



**Form ADV Part 3**  
**Form CRS - Client Relationship Summary**  
March 19, 2021

**Item 1: Introduction**

Boston Common Asset Management, LLC (“Boston Common”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an Investment Adviser. Clients and prospective clients should be aware that Investment advisory services and fees differ between investment advisers and broker-dealers and it is important for you, the retail investor to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

**Item 2: Relationships and Services**

**What investment services and advice can you provide me?**

Boston Common offers investment advisory services on a discretionary basis to retail clients of sponsoring broker-dealers or financial consultants that offer wrap fee programs. These programs offer comprehensive brokerage, custodial and advisory services for an all-inclusive fee, which is typically based on the amount of client assets under management. The accounts generally have a minimum account size ranging from \$100,000 - \$1,000,000 and which is dependent on the program available through the broker. Only a sub-set of Boston Common’s strategies may be available to investors in these programs.

In these wrap fee programs, Boston Common has discretionary authority over the accounts. This means that Boston Common makes decisions regarding what securities should be bought and sold for the client’s account; however the wrap fee program sponsor selects the brokers that will effectuate the transactions. Boston Common is required to direct all brokerage transactions to the program sponsor. Execution prices may be less favorable than execution prices achieved in accounts where the broker selection is not directed. Boston Common’s Investment team reviews client portfolios and holdings continuously to evaluate portfolio composition, industry weightings and risks, and consistency of the portfolio with the clients’ investment strategy and objectives.

More information regarding our services can be found at our website and in our [Form ADV Part 2A](#).

**Questions to ask us: 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?**

**Item 3: Fees, Costs, Conflicts, and Standard of Conduct**

**What fees will I pay?**

Boston Common’s fees are based on a percentage of the value of assets in retail investors’ accounts for which we provide investment advisory services. A retail client’s fees associated with wrap fee programs include most transaction costs and fees to the sponsoring broker-dealer or bank that has custody of these assets, and therefore are higher than typical asset-based advisory fees. **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. Please make sure you understand what fees and costs you are paying.**

Detailed information about our fees can be found in our [Form ADV Part 2A](#).

**Questions to ask us: 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 is an example to help you understand what this means.

Broker program arrangements generally require Boston Common to direct all brokerage transactions to the sponsoring broker-dealer. Where a client directs trades, Boston Common is not able to negotiate commission rates or spreads, and is not able to obtain the same execution it receives for other clients. Directed trades are not aggregated with other clients' orders, and are placed after the completion of non-directed trades. The prices for directed trades are not aggregated with the prices for non-directed trades. This means that directed-trade clients may receive worse prices than non-directed clients receive. Additionally, clients who direct trades to a particular broker or dealer may pay higher commissions, greater spreads, or receive less favorable net prices than they would if Boston Common were able to select brokers or dealers.

Information on our conflicts of interest can be found in our [Form ADV Part 2A](#).

***Questions to ask us: How might your conflicts of interest affect me, and how will you address them?***

***How do your financial professionals make money?***

Financial professionals are assessed on investment returns and the productivity and timeliness of their analytical contribution. The final determination of annual compensation is based on management's judgment of how effectively the employee is advancing the long-term goals of the firm and its clients. All financial professionals are compensated with a base salary and an annual performance bonus that can make up more than half of compensation. Financial professionals are not compensated based on the amount of client assets that they service, the time and complexity required to meet a client's needs, the product sold, or product sales commissions.

***Item 4: Disciplinary History***

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

No. Retail investors can visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research Boston Common and our financial professionals.

***Questions to ask us: As a financial professional, do you have any disciplinary history? For what type of conduct?***

***Item 5: Additional Information***

Retail investors can obtain more information or obtain a copy of the relationship summary by sending a request to <mailto:compliance@bostoncommonasset.com> or calling 617-722-5557.

***Question to ask us: 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?***