

# McShane Partners

A WEALTH & INVESTMENT ADVISORY FIRM

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## ANNUAL CLIENT COMPLIANCE DISCLOSURES

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MARCH 28<sup>TH</sup> 2023

*If you have any questions regarding anything contained herein, please contact us via phone, fax, e-mail, or mailing address listed, below.*

McShane Partners  
2150 Park Dr.  
Charlotte, NC 28204  
Phone: (980) 585-3390 | Fax: (980) 265-1274  
[www.mcschanepartners.com](http://www.mcschanepartners.com)

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## ANNUAL PRIVACY DISCLOSURE STATEMENT

McShane Partners (“the Firm”) maintains strict confidentiality policies and has in place procedural, electronic and physical safeguards to protect your personal, private information.

The Firm collects certain information about you and your financial situation, including: names, addresses, social security numbers, assets, incomes, cash flows, and investment objectives. In the course of providing services to you, the Firm also tracks information regarding transactions, cost basis, use of accounts, and products preferred. The Firm shares client information that is necessary to effect, administer, document, and/or enforce a transaction as you have directed or authorized the Firm to do so. **The Firm does not disclose any information with any person or firm for marketing purposes.**

All client information maintained within the Firm’s place of business earmarked for disposal is properly safeguarded. Information is placed within a locked receptacle and destroyed by the Firm’s records retention manager.

This disclosure is made pursuant to the Gramm-Leach-Bliley Act and Regulation S-P (Privacy of Consumer Financial Information), as issued by the U.S. Securities and Exchange Commission. It is important to note that any broker relationship you have is independent of McShane Partners. Each brokerage has its own privacy policies and privacy disclosures.

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## ANNUAL PROXY VOTING POLICY DISCLOSURE STATEMENT

McShane Partners (“the Firm”) has adopted and implemented policies and procedures that it believes are reasonably designed to ensure that proxies are voted in the best interest of the client, in accordance with the Firm’s fiduciary duties and SEC Rule 206(4)-6 under the *Investment Advisors Act of 1940*. The Firm generally votes in a manner consistent with Board recommendations. However, because the Firm votes proxies in a manner we believe to be in the best interest of its clients, the Firm does vote against the advice of the company management on occasion.

### ANNUAL PROXY VOTING POLICY NOTICE

#### PROCEDURE:

Unless instructed otherwise by its clients, the Firm’s custodians (i.e., Charles Schwab & Co., Fidelity Investments, and National Advisors Trust Co.) are directed to forward domestic company proxy materials to Glass Lewis & Co. LLC, a third-party proxy voting service. Proxy materials are reviewed and voted in accordance with parameters established by the Firm, which the Firm believes meet its fiduciary responsibility to the client. The Firm votes proxies for international companies and mutual funds and does not engage Glass Lewis & Co. LLC for these holdings. All voting is done electronically.

#### RECORDKEEPING:

In accordance with amendments to Advisers Act Rule 204-2, Glass Lewis & Co., LLC or the Firm maintain the following:

1. A copy of these policies and procedures.
2. Proxy statements received regarding client securities.
3. A record of each vote cast.
4. A copy of any material that was important in casting the vote.
5. Each written client request for proxy voting records and written response to each request.

Proxy records are maintained in accordance with U.S. Securities and Exchange Commission retention parameters. Clients may request a copy of these policies and procedures, which may be updated periodically, or a record of how proxies were voted by contacting the Firm via phone, fax, e-mail, or regular mail.

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## ANNUAL ADV NOTICE & DISCLOSURE STATEMENT

To comply with amendments the U.S. Securities and Exchange Commission adopted in July of 2010, the Firm is delivering a copy of its Part 2A Firm Brochure along with these disclosures electronically. If you do not have an email address, these will all be delivered by U.S. Post.

If you would like to see the brochure sooner, you can view it by going directly to [FINRA's BrokerCheck](#), or by going to [www.finra.org](http://www.finra.org), selecting *Individual Investor*, following the prompts for *FINRA BrokerCheck*, and then selecting *Investment Advisor Search*.

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## ANNUAL CUSTODIAN STATEMENT CONFIRMATION & DISCLOSURE

McShane Partners (“the Firm”) has adopted and implemented policies and procedures that it believes are reasonably designed to form and establish a reasonable basis that the Firm’s qualified custodians are distributing and delivering account statements to clients, in accordance with the Firm’s fiduciary duties and SEC Rule 206(4)-2 under the *Investment Advisors Act of 1940*.

The Firm’s reasonable basis is influenced by the following processes that it has put in place to enforce its policies and procedures in this regard:

### EMAIL NOTIFICATIONS FROM CUSTODIANS

The Firm receives regular email notifications from its qualified custodians confirming that client account statements have been posted to the respective custodian’s website and have been delivered and made available to the Firm’s clients.

### ELECTRONIC MEDIA STORAGE AVAILABLE FROM CUSTODIANS

The Firm’s qualified custodians aggregate clients’ account statements and make those files available to the Firm for periodic review via electronic media storage.

### ACCESS TO ACCOUNT STATEMENTS PREPARED BY CUSTODIANS

The Firm also has the ability to access and review clients’ account statements and compare them with the corresponding notifications received by the Firm’s qualified custodians to ensure that the delivery and distribution instructions, as well as the underlying information provided by the qualified custodians, is up-to-date and accurate.

As part of the Firm’s periodic testing, we are asking clients to contact the Firm immediately if they believe they are ***not*** receiving their account statements ***directly*** from their respective qualified custodian.

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