

Item 1 Cover Page

James J. Barrett V, CFP[®], AIF[®]

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about James J. Barrett V that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about James J. Barrett V is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

James J. Barrett V was born in 1989. Mr. Barrett received his Graduate Certificate in Financial Planning from Wake Forest University in 2014. Mr. Barrett graduated from Bentley University in 2013 with a Master of Business Administration degree in Economics and Financial Markets, and from Assumption College in 2011 with a Bachelor of Arts degree in Economics. He has been a Financial Advisor with Grimes since August 2015.

Mr. Barrett is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER[™] professional or a CFP[®] professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Mr. Barrett became an Accredited Investment Fiduciary® (AIF®) Designee in 2015. The AIF® Designation certifies that the recipient has demonstrated specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF® Designation, the individual must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the Code of Ethics and Conduct Standards.

In order to maintain the AIF® Designation, the individual must annually attest to the Code of Ethics and Conduct Standards and accrue and report a minimum of six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the certification division of Fi360 that is responsible for ongoing management of the program. Fi360 is accredited by the ANSI National Accreditation Board for the AIF® Designation, making it one of few independently accredited designations recognized by FINRA.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Joseph J. Benoit, CFA®

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Joseph J. Benoit that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Joseph J. Benoit is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Joseph J. Benoit was born in 1984. Mr. Benoit graduated from Roger Williams University in 2006 with a Bachelor of Science degree in Financial Services. He has been a Portfolio Manager with Grimes since November 2013. Prior to that, he was an Analyst with Grimes from July 2006 to October 2013. He was formerly a registered representative of NewEdge Securities Inc. from September 2009 through September 2017.

Mr. Benoit has been a CFA® Charterholder since 2012. CFA® designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst® (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 190,000 CFA® Charterholders working in over 170 countries and regions. To earn the CFA® charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3)

join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA® Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

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Item 1 Cover Page

Thomas Adam Clark

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
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Additional information about Thomas Adam Clark is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Thomas Adam Clark was born in 1989. Mr. Clark graduated from Texas A&M University in 2022 with a Bachelor’s of Arts and Sciences in Organizational Leadership. He has been a Financial Advisor with Grimes since June 2018. Prior to that, he was employed by JP Morgan Chase Bank from December 2017 to June 2018 and TD Ameritrade, Inc. from February 2015 to November 2017.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

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Item 1 Cover Page

Janelle L. Coulman, CFP®

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
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This Brochure Supplement provides information about Janelle L. Coulman that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Janelle L. Coulman is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Janelle L. Coulman was born in 1982. Ms. Coulman graduated from Bentley University in 2004, with a Bachelor of Science degree in Finance. She has been a Financial Advisor with Grimes since April 2014. She has also been a registered representative of NewEdge Securities Inc. since April 2014.

Ms. Coulman is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Ms. Coulman is a registered representative of NewEdge Securities Inc. (“*NewEdge*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Ms. Coulman in her individual capacity as a registered representative of *NewEdge*, to implement investment recommendations on a commission basis, which could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need.

In the event the client chooses to purchase investment products through *NewEdge*, brokerage commissions will be charged by *NewEdge* to effect securities transactions, a portion of which commissions shall be paid by *NewEdge* to Ms. Coulman. The brokerage commissions charged by *NewEdge* may be higher or lower than those charged by other broker-dealers. In addition, *NewEdge*, as well as Ms. Coulman, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Ms. Coulman is separate and apart from Grimes’ investment management services discussed in Grimes’ *Brochure*.

Licensed Insurance Agent. Ms. Coulman, in her individual capacity, is a licensed insurance agent. Clients can engage Ms. Coulman to purchase insurance products on a commission basis. The recommendation by Ms. Coulman that a client purchase an insurance commission product could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client’s need.

Because of the extremely limited nature of Ms. Coulman’s commission services as set forth above, Ms. Coulman’s commission services are not material to Grimes’ advisory operations. Grimes’ Chief Compliance Officer, Michael J. Davide, remains available to address any questions that a client or prospective client may have regarding the above.

Item 5 Additional Compensation

None.

Item 6 Supervision

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Item 1 Cover Page

Justin C. Davis, CFP®

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Justin C. Davis that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Justin C. Davis is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Justin C. Davis was born in 1984. Mr. Davis graduated from Texas A&M – Commerce in 2020 with a Bachelor’s degree in Organizational Leadership. He has been a Financial Advisor with Grimes since April 2019. Prior to that, he was employed by JP Morgan Securities LLC from December 2017 to April 2019 and TD Ameritrade, Inc. from October 2009 to December 2017.

Mr. Davis is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

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Item 1 Cover Page

Christopher S. Deeley, CFA[®]

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Christopher S. Deeley that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Christopher S. Deeley is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Christopher S. Deeley was born in 1973. Mr. Deeley graduated from Boston College in 1995 with a Bachelor of Science degree in Accounting, and from Babson College in 2004 with a Master of Business Administration degree. He has been a Financial Advisor with Grimes since December 2017. Prior to that, he was employed by Braver Wealth Management, LLC and Adviser Investments from February 2016 through December 2017, and LMCG Investments, LLC from May 2006 through January 2016.

Mr. Deeley has been a CFA[®] Charterholder since 2002. CFA[®] designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst[®] (CFA[®]) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 190,000 CFA[®] Charterholders working in over 170 countries and regions. To earn the CFA[®] charter, candidates must: (1) pass three sequential, six-hour

examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA® Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

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Item 1 Cover Page

Maureen Fields Pasciucco, CFA®

Grimes & Company, Inc.

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This Brochure Supplement provides information about Maureen Fields that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

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

Item 2 Education Background and Business Experience

Maureen Fields was born in 1990. Ms. Fields graduated from Bentley University in 2012, with a Bachelor of Science degree in Economics–Finance. She has been a Sr. Research Associate with Grimes since November 2020. Prior to that she was a Research Associate with Grimes from October 2013 to October 2020.

Ms. Fields has been a CFA® Charterholder since 2016. CFA® designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst® (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

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Item 4 Other Business Activities

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Item 1 Cover Page

Cody J. Forbush, CFP®

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer 110 Turnpike
Road, Suite 100
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Additional information about Cody J. Forbush is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Cody J. Forbush was born in 1982. Mr. Forbush graduated from University of Nebraska at Omaha in 2017 with a Masters in Business Administration and BS in Business Finance in 2010. He has been a Financial Advisor with Grimes since September 2022. Prior to that, he was employed by Dickinson Investment Advisors from November 2020 to September 2022 and TS Capital, LLC from October 2017 to November 2020.

Mr. Forbush is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Tom ONeal French, Jr.

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Tom ONeal French, Jr. that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Tom ONeal French, Jr. is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Tom ONeal French, Jr. was born in 1970. Mr. French graduated from University of North Texas in 1999 with a Bachelor of Business in Finance. He has been a Financial Advisor with Grimes since June 2017.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

J. Michael Grenon, CIMA®

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about J. Michael Grenon that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about J. Michael Grenon is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

J. Michael Grenon was born in 1970. Mr. Grenon graduated from Villanova University in 1992, with a Bachelor of Arts degree in Economics. He has been a Vice President and Principal with Grimes since March 2006. He has also been a registered representative of NewEdge Securities Inc. since September 2009.

Mr. Grenon has held the Certified Investment Management Analyst® designation since 2004. The CIMA® certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. The designation is administered through the Investments & Wealth Institute®. Prerequisites for the CIMA® certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA® certification, candidates must complete an executive education program through a registered education provider and pass a comprehensive certification exam. CIMA® designees are required to adhere to the Investments & Wealth Institute’s® Code of Professional Responsibility and the appropriate use of the certification marks.

CIMA® designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Mr. Grenon is a registered representative of NewEdge Securities Inc. (“*NewEdge*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Grenon in his individual capacity as a registered representative of *NewEdge*, to implement investment recommendations on a commission basis, which could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need.

In the event the client chooses to purchase investment products through *NewEdge*, brokerage commissions will be charged by *NewEdge* to effect securities transactions, a portion of which commissions shall be paid by *NewEdge* to Mr. Grenon. The brokerage commissions charged by *NewEdge* may be higher or lower than those charged by other broker-dealers. In addition, *NewEdge*, as well as Mr. Grenon, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Grenon is separate and apart from Grimes’ investment management services discussed in Grimes’ *Brochure*.

Licensed Insurance Agent. Mr. Grenon, in his individual capacity, is a licensed insurance agent. Clients can engage Mr. Grenon to purchase insurance products on a commission basis. The recommendation by Mr. Grenon that a client purchase an insurance commission product could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client’s need.

Because of the extremely limited nature of Mr. Grenon’s commission services as set forth above, Mr. Grenon’s commission services are not material to Grimes’ advisory operations. Grimes’ Chief Compliance Officer, Michael J. Davide, remains available to address any questions that a client or prospective client may have regarding the above.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Kevin T. Grimes, CFA[®], CFP[®]

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Kevin T. Grimes that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Kevin T. Grimes is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Kevin T. Grimes was born in 1975. Mr. Grimes graduated from Babson College in 1997, with a Bachelor of Science degree in Finance. He has been the President and Chief Investment Officer of Grimes & Company, Inc. since July 2015. He served as Managing Partner and Chief Investment Officer of Grimes from October 2013 through June 2015. Prior to that, he was a Portfolio Manager of Grimes from March 2002 through October 2013. He was also a registered representative of NewEdge Securities Inc. from September 2009 to September 2015 and March 2017 to August 2021.

Mr. Grimes has been a CFA[®] Charterholder since 2001. CFA[®] designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst[®] (CFA[®]) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 190,000 CFA® Charterholders working in over 170 countries and regions. To earn the CFA® charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA® Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Mr. Grimes is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

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- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Molly F. Grimes, CFP®

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Molly F. Grimes that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Molly F. Grimes is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Molly F. Grimes was born in 1992. Ms. Grimes graduated from Dartmouth College in 2014, with a Bachelor of Arts degree in Neuroscience. She has been a Financial Planner with Grimes since August 2021. Prior to that, she was employed by athenahealth from July 2016 to June 2021.

Ms. Grimes is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP

Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.

- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Thomas A. Grimes, CFP®

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Thomas A. Grimes that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Thomas A. Grimes is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Thomas A. Grimes was born in 1958. Mr. Grimes graduated from the University of Massachusetts/Amherst in 1980, with a Bachelor of Arts degree in Business Management. He also graduated from Babson College in 1990 with a Master of Business Administration degree. He has been a Vice President and Principal with Grimes since November 2003. He has also been a registered representative of NewEdge Securities Inc. since September 2009.

Mr. Grimes is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
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- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Mr. Grimes is a registered representative of NewEdge Securities Inc. (“*NewEdge*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Grimes in his individual capacity as a registered representative of *NewEdge*, to implement investment recommendations on a commission basis, which could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need.

In the event the client chooses to purchase investment products through *NewEdge*, brokerage commissions will be charged by *NewEdge* to effect securities transactions, a portion of which commissions shall be paid by *NewEdge* to Mr. Grimes. The brokerage commissions charged by *NewEdge* may be higher or lower than those charged by other broker-dealers. In addition, *NewEdge*, as well as Mr. Grimes, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Grimes is separate and apart from Grimes’ investment management services discussed in Grimes’ *Brochure*.

Licensed Insurance Agent. Mr. Grimes, in his individual capacity, is a licensed insurance agent. Clients can engage Mr. Grimes to purchase insurance products on a commission basis. The recommendation by Mr. Grimes that a client purchase an insurance commission product could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client’s need.

Because of the extremely limited nature of Mr. Grimes’ commission services as set forth above, Mr. Grimes’ commission services are not material to Grimes’ advisory operations. Grimes’ Chief Compliance Officer, Michael J. Davide, remains available to address any questions that a client or prospective client may have regarding the above.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes’ policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes’ policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (“Act”). Grimes’ Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes’ policies and procedures and overseeing the activities of Grimes’ supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Timothy J. Grimes

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Timothy J. Grimes that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Timothy J. Grimes is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Timothy J. Grimes was born in 1949. Mr. Grimes graduated from Bryant College in 1971, with a Bachelor of Science degree in Business Administration. He has held the title of Founder and Chairman of Grimes since July 2015. Previously, he served as President of Grimes from November 1999 to June 2015. He has also been a registered representative of NewEdge Securities Inc. since September 2009.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Mr. Grimes is a registered representative of NewEdge Securities Inc. (“*NewEdge*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Mr. Grimes in his

individual capacity as a registered representative of *NewEdge*, to implement investment recommendations on a commission basis, which could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need.

In the event the client chooses to purchase investment products through *NewEdge*, brokerage commissions will be charged by *NewEdge* to effect securities transactions, a portion of which commissions shall be paid by *NewEdge* to Mr. Grimes. The brokerage commissions charged by *NewEdge* may be higher or lower than those charged by other broker-dealers. In addition, *NewEdge*, as well as Mr. Grimes, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Mr. Grimes is separate and apart from Grimes' investment management services discussed in Grimes' *Brochure*.

Licensed Insurance Agent. Mr. Grimes, in his individual capacity, is a licensed insurance agent. Clients can engage Mr. Grimes to purchase insurance products on a commission basis. The recommendation by Mr. Grimes that a client purchase an insurance commission product could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need.

Because of the extremely limited nature of Mr. Grimes' commission services as set forth above, Mr. Grimes' commission services are not material to Grimes' advisory operations. Grimes' Chief Compliance Officer, Michael J. Davide, remains available to address any questions that a client or prospective client may have regarding the above.

Item 5 Additional Compensation

None.

Item 6 Supervision

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Item 1 Cover Page

Todd A. Herman, CFP®

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Todd A. Herman that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Todd A. Herman is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Todd A. Herman was born in 1987. Mr. Herman graduated from Union College in 2010 with a Bachelor of Science degree in Mechanical Engineering, and from Boston College in 2017 with a Master of Business Administration degree. He has been with Grimes since May 2022 and is currently a Financial Advisor / Financial Planning Specialist. From September 2020 to April 2022, Mr. Herman was a Client Advisor of iCapital, LLC. From March 2018 to May 2020, he was the Operations Manager of Siharum Advisors.

Mr. Herman is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Adam R. Jacobs, CFA[®], CFP[®]

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Adam R. Jacobs that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Adam R. Jacobs is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Adam R. Jacobs was born in 1975. Mr. Jacobs graduated from Babson College in 1997, with a Bachelor of Science degree in Finance. He has been a Vice President with Grimes since February 2010. He was formerly a registered representative of NewEdge Securities Inc. from February 2010 through July 2017.

Mr. Jacobs has been a CFA[®] Charterholder since 2001. CFA[®] designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst[®] (CFA[®]) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 190,000 CFA[®] Charterholders working in over 170 countries and regions. To earn the CFA[®] charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA® Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Mr. Jacobs is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas

CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.

- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

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- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Karen P. Kelly, CFP®

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Karen P. Kelly that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Karen P. Kelly is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Karen P. Kelly was born in 1965. Ms. Kelly graduated from Boston College in 1987, with a Bachelor of Science degree in Business Management with a concentration in Accounting. She has been a Financial Advisor with Grimes since January 2021. Prior to that, she was the Principal at Kelly Consulting LLC from 2003 through 2020.

Ms. Kelly is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Patricia L. Lavoie, CPA

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Patricia L. Lavoie that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Patricia L. Lavoie is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Patricia L. Lavoie was born in 1969. Ms. Lavoie received her Bachelor of Science degree in Accounting from Boston College in 1991. Ms. Lavoie has been a Financial Advisor with Grimes since January 2023. Prior to that, she was employed by EP Wealth Advisors from August 2022 through December 2022 as Tax Manager, and by Fortis Management Group from March 2005 through October 2022 as a Client Advisor, Tax Manager.

Ms. Lavoie has held the designation of Certified Public Accountant (CPA) since 1998. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing

professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own. In addition to the *Code of Professional Conduct*, AICPA members who provide personal financial planning services are required to follow the *Statement on Standards in Personal Financial Planning Services* (SSPFPS).

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (the "Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Jordan A. Letendre, CFP®

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer

110 Turnpike Road, Suite 100

Westborough, Massachusetts 01581

This Brochure Supplement provides information about Jordan A. Letendre that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Jordan A. Letendre is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Jordan A. Letendre was born in 1988. Mr. Letendre graduated from Bryant University in 2010, with a Bachelor of Science degree in Business Administration and a concentration in Financial Services. He has been a Financial Advisor with Grimes since July 2014.

Mr. Letendre is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

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- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Laurie D. Littlefield, FPQP™

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Laurie L. Littlefield that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Laurie L. Littlefield is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Laurie L. Littlefield was born in 1965. She has been a Senior Client Service Manager of Grimes since April 2005. She was formerly a registered representative of NewEdge Securities Inc. from May 2011 through September 2017.

Ms. Littlefield has held the designation of Financial Paraplanner Qualified Professional™ (FPQP™), formerly referred as Registered Paraplanner (RP®), since 2014. Individuals who hold the FPQP™ designation have completed a course of study encompassing the financial planning process, the five disciplines of financial planning and general financial planning concepts, terminology, and product categories at The College for Financial Planning®, an accredited institution of higher learning, and then successfully passed a proctored exam that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. Designees must adhere to the College’s Standards of Professional Conduct, and complete sixteen hours of continuing education every 2 years.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Michael R. Maguire, CFP[®], ChFC[®], RICP[®]

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Michael R. Maguire that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Michael R. Maguire is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Michael R. Maguire was born in 1976. Mr. Maguire graduated from University of Vermont in 1998 with a Bachelor of Arts degree in History. He has been a Financial Advisor with Grimes since June 2023. Prior to that, he was employed by Mutual of America from June 2022 to June 2023 and from August 2006 to March 2022, and Strategic Retirement Partners from March 2022 to June 2022.

Mr. Maguire is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER[™] professional or a CFP[®] professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at www.cfp.net.

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- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
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- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Mr. Maguire is a Chartered Financial Consultant® ("ChFC®"). Mr. Maguire earned the ChFC® designation from The American College and is granted to individuals who have at least three years of full-time business experience within the five years preceding the awarding of the designation. The candidate is required to take seven mandatory courses which include the following disciplines: financial, insurance, retirement and estate planning; income taxation, investments and application of financial planning; as well as two elective courses involving the application of the aforementioned disciplines. Each course has a final proctored exam and once issued, the individual is required to submit 30 hours of continuing education every two years.

Mr. Maguire is a Retirement Income Certified Professional® (“RICP®”). The RICP® designation teaches advisers techniques and best practices used to create sustainable streams of retirement income. The education covers retirement income planning, maximizing Social Security and other income sources, minimizing risks to the plan, and managing portfolios during the asset distribution phase. The designation includes three required, college-level courses that represent a total average study time of more than 150 hours. RICP® designees must meet experience, continuing education and ethics requirements. The credential is awarded by The American College, a non-profit educator founded in 1927 and the highest form of academic accreditation.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Mr. Maguire, in his individual capacity, is a licensed insurance agent. Clients can engage Mr. Maguire to purchase insurance products on a commission basis. The recommendation by Mr. Maguire that a client purchase an insurance commission product could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client’s need.

Because of the extremely limited nature of Mr. Maguire’s commission services as set forth above, Mr. Maguire’s commission services are not material to Grimes’ advisory operations. Grimes’ Chief Compliance Officer, Michael J. Davide, remains available to address any questions that a client or prospective client may have regarding the above

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes’ policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes’ policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (“Act”). Grimes’ Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes’ policies and procedures and overseeing the activities of Grimes’ supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Jennifer A. Moran, CFP[®], AEP[®]

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Jennifer A. Moran that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Jennifer A. Moran is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Jennifer A. Moran was born in 1983. Ms. Moran graduated from Bentley University in 2012 with a Master of Science degree in Financial Planning, and from Syracuse University in 2005 with Bachelor of Science degrees in Finance and Marketing. She has been a Financial Advisor with Grimes since December 2014.

Ms. Moran is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER[™] professional or a CFP[®] professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Ms. Moran has held the designations of Accredited Estate Planner® (AEP®) since 2014. An Accredited Estate Planner applicant must meet all of the following requirements established by the National Association of Estate Planners & Councils:

- To be eligible to be considered for the AEP® designation, the applicant must provide documentation of being licensed to practice law as an Attorney (JD) or to practice as a Certified Public Accountant (CPA), or of being currently designated as a Chartered Life Underwriter® (CLU®), Chartered Financial Consultant® (ChFC®), CERTIFIED FINANCIAL PLANNER™ professional, or Certified Trust & Financial Advisor

(CTFA), in any jurisdiction of the United States of America and meet certain educational requirements.

- The applicant must be presently and significantly engaged in “estate planning activities” as an attorney, an accountant, an insurance professional and financial planner, or a trust officer. A minimum of five (5) years of experience engaged in estate planning and estate planning activities is required. To be exempt from the required education requirements, an applicant must have a minimum of fifteen (15) years of experience engaged in estate planning and estate planning activities.
- AEP® applicants are required to be members of, and continuously maintain membership in, an affiliated local or regional estate planning council where such membership is available. Where no affiliated local council membership is available, the applicant is required to continuously maintain an At-Large individual membership in the National Association of Estate Planners & Councils.
- AEP® applicants must continuously be in good standing with the applicant’s respective professional organization and/or license authority (e.g., State Bar Association for attorneys, etc.) and provide three (3) professional references prior to acceptance.
- In addition, AEP® applicants must abide by the NAEPC Code of Ethics, acknowledge a commitment to the team concept of estate planning by signing a declaration statement and meet continuing education and re-certification requirements, which include the yearly payment of dues.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes’ policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes’ policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (“Act”). Grimes’ Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes’ policies and procedures and overseeing the activities of Grimes’ supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Timothy D. Rheume, CFA[®], CFP[®]

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Timothy D. Rheume that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Timothy D. Rheume is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Timothy D. Rheume was born in 1986. Mr. Rheume graduated from University of New Hampshire in 2008 with a Bachelor of Science degree in Business Administration. He has been a Financial Planner with Grimes since January 2022. Prior to that, he was employed by Natixis Investment Managers from February 2015 to December 2021.

Mr. Rheume has been a CFA[®] Charterholder since 2012. CFA[®] designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst[®] (CFA[®]) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 190,000 CFA[®] Charterholders working in over 170 countries and regions. To earn the CFA[®] charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA® Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Mr. Rheume is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of

financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.

- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

David R. Roberts, CFP®

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about David R. Roberts that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about David R. Roberts is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

David R. Roberts was born in 1972. Mr. Roberts graduated from Connecticut College in 1995 with a bachelor’s degree of Economics. He has been a Financial Advisor with Grimes since April 2021. Prior to that, he was employed by TD Ameritrade, Inc. from December 1999 to January 2021.

Mr. Roberts is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Stephen J. Sacher

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Stephen J. Sacher that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Stephen J. Sacher is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Stephen J. Sacher was born in 1969. Mr. Sacher graduated from the University of Rochester in 1991 with a Bachelor of Arts degree in Integrated Sciences, and from Northwestern University in 1999 with a Master of Business Administration degree. He has been a Wealth Director with Grimes since March 2023. Prior to that, he was employed by Fidelity Investments from January 2019 to March 2023, WBB Securities, Inc. from June 2018 to January 2019 and Mizuho Securities, USA from July 2014 to November 2017.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Mr. Sacher, in his individual capacity, is a licensed insurance agent. Clients can engage Mr. Sacher to purchase insurance products on a commission basis. The recommendation by Mr. Sacher that a client purchase an insurance commission product could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need.

Because of the extremely limited nature of Mr. Sacher's commission services as set forth above, Mr. Sacher's commission services are not material to Grimes' advisory operations. Grimes' Chief Compliance Officer, Michael J. Davide, remains available to address any questions that a client or prospective client may have regarding the above.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Jae Y. Song, CFA®

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Jae Y. Song that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Item 2 Education Background and Business Experience

Jae Y. Song was born in 1973. Mr. Song graduated from Tufts University in 2003 with a Master of Science degree in Electrical Engineering, and from Boston University in 1997 with a Bachelor of Science degree in Computer Engineering. He has been a Senior Quantitative Research Manager since January 2018. He was a Senior Quantitative Analyst at Grimes from November 2017 through December 2018. He was a Research Analyst from June 2011 through October 2017.

Mr. Song has been a CFA® Charterholder since 2016. CFA® designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst® (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 190,000 CFA® Charterholders working in over 170 countries and regions. To earn the CFA® charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3) join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA® Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Gordon J. Thomas, CFP®

Grimes & Company, Inc.

Brochure Supplement

Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Gordon J. Thomas that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Gordon J. Thomas is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Gordon J. Thomas was born in 1990. Mr. Thomas graduated from Wheaton College in 2014, with a Bachelor of Arts degree in Economics. He has been a Financial Advisor with Grimes since June 2021. Prior to that, he was employed by Baystate Financial from June 2019 to June 2021 and Fidelity Investments from March 2016 to June 2019.

Mr. Thomas is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, he may refer to himself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and he may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Benjamin B. Wallace, CFA®

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Benjamin B. Wallace that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Benjamin B. Wallace is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Benjamin B. Wallace was born in 1977. Mr. Wallace graduated from Franklin & Marshall College in 1999, with a Bachelor of Arts degree in Economics. He has been a Portfolio Manager with Grimes since November 2013. Prior to that, he was a Securities Analyst of Grimes from January 2001 through October 2013. He was formerly a registered representative of NewEdge Securities Inc. from May 2011 through September 2015.

Mr. Wallace has been a CFA® Charterholder since 2002. CFA® designates an international professional certificate that is offered by the CFA Institute. The Chartered Financial Analyst® (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 190,000 CFA® Charterholders working in over 170 countries and regions. To earn the CFA® charter, candidates must: (1) pass three sequential, six-hour examinations; (2) have at least four years of qualified professional investment experience; (3)

join CFA Institute as members; and (4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA® Charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA® charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA® Charterholders —often making the charter a prerequisite for employment. Additionally, regulatory bodies in 38 countries/territories recognize the CFA® charter as a proxy for meeting certain licensing requirements, and more than 466 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

None.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes' policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes' policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 ("Act"). Grimes' Chief Compliance Officer, Michael J. Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.

Item 1 Cover Page

Emily G. Wood, CFP[®], CRPS[®]

Grimes & Company, Inc.

Brochure Supplement
Dated March 20, 2024

Contact: Michael J. Davide, Chief Compliance Officer
110 Turnpike Road, Suite 100
Westborough, Massachusetts 01581

This Brochure Supplement provides information about Emily G. Wood that supplements the Grimes & Company, Inc. (“Grimes”) Brochure. You should have received a copy of that Brochure. Please contact Michael J. Davide, Chief Compliance Officer, if you did *not* receive Grimes’ Brochure or if you have any questions about the contents of this supplement.

Additional information about Emily G. Wood is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Education Background and Business Experience

Emily G. Wood was born in 1977. Emily graduated from Villanova University in 1999 with a Bachelor of Science degree in Business Management and a minor in English. She has been a Vice President at Grimes since 2002. She has also been a registered representative of NewEdge Securities Inc. since September 2002.

Ms. Wood is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, she may refer to herself as a CERTIFIED FINANCIAL PLANNER[™] professional or a CFP[®] professional, and she may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP[®] certification. You may find more information about the CFP[®] certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Ms. Wood has held the designation of Chartered Retirement Plans SpecialistSM (CRPS®) since 2009. The College of Financial Planning® awards the CRPS® designation to applicants who complete the CRPS® professional education program, pass a final examination, commit to a code of ethics and agree to pursue continuing education. Continued use of the CRPS® designation is subject to ongoing renewal requirements. Every two (2) years the designee must renew their right to continue using the CRPS® designation by completing 16 hours of continuing education and reaffirming to abide by the Standards of Professional Conduct.

Item 3 Disciplinary Information

None.

Item 4 Other Business Activities

Ms. Wood is a registered representative of NewEdge Securities Inc. (“*NewEdge*”), an SEC Registered and FINRA member broker-dealer. Clients may choose to engage Ms. Wood, in her individual capacity as a registered representative of *NewEdge*, to implement investment recommendations on a commission basis, which could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client’s need.

In the event the client chooses to purchase investment products through *NewEdge*, brokerage commissions will be charged by *NewEdge* to effect securities transactions, a portion of which commissions shall be paid by *NewEdge* to Ms. Wood. The brokerage commissions charged by *NewEdge* may be higher or lower than those charged by other broker-dealers. In addition, *NewEdge* as well as Ms. Wood, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The securities commission business conducted by Ms. Wood is separate and apart from Grimes’ investment management services discussed in Grimes’ *Brochure*.

Licensed Insurance Agent. Ms. Wood, in her individual capacity, is a licensed insurance agent. Clients can engage Ms. Wood to purchase insurance products on a commission basis. The recommendation by Ms. Wood that a client purchase an insurance commission product could present a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client’s need.

Because of the extremely limited nature of Ms. Wood’s commission services as set forth above, Ms. Wood’s commission services are not material to Grimes’ advisory operations. Grimes’ Chief Compliance Officer, Michael J. Davide, remains available to address any questions that a client or prospective client may have regarding the above.

Item 5 Additional Compensation

None.

Item 6 Supervision

Grimes provides investment advisory and supervisory services in accordance with Grimes’ policies and procedures manual. The primary purpose of Rule 206(4)-7 in Grimes’ policies and procedures is to comply with the supervision requirements of Section 203(e)(6) of the Investment Advisers Act of 1940 (“Act”). Grimes’ Chief Compliance Officer, Michael J.

Davide, is primarily responsible for the implementation of Grimes' policies and procedures and overseeing the activities of Grimes' supervised persons. Should an employee, independent contractor, investment adviser representative, or promoter of Grimes have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer, Mr. Davide at (508) 366-3883.