

ITEM 1 – COVER PAGE

August 1, 2025

Concentric Innovation

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This brochure provides information about the qualifications and business practices of Advisor Partners II, LLC doing business as (“DBA”) Concentric or Concentric Innovation (“Concentric” or the “Firm”). If you have any questions about the contents of this Brochure, please contact us at compliance@concentricinnovation.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Advisor Partners II, LLC DBA Concentric is an SEC registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Concentric also is available on the SEC’s website at www.adviserinfo.sec.gov.

ITEM 2 – MATERIAL CHANGES

The Brochure contains important information about Concentric’s business practices, risks and conflicts of interest. This Item 2 of the Brochure summarizes material updates since the Firm’s last annual amendment of Form ADV, dated March 31, 2025.

Effective June 30, 2025:

- Advisor Partners II, LLC, is now doing business as Concentric or Concentric Innovation. The Firm’s branding (including the graphic shown on the cover page) has been updated for all marketing and related materials.
- Concentric is an affiliate of Pathstone because of common control and ownership. Concentric and Pathstone Family Office, LLC (“Pathstone”) have entered into a Shared Services Agreement (the “Shared Services Agreement”) upon which Pathstone agreed to provide certain administrative and operational services to Concentric such as business support, information technology, human resources, vendor coordination, legal, compliance and trading support services solely for the internal benefit of Concentric. The parties otherwise maintain full operational and investment advisory services separation between Concentric and Pathstone.
- Pursuant to the Shared Services Agreement, certain human resources and trading support services related to fixed income securities and tax managed accounts of certain Pathstone advisory clients are managed by Pathstone employees allocated to Concentric. As a result, these individuals will be dual registered under Concentric and Pathstone and the regulatory assets under management (“RAUM”) associated with these individuals will be reflected in both firms’ Form ADVs. Accordingly, RAUM will appear higher in this Brochure. See Item 4C for more details.
- Additionally, Concentric and Pathstone have entered into a separate Second Amended and Restated Sub-Advisory Agreement under which Concentric agreed to provide discretionary sub-advisory services to certain advisory clients of Pathstone. This agreement contains enhanced fee descriptions and disclosures to further clarify the existing Concentric fees and billing methodologies in respect of Pathstone client accounts, among other updates.

Clients and prospective clients may request at any time a copy of this Brochure or additional details on these changes by contacting compliance@concentricinnovation.com.

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ITEM 4 – ADVISORY BUSINESS

A. General Description of the Company

Advisor Partners II, LLC now doing business as Concentric or Concentric Innovation (“Concentric” or the “Firm”) (CRD# 321633) succeeded to the advisory business of its predecessor Advisor Partners, LLC (CRD#114536) in June 2022. The predecessor’s business was founded in 2001. The advisory services and management of Concentric remain the same and Concentric continues the advisory business of the prior adviser in all respects.

Concentric is an affiliate of Pathstone Family Office, LLC (“Pathstone”) due to common control and ownership. Pathstone is an integrated wealth management organization serving ultra-high-net-worth (“UHNW”) families, single family offices, endowments, foundations, and other clients. Pathstone provides a broad range of investment advisory and professional services to its clients. Pathstone is privately owned with partner participation through equity ownership. Additionally, the firm’s equity ownership includes investment vehicles controlled by Kelso & Company (“Kelso”) and Lovell Minnick Partners, LLC (“LMP”), and certain Pathstone clients, in each case through intermediate subsidiaries. Please see “Item 10 - Other Financial Industry Activities and Affiliations” herein for additional information regarding ownership.

Concentric provides discretionary sub-advisory services through two distinct investment platforms, namely Separately Managed Accounts (“SMA”) and Unified Managed Accounts (“UMA”). Concentric primarily provides sub-advisory services for the benefit of other registered investment advisers (“RIAs”) and their underlying clients (each, an “Underlying RIA Client”) and other financial institutions. In certain circumstances, Concentric manages accounts for individuals, family entities, or other clients directly. Concentric also provides model portfolio construction services through its Model Portfolio Management (“MPM”) program. All such recipients of services are referred collectively as “Clients” and, individually, as a “Client”.

As of June 30, 2025, Concentric and Pathstone entered into a Shared Services Agreement in part to provide better economies of scale and gain other efficiencies. Pathstone provides certain administrative and operational services to Concentric such as business support, information technology, human resources, vendor coordination, legal, compliance and trading support services solely for the internal benefit of Concentric. The parties otherwise maintain full operational and investment advisory services separation between Concentric and Pathstone. Pursuant to the Shared Services Agreement, certain human resources and trading support services related to fixed income securities and tax managed accounts of certain Pathstone advisory clients are managed by Pathstone employees allocated to Concentric. As a result, such individuals responsible for those activities will be dual registered under Concentric and Pathstone and the regulatory assets under management (“RAUM”) associated with these individuals will be reflected in both firms’ Form ADVs, which will increase the RAUM reported here.

Additionally, Concentric and Pathstone have entered into a separate Second Amended and Restated Sub-Advisory Agreement under which Concentric has agreed to provide discretionary sub-advisory services to certain advisory clients of Pathstone. This agreement contains enhanced fee descriptions and disclosures to further clarify the existing Concentric fees and billing methodologies in respect of Pathstone advisory client accounts.

B. Summary of Concentric's Services

Concentric will build customized portfolios for Underlying RIA Clients through SMAs and UMAs. These services may include any combination of the following: tax loss harvesting overlays, Environmental, Social, and Governance ("ESG") overlays, factor tilts, implementation of each RIA's established asset allocations and custom index exposures and additional portfolio constraints. For the equity strategy, Concentric will invest in exchange-traded equity securities, exchange-traded funds ("ETFs"), mutual funds, and American Depositary Receipts ("ADRs"). Concentric may also invest in other types of securities including, but not limited to, fixed income (e.g., Treasuries, Agencies, Municipals, Corporates etc.) and fixed income ETFs, foreign securities, multicurrency/foreign exchange, ordinaries and real estate investment trusts ("REITs"). Please see "Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss" of this brochure for further information about the investments and strategies employed by Concentric.

Depending on the type of product selected, Concentric generally tailors advisory services to the individual needs of each Client. There are different types of products and investment structures Concentric can implement for each RIA which can be offered to their Underlying RIA Clients. For example, SMAs are generally highly customized based upon individual investment goals and objectives which are mutually agreed upon by Concentric, the RIA, and the Underlying RIA Client. The Underlying RIA Client can impose reasonable restrictions on investing in certain securities or types of securities subject to the limitations further detailed in the "Item 16 - Investment Discretion."

Summary of Concentric Platforms and Acting as an Overlay Manager

Separately Managed Accounts ("SMA") Platform

Concentric will provide discretionary investment solutions and management in the form of individually managed accounts within its SMA platform. Each SMA may focus on a single, targeted investment strategy and be managed to a chosen index or a blend of different indices or benchmarks. Concentric may construct customized equity and fixed income portfolios for each Underlying RIA Client. As part of managing the SMA platform, where appropriate, Concentric will apply an overlay strategy, such as tax-loss harvesting, ESG, and/or other factor screens as selected by the relevant RIA.

Unified Managed Accounts ("UMA") Platform

Concentric will provide discretionary investment solutions and management in the form of unified managed accounts. Within its UMA platform, Concentric can deploy one or more investment strategies for each Underlying RIA Client as directed by the relevant RIA.

Concentric Acting as Overlay Manager

As an overlay manager for either SMAs or UMAs, Concentric will be responsible for applying an overlay on a portfolio such as a tax-loss harvesting overlay, Environmental, Social and Governance ("ESG") overlay, and/or other factor screens as selected by the relevant RIA for each Underlying RIA Client. The RIA will provide the strategy and objectives for a given Underlying RIA Client, and Concentric will manage the implementation, trading, reconciliation, and reporting for such Underlying RIA Client. See "Item 5 – Fees and Compensation" below for a discussion on specific overlay fees related to tax-loss harvesting, ESG, and factor screens.

Summary of Concentric Strategies

As part of managing its SMA or UMA platforms, Concentric may offer one or more of the following strategies to each Underlying RIA Client (each, a “Client Account”) as directed by the relevant RIA.

Direct Indexing Strategy (“Dir. Index Strat”)

For the Direct Indexing Strategy, Concentric will seek to deliver investment performance in-line with a chosen index from a pre-tax perspective while seeking to outperform the index from an after-tax perspective. Concentric will seek to identify investment losses in a Client Account and sell those securities to recognize a taxable loss to offset any applicable capital gains. This harvesting technique is designed to reduce taxes and improve after-tax returns (*i.e.*, create “tax alpha”). Concentric will customize each Client Account to meet the investment objectives and tax profile of the applicable client as mutually agreed to by Concentric and the relevant RIA.

Active Manager Allocation (“AMA”) Strategy

Within the AMA strategy, the RIA will stipulate the targeted asset allocation within each Client Account. The asset allocation may include allocations to third-party model managers (*e.g.*, unaffiliated, third-party private fund sponsors identified as “third-party model managers” below) with which the RIA will contract directly. As stipulated within the relevant contract, these third-party managers will share their models with Concentric for implementation by Concentric within the AMA strategy for the Client Account. The RIA is ultimately responsible for the due diligence of the third-party managers and verification of these models. Concentric is only responsible for implementing the models on behalf of the RIA. The use of these models results in additional third-party model manager fees. While Concentric may assist in the calculation and collection of such fees, in addition to its own contractually stipulated fees, each RIA is ultimately responsible for paying fees to third-party model managers. Please see “Item 5 – Fees and Compensation” section named “Third-Party Model Managers’ Fees” for additional information.

Customized Asset Allocation (“CAA”) Strategy

Within the CAA strategy, the RIA will stipulate the targeted asset allocation model within each Client Account. The asset allocation model may include allocations to unaffiliated investment managers or sponsors of publicly traded securities such as index funds, mutual funds, or ETFs. The RIA is responsible for delivering the CAA model to Concentric. The Firm is only responsible for implementing the model on behalf of the relevant RIA.

Closed End Funds (“CEF”) Strategy

Within the CEF strategy, as part of the UMA platform, Concentric will manage the Client Account utilizing one or more third-party manager closed end fund models. Currently, this strategy is only available to Pathstone.

Model Portfolio Management (“MPM”) Strategy

Concentric’s MPM services typically involve the construction of model portfolios used by RIAs. The models are typically benchmarked to an index incorporating screening criteria mandated by

the institution. Models primarily consist of individual equity securities but may include other investments.

The platforms and strategies outlined above are illustrative examples of Concentric's current services available to existing and prospective Clients and are not meant to be an exhaustive list. They may be updated, revised, customized or tailored to meet the specific needs of each Client.

C. Amount of Assets Under Management

As of December 31, 2024, Concentric manages \$7,668,325,922 in discretionary assets a under management ("RAUM") as reflected in Form ADV, Part 1A, Item 5F ("Item 5F of Part 1A").

In addition, Concentric advises on \$38,717,107 in the Model Portfolio Management program. These assets are not regulatory assets under management; however, Concentric does provide investment advisory services to certain Clients and therefore these assets are reported in Form ADV, Part 1A, Item 5C ("Item 5C of Part 1A").

Lastly, due to Concentric and Pathstone having entered into a Shared Services Agreement as of June 30, 2025, certain human resources and trading support services related to fixed income securities and tax managed accounts of certain Pathstone advisory clients are now managed by Pathstone employees allocated to Concentric. As a result, these individuals will be dual registered under Concentric and Pathstone and the regulatory assets under management ("RAUM") associated with these individuals will be reflected in both firms' Form ADVs as of the next annual updating amendment. This will result in a higher amount of RAUM. As of June 30, 2025, the allocable amount of additional RAUM is approximately \$5,566,500,000.

ITEM 5 – FEES AND COMPENSATION

A. Concentric Fee or Sub-Advisory Fee

In consideration of its provision of services under separate written contracts with individuals, families or institutions and under separate sub-advisory agreements with each RIA, Concentric will charge a quarterly fee (the "Concentric Fee" or "Sub-Advisory Fee"). The specific fee schedule, nature, rate, timing (*e.g.*, quarterly, in advance or in arrears), method of calculation and manner of payment will be set forth in separate written agreements with each Client or RIA. For other than Sub-Advisory relationships, the Concentric Fee schedule ranges from approximately 0.00% to 0.50% per annum and is subject to change upon notice.

For sub-advisory relationships, the terms will vary depending on the constraints imposed by the relevant RIA, the strategies or overlays selected, and the level of customization and complexity. Fee arrangements are negotiable based on the size, scope and complexity of the relationship, and different Clients may therefore pay different fees.

Lastly, in instances where Concentric serves as a discretionary sub-adviser or as a portfolio manager in a wrap fee program, Concentric's discretionary relationship is fully disclosed to the client. When Concentric acts as a portfolio manager for a wrap fee program, Concentric receives a portion of the wrap fee for its services.

B. Sub-Advisory Fee Schedule

Concentric will charge a Sub-Advisory Fee for each Client Account depending on the type of platform (*e.g.*, SMA or UMA), strategy (*e.g.*, Dir. Index Strat, AMA, CAA, CEF, MPM, etc.), index (*e.g.*, S&P Dow Jones

Indices, Solactive, etc.) and overlay selected by each RIA. Depending on the platform, strategy or overlay selected as well as the size and complexity of each Client engagement, fees may be negotiable. For Sub-Advisory relationships, the current Sub-Advisory Fee schedule ranges from approximately 0.05% to 0.50% per annum and is subject to change upon notice.

C. Third-Party Model Manager Fees

As part of the AMA and CEF strategies, each Client Account is subject to any applicable third-party model manager fees. Concentric will assist with both the calculation and collection of any third-party model manager fees. The third-party model manager fees are separate and in addition to any applicable Sub-Advisory Fee. Each RIA is responsible for negotiating the third-party model manager fees and for the accuracy and payment of the model manager fees to third-party managers.

D. Third-Party Index or Benchmark Provider Fees

In addition to the Sub-Advisory Fees, each Client Account is subject to all applicable third-party index or benchmark provider fees (*e.g.*, S&P Dow Jones Indices, Solactive or other third-party index providers) related to the licensing of a particular index or benchmark by asset class (*e.g.*, equity, fixed income, currency, commodity, etc.). Index or benchmark provider fees may differ between indices or benchmarks and are subject to change based on specific market, asset class, sector, or investment strategy. Ultimately, such fees will be charged to each Client Account depending upon the index or benchmark used. Concentric may at its sole discretion determine i) what rate or fee to charge for the use of a particular index or benchmark; ii) to change index or benchmark service providers or iii) to waive or cover the charge related to a particular index or benchmark. Concentric currently offers the choice of the Solactive or S&P Dow Jones Indices (“S&P”) indices.

For Third-Party Index or Benchmark Provider Fees, Concentric will calculate and collect these fees from Client Accounts. Please note that the actual amount of fees charged to the Client Account may be slightly higher than the underlying index or benchmark provider fee due to the differences in timing and methodology of calculations between index providers and Concentric as well as the variability of the billable assets used in different calculation periods between index providers and Concentric (*e.g.*, monthly index fees vs. quarterly Sub-Advisory Fee utilizing a three month average calculation).

E. Other Third-Party Expenses

In addition to the Sub-Advisory Fee, each Client Account is subject to all unaffiliated third-party expenses (*e.g.*, expenses related to the purchase and sale of mutual funds, ETFs, or other securities) incurred directly or indirectly in connection with transactions on behalf of the Client Account pursuant to other unaffiliated third-party agreements, which expenses shall include, but are not limited to brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the Client Account. Client Accounts may incur certain charges imposed by custodians, brokers and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Additionally, unaffiliated mutual funds and exchange traded funds (“ETFs”) (collectively, “Other Third-Party Funds”) also charge management, shareholder servicing and/or 12b-1 fees, which are disclosed in Other Third-Party Funds’ prospectuses. Such charges, fees and commissions are exclusive of and in addition to the Sub-Advisory Fee and Concentric does not receive any portion of these commissions, fees and costs.

F. Other Affiliated or Unaffiliated RIA Fees

In addition to the Sub-Advisory Fee, each Client Account may be subject to any applicable affiliated or unaffiliated RIA fee pursuant to separate engagement letters, addendums or other written agreements such as an investment advisory, management, or consulting agreements with an RIA other than Concentric.

G. Calculation Methodology and Collection of Sub-Advisory Fee and Other Fees

Depending upon the terms of the sub-advisory agreement between Concentric and the applicable RIA, Concentric may assist with the calculation and collection of applicable Sub-Advisory Fees, third-party model manager fees, third-party index or benchmark provider fees, impact customization fees, or other fee types as agreed upon by the parties. Concentric may coordinate with each RIA regarding the fees or other charges related to its Client Accounts. For example, fee calculations may be based on several arrangements including, but not limited to, an assets under management (AUM) formula based on the average market value at each month-end during the preceding quarter, the market value on the last business day of the preceding quarter, or the average daily market value for the quarter. Depending upon the billing arrangements and methodology chosen, Concentric fees may be deducted by Concentric from the Client's applicable account, separately invoiced at the Client's discretion, or subject to some other agreed upon billing calculation and collection methodology. Concentric fees for MPM services are based on the total aggregate percentage of assets which will be invested based on Concentric's model construction. Please note that the net asset values ("NAVs") used by Concentric for billing and reporting purposes may differ from the NAVs used by each RIA subject to the billing methodology or timing chosen.

H. Termination of Client Account

Subject to the applicable terms of each written agreement, generally, either party (*e.g.*, Concentric or Client) may terminate an agreement for any reason upon effective written notice to the other party. Upon termination of a Client Account or other account, any prepaid, unearned fees will be promptly refunded and any earned, unpaid fees will be due and payable immediately.

ITEM 6 – PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Concentric does not charge performance-based fees (*i.e.*, fees based on a share of capital gains on or capital appreciation of the assets of a client).

ITEM 7 – TYPES OF CLIENTS

Concentric's Clients are primarily RIAs or other financial institutions. Concentric acts as a sub-advisor for RIA accounts, referred to above as "Underlying RIA Clients". In certain circumstances, Concentric manages accounts for individuals, family entities, or other types of clients directly.

A. Observations on Number of Clients and Accounts in Part 1A Items 5D & 5F

For clarification, in our Form ADV Part 1A, (Items 5D & 5F), the number of clients and accounts disclosed represents the total number of Underlying RIA Client Accounts sub-advised by Concentric. Concentric generally requires a minimum of \$250,000 for each SMA account; however, Concentric may waive this requirement at its sole discretion.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES, RISK OF LOSS

Concentric uses a combination of qualitative and quantitative statistical analysis to build client-specific portfolios. In managing individual accounts, Concentric uses a quantitative portfolio construction methodology designed to meet each Client's objectives and needs.

The methods of analysis used by Concentric are unique to each Client or SMA platform and are summarized below. Further details about Concentric's investment methodology may be obtained upon request.

All investments involve a risk of loss, and Clients should be prepared to bear such losses.

A. Separately Managed Accounts ("SMA") Platform

An SMA is typically comprised of individual equity, ADRs and fixed income securities. Each SMA is closely tailored to the Client's specific financial circumstances and preferences. Concentric seeks to control risks, such as volatility and tracking error, through explicit measurement and management techniques. For example, a customized SMA may have custom individual securities weights and include or omit a given security, sector, capitalization or value-growth style. Relevant circumstances and preferences of each Client can be considered in creating the account.

Concentric manages some SMAs that seek to closely track the performance of a benchmark index. Assigned account benchmarks can be custom designed to address the Client's specific financial circumstances and preferences. In seeking to match the performance of an assigned index, Concentric typically does not invest in all components of the index but uses its judgment to select a subset of index components that it believes will closely match the performance of an index. This technique is commonly referred to as "sampling."

Concentric's investment personnel also use portfolio optimization software provided by an unaffiliated third-party in portfolio construction. The software incorporates a multi-factor risk model and makes portfolio transaction recommendations based upon factors inherent in the model and predefined constraints including, but not limited to transaction costs, taxes, tracking error and position size. Common examples of customized investment strategies employed by Concentric's SMA Clients are listed below. Due to the numerous investment strategies that may be employed within an individual SMA, a complete list of all possible strategies available has not been provided. Additional examples may be obtained upon request.

B. Examples of Customized Investment Strategies

Active Tax Indexing

While not exclusive to all SMAs managed by Concentric, most SMAs contain a tax-managed component. Concentric seeks to actively manage the taxable gains and losses both at inception and opportunistically thereafter based on a defined tax plan. The plan can include pursuing losses within the account to offset gains from within or outside the Client's portfolio or realizing gains to offset losses outside the portfolio. The first strategy is generally achieved by "loss harvesting," identifying and selling tax lots with high-cost basis. Conversely, a "gain-seeking" approach involves identifying tax lots with unrealized gains that would be most beneficial to realize according to the Client's objectives.

The ongoing tax plan incorporates the Client's preference to maximize tax results, more closely reproduce benchmark performance, or achieve a blend of each. An emphasis on maximizing tax outcomes may result in selling positions that are important to control tracking error. As a result, accounts emphasizing tax

outcomes tend to track their benchmarks less closely than accounts that are focused on closely reproducing benchmark performance.

Thematic Beta Mandates

Some SMAs managed by Concentric are designed to diversify away from a concentrated equity risk (*e.g.*, a single stock or industry) or to focus on a specific set of attributes (*e.g.*, high-quality dividend yielding equities or socially responsible companies, also called “ESG” companies). In these strategies, Concentric may attempt to replicate the performance of an index, while at the same time avoiding or favoring particular index components, sectors or style factors to achieve a diversified portfolio that reflects the Client’s preferences.

C. Material Risks

Investing in Securities Involves the Risk of Loss that a Client Should Be Prepared to Bear

The following describes certain material risks involved with each significant investment strategy, method of analysis and particular types of securities. The risks listed below are not all inclusive.

- **Market Risk:** Global financial markets and economic conditions have in the past, and will in the future, experience periods of uncertainty and unprecedented volatility and stress resulting from social, political, economic conditions and events as well as natural disasters, epidemics and pandemics, terrorism, military conflicts, cyber-attacks, and social unrest, etc. Such conditions may negatively impact both the business of Concentric and the underlying investments of Clients. For example, uncertainties regarding the recent instability in the banking system have resulted and may in the future, result in serious economic disruptions across the globe. These conditions can cause severe decreases in core business activities and lead to unavailability, instability, or hindered operation of markets and economic systems, asset price declines, heightened volatility, and extreme and unpredictable governmental measures. Although it is impossible to predict the precise nature and consequences of these conditions, Client portfolios could be significantly impacted, and there can be no assurance that these events will not cause a Client to suffer a loss of any or all of the value of its investments. In addition, associated disruptions may affect Concentric’s ability to maintain normal business operations for an extended period, which could negatively impact the identification, monitoring, operation and disposition of investments.
- **Equity Risk:** The prices of equity securities rise and fall daily. These price movements may result from factors affecting individual companies, industries or the securities market. In addition, equity markets tend to move in cycles, which may cause stock prices to fall over short or extended periods.
- **Fixed Income Risk:** Investment in fixed income securities is subject to the risk of the issuer’s or a guarantor’s inability to meet principal and interest payments on its obligations (*i.e.*, credit risk) and is subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer, the rate of inflation, and general market liquidity (*i.e.*, market risk). In addition, mortgage-backed securities and asset-backed securities may also be subject to call risk and extension risk. For example, the duration of a security backed by home mortgages can either shorten (*i.e.*, call risk) or lengthen (*i.e.*, extension risk).
- **High Yield Securities:** High-yield bonds (commonly known as “junk bonds”), distressed debt instruments, and other debt securities will typically be junior to the obligations of companies to

senior creditors, trade creditors, and employees. The lower rating of high-yield debt reflects a greater possibility that adverse changes in the financial condition of the issuer or in general economic, financial, competitive, regulatory, or other conditions may impair the ability of the issuer to make payments of principal and interest. High-yield debt securities have historically experienced greater default rates than investment grade securities. The ability of holders of high-yield debt to influence a company's affairs will be substantially less than that of senior creditors. The market for lower grade debt securities may be thinner and less active than for higher grade debt securities, and thus less liquid. This could result in an investor being unable to sell such securities for an extended period, if at all.

- Small Capitalization Companies: Securities of small capitalization companies and recently organized companies have historically been more volatile in price, and less liquid, than those of larger, more highly capitalized, established companies and therefore may pose greater investment risks. Small capitalization companies may require substantial additional capital or borrowings. There is often less publicly available information concerning such companies, making them more difficult to value. Investments in companies with limited or no operating histories are more speculative and entail greater risk than investments in companies with an established operating record.
- Growth Stock Risk: Securities of growth companies may be more volatile since such companies usually reinvest a high portion of their earnings in their businesses and may lack the dividends of value stocks that can cushion stock prices in a falling market. In addition, earnings disappointments often lead to sharply falling prices because investors buy growth stocks in anticipation of superior earnings growth.
- Value Stock Risk: A particular risk of value stock investment is that some holdings may not recover and provide the capital growth anticipated or that a stock judged to be undervalued may be appropriately priced. Further, because the prices of value-oriented securities tend to correlate more closely with economic cycles than growth-oriented securities, they generally are more sensitive to changes in interest rates, corporate earnings, and industrial production. Markets may not favor value-oriented stocks or equities at all, and during those periods, relative performance may suffer.
- Default Risk: Cash balances typically are managed by a Client's custodian bank. However, Concentric may invest Client cash balances in certain situations. An account managed by Concentric may hold cash, invest in short-term debt securities or in other money market instruments for defensive purposes or to earn a return on available cash balances pending investment or reinvestment or in anticipation of redemptions.
- Non-Diversification Risk: Concentric may construct Client portfolios using a limited number of securities with varying weights depending on the desired investment strategy or solution. These portfolios may be subject to non-diversification risk. The price of any security held in a Client account may decrease and Concentric may be unable to liquidate its position quickly or at a relatively advantageous price. As a result, losses incurred in any one security could adversely affect a Client's performance to a greater degree than if a Client had been invested in a more diversified portfolio.

- Portfolio Turnover Risk: Concentric's tax-managed strategies may involve frequent trading of securities. Depending on the market and other conditions, the investment strategy may experience high portfolio turnover, which may result in higher brokerage commissions and transaction costs, which could reduce Client investment returns, and capital gains.
- Credit Risk: The values of the debt securities held in the strategy fluctuate with the credit quality of the issuers of those securities. Credit risk relates to the ability of the issuer to make payments of principal and interest when due. U.S. government securities ("USGS") are obligations of, or guaranteed by, the U.S. government, its agencies or government sponsored enterprises. USGS are subject to market and interest rate risk and may be subject to varying degrees of credit risk. Some USGS are issued or guaranteed by the U.S. Treasury and are supported by the full faith and credit of the U.S. government while others are supported in different ways: (1) supported by the ability of the issuer to borrow from the U.S. Treasury; (2) supported only by the credit of the issuing agency, instrumentality or government-sponsored corporation; or (3) supported by the U.S. in some other way. These securities may be subject to greater credit risk. USGS include zero coupon securities, which tend to be subject to greater market risk than interest-paying securities of similar maturities.
- Interest Rate Risk: When interest rates change, the value of the strategy's holdings will be affected. An increase in interest rates tends to reduce the market value of debt securities, while a decline in interest rates tends to increase their value. Securities with longer durations tend to be more sensitive to interest rate changes than securities with shorter durations.
- Changes in Debt Ratings: If a rating agency gives a debt security a lower rating, the value of the security may decline because investors may demand a higher rate of return.
- Tracking Error Risk: For Clients who have selected an indexing strategy, Concentric seeks to track the performance of a selected index. Concentric may not be successful in achieving this. The divergence between the performance of an account and its index, positive or negative, is called "tracking error." Tracking error can be caused by many factors and may be significant.
- ETF Risk: Shares of ETFs may trade at prices other than NAV. ETF shares may be bought and sold in the secondary market at market prices. There may be times when the market price and the NAV vary significantly. Concentric may pay more than NAV when it buys shares of an ETF in the secondary market and may receive less than NAV when it sells those shares in the secondary market.
- Foreign Investment Risk: Risks associated with foreign investments include the potential of heightened illiquidity, greater price volatility and adverse effects of political, regulatory, tax, currency, economic or other macroeconomic developments.
- Model Risk: Concentric's quantitative models may not produce the results intended which may cause an investment strategy to not meet its stated objective. Separately, with its AMA product, some models are constructed and provided by third-party managers. These models may not have the results intended by the third-party manager. Concentric is not responsible for the due diligence of the third-party managers nor for the verification of the models provided by third party managers contracted by the relevant RIA.

- Liquidity Risk: Less liquid securities can increase the volatility of the Client portfolio. Positions in such securities entail risks including increased transaction costs and potential difficulty in exiting the position at an advantageous price.
- Tax-Management Strategy Risk: The tax-management strategies may alter investment decisions and affect portfolio holdings, when compared to those of non-tax managed strategies. In addition, Concentric may have incorrect tax basis information from a Client, which could cause the purchase or sale of securities in a way that may not maximize taxable benefits.
- Legal, Tax and Regulatory Risks: Legal, tax and regulatory changes or uncertainty could adversely affect the investments made by underlying funds, or separate accounts of underlying managers or the firm's operations. It is uncertain what impact legal, tax and regulatory changes applicable to the separate accounts or the one or more underlying funds, the markets in which the underlying funds trade and invest, or the counterparties with which they do business will have, or what further changes may be instituted. Any such regulation could have a material adverse impact on the profit potential of the underlying funds (and, as a result, the Client).
- Cyber Security Risk: As the use of technology has grown, there are ongoing cybersecurity risks that make Concentric and its Clients susceptible to financial, operational, legal, and reputational risks associated with cybersecurity. To the extent that Concentric is subject to a cyber-attack or other unauthorized access is gained to its systems, Concentric and its Clients may be subject to substantial losses in the form of theft, loss, misuse, improper release, or unauthorized access to confidential or restricted data related to Concentric or its Clients. Cyber-attacks could also affect Concentric's service providers such as custodians, brokers, pricing services, and other technology vendors which may result in financial losses to Concentric's Clients, despite efforts to prevent and mitigate such risks under Concentric's policies. While Concentric has implemented and continually enhances procedures and controls designed to reduce the risks associated with cybersecurity, there are inherent limitations in such procedures and controls that could impact their effectiveness. In addition, Concentric does not directly control the cybersecurity procedures and controls of its service providers and financial intermediaries, and therefore, there are inherent limitations in the third party's procedures and controls that could impact their effectiveness.

ITEM 9 – DISCIPLINARY INFORMATION

RIAs are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Concentric or the integrity of its management.

As of the date of this Brochure, Concentric has no such reportable legal or disciplinary events.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Concentric is an affiliate of Pathstone due to common control and ownership. Pathstone, through Pathstone Intermediate Holdings, LLC, is wholly owned by Pathstone Holdings, LLC. Pathstone is an integrated wealth management organization serving UHNW families, single family offices, endowments, foundations, and other clients. Pathstone provides a broad range of investment advisory and professional services to its advisory clients. As previously noted and discussed, Concentric and Pathstone have entered into a Shared Services Agreement under which Pathstone provides certain administrative and operational services to Concentric such as business support, information technology, human resources, vendor

coordination, legal, compliance and trading support services solely for the internal benefit of Concentric, in part to provide better economies of scale and gain other efficiencies. The parties otherwise maintain full operational and investment advisory services separation between Concentric and Pathstone. Additionally, Concentric and Pathstone have entered into a separate second amended and restated sub-advisory agreement under which Concentric provides discretionary sub-advisory services to certain advisory clients of Pathstone. This agreement contains enhanced fee descriptions and disclosures to further clarify the existing Concentric fees and billing methodologies in respect of Pathstone client accounts.

Under the Shared Services Agreement with Pathstone, certain Pathstone employees who support trading and operational functions are also registered as investment adviser representatives (“IARs”) of both Pathstone and Concentric. These dually registered IARs perform trading functions for client accounts of both firms. While such arrangement may present a potential conflict of interest, Concentric and Pathstone maintain policies and procedures designed to ensure that such employees allocate time and trading activity fairly and equitably, and that clients of both firms are treated in accordance with their respective fiduciary duties.

Concentric is affiliated by common control and ownership with the following affiliated companies: Willow Street Trust Company of Wyoming, LLC (“WSTC, LLC”) and Willow Street Group, LLC (“WSG, LLC”) (collectively, “Willow Street”) that provide professional solutions for the administration, management, and stewardship of assets. Pathstone is also affiliated by common control and ownership with Willow Street. Please note that WSTC, LLC is a trust company and WSG, LLC is a fiduciary services firm and not a trust company. Laurel Trust Company (“LTC”) is a Nevada trust company that provides professional solutions for the administration, management, and stewardship of assets. Pathstone is also affiliated by common control and ownership with LTC. Cambrian Capital Management, L.L.C. (CRD# 324643) (“Cambrian”) is a separately registered investment adviser that sponsors anchor investments with highly qualified portfolio managers who are interested in starting their own private equity firms.

Concentric, through Pathstone Intermediate Holdings, LLC is wholly owned by Pathstone Holdings, LLC, which is owned by investment vehicles controlled by Kelso & Company (“Kelso”) and Lovell Minnick Partners, LLC (“LMP”) and as well as certain Pathstone employees and clients of Pathstone, in each case through intermediate subsidiaries.

Kelso (CRD# 131471) and LMP (CRD#156494) are separately registered investment advisers who sponsor and manage their own privately offered funds. Collectively, they own a controlling interest in Pathstone, through Pathstone Holdings, LLC and, indirectly through Pathstone Intermediate Holdings, LLC. Please see Concentric’s Form ADV Part 1A, Schedule A Direct Owners & Schedule B Indirect Owners for more details.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Pursuant to SEC Rule 204A-1, Concentric, in conjunction with the Pathstone Compliance Group, has adopted a Code of Ethics for all supervised persons of the firm describing its standard of business conduct and fiduciary duty to its Clients under the Advisers Act. The Code of Ethics includes provisions relating to the confidentiality of Client information, a prohibition on insider trading, the maintenance of a Restricted List in specific securities, requirements with respect to personal trading intended to avoid or mitigate actual or potential conflicts with any Client’s interests, limitations with respect to gifts and business entertainment, among other requirements. Employees at Concentric must comply with and acknowledge the terms of the Code of Ethics annually, or as materially amended. The Code of Ethics also includes

requirements related to confidential treatment of certain information. The Code of Ethics is an exhibit to the firm's Compliance Manual.

Concentric reviews the Code of Ethics and other compliance policies and procedures in its onboarding of new employees and provides annual training on compliance topics to employees. Annually, personnel are required to certify in writing that they have received a copy of and complied with the provisions of the Compliance Manual, including the Code of Ethics and any amendments, and submit other compliance-related certifications. The Pathstone Compliance Group actively monitors compliance with the Compliance Manual and the Code of Ethics and recommends sanctions deemed appropriate for violations.

In addition, the Code of Ethics has required restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other policies. All Supervised Persons at Concentric must comply with and acknowledge the terms of the Code of Ethics annually, or as amended.

Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as Clients, there is a possibility that employees might benefit from market activity by a Client in a security held by an employee. Employee trading in a specific security may occur on the same day Concentric trades for a Client. The employee will receive a different price from the Client which could potentially be better. Employee trading is monitored under the Code of Ethics and is reasonably designed to prevent conflicts of interest between Concentric and its Clients.

Concentric's Clients or prospective Clients may request a copy of the firm's Code of Ethics by contacting Douglas McCall, Chief Compliance Officer of Concentric, via email at compliance@concentricinnovation.com.

ITEM 12 – BROKERAGE PRACTICES

A. Selection and Ongoing Monitoring of Broker-Dealers

Unless otherwise instructed or directed by a Client for which it has discretion, Concentric has the authority to determine the broker to be used to effect a Client's securities transactions and the commission rates to be paid in connection with a Client's securities transactions. When exercising its discretion to select broker-dealers to execute securities transactions for Clients, Concentric selects brokers in accordance with its obligation to seek "best execution" as further described below. Through its brokerage discretion, Concentric is authorized to place trades in various manners including through different broker-dealers for most Client accounts. Selection of the broker-dealer used for executing transactions is dependent on several factors. Concentric has relationships with many custodians. Concentric will inform its RIA Client which custodians are available; however, the Clients make the actual selection. When a Client chooses a custodian that is compensated for its custodial services through trading commissions, such as those discussed in "Section F. Trade Practices" below, it is generally most cost effective to the Client to trade through the custodian's broker-dealer.

The custodian/trading relationships maintained by Concentric offer competitive trading costs, electronic order execution, and competent back-office support including technological links with Concentric's information systems

B. Best Execution

Concentric seeks to execute trades through a broker or dealer offering the best execution. Best execution does not necessarily mean the lowest broker commission rates. In selecting brokers, Concentric considers several relevant factors including, but not limited to, execution capability, responsiveness, and commission

rates; research and other services offered by a broker; the size and type of the transaction and the broker's capital strength and stability. Unless otherwise agreed to or directed by the Client as discussed in Section F. Trade Practices, Concentric has discretion to execute trades with such brokers or dealers as it deems appropriate. This could include placing Client trades with their broker custodian (*e.g.*, Schwab, Fidelity, etc.).

Concentric performs periodic evaluations of its trading practices, and the broker/custodians it uses, as part of its effort to ensure best execution.

C. Research and Other Soft Dollar Benefits

Concentric does not utilize what are commonly referred to as "soft dollar" arrangements to acquire brokerage or research services when carrying out its investment decisions.

D. Directed Brokerage

A Client may, in its sole discretion, elect a different broker-dealer to execute securities transactions. Clients may direct Concentric to use a specific broker, and some Clients have relationships with brokers that predate their relationship with Concentric. In these directed brokerage situations, the firm has not negotiated the terms and conditions (including, but not limited to, commission rates) and does not have any responsibility for seeking best execution. Clients who direct Concentric to use a specific broker may pay higher commission rates or receive less favorable execution than non-directing Clients. For example, in directed brokerage accounts, Clients may pay higher brokerage commissions than the firm has negotiated with broker-dealers. Concentric may direct a Client account to pay a brokerage commission exceeding that which another broker might charge for effecting the same transaction, in recognition of the value of the execution capabilities.

E. Aggregation of Orders

Where possible and advantageous to Clients, Concentric will seek to aggregate or block transaction orders in securities that may be appropriate for more than one Client or account and allocate the trades, in a fair and equitable manner, across participating accounts. Concentric has adopted procedures designed to help ensure that investment opportunities are allocated so that no Client or account of Concentric is improperly favored over any other Client or account.

F. Trade Practices

Step-Outs. Concentric may determine that exercising a block trade step-out is most advantageous for its Clients. This step-out trade occurs when an executed trade is transferred or "stepped out" from the custodian of record to another broker for execution and settlement. In these situations, the block trade is executed with a specific broker, resulting in Clients' accounts being traded away. There could be additional costs associated with step-out trades.

Trade rotations. Concentric may also determine to trade accounts on a rotational basis among the various custodians of Clients' accounts. This is to limit market impact and provide fair and equitable treatment of execution, irrespective of where accounts are held. Transactions for all Clients utilizing the same custodian will typically be aggregated/blocked together for execution purposes. Concentric utilizes a random generator to determine the rotational basis each time.

G. Principal and Cross Transactions

It is the policy of Concentric to not engage in principal or agency cross securities transactions for Client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any Client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another Client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the Client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

On occasion, Concentric may execute transactions in which a Client's securities are sold to or bought from another Client of Concentric. Such transactions, when they occur, shall be executed in compliance with Rule 206(3)-2 under the Investment Advisers Act of 1940, as amended. Cross Trades will only be exercised where it is in the best interest of both participating Client accounts. The use of cross trades can create conflicts as the Client accounts are both advised by Concentric. Concentric views the cross trades as two distinct transactions for each Client (buy/sell). Concentric will generally use cross trades when accounts are harvesting tax losses and specific security can be used by another account harvesting a loss with similar criteria investment strategy, guidelines, restrictions and limitations. Examples of details reviewed and assessed to ensure they are appropriate for both Clients are the following but are not limited to, issuer, maturity, call, credit rating, and coupon. In all cases, the bonds in the cross trade must be similar but not identical (e.g., different security identifiers such as CUSIP, ISIN, or SEDOL) to prevent a wash sale for tax loss harvesting purposes and the transaction must comply with applicable account restrictions and guidelines. There may be instances of cross trades where each Client is not harvesting losses. These are documented and are reviewed in the same manner as a tax loss harvesting trade. All cross trades are subject to Concentric's best execution evaluations. Examples of guidelines which need to be met prior to executing a cross trade:

- A good faith determination has been made that the trades are beneficial to both parties.
- The trades adhere to applicable Client contractual restrictions and limitations, investment objectives and guidelines for those Client accounts involved in the cross.
- The trades adhere to applicable trading and trade allocation policies.
- The trades are consistent with applicable federal and securities laws.
- Transaction prices reflect fair market value and are based on prices provided by independent third-party services.
- The trades are processed through broker-dealers not affiliated with Concentric.

Concentric will not engage in cross transactions with its ERISA accounts, IRAs, or proprietary accounts sub-advised by the firm.

ITEM 13 – REVIEW OF ACCOUNTS

Concentric reviews Client account activity, performance and positioning at least monthly. Accounts are reviewed on an ongoing basis for available cash, tax-loss harvesting opportunities (as applicable), and compliance with any Client-specific restrictions. Concentric's Investment Committee ("IC") reviews the integrity of management processes each quarter comparing accounts' results versus expectations and

researching account-specific results in detail. The IC evaluates and recommends potential updates to portfolio management processes to ensure portfolio composition is consistent with each Client's investment guidelines and aligns with target asset allocations. A Client account is also reviewed when Concentric receives notice from the Client or the Client's RIA that a material change has occurred with respect to the Client which would impact the Client's portfolio, its investment objective or asset value.

Individual Clients of Concentric's SMA Program are provided with quarterly reports electronically via access to a secure website. All reports contain summary statistics including, but not limited to, inception date, current market value, and performance metrics. The portfolio mandate varies by account type. For example, each SMA has a portfolio goal (e.g., broad market, large cap) measured against a specific benchmark. Quarterly reports for individual SMA Clients may include charts and/or tables detailing portfolio holdings, sector exposure, portfolio performance measured against a benchmark and net realized gains and losses.

Clients are encouraged to review and compare the statements received from Concentric with those received from the Client's custodian.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

Concentric does not pay or compensate any third party for Client referrals.

ITEM 15 – CUSTODY

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains the Client's investment assets. Concentric urges its Clients to carefully review and compare such official custodial records to the account statements that Concentric may provide to its Clients. Account statements received directly from Concentric may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

ITEM 16 – INVESTMENT DISCRETION

Within the SMA and UMA Programs, unless otherwise instructed or directed by a Client, Concentric has the discretionary authority generally to determine the securities to be purchased and sold for the account of a Client (subject to restrictions set forth in the applicable advisory agreement and any written investment guidelines) and the amount of securities to be purchased or sold without Client consultation or consent.

The RIA, providing written notification or agreement, may specify or restrict the types of securities, or individual securities, it does or does not want held in an account. Concentric will take reasonable measures to comply with such restrictions. However, Concentric, at its sole discretion, may decline to open or maintain a Client account if restrictions placed on the account by the Underlying RIA Client cause the account's characteristics to materially differ from other accounts invested in a similar investment strategy or if Concentric does not have sufficient expertise or capabilities to manage such an account. Investment guidelines and restrictions must be provided to and acknowledged by Concentric in writing.

Within the MPM program, Concentric constructs and updates models that are utilized by other RIAs. Concentric does not implement or execute these models for the RIA. Concentric also does not accept investment discretion in the model creation.

ITEM 17 – VOTING CLIENT SERVICES

A. Proxy Voting

As a fiduciary, Concentric owes its Clients duties of care and loyalty in proxy voting. For Clients who direct Concentric to vote proxies on their behalf, Concentric will monitor corporate events and vote these proxies as needed. Concentric will cast proxy votes in a manner consistent with the best interests of its Client and Concentric will not seek to place its interests ahead of its Clients.

Concentric has retained Broadridge Investor Communication Solutions, Inc., (“Broadridge”), an independent third party, as proxy adviser and voting agent to assist with monitoring, researching, making voting recommendations, and voting proxies. Broadridge provides the Concentric Investments team with analysis and recommendations on voting proxies, according to a set of pre-determined policy guidelines. Concentric retains the right to vote on any agenda item in a different manner if it does not believe the Broadridge recommendation is in the best interest of its Clients. Once ballots have been voted, Broadridge provides Concentric with proxy voting records on an aggregated basis for Concentric’s Clients.

The Concentric Investments team will monitor and resolve possible material conflicts of interest, if any, between Concentric and its Clients with respect to proxy voting. Since Concentric’s voting guidelines are predetermined by Concentric’s Investments team using recommendations from Broadridge, possible conflicts of interest should, in most instances, be adequately addressed.

Clients may obtain a copy of Concentric’s and/or Broadridge’s complete proxy voting policies and procedures and information about how Concentric voted any proxies on behalf of their account(s) upon request. Clients should contact Douglas McCall, Chief Compliance Officer of Concentric via email at compliance@concentricinnovation.com. Clients who authorize Concentric to vote proxies on their behalf may not generally direct the vote in a particular solicitation, except at Concentric’s sole discretion.

For Clients who have not authorized Concentric to vote proxies, Clients will receive proxy materials directly from their custodian or transfer agent. Clients may contact Concentric with questions about specific proxy solicitations at the address and telephone number on the front page of this brochure.

B. Class Action Lawsuits

From time to time, securities held in Client accounts may be the subject of class action lawsuits. Concentric has no obligation to determine if securities held by the Client are subject to a pending or resolved class action lawsuit. Concentric also has no duty to evaluate a Client’s eligibility or submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, Concentric has no obligation or responsibility to initiate litigation to recover damages on behalf of Clients who may have been injured because of actions, misconduct or negligence by corporate management of issuers whose securities are held by Clients. In the event Concentric receives written or electronic notice of a class action lawsuit, settlement or verdict affecting securities owned by a Client, it will forward, to the extent practicable, all notices, proof of claim forms and other materials to the Client (or Client representative), unless alternative mutually agreed to written arrangements have been made.

ITEM 18 – FINANCIAL INFORMATION

Concentric has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to Clients and has not been the subject of a bankruptcy proceeding.