

**Form CRS Client Relationship Summary – TWIN Capital Management Inc.
March 29, 2024**

Our name is TWIN Capital Management Inc. We are registered with the Securities and Exchange Commission as an investment adviser. The services offered and fees charged by an investment adviser differ from those of broker-dealers and it is important that you understand the differences. Free and simple tools are available to research investment adviser firms, broker-dealers, and their financial professionals at www.Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors. We provide separately managed accounts (referred to as “SMAs”) to retail investors and model investment portfolios to UMA (Unified Managed Account) platforms. These accounts may be provided through a wrap-fee program sponsored by a third party. We monitor the investments held in SMAs daily, and we do not charge an additional fee for this service. We do not monitor the investments held in accounts which access our advisory services through UMA platforms.

If we have an SMA agreement with you, it gives us the authority to buy and sell investments on your behalf. The agreement limits our authority to the specific investments permitted by our investment strategy. We only offer advice regarding equity investments that trade on U.S. exchanges, ETFs, and mutual funds. We do not have authority to engage in transactions or select brokers for investors that receive our advisory services through UMA platforms.

We require a minimum account size of \$2 million to open an account directly with us, however the minimum is \$100,000 when we manage an account through a wrap fee program. UMA platforms set their own minimums, which are typically less.

Please see the more detailed disclosure on the investment services and advice that we can provide to you in **Items 4 and 7 of our Form ADV, Part 2A:**

<https://www.twincapital.com/forms-adv-crs/>

Conversation Starter. *Questions you can ask: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What fees will I pay?

We receive an asset-based fee for managing your SMA ranging from 0.75% to 0.30% of the net assets in your account each year. When we provide a model portfolio to a UMA platform, we receive a fee ranging from 0.20% to 0.05% of assets annually from the platform sponsor. Since we are paid an asset-based fee, we have an incentive for you to increase the amount of assets in your account. If you invest through a wrap account, you will pay an asset-based based fee to your wrap fee program sponsor of up to 3.0%, which will include most transaction costs and fees to the broker-dealer that has custody of these assets (and therefore is higher than a typical asset-based advisory fee). We may receive a portion of the wrap fee as payment for our investment management services, or our fee may be paid in addition to the wrap fee. The Wrap Fee Brochure provides a more complete description of the program including fees and services provided. Wrap fee clients should let their Financial Advisor know if they did not receive a copy of the Wrap Fee Brochure or if they have any questions regarding the information contained in it. You will also have other expenses, including custodian fees, brokerage fees, commissions, governmental charges, and account maintenance fees. Some of these fees are not applicable for a wrap account.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. It is important to understand what fees and costs you are paying. Please see the more detailed disclosure on our fees and costs in **Items 5.A., B., C., and D of our Form ADV, Part 2A:**

<https://www.twincapital.com/forms-adv-crs/>

Conversation Starter. Questions you can ask: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- **Broker Selection.** We manage wrap fee accounts in the same manner as non-wrap fee accounts, but since a portion of the wrap fee paid by clients is for execution services, those accounts will typically be traded with the wrap fee sponsor rather than at the broker/dealer selected for our non-wrap fee accounts. Please refer to our disclosures for Directed Brokerage in the Brokerage Practices section of our [ADV Part 2A](#).
- **Personal Trading.** We may invest in the same (or related) securities that we recommend to you. We may also buy or sell securities for you at or about the same time that we buy or sell the same securities for our own account.

Conversation Starter. Questions you can ask: How might your conflicts of interest affect me, and how will you address them?

Please see the more detailed disclosure on our conflicts of interest in [Items 5, 6, 10, 11, 12, 14, and 17 of our Form ADV, Part 2A](#). [Item 14 discusses our referral agreement with Palmetto Advisory LLC.](#)

<https://www.twincapital.com/forms-adv-crs/>

How do your financial professionals make money?

We pay our financial professionals a cash salary and bonus. Their compensation is based on a variety of factors including the amount of client assets they service, revenue that we earn from their advisory services or recommendations, and our overall profitability. These compensation factors give our financial professionals an incentive to sell investment strategies for which we charge a higher fee.

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

No. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starter. Questions you can ask: As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

You can find additional information about our investment advisory services on the SEC's website (www.sec.gov) and on our website, www.twincapital.com. You can request up to date information and a copy of our relationship summary by contacting us at (724) 942-2000.

Conversation Starter. Questions you can ask: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?