

DaVinci Capital Management, Inc.

Client Relationship Summary

DaVinci Capital Management, Inc. is registered with the Securities and Exchange Commission and FINRA as a broker-dealer, a member of the Financial Industry Regulatory Authority (FINRA) and member of the Securities Investor Protection Corporation (SIPC). Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS) which also provides educational materials about broker-dealers, investment advisers, and investing. This document is a summary of the main types of services we offer to retail investors who are natural persons that seek or receives securities services primarily for personal, family, or household purposes.

What investment services and advice can you provide me?

As a broker-dealer, we can recommend and effect securities transactions for you, including buying and selling securities but you make the ultimate decision regarding whether to buy, sell or hold any investments. We offer a broad range of securities products, including but not limited to stocks bonds, municipal securities, unit investment trusts, exchange-traded funds (ETFs), mutual funds, variable annuities, and variable life insurance products.

We have various types of accounts through which you can effect transactions and hold securities, such as direct accounts, education accounts (for 529 plans), retirement accounts and various types of brokerage accounts (e.g., cash or margin). Different types of accounts offer access to different investments and have different features and fees. Further, we do not require a minimum investment to open and maintain an account, however, some investment products may have minimums which are established by the issuer of the product.

We are available to assist you after affecting a securities transaction, including those we recommend, but we do not monitor your account, nor do we exercise discretion. For specific parameters of the services, investments, and accounts listed above, please have a discussion with your financial professional.

Key Questions to Ask Your Financial Professional

Given my financial situation, should I choose a brokerage 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?

The principal fees and costs associated with engaging our firm for broker-dealer services include commissions and other product-level fees associated with your specific investments. Commissions are based on the specific transaction and the amount you invest. For stocks or ETFs, you will typically pay a commission every time you buy or sell. ETFs also deduct other fees and expenses, such as management fees, from ETF assets. With other investments, such as bonds, you will typically pay a fee (called a “mark-up” or “mark down”) every time you buy or sell but this fee is part of the investment’s price.

For variable annuities and insurance products, the insurance company pays us a commission, but you will also pay ongoing fees to the insurance company including mortality and expense charges, administrative fees, rider fees, and sub-account expenses. These fees reduce the value of your investment over time. If you surrender or withdraw from your variable product, surrender fees may be assessed by the insurance company if you are still within any applicable surrender period. The surrender fees typically reduce over time. Please refer to the insurance product’s prospectus for the details on the specific investment’s fees, costs, and expenses.

For mutual funds, the sales charge (“load”), fees and expenses differ depending upon the share class you purchase. A front-end load may reduce the amount you invest, or you may be charged an annual level asset-based sales charge as a percentage of your assets and maybe also be subject to a contingent, deferred sales charge. Further, you will also pay additional ongoing fees and expenses, such as 12b-1 fees, management fees or servicing fees, from fund assets. Each mutual fund defines its share classes and respective sales

charges, fees, and expenses therefore, you must refer to the specific fund's prospectus for the details on its respective sales charge, fees, and expenses.

You will pay a fee and/or commission every time you trade in your brokerage account or make a new investment. The more trades you place, the more commission we earn thus, we have an incentive to encourage more trading. In addition to the principal fees described above, additional fees may apply such as custodian fees, ticket charges, account maintenance fees, and usage fees (e.g., processing and handling fees for trades, wire fees, and transfer fees). A brokerage fee schedule, entitled *NFS Fully Disclosed Fees*, is located on our website davincicapitalmanagement.com.

You will pay fees 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. Please make sure you understand what fees and costs you are paying and ask your financial professional.

Key Questions to Ask Your Financial Professional

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 providing recommendations? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation, 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 recommendations we provide to you. Here are some examples to help you understand what this means.

- Registered representatives providing brokerage services and securities recommendations may also be licensed as an independent insurance agent. These persons will earn commission-based compensation for selling insurance products. Insurance commissions are separate and in addition to broker-dealer commissions.
- Registered representatives providing securities recommendations may be registered with a registered investment adviser. This represents a potential conflict as the representative is registered to offer securities products through multiple entities.

This is a brief summary and does not represent all of our conflicts of interest. For additional information on our conflicts, please contact us at the number provided below or speak to your financial professional.

Key Question to Ask Your Financial Professional

How might your conflicts of interest affect me, and how will you address them?

How do our financial professionals make money?

The financial professional servicing your account(s) are compensated based on commissions.

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

Yes. Disclosures for our firm or our financial professionals can be found by going to Investor.gov/CRS.

Key Questions to Ask Your Financial Professional

As a financial professional, do you have any disciplinary history? For what type of conduct?

You can request up-to-date information or a copy of this relationship summary by calling our office at 617-354-3222 ext. 75.

Key Questions to Ask Your Financial Professional

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?

DaVinci Capital Management, Inc.
Exhibit to Form CRS (Client Relationship Summary) - Summary
August 15, 2022

DaVinci Capital Management, Inc is required to update its Form CRS when information becomes materially inaccurate. This Exhibit summarizes the following changes to the firm's Form CRS, last implemented on June 26, 2020. Headings shown below relate to the original Form CRS:

Our initial Form CRS was inadvertently dated June 26, 2019, when it should have reflected the correct year of 2020. The updated Form CRS reflects the current date of August 15, 2022.

What investment services and advice can you provide me?

We have added additional information on account minimums and also an indication of the account types we can offer.

As a broker-dealer, we can recommend and effect securities transactions for you, including buying and selling securities but you make the ultimate decision regarding whether to buy, sell or hold any investments. We offer a broad range of securities products, including but not limited to stocks bonds, municipal securities, unit investment trusts, exchange-traded funds (ETFs), mutual funds, variable annuities, and variable life insurance products.

We have various types of accounts through which you can effect transactions and hold securities, such as direct accounts, education accounts (for 529 plans), retirement accounts and various types of brokerage accounts (e.g., cash or margin). Different types of accounts offer access to different investments and have different features and fees. Further, we do not require a minimum investment to open and maintain an account, however, some investment products may have minimums which are established by the issuer of the product.

We are available to assist you after affecting a securities transaction, including those we recommend, but we do not monitor your account, nor do we exercise discretion. For specific parameters of the services, investments, and accounts listed above, please have a discussion with your financial professional.

What fees will I pay?

We have added updated the fees and costs section to add more details on the fees associated with ETFs, mutual funds, variable annuity, and variable life contracts. Further, we have included a brokerage fee schedule on our website and added the website's address to the Form CRS.

The principal fees and costs associated with engaging our firm for broker-dealer services include commissions and other product-level fees associated with your specific investments. Commissions are based on the specific transaction and the amount you invest. For stocks or ETFs, you will typically pay a commission every time you buy or sell. ETFs also deduct other fees and expenses, such as management fees, from ETF assets. With other investments, such as bonds, you will typically pay a fee (called a "mark-up" or "mark down") every time you buy or sell but this fee is part of the investment's price.

For variable annuities and insurance products, the insurance company pays us a commission, but you will also pay ongoing fees to the insurance company including mortality and expense charges, administrative fees, rider fees, and sub-account expenses. These fees reduce the value of your investment over time. If you surrender or withdraw from your variable product, surrender fees may be assessed by the insurance company if you are still within any applicable surrender period. The surrender fees typically reduce over time. Please refer to the insurance product's prospectus for the details on the specific investment's fees, costs, and expenses.

For mutual funds, the fee (typically called a "load") you pay depends upon the share class you purchase. The load may reduce the amount you invest or maybe charged if you sell the investment within a specified time. Further, you will also pay additional ongoing fees and expenses, such as 12b-1 fees, management fees or servicing fees, from fund assets. Please refer to the fund's prospectus for the details on fees and expenses.

You will pay a fee and/or commission every time you trade in your brokerage account or make a new investment. The more trades you place, the more commission we earn thus, we have an incentive to encourage more trading.

In addition to the principal fees described above, additional fees may apply such as custodian fees, ticket charges, account maintenance fees, and usage fees (e.g., processing and handling fees for trades, wire fees, and transfer fees). A brokerage fee schedule, entitled *NFS Fully Disclosed Fees*, is located on our website davincicapitalmanagement.com.

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