



NORTHSTAR

ASSET MANAGEMENT

11 March 2026

NorthStar Asset Management, Inc. ADV Part 2A - Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes. Since our last annual amendment dated 02.20.2025, we are reporting the following material changes:

- Items 4 and 5 have been amended to disclose that NorthStar may engage an unaffiliated registered investment adviser to provide sub-advisory services to us. We maintain discretionary authority over the assets for which a sub-adviser provides services to us, and sub-advisers will have no authority to act for any account under NorthStar's discretionary management. We have entered into a sub-advisory agreement with Orion Portfolio Solutions, LLC ("OPS"), an unaffiliated registered investment advisor, whereby OPS will offer non-discretionary advice to us with respect to client accounts for which, under our discretionary authority, we have engaged OPS for sub-advisory services. In particular, OPS will provide non-discretionary advice for the development of custom, optimized investment portfolios based on specific risk models and objectives, and clients' particular objectives, investment restrictions, tax considerations, and other information determined by us, with an emphasis on tax efficiency and tax transitions ("Custom Indexing Services"). In utilizing the sub-advisory services of OPS, clients have access to a wide range of investment mandates, such as traditional market asset classes, factor strategies, thematic portfolios, as well as SRI/ESG portfolios. Clients may also further customize their portfolios to meet their specific needs. OPS will have no authority to effect any transaction on behalf of a client and NorthStar will retain full discretionary authority over the client's account. The fee charged by the sub-adviser for this program are separate from, and in addition to NorthStar's annual management fee.
- Item 8 has been amended to disclose that as of October 2025, NorthStar claims compliance with the Global Investment Performance Standards ("GIPS®"), which are voluntary ethical standards for the calculation and presentation of investment performance developed by CFA Institute. The GIPS® standards are designed to promote transparency and comparability of performance results among investment

- management firms. Verification assesses whether NorthStar has complied with all applicable GIPS® composite construction requirements on a firm-wide basis and whether our policies and procedures are designed to calculate and present performance in compliance with the GIPS® standards. Verification does not provide assurance regarding the accuracy of any specific composite performance presentation.