of any associated person of our firm should contact Timothy F. Shanahan, President and Chief Compliance Officer, directly. Tim can be reached by telephone at 781-535-6083 x 305, by e-mail ([Tim@CompassCapital.co](mailto:Tim@CompassCapital.co)), or in writing at 50 Braintree Hill Park, Braintree, MA 02184

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### **Annual Offer to Receive [Form ADV Part II](#)**

As Registered Investment Advisors under the Investment Advisors Act of 1930, Compass Capital Corporation is subject to the "Brochure Rule." Under SEC Rule 240-3A, we are required, on an annual basis, to deliver or to offer in writing to you, without charge, information to be disclosed by the Brochure Rule. The information required in this rule is included as Part II of the "Revised Registration Form for Investment Advisor," (Form ADV).

The most current version of our "[Compass Capital Corporation SEC Form ADV, Part II](#)" booklet in hardcopy is available at no charge upon request, but the web version is available to you on our web site, [www.compasscapital.co](http://www.compasscapital.co). Click on "Disclosure Documents" and select Form ADV Part II. Part I of our ADV is also available. Select "Disclosure Documents" and select Form ADV IAPD Version.

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### **Business Conduct and [Code of Ethics](#)**

Compass Capital Corporation (CCC), a Registered Investment Adviser is committed to promoting integrity and maintaining the highest standard of business conduct and all its activities. Effective January 7, 2005

we adopted a Code of Ethics and are prepared to maintain and enforce it. Clients are welcome to request a copy of the [Code of Ethics](#).

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### **Privacy Statement Notice**

Compass Capital Corporation (CCC), a Registered Investment Adviser is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the *strictest* confidence.

CCC collects nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms
- Information about your transactions with us or others
- Information we receive from a consumer reporting agency.

We do not disclose any nonpublic personal information about you to anyone, except as permitted by law.

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

CCC restricts access to your personal and account information to those employees who need to know that information to provide products or services to you. CCC maintains physical, electronic, and procedural safeguards to protect your nonpublic personal information.

### **Annual Disclosure of Investment Adviser Public Disclosure (IAPD)**

Compass will provide customers with the following information in writing about the Investment Adviser Public Disclosure (IAPD) Investment Adviser Public Disclosure (IAPD) provides information about current and certain former Investment Adviser Representatives, Investment Adviser firms registered with the SEC and/or state securities regulators, and Exempt Reporting Advisers that file reports with the SEC and/or state securities regulators. IAPD also provides links to FINRA's BrokerCheck system which contains information about Brokerage firms and Registered Representatives of Brokerage firms.

- [http://www.adviserinfo.sec.gov/IAPD/Content/Search/iapd\\_Search.aspx](http://www.adviserinfo.sec.gov/IAPD/Content/Search/iapd_Search.aspx).
- For further information on the program you may also obtain a BrokerCheck through the FINRA website <http://brokercheck.finra.org/>.
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### **Annual Notice Regarding Customer Account Information**

Compass Capital Corporation will furnish each customer who opens an account after May 2, 2003 with a copy of their account record within 30 days of the opening of the account.

Customers should mark any corrections and return the document to the firm.

### **Business Continuity Planning**

Compass Capital Corporation (CCC) has developed a [Business Continuity Plan](#) on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions

is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at 781-535-6083 or Principals@compasscapital.co, you should call our alternative number 617-435-3966 or go to our web <http://www.CompassCapital.co>. If you cannot access us through either of those means, you should contact the firm where your assets are custodied for instructions on how it may provide prompt access to funds and securities, enter orders, and process other trade-related, cash, and security transfer transactions for your account.

Firm Name	Phone number	Web address
SEI (managed accounts)	800-734-1003	<a href="http://www.AccessMyPortfolio.com">http://www.AccessMyPortfolio.com</a>
FOLIOfn (managed accounts)	888-485-3456	<a href="http://www.folioinstitutional.com">www.folioinstitutional.com</a>
Pentegra	800-433-4422	<a href="https://bsp.pentegra.com/bspadminlogin.aspx?login=Login">https://bsp.pentegra.com/bspadminlogin.aspx?login=Login</a>
Fidelity Advisor	800-544-6666	<a href="https://www.fidelity.com">https://www.fidelity.com</a>
NRS / Mid Atlantic Trust	781-938-6559	<a href="https://www.your-retirement.com">https://www.your-retirement.com</a>

The disaster recovery plans in place for those firms with which we do business are separate from the Firm.

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within 4 hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within 1 business day. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our web site [www.compasscapital.co](http://www.compasscapital.co) or our customer emergency number, 617-435-3966 how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

**For more information** – If you have questions about our business continuity planning, you can contact us at 781-535-6083 or Principals@CompassCapital.co.

#### Annual Notice Regarding Regulation BI and Form CRS

The SEC has adopted a new rule *Regulation Best Interest* to help retail investors better understand their relationship with their Registered Investment Advisor. Included in our annual update is Compass Capital

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Corporation's [Customer Relationship Summary](#) which answers and links to key questions a retail client may have working with a Registered Investment Advisor.

On June 30, 2020, Compass Capital Corporation ("CCC") filed its Form CRS with the Securities and Exchange Commission. The Form CRS is designed to help inform our clients about the services and potential conflicts of interest associated with our investment advisory business.

View a copy of [CCC's Form CRS](#). See our web site posting at <http://compasscapital.co> and select the "Resources" tab, then the "Disclosures" tab for a more complete description of our **Regulation BI and Form CRS**, or contact us to request a written copy.

CCC is required to deliver a copy of this document to all open accounts invested with us.

<p>What investment services and advice can you provide me?</p>	<p>Compass Capital Corp. provides investment supervisory services, also known as asset management services; furnishes investment advice through consultation and personal financial planning. Compass Capital Corp. is strictly a fee-only financial planning and investment management firm. The firm does not receive commissions for purchasing or selling annuities, insurance, stocks, ETFs, bonds mutual funds, limited partnerships or other commissioned products. Investment advice is based on understanding specific client's objectives and goals. Compass Capital Corp. does not act as a custodian of client assets. The client always maintains asset control. Compass Capital Corp. places trades for clients under a limited power of attorney. Periodic reviews are communicated to provide the specific courses of action that need to be taken.</p>	<p>Conversation Starters.</p> <ul style="list-style-type: none"> <li>Given my financial situation, should I chose an investment advisory service? Why or why not?</li> <li>How will you choose investments to recommend to me?</li> <li>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</li> </ul>												
<p>What fees will I pay?</p>	<p>Most clients choose to have Compass Capital Corp. manage their assets to obtain ongoing investment advice. The annual Advisory Service Agreement fee may be a blended or flat rate % of investable assets as follows:</p> <table border="1" data-bbox="451 1346 976 1562"> <thead> <tr> <th><u>Assets in account</u></th> <th><u>Annual Fee</u></th> </tr> </thead> <tbody> <tr> <td>\$0 - \$150,000</td> <td>1.25%</td> </tr> <tr> <td>\$150,000 - \$250,000</td> <td>1.00%</td> </tr> <tr> <td>\$250,000 - \$500,000</td> <td>0.95%</td> </tr> <tr> <td>\$500,000-\$1,000,000</td> <td>0.80%</td> </tr> <tr> <td>Greater than \$1,000,000</td> <td>0.75%</td> </tr> </tbody> </table> <p>Minimum Account Size is \$150,000</p> <p>Client assets may be held at one of several custodians who may have custodial or program fees either at a flat rate or percentage of assets. Custodians may charge transaction fees on purchases or sales of certain investment types or upon closure of accounts.</p>	<u>Assets in account</u>	<u>Annual Fee</u>	\$0 - \$150,000	1.25%	\$150,000 - \$250,000	1.00%	\$250,000 - \$500,000	0.95%	\$500,000-\$1,000,000	0.80%	Greater than \$1,000,000	0.75%	<p>Conversation Starters.</p> <ul style="list-style-type: none"> <li>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?</li> </ul>
<u>Assets in account</u>	<u>Annual Fee</u>													
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	<p>Financial planning fees are predicated on known facts at the start of the engagement and at \$175/hour.</p>	
<p>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?</p>	<p>When we act as your investment advisor, we have to act in your best interest and not put our interest ahead of yours.</p> <p>For example, Officers and employees of Compass Capital Corp. may, from time to time, buy or sell some of the same securities that it recommends to clients. These transactions are executed in full compliance with FINRA regulations on insider trading, Chinese walls, free riding, front running and withholding. As a matter of firm policy trades of affiliated persons are not knowingly executed before customer's orders.</p> <p>Compass Capital Corp. as SEC-registered investment advisor under rule 204A-1 has adopted a Code of Ethics as of January 5, 2005 it is available at anytime for download from our website under "disclosures" at <a href="http://www.compasscapital.co">www.compasscapital.co</a>. The code of ethics sets forth the standard of business conduct required of all employees that at a minimum, reflects the adviser's fiduciary obligations and requires compliance with the federal securities laws.</p>	<p>Conversation Starters.</p> <ul style="list-style-type: none"> <li>• How might your conflict of Interest affect me, and how will you address them?</li> </ul>

<p>How do your financial professionals make money?</p>	<p>Compass Capital Corp. bases its fees on a percentage of assets under management and/or hourly charges in which the financial professionals make money.</p> <p>Investment management fees are billed quarterly, in arrears, meaning that we bill you after the three month period has ended.</p> <p>Some retainer agreements may be priced on the complexity of work, especially when asset management is not the significant part of the relationship.</p> <p>Financial plan pricing is based on time spent according to the degree of complexity associated with client's situation.</p>	
<p>Do you or your financial professionals have legal or disciplinary history?</p>	<p>Compass Capital Corporation and its advisors do not have any disciplinary history. All advisor's profiles are available at anytime as Part 2b of form ADV for download from our website under "disclosures" at <a href="http://www.compasscapital.co">www.compasscapital.co</a></p>	<p>Conversation Starters.</p> <ul style="list-style-type: none"> <li>As a financial professional, do you have any disciplinary history? For what type of conduct?</li> </ul>
<p>Additional Information</p>	<p>Clients primary point of contact is their advisor representative but additional inquiries can be made to our CCO Tim Shanahan @ 781-535-6083.</p> <p>Compass Capital Corporation maintains additional information and it's necessary Disclosures on it's website: <a href="http://www.compasscapital.co">www.compasscapital.co</a></p>	<p>Conversation Starters.</p> <ul style="list-style-type: none"> <li>Who is my primary contact person? Is he or she a representative of an investment –adviser? Who can I talk to if I have concerns about how this person is treating me?</li> </ul>

**For more information** – If you have questions about our Form CRS, you can contact us at 781-535-6083 or Principals@CompassCapital.co.



Your Trusted Financial Advisor<sup>SM</sup>  
**COMPASS CAPITAL CORPORATION**  
 Registered Investment Advisor

**Table of Fees for Services**

Carefully read Item 4 and Item 5 of Form ADV Part 2A (“Brochure”), as these sections of the Brochure contain important details about Compass Capital Corporation advisory services and fees. Fees may be negotiable. The fees below will only apply to you when you request the services listed.

<b>Fees Charged by Investment Adviser</b>	<b>Fee Amount</b>	<b>Frequency Fee is Charged</b>	<b>Services</b>	
Assets Under Management Fee	<b>Assets In Account</b> <b>Annual Fee</b>	Quarterly in arrears	Portfolio management for individuals	
	\$0- \$150,000			1.25%
	\$150,000- \$250,000			1.00%
	\$250,000- \$500,000			0.95%
	\$500,000- \$1,000,000			0.80%
	<i>Greater than</i> \$1,000,000	0.75%		
Hourly Fee	\$175/hour	Invoiced monthly	Financial planning	
Subscription Fee	n/a			
Fixed Fee	Varies by estimate	50% at start 50% at completion	Financial planning	
Commissions to the Adviser	See note 1			
Performance-based Fee	n/a			
Other	n/a			
<b>Fees Charged by Third Parties</b>	<b>Fee Amount</b>	<b>Frequency Fee is Charged</b>	<b>Services</b>	
Third Party Money Manager	Varies by SMA manager typically .50 to 1%	Typically 1/4ly in arrears	Portfolio management	
Robo-Adviser Fee - FolioFN	0.25%	Quarterly in arrears	Portfolio management	
<b>Talk with your Adviser about fees and costs applicable to you</b>				



### Additional fees and costs to discuss with your Adviser

Additional Fees/Cost	Yes/No	Paid To
Brokerage Fees	Yes	3 <sup>rd</sup> party broker
Commissions	no	
Custodian Fees	yes	Custodian see note2
Mark-ups	no	
Mutual Fund/ETF Fees and Expenses	yes	Fund company see note 3

Effective 1/1/20

*Note 1- Although our advisors are fee based in some cases Compass advisors may also sell insurance to advisory clients which generates commissions to the advisor.*

*Note 2- Some custodians may charge a custody fee for example SEI trust charges a discounted fee of 0.15% for non SEI assets held up to a maximum of \$1,000 per household annually.*

*Note 3- Mutual funds and ETFs have internal fund expenses which are a cost of running the fund and subtract from performance- see prospectus for details.*