CONGRESS ASSET MANAGEMENT COMPANY

FORM CRS

March 17, 2026

Congress Asset Management Company, LLP ("Congress Asset", "we", "us")

Congress Asset is a SEC registered investment adviser with its principal place of business located in Boston, Massachusetts. Additional information about Congress Asset is available on the SEC's website at https://adviserinfo.sec.gov/. You can search this site by a unique identifying number, known as a CRD number. Congress Asset's CRD number is 105161.

Investment advisory services and fees discussed in this document differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at https://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 provide discretionary portfolio investment management services to you either directly or, through your financial advisor, bank or brokerage firm (your "Agent").

We are primarily a growth style equity investment manager. We also provide investment management services for small cap value, fixed income, and balanced portfolios. Additionally, we provide socially responsible investing ("SRI"), environmental, social and governance ("ESG"), and tax sensitive versions in certain equity strategies.

We continually monitor your investments managed by us to meet your stated goals, risk tolerance, cash needs, and other stated objectives and constraints. We also send to you and/or your Agent each quarter a portfolio appraisal for each account you have with us, so you may review and compare to other statements you receive from your custodian or your Agent. You may impose on us reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Please note, we may need to refuse accepting your account if we feel your restriction(s) will impede our service to you. You may terminate your agreement with us at any time in accordance with the investment management agreement you or your Agent have with us. For more information on these strategies, you may visit our website at: https://www.congressasset.com/

Generally, a minimum of $100,000 is required to open an account with us. Account minimums may be higher or lower depending on the strategy you select. We may consider for the purposes of achieving the minimum account size other accounts you have with us.

Congress Asset's Large Cap Growth mutual fund, Mid Cap Growth mutual fund and Small Cap Growth mutual fund products can also be accessed through our sponsored mutual funds. In addition, our Large Cap Growth ETF, SMid Growth ETF and Intermediate Bond ETF products can also be accessed through our sponsored ETFs (together with the mutual funds, the "Congress Funds"). The Congress Funds are SEC registered Investment Companies trusteed at US Bancorp and distributed by Quasar Distributors Inc. Congress Asset may recommend that you buy or sell shares of the Congress Funds. In cases where Congress Asset recommends you invest through the Congress Funds, we will waive its advisory fee on the assets invested in the Congress Funds, as these funds, not you, pay an advisory fee to us. The Congress Funds' Prospectus and Statement of Additional Information are available on-line at: https://congress-mutual-funds.web.app/ (for mutual funds) and https://etfs.congressasset.com/ (for ETFs).

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 qualification? What do these qualifications mean?

What fees will I pay?

Advisory Fees paid to Congress

We charge an investment advisory fee based on a percentage of your assets under our management. Fees are calculated on either a monthly or quarterly basis (a "full billing cycle") and are typically payable in arrears based on the value of the account at the end of each billing period or, in advance based on the value of the account as of the beginning of each billing period. The advisory fee is prorated for periods less than a full billing cycle.

The investment advisory fees are negotiable and differ from one Client to another based on certain criteria such as:

amount of assets, client type, style, portfolio customization, operational requirements and other factors discussed above.
You should be aware that more assets placed in your account with Congress Asset lead to more fees paid to us, thus we have an incentive to encourage you to increase assets in your account.

Other Fees and Expenses

In addition to the advisory fee you pay us, you may also be subject to fees and expenses separate and apart from Congress Asset. For example, you may be charged fees by securities exchanges, brokers and custodians related to transactions, administration and safekeeping of your investments. In addition, if you were referred to Congress by another investment adviser, you may be subject to advisory and/or management fees separate and apart from those of Congress Asset.

Under certain other circumstances, Congress Asset may invest all or a portion of your assets in mutual funds and/or Exchange Traded Funds ("Funds") not affiliated with Congress Asset. Fees assessed by these Funds are separate and distinct from the fees and expenses charged by us.

If you are invested in one or more of the Congress Funds, our advisory fee will be waived relating to the amount of assets invested in the Congress Fund.

For more information on fees and expenses please go to our website to view our Form ADV Part 2A, Item 5 "Fees and Compensation" at: https://www.congressasset.com/.

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.

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. For example, Congress Asset may use brokers to execute portfolio trades on your behalf who provide us valuable investment research and/or securities transaction services, even though a lower commission may be charged by a broker who offers no such services. Nonetheless, we believe our processes ensure we act in your best interest and our relationship with our affiliate does not disadvantage you. For more detailed information regarding our affiliations and brokerage practices please refer to our Form ADV, Part 2A, Item10 "Other Financial Industry Activities and Affiliations" at: https://www.congressasset.com/

How do your financial professionals make money?

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

Our investment professionals receive a competitive base salary and benefits package. They are eligible for a bonus that is derived from a number of metrics including personal performance, investment performance, assets under management, and net operating income. They are also eligible for and may participate in a deferred compensation program.

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

No.

Free and simple tools are available to research firms and financial professionals at https://www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

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

More information regarding Congress Asset Management can be found at www.congressasset.com. If you have any questions or want to receive an additional copy of the Form CRS, please contact us at 617-428-4300, or info@congressasset.com.

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?

Part 2A of Form ADV: *Firm Brochure*

Congress Asset Management Company, LLP

2 Seaport Lane

5th Floor

Boston, MA 02210

Telephone: 617-428-4300

Email: info@congressasset.com

Web Address: www.congressasset.com

March 17, 2026

This Firm Brochure (or "Brochure") provides information about the qualifications and business practices of Congress Asset Management Company, LLP. If you have any questions about the contents of this Brochure, or to receive a copy of this Brochure, please contact us at 617-428-4300 or info@congressasset.com or, by mail at the address listed above. The information in this Firm Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Congress Asset Management Company, LLP also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The Firm's CRD number is 105161.

Item 2 Summary of Material Changes

There have been no material changes since the last update filed on March 20, 2025.

Item 3 Table of Contents

		Page
Item 1	Cover Page	1
Item 2	Summary of Material Changes	2
Item 3	Table of Contents	3
Item 4	Advisory Business	4
Item 5	Fees and Compensation	6
Item 6	Performance-Based Fees and Side-By-Side Management	8
Item 7	Types of Clients	8
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss	9
Item 9	Disciplinary Information	11
Item 10	Other Financial Industry Activities and Affiliations	11
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	12
Item 12	Brokerage Practices	13
Item 13	Review of Accounts	14
Item 14	Client Referrals and Other Compensation	15
Item 15	Custody	16
Item 16	Investment Discretion	16
Item 17	Voting Client Securities	16
Item 18	Financial Information	17

Item 4 Advisory Business

Firm Background:

Congress Asset Management Company, LLP ("Congress Asset", "we", "us", or, the "Firm") is an SEC registered investment adviser with its principal place of business located in Boston, Massachusetts. The Firm was founded in 1985 and is majority owned by the Lagan Holding Company Trust. The Firm is a boutique asset manager focused on high quality equity and fixed income investing with a specialty in growth equities. Congress Asset began by providing tailored risk-adjusted investment solutions to Taft-Hartley pension plans and insurance companies. The Firm has maintained a consistent investment philosophy and process and continues to apply this high-quality approach for its large array of clients.

Types of Advisory Services:

Overview

Congress Asset provides discretionary and model portfolio investment management services to its clients. Clients of the Firm include advisory platforms, charitable organizations, pension, and profit-sharing plans, including plans subject to the Taft-Hartley Act and the Employee Retirement and Income Security Act ("ERISA"), state and municipal government entities, corporations, taxable and tax-exempt institutions, individuals, high net worth individuals, and commingled investment vehicles such as collective investment trusts ("CIT" or "Trust"), mutual funds and ETFs ("Clients"). Congress Asset also provides these services in the capacity of a sub-adviser to mutual fund advisors and to wrap account programs sponsored by other investment advisers and broker-dealers ("Wrap Sponsors").

Congress Asset's investment strategies available to Clients include:

- Large Cap Growth Equity
- Mid Cap Growth Equity
- Small Cap Growth Equity
- Dividend Growth Equity
- Multi-Cap Growth Equity
- SMid Growth Equity
- Small Cap Value Equity
- Large Cap Balanced
- Multi-Cap Balanced
- Intermediate Fixed Income
- Intermediate Credit
- Core Fixed Income
- Short Term Govt/Credit
- Private Equity

Congress Asset also provides socially responsible investing ("SRI"), environmental, social and governance ("ESG"), and tax sensitive versions of certain equity strategies. Lastly, the Firm provides advice regarding investment in private equity funds sponsored by other investment advisers for institutional investors only. In addition, Congress Asset offers access to portfolio strategy and asset allocation advice to current and prospective institutional Clients.

We construct high quality, high conviction, and high active share portfolios managed through a risk lens. We accomplish this through a disciplined, moderate turnover approach which emphasizes growth, profitability, franchise, and valuation. We seek to invest in companies with positive earnings growth, strong revenues, positive free cash flow, and sustainable margins, who demonstrate prudent use of leverage with shareholder conscious management teams.

Client portfolios will generally include advice regarding the following securities: exchange-listed securities, securities traded over the counter, exchange-traded funds, corporate debt securities (other than commercial paper), commercial paper, certificates of deposit, municipal securities, ETF shares, mutual fund shares, United States Government securities, and private equity limited partnership interests (for institutions only).

Clients invest with Congress Asset in the following manner:

Separately Managed Accounts ("SMA")

The Firm provides continuous investment advice to its SMA Clients. Congress Asset at times also works with individual Clients and will assist such Clients to identify time horizon, risk tolerance, tax considerations, and liquidity needs suitable for each. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Model Portfolio Management:

Congress Asset provides model portfolio management services for most of its investment strategies, to institutional Clients, primarily financial intermediaries of Unified Managed Account ("UMA") programs (each a "Model Portfolio Client"). Congress Asset will provide to each Model Portfolio Client an initial model of portfolio securities with recommended weightings, and communicate each subsequent model change to the Model Portfolio Client. In turn, each model delivery program sponsored by other investment advisers or broker-dealers ("Model Delivery Sponsors") is responsible for accepting, rejecting, or modifying each change to the model portfolio, and for placing trade orders and executing orders for their clients' accounts.

Wrap Accounts

Discretionary portfolio management is also made available to Wrap Sponsors pursuant to a sub-advisory agreement with the Firm, where the Firm will manage all or a portion of the Wrap Sponsor's clients' investment portfolios. Wrap Sponsors typically charge their clients an all-inclusive "wrap fee" from which the investment adviser is paid a portion of such fee. In addition, most Wrap Sponsors will require Congress Asset to direct brokerage on trades made by the Firm on behalf of their wrap clients to their designated broker-dealer.

Each Wrap Sponsor is required to deliver to the wrap fee clients a wrap fee program Brochure and a copy of Congress Asset's most recent Form ADV Part 2A, pursuant to the requirements of the Investment Advisers Act of 1940, as amended ("Advisers Act"). A list of each Wrap Sponsor and their corresponding Wrap Program may be found in Congress Asset's ADV, Part 1, Schedule D, Section 5.I. (2).

Congress Asset may terminate its services to one or more of its Clients under the agreement for any reason, or for no reason, upon at least 30 days of prior notice.

Mutual Funds and Exchange Traded Funds

Congress Asset provides discretionary investment management and related services to mutual funds and ETFs, each of which are open-end investment companies registered under the Investment Company 1940 Act, as amended ("1940 Act"). These funds are: the Congress Intermediate Bond ETF, Congress Large Cap Growth Fund, the Congress Large Cap Growth ETF, the Congress Mid Cap Growth Fund, the Congress SMid Growth ETF, and the Congress Small Cap Growth Fund (the "Congress Funds"). Each Congress Fund is a Series of the Professionally Managed Portfolio Trust (SEC File Number 811-05037).

Interested investors should refer to the applicable Congress Fund's Summary Prospectus, Prospectus and Statement of Additional Information ("SAI") for important information regarding objectives, investments, time-horizon, risks, fees, and additional disclosures. Mutual Fund documents are available on-line at: https://congress-mutual-funds.web.app/ ETF documents are available on-line at: https://etfs.congressasset.com/. Prior to making any investment in the Congress Funds, investors and prospective investors should carefully review these documents for a comprehensive understanding of the terms and conditions applicable for investment in the Congress Funds.

Collective Investment Trust Management

The Firm provides discretionary investment management services to the Congress Mid Cap Growth Collective Investment Trust ("CIT" or "Trust") Ticker CMCABX, the Congress SMid Growth CIT, Ticker CSMCGX and the Congress Small Cap Growth CIT, Ticker CGCALX. We may, subject to approval by SEI Investments Company, the CIT Trustee, add other strategies/funds to the CIT in the future. The Trust is regulated by the Department of Banking and Securities for the Commonwealth of Pennsylvania and is available only to eligible plans.

Private Equity

Congress Asset provides discretionary investment management services to pensions and other institutions that invest in private equity limited partnerships that are sponsored by other investment advisers. Investment in these types of securities may involve certain additional degrees of risk and will only be recommended to institutional Clients and only when consistent with the Client's stated investment objectives, tolerance for risk, liquidity, and suitability.

Sub Advisory Arrangements

Congress Asset also serves as sub-adviser to other investment advisers. In its capacity as sub-adviser, the Firm provides portfolio management, trading, and operational support.

Amount of Assets Managed

As of 12/31/2025, Congress Asset's regulatory assets under management were $14,199,956,103 all of which was on a discretionary basis. In addition, the Firm provided Model Portfolios of its investment strategies, primarily to its Model Delivery Sponsor Clients. As of 12/31/2025 there was $8,999,300,458 invested by such Clients, utilizing Congress Asset's Model Portfolio service. The total assets attributable to regulatory assets under management and Model Portfolio Management were $23,199,256,561.

Item 5 Fees and Compensation

Investment Advisory Fees

Overview

Congress Asset typically charges an investment advisory fee based on a percentage of the assets under its management. Some clients are charged fixed fees. Fees are calculated on either a monthly or quarterly basis and may be payable either in advance based on the value of the account as of the beginning of each billing period, or in arrears based on the value of the account at the end of each billing period. The account management fee is prorated for periods less than a full billing cycle.

Congress Asset does not have any performance-based fee arrangements. All fee arrangements, terms, and conditions of the fee structure will be mutually agreed upon prior to entering into an Investment Management Agreement ("IMA"). Clients have the option to purchase investment products that Congress Asset recommends through other brokers or agents that are not affiliated with Congress.

Congress Asset retains the discretion to negotiate alternative fees on a Client-by-Client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include but are not limited to: complexity of the Client, amount of assets to be placed under management, anticipated future additional assets, assets under management in related accounts, complexity of Client specific guidelines and restrictions and special reporting/ client service requirements. Each Client's fee is agreed to in writing within the IMA.

Congress Asset may group certain related Client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee. Discounts may be offered to family members and friends or associated persons of the Firm.

Discretionary Portfolio Management

Congress Asset's annual fees for Discretionary Portfolio Management Services for SMAs are based upon a percentage of assets under management and generally range from 0.10% to 1.00%. The investment advisory fees are negotiable and differ from one Client to another based on certain criteria such as: amount of assets, client type, style, portfolio customization, operational requirements, and other factors discussed above.

Mutual Fund Portfolio Management

The Firm receives a management fee for its Portfolio Management services performed on behalf of each Congress Fund that is a mutual fund. The annualized management fee is charged to each mutual fund as a percentage of assets under management. Management fees are accrued daily and paid monthly, in arrears. The Firm may also waive or defer all or a portion of its management fee based upon an agreement with the mutual fund to limit a fund's overall expense ratio. Below is the fee schedule for each Congress Fund that is a mutual fund.

Fund Name	Management Fee
Congress Large Cap Growth Fund	0.50% per annum
Congress Mid Cap Growth Fund	0.60% per annum
Congress Small Cap Growth Fund	0.85% per annum

Exchange Traded Fund Management

The Firm receives a unitary management fee for its Portfolio Management and other services performed on behalf of each Congress Fund that is an ETF. The annualized management fee for each ETF is charged as a percentage of assets under management. Management fees are accrued daily and paid monthly, in arrears. Below is the fee schedule for each of the ETFs:

Fund Name	Unitary Management Fee
Congress Large Cap Growth ETF	0.65% per annum
Congress SMid Growth ETF	0.68% per annum
Congress Intermediate Bond ETF	0.35% per annum

The Firm is responsible for paying all expenses of the ETFs out of the single unitary management fee, other than certain expenses excluded under the advisory agreement for the ETF as described in the prospectus for the applicable ETF.

Sub-Advisory to Mutual Funds

Congress Asset is a provider of sub-advisory services to mutual fund advisers. Fees for this service are negotiable.

Sub-Advisory to Other Investment Advisers

Congress Asset also serves as sub-adviser to other investment advisers. The sub-advisory agreement provides for investment management and related trading and operational support. In its capacity as sub-adviser, the Firm acts as investment manager to certain clients who wish to solely contract with the other investment adviser, rather than contracting directly with Congress Asset. Congress Asset typically charges an investment advisory fee based on a percentage of the assets under its management. In some cases, the Firm also enters into dual-contract investment advisory agreements with both the other investment adviser and the underlying clients.

Model Portfolio Management

Congress Asset's annual fees for Model Portfolio Management Services are based upon a percentage of assets under management and generally range from 0.20% to 0.50%. The annualized fee for Model Portfolio Management Services is charged as a percentage of assets under management as negotiated with each Client, typically a financial intermediary sponsor to a model delivery program.

Generally, a minimum of $100,000 of assets under management is required for this service. This account size may be negotiable under certain circumstances. Congress Asset may group certain related Client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Private Equity

Congress Asset assesses an annualized fee of up to 0.50% on investments in private equity limited partnerships sponsored by other investment advisers. In certain cases, the Firm may enter into a flat fee arrangement, if appropriate to both the Client and Congress Asset.

Termination of the Advisory Relationship

A Client agreement may be canceled by either party at any time and for any reason upon receipt of at least 30 days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid and/or unearned fees will be promptly refunded/collected. In calculating a Client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

Other Fees

Additional Fees and Expense Information

Clients are also subject to fees and expenses charged by custodians and broker dealers for services such as safekeeping, brokerage, and administration of their account. In addition, Clients who were referred to Congress Asset by another investment adviser may be subject to advisory fees separate and apart from those of Congress Asset. Please refer to "Brokerage Practices", Item 12 of this Brochure, for more information regarding the Firm's brokerage practices.

Mutual Fund and ETF Fees

Under certain other circumstances, Congress Asset may invest all or a portion of a Client's assets in mutual funds and/or ETFs. Fees paid to Congress Asset for investment advisory services are separate and distinct from the fees and expenses charged by such funds to their shareholders. These fees and expenses are described in each fund's prospectus. For mutual funds, these fees will generally include a management fee, a distribution fee, and charges for fund operating expenses. If the mutual fund also imposes sales charges, a Client may pay an initial or deferred sales charge. The Firm receives a unitary management fee for its Portfolio Management and other services performed on behalf of each Congress Fund that is an ETF.

In cases where a Client of Congress Asset is invested in a Congress Fund, the Congress Asset advisory fee will be waived relating to the amount of assets invested in the Congress Fund.

ERISA Accounts

Congress Asset is deemed to be a fiduciary to advisory Clients that are employee benefit plans or individual retirement accounts ("IRAs") pursuant to ERISA, and regulations under the Internal Revenue Code. As such, Congress Asset is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include, among other things, restrictions concerning certain forms of compensation. Congress Asset may only charge fees for investment advice about products for which it and/or its related persons do not receive any commissions or 12b-1 fees, or conversely, when such fees are used to offset Congress Asset's advisory fees.

At this time, Congress Asset does not recommend rollovers to individual Clients.

Item 6 Performance-Based Fees and Side-By-Side Management

Performance Based Fees

Congress Asset does not have any performance-based fee arrangements with its Clients.

Side by-side Management

The Firm recognizes that managing Client accounts with different fee arrangements may create a conflict where an account with a higher fee may receive allocations of certain investment opportunities over another Client account. The Firm believes that opportunities for such conflict are mitigated by the high level of liquidity for comparable securities among all its Clients and the Firm's Code of Ethics, Trading, and Account Review policies.

Item 7 Types of Clients

As discussed above in Item 4, Congress Asset provides discretionary and model portfolio investment management services to individual and institutional Clients. Clients include charitable organizations, pension, and profit-sharing plans (including plans subject to the Taft-Hartley Act), state and municipal government entities, taxable and tax-exempt institutions, individuals, high net worth individuals, and commingled investment vehicles such as mutual funds, ETFs and CITs. Congress Asset also provides these services in the capacity of a sub-adviser and through SMA wrap accounts and model delivery programs sponsored by other investment advisers or broker-dealers.

Generally, a minimum of $100,000 of assets under management is required for this service. This account size may be negotiable under certain circumstances. Congress Asset may group certain related Client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Overview - Equities

Congress Asset employs a view that superior long-term performance of a company's stock price is a result of consistent earnings growth and cash flow. Stock selection is primarily based on a research-driven, bottom-up approach, and implemented using a congressional approach, where each investment strategy is governed by an investment policy committee ("IPC"). The IPC is where research recommendations are reviewed, debated, and decided upon. Each Congress Asset IPC contains at least one member who also is a member of the Firm's Investment Oversight Committee ("IOC"). The IOC serves in an advisory capacity and meets only on an as-needed basis. Oversight of investment activity is primarily performed by the individual IPC's.

Congress Asset uses many research techniques which may be summarized as follows:

Idea Generation: Congress Asset exercises continuous and proactive idea generation. Portfolio managers and research analysts identify possible investment opportunities through fundamental analysis and using numerous tools, such as quantitative screening, third-party research reports, periodicals, news articles, direct company meetings, press releases, industry conferences, and any other useful and reliable information sources. The best ideas move forward to the analysis stage.

Fundamental Analysis: The Firm performs its own analysis of the companies identified as having the most compelling investment opportunity. The teams validate key quantitative metrics such as earnings growth, cash flows, and balance sheet strength, and other key factors such as competitive advantages, market leadership, stability of revenue stream, product development, and pricing power. The teams also assess the relevant external conditions of the economic and industry sectors related to each company, and the management of each company. The decision to invest is debated within the IPC on its investment merits, its fit within the investment discipline, and its fit within the current portfolio investment mix.

Overview – Fixed Income

Congress Asset strives for preservation of capital, consistent income, and alpha generation through a diversified portfolio of investment grade government, corporate, and securitized bonds. Consistency of approach and adherence to sound fundamental and relative value analysis is the basis of our investment process.

Congress Asset's investment philosophy is to evaluate potential return per unit of risk using fundamental and relative valuations that employ a combination of top down and bottom-up techniques to deliver a consistent pattern of relative returns with minimal periods of underperformance. The Fixed Income IPC is the central coordinating body that sets, implements, and supervises our fixed income screening process and investment policy. The Fixed Income IPC sets the sector allocation weights, duration targets, and reviews credit analysis performed by analysts and portfolio managers. The Fixed income IPC contains at least one member from the IOC.

Top-Down analysis: This can include identifying global and domestic trends (i.e., fiscal policy, monetary policy, fund flows, etc.), anticipating future yield curve shape and position, determining which sectors to overweight and underweight via spread analysis, and identifying undervalued or overvalued securities.

Bottom-Up analysis: A multistep process that can include identifying attractive issuers through screening tools, identifying mispriced securities through daily evaluation of broker runs, selecting individual securities for possible investment through a break-even analysis, and comparative analysis of security versus security purchase and sale.

Additional research techniques may be utilized depending on the asset class being evaluated and can be summarized as follows:

Quantitative Screening: Each fixed income product has its own universe of securities in which it may invest. The universe is screened and reduced based primarily on security indicative features which can include, but are not limited to, maturity date, issuance size, credit ratings, market of issue, and other bond-specific features.

Fundamental Analysis: The Firm's portfolio managers and research team performs its own analysis of existing and potential issuers using our proprietary fundamental model. We seek to ensure proper payment of interest and principal by assessing the overall financial health of issuers using a variety of metrics as well as peer-based analyses.

Investment Strategies

Congress Asset professionals consider themselves investors and not short-term traders. The Firm typically acquires a security with the intent of holding it as a long-term investment. However, circumstances may arise where it is in the best interest of the Firm's Clients to sell sooner than expected. For example, a run-up in a security price to a level higher than our analysis supports may cause us to exit or trim that position. Conversely, an unforeseen event, either internal or external to the securities issuer, may also cause us to exit or trim the position.

Congress Asset employs various investment strategies based on the objectives and risk appetite of its Clients. Client portfolios with similar investment strategies and guidelines are generally managed similarly. Long-term (securities held for at least one year), short term (securities sold within one year), trading (securities sold within thirty days), and option strategies, including option writing, may all be used if permitted by the applicable Client's investment guidelines. The Firm may also borrow securities in connection with short sales, borrow money to invest in additional portfolio securities or engage in transactions in futures contracts for some Clients. Congress Asset may also provide asset allocation services to certain Clients, on either a discretionary or non-discretionary basis, with periodic rebalancing.

In employing investment strategies, Congress Asset may use certain strategies in an attempt to "hedge" or "neutralize" various risks associated with positions in a Client's portfolio. The instruments used to engage in these hedging strategies may include derivative instruments, such as options, warrants, interest rate swaps, interest rate caps and other derivative securities. The Firm's attempts to partially or fully hedge a portfolio may not be successful and may cause the portfolio to incur a loss.

Upon request and after discussion and agreement with the Client, the Firm will incorporate ESG factors into its fundamental analysis to help identify risks and opportunities and to the extent that they are material to investment performance. The ESG process includes a focus on governance and the use of Sustainalytics. In addition, the Firm will also employ certain socially conscious screens upon specific request and direction from our Clients.

Risk of Loss

Securities investments are not guaranteed, and you may lose money on your investments. Each investment style or strategy will carry with it different levels of risk. Our investment styles and strategies can be matched with each Client's unique combination of desired returns, investment objectives, cash flow needs, and personal risk tolerance to determine the most suitable investments.

All investments in securities involve risk. It is possible that a Client's investment objectives will not be achieved or that a Client will lose all or a portion of their investments. The risks all investors face include the following:

Market Risk: All securities investments are subject to changes in the marketplace. At times, movements in the market can be significant, which will cause the value of an investor's account to change. For example, in 2008 the markets experienced significant broad-based decreases, due in part to a widespread credit crisis and significantly negatively impacted investors' portfolios.

Investment Selection Risk: Congress Asset's analysis of an investment may be incorrect and may result in selections of investments that suffer losses or underperformance relative to other investments.

ETF Risk: Disruptions in the markets for the securities underlying ETFs purchased or sold by the ETF could result in losses on investments in the ETF. ETFs also carry the risk that the price the ETF pays or receives may be higher or lower than the ETF's net asset value ("NAV"). ETFs are also subject to certain additional risks, including the risks of illiquidity and of possible trading halts due to market conditions or other reasons, based on the policies of the relevant exchange.

Credit Risk: The issuer of a fixed-income security could default on its obligation to pay principal and/or interest, or its credit rating could be downgraded, resulting in loss of part or all such security or result in such security becoming illiquid for some period of time.

Liquidity Risk: Market dynamics can change over time, which may reduce the availability of certain securities for purchase or sale. Such a lack of liquidity may impact the marketability of a security, meaning that it may not be purchased or sold without negatively impacting its price.

Interest Rate Risk: As interest rates rise, the value of fixed-income securities is likely to decrease. Securities with longer durations tend to be more sensitive to changes in interest rates and are usually more volatile than securities with shorter durations. In a rising interest rate environment, a Client's fixed income portfolio may lose value.

Investment Model Allocation Risk: As markets move, our investment allocation assumptions and decisions regarding cash balances may be incorrect and may result in underperformance relative to other investments.

Client Imposed Investment Restrictions Risk: Clients who place restrictions on Congress Asset from investing in certain industries or specific companies for social, religious, statutory, or other reasons, may result in Congress Asset forgoing investment opportunities which are in the best economic interest of the Client. Such restrictions may result in performance less favorable than other Client accounts managed by the Firm without such restrictions. Further, Clients may impose proxy voting requirements which may cause Congress Asset to vote in a manner that is not in the best economic interest of its Clients.

Risks for all forms of analysis: While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information. Information that the Firm gathers, and in-part depends upon to be accurate and unbiased includes, but is not limited to: corporate annual reports, filings with the SEC, company press releases, research material reported by others, financial newspapers and magazines, corporate ratings/analytical services, government reports, etc.

Cybersecurity Breaches: Cybersecurity is a generic term used to describe the technology, processes, and practices designed to protect networks, systems, computers, programs, and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate, but unintentional events may have similar effects. Cyber-attacks may cause losses to a Client Account by interfering with, impeding, or sabotaging trading. Congress Asset and Client Accounts may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, adverse investor reaction, the dissemination of confidential and proprietary information, and reputational damage. Any such breach could expose Congress Asset and Client Accounts to civil liability as well as regulatory inquiry and/or action. Fund investors and Managed Account Clients could be exposed to additional losses as a result of unauthorized use of their personal information. While Congress Asset has established cybersecurity policies and procedures and systems reasonably designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cybersecurity risks also are present for issuers of securities in which a Client Account invests, which could result in material adverse consequences for such issuers and may cause an investment in such securities to lose value.

Privacy, Data Protection and Information Security Compliance Risk: Compliance with current and future privacy, data protection, and information security laws could significantly impact current and planned privacy and information security related practices, the collection, use, sharing, retention, destruction, and safeguarding of personal data and some of a Client Account's current and planned business activities and as such could increase costs for a Client Account and/or its investing securities. Failure to comply with such laws and regulations could result in fines, sanctions, or other penalties, which could materially and adversely affect the results of operations of a Client Account, and/or its investing securities and overall business, as well as have an impact on reputation.

Limitations of Disclosure: The foregoing list of risks does not purport to be a complete enumeration or explanation of the risks involved in the Firm's strategies. As the strategies develop and change over time, Clients and investors may be subject to additional and different risk factors. No assurance can be made that profits will be achieved or that substantial losses will not be incurred.

Item 9 Disciplinary Information

Congress Asset is required to disclose any legal or disciplinary events that are material to a Client or prospective Client's evaluation of our advisory business or the integrity of our management.

The Firm and the management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

General

Congress Asset is not affiliated with any investment adviser, broker dealer, custodian, or non-advisory service provider which performs services to the Firm, its affiliates, or its Clients. In addition, Congress Asset does not engage in financial industry activities except for the advisory services performed and disclosed in this Brochure.

Relationship with Unaffiliated Broker-Dealer

Congress Asset utilizes Quasar Distributors LLC, an unaffiliated broker-dealer and a subsidiary of ACA Foreside Financial Group, LLC ("Quasar"), as the principal underwriter to the Congress Funds. Some employees of Congress Asset are separately licensed as registered representatives of Quasar and in their separate capacity as distributors, can affect securities transactions to purchase or sell the Congress Funds.

Congress Funds

Congress Asset is the investment adviser to the Congress Funds, registered mutual funds, and exchange traded funds trusteed at US Bancorp and distributed by Quasar. From time to time, Congress Asset and/or its affiliates may recommend that Clients buy or sell shares of the Congress Funds. In cases where Congress Asset recommends its Clients invest through the Congress Funds, the Firm will waive its advisory fee on the assets invested in the Congress Funds. The Congress Funds' Prospectus and Statement of Additional Information are available on-line at: https://congress-mutual-funds.web.app/ (for mutual funds) and https://etfs.congressasset.com/ (for ETFs).

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Congress Asset has adopted a "Code of Ethics", pursuant to Rule 204A-1 of the Advisers Act. The Code of Ethics sets forth high ethical standards of business conduct, including compliance with applicable federal securities laws.

Congress Asset's personnel owe duties of loyalty, fairness, and good faith towards its Clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code of Ethics.

The Firm's Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by each of the Firm's Access Persons as defined in the Code of Ethics. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our Code of Ethics also provides for oversight, enforcement, and recordkeeping provisions.

Congress Asset's Code of Ethics further includes the Firm's policy prohibiting the use of material non-public information. While the Firm does not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

Congress Asset may recommend that Clients buy or sell securities or investment products in which Congress Asset, its officers, and its employees have a financial interest. Conversely, officers and employees may buy and sell for themselves securities which Clients hold. To safeguard against conflicts with the Firm's Clients, each employee and his or her immediate family members, as well as designated interns and contractors, are required to pre-clear all 'reportable securities' trades, as defined in the Code of Ethics, for his or her own account. Certain pre-clearance requests are reviewed by investment professionals as designated by the Chief Compliance Officer to ensure trading by officers and employees for their personal accounts is not prior to or contemporaneous with transactions effected by the Firm on behalf of its Clients.

The Firm's Code of Ethics also requires each employee to disclose each outside business activity they may have and to pre-clear with the Firm's management and compliance personnel each prospective outside business activity.

A copy of our Code of Ethics is available to our advisory Clients and prospective Clients. You may request a copy by email sent to info@congressasset.com, or by calling us at 617-428-4300.

Item 12 Brokerage Practices

General

The Firm has the responsibility to effect orders correctly, promptly, and in the best interests of its Clients. Congress Asset has the duty to treat all its Clients fairly, endeavoring that, over time, no Client is advantaged or disadvantaged compared to other Clients. In the event a trade error occurs in the handling of any Client transactions due to the Firm's actions, or inaction, or actions of others, Congress Asset will seek to identify and correct any errors as promptly as possible without disadvantaging the Client or benefiting the Firm.

Congress Asset recognizes that brokerage commissions are the property of the Clients, and as such, are to be allocated to broker-dealers in a manner that serves the interests of its Clients. It also recognizes an ongoing duty to seek to obtain best execution. While the Firm endeavors to obtain the best combination of price and execution for its Clients, "best execution" does not necessarily mean it will pay the lowest commission or spread.

The Firm also seeks competitively priced brokerage services where the broker-dealer can provide value-added, company-specific, and thematic industry research, including meetings with management and conferences. Additional factors in selecting a broker-dealer include but are not limited to: quality of investment research; liquidity of the market in a security; financial stability of the broker-dealer; promptness of execution; the broker's ability to handle a desired block; and efficiency in clearing and settling trades.

Research and Soft Dollars

Congress Asset may use brokers who provide useful research and securities transaction services even though a lower commission may be charged by a broker who offers no research services and minimal securities transaction assistance. Some research services may be useful in servicing all our Clients while some research may be useful for only certain Client accounts.

Congress Asset's investment professionals periodically review the quality of research provided by brokers. The review is coordinated by the Director of Research and results in a 'research vote' which is presented to the Firm's Best Execution Committee for review. Consideration for retaining or replacing brokers occurs at this meeting.

Consistent with obtaining best execution for Clients, Congress Asset may use direct brokerage transactions for Clients' portfolios to brokers who provide third-party research and execution services to Congress Asset and indirectly to Congress Asset's Clients. These services, which are eligible pursuant to Section 28(e) of the Securities Exchange Act of 1934, as amended ("Section 28(e)") are designed to augment the Firm's internal research and investment strategy capabilities. The Firm believes that the acquisition of such research through soft dollars is in the long-term benefit to all its Clients.

Congress Asset recognizes that when using Client brokerage commissions to obtain research or brokerage services, it receives a benefit to the extent that Congress Asset does not have to produce such products internally or compensate third parties with its own money for the delivery of such services. Therefore, such use of Client brokerage commissions results in a conflict of interest, because Congress Asset has an incentive to direct Client brokerage to those brokers who provide research and services, even if such brokers do not offer the best price or commission rates for our Clients. Further, broker-dealers selected may be paid commissions for effecting transactions for our Clients that exceed the amounts other broker-dealers would have charged for effecting the same transactions. However, Congress Asset endeavors to determine in good faith that such amounts are reasonable in relation to the value of the brokerage and/or research services provided by those broker-dealers.

Certain items obtainable with soft dollars may not be used exclusively for either execution or research services. In such cases, the cost of such "mixed-use" products or services will be fairly allocated and Congress Asset makes a good faith effort to determine the percentage of such products or services which may be considered as investment research. The portions of the costs attributable to non-research usage of such products or services are paid by the Firm to the broker-dealer in accordance with the provisions of Section 28(e).

Congress Asset uses products and services including investment recommendations, investment research, and financial publications providing corporate financial data, financial statistical data, economic data and forecasts, and systems for arranging and assimilating data.

Congress Asset's Best Execution Committee conducts periodic soft-dollar reviews, analyzing price and commissions offered by the various brokers used and volume of Client commissions directed to each broker. Moreover, we perform a qualitative ranking of all brokers used by polling our trading staff, research analysts, and portfolio managers.

Brokerage for Client Referrals

Brokers that the Firm selects to execute transactions may from time to time refer Clients to the Firm. Congress Asset, in recognizing this potential conflict, will not make commitments to any broker or dealer to compensate that broker or dealer through brokerage or dealer transactions for Client referrals.

Directed Brokerage

Clients may direct Congress Asset to trade through a particular broker or dealer. In addition, wrap-fee arrangements generally require Congress Asset to direct all brokerage transactions to the sponsoring broker-dealer. In both such cases, Congress Asset may not be able to negotiate commission rates or spreads and may pay higher commissions, greater spreads, or receive less favorable net prices than other Clients who delegate broker-dealer selection to Congress Asset.

Order Allocation and Trade Aggregation

When decisions are made to buy or sell the same security simultaneously for a number of accounts, Congress Asset may aggregate the purchase or sale into a single trade order (a "bundled" trade) if it deems this to be appropriate and in the best interests of the accounts involved. Bundle trading may allow us to execute trades in a timely, and equitable manner, at the same average share price or spread for each Client account. Congress Asset will typically aggregate trades among Clients whose accounts can be traded at a given broker.

Congress Asset's policy prohibits any allocation of trades in a manner that favors one type of Client account over another. In addition to executing bundled trades, as described above, Congress Asset will also rotate the trading order of its discretionary and directed groupings, in cases where a portfolio model change is required. A model change in a given investment strategy impacts all Clients in that investment strategy. When a model change is executed, the Firm will rotate the order among Client groupings to ensure overall best execution and equitable trading among all Clients over time.

Generally, Model Portfolio Clients are excluded from the trade rotation and are communicated changes to a model portfolio following completion of the rotation. Certain Model Portfolio Clients may be allowed to participate in the rotation process, provided such Client's trading desks can provide requisite levels of transparency, execution speed, and reporting capability.

Item 13 Review of Accounts

General

Congress Asset portfolio managers continually review Client accounts to ensure they are managed to meet the Clients' goals, risk tolerances, liquidity needs, and other stated objectives and constraints. Clients and/or their appointed agents are provided quarterly portfolio account appraisals for their review and comparison to other statements they may receive from broker dealers, custodians, trust companies, etc.

Review of SMAs

Underlying securities of each Client SMA are continually monitored. Generally, formal account reviews are held semi-annually by the Account Review Committee. Additional account reviews may be held due to market events, disruptions, or trends. Client accounts are reviewed in the context of Congress Asset's model portfolios, approved lists, cash holding, and each Client's stated investment objectives and guidelines.

Account Review Committee meetings are attended by Client portfolio managers, members of the IPC, and compliance.

Review of Wrap Accounts

Underlying securities in SMA and UMA Wrap Accounts are continually monitored. Formal account reviews are held, generally, semi-annually by the Wrap Account Review Committee. Additional account reviews may be held due to market events, disruptions, or trends. Client accounts are reviewed in the context of Congress Asset's model portfolios, approved lists, cash holding, and each Client's stated investment objectives and guidelines. Service levels of Wrap Account sponsors and trading platforms are also reviewed.

Wrap Account Review Committee meetings are attended by Wrap Client portfolio managers, a member of the IOC, operations, and compliance.

Review of Mutual Funds and ETFs

Congress Asset continually reviews and monitors each mutual fund/ETF for which it is the adviser or sub-adviser, in accordance with the 1940 Act, the policies and procedures adopted by each mutual fund's or ETF's board of directors/trustees and investment objectives set forth in each mutual fund's or ETF's Prospectus. The Firm reviews each fund with its board as well as the business of the Firm annually, as required under Section 15c of the Investment Company Act.

Review of Collective Investment Trusts

Congress Asset also continually reviews and monitors each CIT for which it is the adviser or sub-adviser in accordance with the applicable regulations and policies and procedures of the CIT's Trustee and the Firm.

Item 14 Client Referrals and Other Compensation

General

Congress Asset may from time to time pay referral fees to independent firms ("Promoters") for introducing Clients to us. In such cases, this practice will be disclosed in writing to the Client and shall comply with other applicable requirements contained in the SEC's new marketing rule.

As a matter of Firm practice, the advisory fees paid to us by Clients referred by Promoters would not increase.

Congress Asset may pay independent firms that recommend Congress Asset's investment strategies to their clients amounts to defray the costs of marketing or promotional expenses, for expenses incurred in connection with training or educational seminars for personnel of the firms or for expenses incurred in connection with Client or prospective Client meetings relating to Congress Asset's investment services. These benefits could give such firms and their personnel incentives to favor Congress Asset investment strategies over those of firms that do not provide the same payments and benefits.

Also, Congress Asset makes payments to certain independent firms in order to obtain data, analytics, and other information that is used for internal business purposes. Such payments will be made by Congress Asset out of its profits and other available sources, including profits from its relationship with the independent firm. These payments may create an incentive for the independent firm or its employees or associated persons to recommend or sell Congress Asset's investment advisory services to its Clients.

With respect to the Congress Large Cap Growth ETF and SMid Cap Growth ETFs, Congress Asset pays a fixed fee out of its own assets to an independent firm, Hantz Financial Services, Inc ("Hantz"), for product and shareholder servicing support. The fee is used to cover the independent firm's reasonable expenses associated with due diligence, suitability, technology, shareholder servicing, and education and training of its professional and administrative staff and is unrelated to distribution.

In addition, Congress Asset pays variable compensation out of its own assets to Hantz for consulting services on marketing strategies involving third-party investment platforms utilizing third-party investment management models. Congress Asset pays Hantz a quarterly fee in arrears based on the average of the asset value of each of the Congress Large Cap Growth ETF and the SMid Cap Growth ETF from the prior three months in the amount of 5 basis points (0.05%); provided, the calculation of these payments will not be based, directly or indirectly, or otherwise contingent or dependent upon any measure of Hantz's assets under management or advisement that may be invested in either of the Congress Large Cap Growth ETF or SMid Cap Growth ETF. These payments may create an incentive for Hantz or its employees or associated persons to recommend or sell the Congress Large Cap Growth ETF or the SMiD Cap Growth ETF to its clients. These payments are disclosed in the Congress Large Cap Growth ETF and SMid Growth Cap ETF Statement of Additional Information found on https://etfs.congressasset.com/.

Other Compensation

Congress Asset is adviser to the Congress Funds and compensates certain broker-dealers for the sale of the Congress Funds to Clients who purchase the retail classes of the Congress Funds' shares.

A component of certain employees' compensation is based on a percentage of revenue from new and existing Clients.

Item 15 Custody

Although Congress Asset does not hold assets of its Clients, it may be deemed to have custody of certain Clients' assets pursuant to the SEC's Custody Rule, Rule 206(4)-2 under the Advisers Act. Client assets are held at qualified custodian(s) of the Client's choosing, who shall provide custody account statements directly to each Client, at least quarterly. Congress Asset urges you, as the Client, to carefully review your account statements from your custodian(s) and compare them carefully with the account statements and related reporting that Congress Asset provides to you. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 Investment Discretion

Clients may hire Congress Asset to provide discretionary asset management services, in which case we place trades in a Client's account without contacting the Client prior to each trade to obtain the Client's permission. Our discretionary authority includes the ability to determine the security to buy or sell, and/or determine the amount of the security to buy or sell.

Clients give us discretionary authority when they sign an IMA with the Firm. Within the IMA or by separate written instructions, Clients may limit discretionary investment authority and/or place upon the Firm reasonable investment restrictions. Clients may also change or amend such limitations by once again providing us with written instructions.

Item 17 Voting Client Securities

Congress Asset will vote proxies for Client accounts when such authority is granted, and the Client's custodian can provide an electronic feed of the Client's proxy information to the Firm's proxy voting service provider. Any Client may choose to vote proxies on their own account.

Congress Asset will vote proxies in the best economic interests of its Clients and in accordance with our established policies and procedures. In the case of ERISA Clients, Congress Asset accepts its fiduciary responsibility to vote proxies in the best interest of plan participants and their beneficiaries.

Congress Asset will retain all proxy voting books and records for the requisite period of time, including a copy of each proxy statement received, a record of each vote cast, a copy of any document created by us that was material to making a decision how to vote proxies, and a copy of each written Client request for information on how the adviser voted proxies. Congress Asset also uses a third-party research firm to assist in the decision-making process for proxy voting.

With respect to ERISA accounts, we will vote proxies unless the plan documents specifically reserve the plan sponsor's right to vote proxies.

Clients may instruct us to vote proxies according to particular criteria (for example, to always vote with management, or to vote for or against a proposal to allow a so-called "poison pill" defense against a possible takeover). These requests must be made to Congress Asset in writing. Clients may also instruct us on how to cast their vote in a particular proxy contest by email to info@congressasset.com, or in writing to Congress Asset, 2 Seaport Lane, 5th Floor, Boston, MA 02210.

Clients and prospective Clients should be aware that Congress Asset typically follows the recommendation of the AFL-CIO when voting proxies for Taft-Hartley Clients, while at the same time is actively soliciting new business from the Taft-Hartley market. Voting to such recommendations may at times be different from how we vote our other Clients' proxies and in opposition to the interests of such other Clients. In addition, Congress will typically consider Glass Lewis ESG recommendations when voting proxies for ESG clients.

From time-to-time conflicts may arise with regard to how Congress Asset should vote or abstain a particular proxy vote. Generally, in such cases the Chair of the Congress Asset Proxy Committee and the Chief Compliance Officer will be notified. If a true conflict is identified, a meeting of the Proxy Committee will be called to order to review the conflict and determine how the proxy will be voted.

We will neither advise nor act on behalf of the Client in legal proceedings involving companies whose securities are held in the Client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, Clients may direct us to transmit copies of class action notices to the Client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

Clients may obtain a copy of our complete proxy voting policies and procedures by contacting Congress Asset by telephone at 617-428-3000, by email to info@congressasset.com, or in writing to Congress Asset 2 Seaport Lane, 5th Floor, Boston, MA 02210. Clients may request, in writing, information on how proxies for his/her shares were voted.

Item 18 Financial Information

As Congress Asset does not require or solicit prepayment of more than $1,200 in fees per Client more than six months in advance of services rendered, it is not required to include a financial statement with this Brochure.

Congress Asset is well capitalized with sufficient financial resources to fund continuing operations, growth, and meet our obligations to Clients. Further, Congress Asset has not ever been subject of a bankruptcy.

Form ADV Part 2B – Brochure Supplement

for

Daniel A. Lagan, CFA
CEO & CIO

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Daniel A. Lagan, CFA (CRD# **2236297**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Lagan is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Daniel A. Lagan is the Chief Executive Officer and Chief Investment Officer of CAM. Mr. Lagan, born in 1964, is dedicated to advising clients of CAM. He is the chair of the Firm's Investment Oversight Committee. Additionally, Mr. Lagan is a member of all investment committees ex officio in his role as CIO. Mr. Lagan earned a B.A. from St. Michael's College in 1987. He earned his MBA with a specialization in Finance from Boston College in 1993. Additional information regarding Mr. Lagan's employment history is included below.

Table 1: Employment History

Congress Asset Management; Chief Executive Officer, Chief Investment Officer	08/2013 to Present
Congress Asset Management; President	07/1999 to 05/2022
Congress Asset Management; Executive Vice President	08/1989 to 06/1999
Price Waterhouse; Auditor	09/1987 to 04/1989
Congress Trust National Association; Executive Vice President & Trust Officer	12/1997 to 11/2009
CW Advisors, LLC (Formerly Congress Wealth Management, LLC); Director	04/2009 to 8/2025

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Lagan. Mr. Lagan has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Lagan.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Lagan.***

However, we do encourage you to independently view the background of Mr. Lagan on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD# **2236297**.

Item 4 – Other Business Activities

Mr. Lagan does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory service.

Item 5 – Additional Compensation

Mr. Lagan does not have additional business activities where compensation is received. His business activities are detailed in Item 4 above.

Item 6 – Supervision

Mr. Lagan's is subject to the firm's compliance program administered by the CAM Chief Compliance Officer.

CAM has implemented a Code of Ethics and internal compliance that guides each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Christopher M. Lagan, CFA

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Christopher M. Lagan, CFA (CRD# **2497190**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Lagan is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Christopher M. Lagan is President of CAM. Mr. Lagan, born in 1970, is dedicated to advising clients of CAM. He is a member of the firm's Investment Oversight Committee. He is also Chair of the Private Equity Investment Policy Committee. Mr. Lagan earned a B.S. in Business Administration from Saint Michael's College in 1992. He earned his MBA from Boston University's Graduate School of Management in January 1999.Additional information regarding Mr. Lagan's employment history is included below.

Table 2: Employment History

Congress Asset Management; President	05/2022 to Present
Congress Asset Management; Managing Director and Chief Operating Officer	08/2013 to 05/2022
Congress Asset Management; Senior Vice President	02/1999 to 08/2013
Congress Wealth Management, LLC; Director	04/2009 to 06/2023
Congress Trust National Association; Vice President and Trust Officer	02/1999 to 12/2005
Congress Asset Management; Research Analyst	02/1997 to 02/1999
Rentex Inc; Purchasing Agent	01/1992 to 12/1993

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Lagan. Mr. Lagan has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Lagan.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Lagan.***

However, we do encourage you to independently view the background of Mr. Lagan on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD# **2497190**.

Item 4 – Other Business Activities

Mr. Lagan does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory service.

Item 5 – Additional Compensation

Mr. Lagan does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Lagan serves as the President of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Matthew Terence Lagan, CFA
Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Matthew Terence Lagan, CFA (CRD# **4345233**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Lagan is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Matthew Lagan is a Portfolio Manager at CAM. Mr. Lagan, born in 1973, is dedicated to advising clients of CAM. He is a member of the firm's Investment Oversight Committee. He is Vice Chair of the Impact Investing Committee, Vice Chair of the Large Cap Growth Investment Committee, and is a member of the Socially Responsible Investment Committee and SMid Growth Investment Committee. Mr. Lagan earned a B.S. from Bridgewater State University in 1995. Mr. Lagan earned his MBA from the University of Dublin in 2003. Additional information regarding Mr.

Lagan's employment history is included below.

Table 3: Employment History

Congress Asset Management; Vice President, Portfolio Manager	01/2014 to Present
Congress Asset Management; Senior Research Analyst	01/2003 to 01/2014

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Lagan. Mr. Lagan has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Lagan.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Lagan.***

However, we do encourage you to independently view the background of Mr. Lagan on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD# **4345233.**

Item 4 – Other Business Activities

Mr. Lagan does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory service.

Item 5 – Additional Compensation

Mr. Lagan does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Lagan serves as Vice President, Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

CONGRESS
ASSET MANAGEMENT COMPANY

Form ADV Part 2B – Brochure Supplement

for

John M. Beaver, CFA
Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of John M. Beaver, CFA (CRD# **4587495**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Beaver is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

John M. Beaver is a Portfolio Manager at CAM. Mr. Beaver, born in 1969, is dedicated to advising clients of CAM. He is a member of the Investment Oversight Committee, and the Fixed Income, and Small Cap Value Investment Committees. Beaver earned a B.A. from Colby College in1992. Mr. Beaver earned his MBA from Babson College in 2002. Additional information regarding Mr. Beaver's employment history is included below.

Table 4: Employment History

Congress Asset Management; Vice President, Portfolio Manager	12/2006 to Present
Congress Asset Management; Credit Analyst	06/2002 to 12/2006
Massachusetts Financial Services Company; Quantitative Research Associate	11/1996 to 08/2002
Fidelity Investments; Performance Analyst	09/1992 to 07/1996

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Beaver. Mr. Beaver has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Beaver.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Beaver.***

However, we do encourage you to independently view the background of Mr. Beaver on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD# **4587495**.

Item 4 – Other Business Activities

John M. Beaver does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Mr. Beaver does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Beaver serves as Vice President, Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Noel B. Blair, CFA
Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Noel B. Blair, CFA, (CRD# **5091619**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Blair is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5091619.

Item 2 – Educational Background and Business Experience

Noel B. Blair is a Portfolio Manager at CAM. Mr. Blair, born in 1978, is dedicated to advising clients of CAM. He is Vice Chair of the Small Cap Growth Investment Policy Committee. Mr. Blair attended Cornell University until the year 2000 in pursuit of a degree unrelated to his career in Finance. Since February 2001, he has been employed by Congress Asset Management and has held several positions at the company. Additional information regarding Mr. Blair's employment history is included below.

Table 5: Employment History

Congress Asset Management; Vice President, Portfolio Manager	01/2021 to Present
Congress Asset Management; Investment Analyst	01/2005 to 12/2019
Congress Asset Management; Operations Team Leader	09/2001 to 02/2004

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Blair. Mr. Blair has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Blair.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Blair.***

However, we do encourage you to independently view the background of Mr. Blair on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# **5091619**.

Item 4 – Other Business Activities

Mr. Blair is not engaged in any other investment-related activities. He does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Mr. Blair does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Blair serves as Vice President, Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

John ("Jack") Thomas Corrigan, CFA
Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of John Thomas Corrigan, CFA in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Item 2 – Educational Background and Business Experience

Jack Corrigan is a Portfolio Manager at CAM. Mr. Corrigan, born in 1983, is dedicated to advising clients of CAM. He is a member of the firm's Fixed Income Investment Policy Committee. Mr. Corrigan earned a B.A. from Boston College in 2006. Additional information regarding Mr. Corrigan's employment history is included below.

Table 3: Employment History

Congress Asset Management; Vice President, Portfolio Manager	02/2024 to Present
Congress Asset Management; Vice President, Fixed Income Research & Trading	01/2018 to 02/2024
Congress Asset Management; Fixed Income Trader	06/2011 to 12/2017
Kaufman Rossin Fund Services; Senior Associate	10/2007 to 05/2011
State Street; Custody Fund Accountant	07/2006 to 09/2007

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Corrigan. Mr. Corrigan has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Corrigan.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Corrigan.***

Item 4 – Other Business Activities

Mr. Corrigan does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory service.

Item 5 – Additional Compensation

Mr. Corrigan does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Corrigan serves as Vice President, Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

E. Martine Elie, CFA
Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of E. Martine Elie, CFA (CRD# **4345533**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Ms. Elie is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

E. Martine Elie is a Portfolio Manager at CAM. Ms. Elie, born in 1972, is dedicated to advising clients of CAM. She is Chair of the Dividend Growth Investment Policy Committee. She is a member of the firm's Investment Oversight Committee, and Private Equity, Large Cap Growth, and Small Cap Value Investment Policy Committees. Ms. Elie earned her BBA from HEC Montreal in 1994. She earned an MBA with a concentration in Finance from Northeastern in 1999. Additional information regarding Ms. Elie's employment history is included below.

Table 6: Employment History

Congress Asset Management; Vice President, Portfolio Manager	01/2002 to Present
Congress Trust National Association; Vice President and Trust officer	08/2005 to 09/2009
Congress Asset Management; Research Analyst	06/1999 to 01/2002
Credifinance Securities (formerly Majendie Charlton Securities); Analyst	05/1995 to 06/1997

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Ms. Elie. Ms. Elie has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Ms. Elie.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Ms. Elie.***

However, we do encourage you to independently view the background of Ms. Elie on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD#**4345533.**

Item 4 – Other Business Activities

Ms. Elie is not engaged in any other investment-related activities. She does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. She is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of her time. She does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Ms. Elie does not have additional business activities where compensation is received. Her business activities are detailed in item 4 above.

Item 6 – Supervision

Ms. Elie serves as Vice President, Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

CONGRESS
ASSET MANAGEMENT COMPANY

Form ADV Part 2B – Brochure Supplement

for

John G. Fitzgerald, CFA
Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of John G. Fitzgerald, CFA (CRD# **2958946**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Fitzgerald is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

John G. Fitzgerald is a Portfolio Manager at CAM. Mr. Fitzgerald, born in 1964, is dedicated to advising clients of CAM. He is a member of the Private Equity and Small Cap Growth Investment Policy Committees. Mr. Fitzgerald earned a B.A. with a concentration in Finance from the University of Massachusetts in 1986. He earned his MBA from Suffolk University in 1991. Additional information regarding Mr. Fitzgerald's employment history is included below.

Table 7: Employment History

Congress Asset Management; Vice President, Portfolio Manager	06/2001 to Present
Congress Trust National Association; Vice President and Trust Officer	04/2002 to 06/2009
MG Financial; Principal	09/1996 to 06/2001
Gannett Welsh & Kotler; Vice President	08/1994 to 8/1996
Wellington Management Company; Assistant Vice President	01/1989 to 07/1994
Putnam Investor Services; Senior Accountant	09/1986 to 12/1988

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Fitzgerald. Mr. Fitzgerald has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Fitzgerald.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Fitzgerald.***

However, we do encourage you to independently view the background of Mr. Fitzgerald on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD# **2958946**.

Item 4 – Other Business Activities

Mr. Fitzgerald is not engaged in any other investment-related activities. He does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Mr. Fitzgerald does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Fitzgerald serves as Vice President, Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

CONGRESS
ASSET MANAGEMENT COMPANY

Form ADV Part 2B – Brochure Supplement

for

Keith R. Gontarz, CFA
Portfolio Manager

Effective: March 17, 2026

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Keith R. Gontarz, CFA, (CRD# **5668558**) in addition to the information contained in the Congress Asset Management Company, LLP ("CAM" or the "Advisor," CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Gontarz is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5668558.

Item 2 – Educational Background and Business Experience

Keith R. Gontarz is a Portfolio Manager at CAM. Mr. Gontarz, born in 1984, is dedicated to advising Clients of CAM. Mr. Gontarz earned a B.A. in Finance and Operations Management from University of Massachusetts Amherst in 2007. Mr. Gontarz earned an MBA from Boston College in 2015. Additional information regarding Mr. Gontarz's employment history is included below.

Table 8: Employment History

Congress Asset Management Company, LLP; Portfolio Manager	09/2020 to Present
Congress Asset Management Company, LLP; Investment Analyst	04/2017 to 09/2020
GW&K Investment Management; Senior Client Service Associate	05/2010 to 04/2017
Evergreen Investment/Wells Fargo; Client Service Consultant	10/2007 to 05/2010

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Gontarz. Mr. Gontarz has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Gontarz.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Gontarz.***

However, we do encourage you to independently view the background of Mr. Gontarz on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# **5668558**.

Item 4 – Other Business Activities

Mr. Gontarz is dedicated to the investment advisory activities of CAM's Clients. Mr. Gontarz does not have any other business activities.

Item 5 – Additional Compensation

Mr. Gontarz is dedicated to the investment advisory activities of CAM's Clients. Mr. Gontarz does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Gontarz serves as a Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its Supervised Persons. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Brian T. Guild
Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Brian T. Guild (CRD# **5780952**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD # **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Guild is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Brian T. Guild is a Portfolio Manager at CAM. Mr. Guild, born in 1977, is dedicated to advising clients of CAM. He is also a member of the Fixed Income Investment Policy Committee and the Impact Investing Committee. Mr. Guild earned a B.S. Economics Finance from Bentley College in 2000. He earned an MBA from Northeastern University in 2011. Additional information regarding Mr. Guild's employment history is included below.

Table 9: Employment History

Congress Asset Management; Vice President, Portfolio Manager	01/2016 to Present
Congress Wealth Management: Portfolio Manager	12/2010 to 03/2017
Congress Asset Management; Research Analyst	05/2008 to 01/2016
Congress Asset Management; Fixed Income Trader	11/2001 to 05/2008
Congress Asset Management; Portfolio Accountant	08/2000 to 11/2001

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Guild. Mr. Guild has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Guild.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Guild.***

However, we do encourage you to independently view the background of Mr. Guild on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his individual CRD # **5780952**.

Item 4 – Other Business Activities

Mr. Guild is not engaged in any other investment-related activities. He does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Mr. Guild does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Guild serves as Vice President and Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Nancy T. Huynh
Senior Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Nancy T. Huynh in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Item 2 – Educational Background and Business Experience

Nancy T. Huynh is a Portfolio Manager at CAM. Ms. Huynh, born in 1973, is dedicated to advising clients of CAM. Ms. Huynh is Vice Chair of the SMid Growth Investment Policy Committee. Ms. Huynh earned her undergraduate degree from Colby College in 1996. She earned her ALM in Management with a concentration in Finance, from Harvard University in 2007. Additional information regarding Ms. Huynh's employment history is included below.

Table 10: Employment History

Congress Asset Management; Senior Vice President, Portfolio Manager	2/2023 to Present
Congress Asset Management; Director of Research	5/2014 to 2/2023
Congress Asset Management; Research Analyst	01/2001 to 5/2014
Congress Asset Management; Investment Administrator	01/2000 to 12/2000
Congress Asset Management; Portfolio Accountant	06/1998 to 12/1999
Museum of Science; Membership Relations	08/1996 to 01/1998

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Ms. Huynh. Ms. Huynh has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Ms. Huynh.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Ms. Huynh.***

Item 4 – Other Business Activities

Ms. Huynh is not engaged in any other investment-related activities. She does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. She is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of her time. She does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Ms. Huynh does not have additional business activities where compensation is received. Her business activities are detailed in item 4 above.

Item 6 – Supervision

Ms. Huynh serves as Senior Vice President, Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

CONGRESS
ASSET MANAGEMENT COMPANY

Form ADV Part 2B – Brochure Supplement

for

Jeffrey K. Kerrigan, CFA
Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Jeffrey K. Kerrigan, CFA (CRD# **2492389**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Kerrigan is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Jeffrey K. Kerrigan is a Portfolio Manager at CAM. Mr. Kerrigan, born in 1971, is dedicated to advising clients of CAM. He is Chair of the Small Cap Value Investment Policy Committee. Mr. Kerrigan earned his B.A. and MBA in Economics from Boston University in 1993. Additional information regarding Mr. Kerrigan's employment history is included below.

Table 11: Employment History

Congress Asset Management; Vice President,Portfolio Manager	09/2017 to Present
Century Capital Management, LLC; Vice President and Portfolio Manager	03/2014 to 09/2017
Haber Trilix; Portfolio Manager and Chief Investment Officer	05/2013 to 03/2014
Ten Asset Management	08/2010 to 05/2013

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Kerrigan. Mr. Kerrigan has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Kerrigan.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Kerrigan.***

However, we do encourage you to independently view the background of Mr. Kerrigan on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD # **2492389**.

Item 4 – Other Business Activities

Mr. Kerrigan serves as a Board Member for a private family office. This activity is separate from Mr. Kerrigan's capacity with CAM. Mr. Kerrigan spends less than 10% of his time at this activity.

Item 5 – Additional Compensation

Mr. Kerrigan has additional business activities that are detailed in item 4 above.

Item 6 – Supervision

Mr. Kerrigan serves as Vice President, Portfolio Manager for CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Eric M. Meyers, CFA
Director of Research,
Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Eric M. Meyers, CFA in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Item 2 – Educational Background and Business Experience

Eric M. Meyers is a Portfolio Manager at CAM. Mr. Meyers, born in 1974, is dedicated to advising clients of CAM. Mr. Meyers also serves as the Director of Research for the Firm. He is the Chair of the Mid Cap Growth Investment Policy Committee. Mr. Meyers earned his B.A. from University of Notre Dame in 1996. He earned his MBA with a specialization in Finance from Carnegie Mellon University in 2001. Additional information regarding Mr. Meyers's employment history is included below.

Table 12: Employment History

Congress Asset Management; Director of Research	03/2023 to Present
Congress Asset Management; Portfolio Manager	04/2022 to Present
Congress Asset Management; Research Analyst	09/2017 to 03/2023
Century Capital Management; Equity Analyst	06/2011 to 09/2017
Loomis, Sayles & Company; Equity Analyst	02/2005 to 06/2011
Federated Investors, Inc.; Equity Analyst	09/2001 to 02/2005

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Meyers. Mr. Meyers has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Meyers.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Meyers.***

Item 4 – Other Business Activities

Eric M. Meyers does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Mr. Meyers does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Meyers serves as a Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Amy B. Noyes, CFA
Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Amy Noyes, CFA (CRD# **2097723**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Ms. Noyes is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Amy Noyes is a Portfolio Manager at CAM. Ms. Noyes, born in 1968, is dedicated to advising clients of CAM. She is a member of the Mid Cap and Small Cap Investment Policy Committees. Ms. Noyes earned her undergraduate degree from Castleton University in 1990. She earned an MBA from Northeastern University in 1994. Additional information regarding Ms. Noyes 'employment history is included below.

Table 13: Employment History

Congress Asset Management; Vice President, Portfolio Manager	05/1998 to Present
Congress Asset Management; Research Analyst	05/1996 to 05/1998
New England Insurance and Investment; Senior Investment Analyst	09/1995 to 05/1996
Fidelity Investments; Research Assistant	09/1994 to 09/1995
Newbury, Piret & Companies, Inc.; Controller & Office Manager	06/1991 to 09/1994

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Ms. Noyes. Ms. Noyes has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Ms. Noyes.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Ms. Noyes.***

However, we do encourage you to independently view the background of Ms. Noyes on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for her full name or CRD# 2097723.

Item 4 – Other Business Activities

Ms. Noyes is not engaged in any other investment-related activities. She does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. She is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of her time. She does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Ms. Noyes does not have additional business activities where compensation is received. Her business activities are detailed in item 4 above.

Item 6 – Supervision

Ms. Noyes serves as Vice President, Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Gregg A. O'Keefe, CFA
Executive Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Gregg A. O'Keefe, CFA (CRD# **2276823**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. O'Keefe is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Gregg A. O'Keefe is a Portfolio Manager of CAM. Mr. O'Keefe, born in 1960, is dedicated to advising clients of CAM. He is Chair of the Small Cap Growth Investment Policy Committee. Mr. O'Keefe is also a member of the firm's the Investment Oversight Committee and Mid Cap Growth Investment Policy Committee. Mr. O'Keefe completed a B.S. with a concentration in Finance from Boston University. He also earned an MBA from Boston College in 1989. Additional information regarding Mr. O'Keefe's employment history is included below.

Table 14: Employment History

Congress Asset Management; Executive Vice President	07/1999 to Present
Congress Asset Management; Senior Vice President	05/1986 to 06/1999
Congress Trust National Association; Vice President & Trust Officer	12/1997 to 10/2005
Congress Trust National Association; Vice President	08/1994 to 8/1996
Trustee & Investors Co., Inc.; Analyst	06/1982 to 04/1986

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. O'Keefe. Mr. O'Keefe has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. O'Keefe.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. O'Keefe.***

However, we do encourage you to independently view the background of Mr. O'Keefe on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD# **2958946**.

Item 4 – Other Business Activities

Mr. O'Keefe is not engaged in any other investment-related activities. Mr. O'Keefe does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. Mr. O'Keefe is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. Gregg A. O'Keefe does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Mr. O'Keefe does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. O'Keefe serves as Executive Vice President, Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

John B. O'Reilly, CFA
Senior Vice President, Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of John B. O'Reilly, CFA (CRD# **1694781**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. O'Reilly is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

John B. O'Reilly is a Portfolio Manager of CAM. Mr. O'Reilly, born in 1964, is dedicated to advising clients of CAM. He is Chair of the Multi-Cap Growth Investment Policy Committee. He is also a member of the Investment Oversight Committee, the Mid Cap Growth Investment Policy Committee and the Large Cap Growth Investment Policy Committee Mr. O'Reilly earned a B.A. from Providence College in 1986. He earned an MBA from Bryant College in 1992. Additional information regarding Mr. O'Reilly's employment history is included below.

Table 15: Employment History

Congress Asset Management; Senior Vice President, Portfolio Manager	06/2001 to Present
Mellon Private Asset Management; Portfolio Manager	07/2000 to 06/2001
State Street Bank & Trust; Vice President	03/1991 to 07/2000

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. O'Reilly. Mr. O'Reilly has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. O'Reilly.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. O'Reilly.***

However, we do encourage you to independently view the background of Mr. O'Reilly on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD# **1694781**.

Item 4 – Other Business Activities

Mr. O'Reilly is not engaged in any other investment-related activities. He does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Mr. O'Reilly does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. O'Reilly serves as Senior Vice President, Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Jeffrey R. Porter, CFA
Executive Vice President & Director Fixed Income

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Jeffrey R. Porter, CFA (CRD# **5096700**) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# **105161**) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Porter is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Jeffrey R. Porter is a Portfolio Manager at CAM. Mr. Porter, born in 1964, is dedicated to advising clients of CAM. Mr. Porter is an Executive Vice President and the Director of Fixed Income of CAM. He is Chair of the Fixed Income Investment Policy Committee. He is also member of the firm's Investment Oversight Committee. Mr. Porter received two Bachelor degrees, Accounting and Business Management, from North Carolina State University in 1987. He also received an MBA from East Carolina University in 1990.Additional information regarding Mr. Porter's employment history is included below.

Table 16: Employment History

Congress Asset Management; EVP & Director Fixed Income	03/2010 to Present
Prelude Asset Management; Co-Founder & Chief Executive Officer	06/2009 to 03/2010
Kellport Capital Management/Crescam Asset Management; Co-Founder	04/2005 to 05/2009
Partners HealthCare Systems, Inc.; Director of Portfolio Management	05/1997 to 04/2005
North Carolina Retirement Systems; Investment Professional	08/1992 to 04/1997
KPMG Peat Marwick; Staff Auditor	08/1987 to 04/1988

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Porter. Mr. Porter has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Porter.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Porter.***

However, we do encourage you to independently view the background of Mr. Porter on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD# **5096700.**

Item 4 – Other Business Activities

Mr. Porter is not engaged in any other investment-related activities. He does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Mr. Porter does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Porter serves as Executive Vice President and Director of Fixed Income for CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Ryan G. Tumbry, CFA
Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Ryan G. Tumbry, CFA (CRD# 5503638) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# 105161) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Tumbry is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Ryan G. Tumbry is a Portfolio Manager at CAM. Mr. Tumbry, born in 1977, is dedicated to advising clients of CAM. He is Vice Chair of the Dividend Growth Investment Policy Committee and Chair of the Impact Investing Committee. Mr. Tumbry earned a B.S. from University at Albany - SUNY in 1999. Additional information regarding Mr. Tumbry's employment history is included below.

Table 17: Employment History

Congress Asset Management; Portfolio Manager	7/2025 to Present
Congress Asset Management; Research Analyst	11/2007 to 6/2025
Congress Asset Management; Performance/Attribution Analyst	1/2006 to 11/2007
Congress Asset Management; Operations Analyst	11/2001 to 12/2005

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Tumbry. Mr. Tumbry has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Tumbry.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Tumbry.

However, we do encourage you to independently view the background of Mr. Tumbry on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD# 5505368.

Item 4 – Other Business Activities

Ryan G. Tumbry does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Mr. Tumbry does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Tumbry serves as Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

CONGRESS
ASSET MANAGEMENT COMPANY

Form ADV Part 2B – Brochure Supplement

for

Nicholas Koup, CFA
Portfolio Manager & Research Analyst

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Nicholas Koup, CFA (CRD# 6135931) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# 105161) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Koup is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Nicholas Koup is a Portfolio Manager at CAM. Mr. Koup, born in 1987, is dedicated to advising clients of CAM. He is a member of the Mid Cap Growth Investment Policy Committee. Mr. Koup earned a B.B.A. from James Madison University in 2010. Additional information regarding Mr. Koup's employment history is included below.

Table 18: Employment History

Congress Asset Management; Portfolio Manager	7/2025 to Present
Congress Asset Management; Research Analyst	10/2014 to 7/2025
Weston Financial Group; Financial Associate	7/2012 to 9/2014
BNY Mellon; Accounting and Reporting Specialist	9/2010 to 6/2012

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Koup. Mr. Koup has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Koup.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Koup.

However, we do encourage you to independently view the background of Mr. Koup on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD# 6135931

Item 4 – Other Business Activities

Nicholas M. Koup does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Mr. Koup does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Koup serves as Portfolio Manager, Research Analyst of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guides each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Zachary Zeller, CFA
Portfolio Manager

Effective: March 17, 2026

This Brochure Supplement provides information about the background and qualifications of Zachary Zeller, CFA (CRD# 8236293) in addition to the information contained in the Congress Asset Management, LLP ("CAM" or the "Advisor") (CRD# 105161) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CAM Disclosure Brochure or this Brochure Supplement, please contact us at (617) 428-4300.

Additional information about Mr. Zeller is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Zachary Zeller is a Portfolio Manager at CAM. Mr. Zeller, born in 1993, is dedicated to advising clients of CAM. He is a member of the Multi-Cap Growth Investment Policy Committee and SMid Growth Investment Policy Committee. Mr. Zeller earned a B.B.A. from University of New Hampshire in 2015. Additional information regarding Mr. Zeller's employment history is included below.

Table 19: Employment History

Congress Asset Management; Portfolio Manager	7/2025 to Present
Congress Asset Management; Research Analyst	1/2021 to 7/2025
Congress Asset Management; Operations Associate	2/2017 to 1/2021
State Street; Associate	1/2015 to 1/2017

Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Zeller. Mr. Zeller has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Zeller.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Zeller.

However, we do encourage you to independently view the background of Mr. Zeller on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for his full name or CRD# 8236293.

Item 4 – Other Business Activities

Zachary E. Zeller does not receive commissions, bonuses, or other compensation on the sale of securities or other investment products. He is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time. He does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 5 – Additional Compensation

Mr. Zeller does not have additional business activities where compensation is received. His business activities are detailed in item 4 above.

Item 6 – Supervision

Mr. Zeller serves as Portfolio Manager of CAM and is supervised by Daniel A. Lagan, the CEO and CIO of the Advisor. Mr. Daniel A. Lagan can be reached at (617) 428-4300 or by email at dlagan@congresasset.com.

CAM has implemented a Code of Ethics and internal compliance that guides each employee in meeting their fiduciary obligations to clients of CAM. Further, CAM is subject to regulatory oversight by various agencies. These agencies require registration by CAM and its employees. As a registered entity, CAM is subject to examinations by regulators, which may be announced or unannounced. CAM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

CONGRESS
ASSET MANAGEMENT COMPANY

ERISA 408(b)(2) - Compensation Disclosure Statement

Disclosure to ERISA Plan Sponsors

Congress Asset Management Company, LLP

March 17, 2026

In compliance with the Department of Labor's final rules relating to ERISA Section 408(b)(2), Congress Asset Management Company, LLP (CAM) is providing the following disclosures:

CAM provides investment advisory or sub-advisory services to the Plan under a fully executed discretionary Investment Management Agreement (the Agreement).

CAM provides services to Plan as an SEC Registered Investment Advisor subject to the Investment Advisors Act of 1940 and in this capacity fully accepts our responsibility to act as a Fiduciary as defined in the Employee Retirement Income Security Act (ERISA) of 1974.

CAM receives direct compensation from the Plan in the form of cash compensation for investment management fees under the Agreement. CAM may also receive indirect compensation from the Plan which will solely come in the form of soft dollar commissions that are used to pay for certain Section 28(e) "safe harbor" research obtained by CAM from third party research service providers.

In the event CAM is terminated as investment advisor to the Plan, the Plan would only be required to pay a pro-rated final bill for management fees if such billing is done in arrears (CAM is compensated after the services are provided). If CAM were billing in advance, a refund of fees would be paid to the Plan.

Congress Asset Management does not provide any record-keeping services to the Plan.

If you have any questions or need further information about compensation received in connection with services to the Plan, you may contact CAM directly.

James Fricano
Chief Compliance Officer
617-428-4395
jfricano@congressasset.com

CONGRESS
ASSET MANAGEMENT COMPANY

Summary of Material Changes

to

Part 2A of Form ADV: *Firm Brochure*

Congress Asset Management Company, LLP

2 Seaport Lane
5th Floor
Boston, MA 02210
Telephone: 617-428-4300
Email: info@congressasset.com
Web Address: www.congressasset.com

March 18, 2026

This Firm Brochure (or "Brochure") provides information about the qualifications and business practices of Congress Asset Management Company, LLP. If you have any questions about the contents of this Brochure, or to receive a copy of this Brochure, please contact us at 617-737-1566 or info@congressasset.com or, by mail at the address listed above. The information in this Firm Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Congress Asset Management Company, LLP also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The Firm's CRD number is 105161.

Item 2 Summary of Material Changes

There have been no material changes to this brochure since the last update filed on March 20th, 2025.

CONGRESS ASSET
MANAGEMENT COMPANY

2026 PRIVACY & PROXY NOTICE

PRIVACY POLICIES AND PROCEDURES

The trust and confidence of you, our customers, is important to us at Congress Asset Management Company. For this reason, we are careful in the way we collect and handle non-public, personal information about you, our clients ("Client Information"). This Privacy Notice describes our policies and practices regarding your information and how it is obtained, disseminated, and protected.

Information We Collect

We may collect Client Information from the following sources:

- Information we receive on contracts or other forms, such as your name, address, date of birth, and social security number
- Information relating to transactions with us, our affiliates and others, such as the purchase and sale of securities and account balances
- Information we receive from third parties, such as custodians, wealth management and financial service firms, as required or permitted by law
- The retention period for which we hold your personal data varies depending on the purpose for which we are using your personal data and legal obligations (laws or regulation may set a minimum period for which we have to keep your data)

Information We Disclose

We disclose Client Information about you or our former clients to third parties only to the extent required or permitted by law. Such sharing of your information is applied to:

- Everyday business purposes such as processing transactions, maintaining and or servicing your account
- Cooperating with regulatory authorities, responding to court orders and legal investigations
- Taking reasonable and necessary steps to prevent fraud, unauthorized transactions, etc.

Opting Out

The information we disclose is limited, and essential to servicing your account, protecting your privacy and meeting obligations under state and federal law. We do not disclose Client Information that requires a notice to you for limiting such disclosures, otherwise known as "opting-out." However, should we wish to disclose additional Client Information of yours, we will only do so with your written permission as discussed below.

Opt-In Process for Sharing Additional Client Information

Our current business practices require us to obtain affirmative written permission from you ("Opting-In"), before we disclose any Client Information outside of what is discussed above in the "Information We Disclose" section of this notice. In the event we wish to share such additional Client Information, we will provide you an Opt-In form describing the additional Client Information we seek to share, with whom we wish to share it with, and for what purpose. Until such form is received by us from you, indicating your permission, such additional Client Information about you will not be shared.

Information Security

- We maintain an Information Protection and Cybersecurity program and provide ongoing awareness and training to our employees
- We continue to evaluate our efforts to protect confidential Client information and to keep our privacy policy and practices current
- We restrict access to Client Information to employees and service providers who are involved in providing products and services to our clients
- Employees with access to Client Information may not use or disclose such information, except for Congress Asset Management Company business use
- We maintain physical, electronic, and procedural safeguards in order to protect Client Information
- When there is a need to dispose of confidential Client Information, we require our employees to shred, not discard the information

If you have any questions regarding our Privacy Policy, please call us at 800-542-7888 or write to us at 2 Seaport Lane, Boston, MA 02210.

PROXY POLICIES AND PROCEDURES

PROXY POLICIES

Responsibility

Congress Asset Management Company's responsibility as an investment manager and plan fiduciary, as outlined in rule 206(4)-6 under the Investment Advisers Act of 1940, and the Employee Retirement Income Security Act of 1974 and subsequent Department of Labor policy statements, includes the duty to vote proxies on behalf of our clients when proxy voting authority has been delegated to us. Congress Asset Management Company accepts its fiduciary responsibility to vote proxies under these circumstances. This statement is intended to set forth those policies and guidelines to be followed in carrying out our responsibility.

General Principles of Voting

Proxy voting rights have been declared by the Department of Labor to be valuable plan assets and therefore must be exercised in accordance with the fiduciary duties of loyalty and prudence. This policy statement has been carefully crafted to meet the requirements of loyalty and prudence and will be employed by the Proxy Committee (the "Proxy Committee") in its proxy voting procedures and decisions.

The duty of loyalty requires that a voting fiduciary exercise its proxy voting authority solely in the interests of its clients, or plan participants and beneficiaries, and for the exclusive purpose of providing plan benefits to participants and beneficiaries. The voting fiduciary is prohibited from subordinating the interests of participants and beneficiaries to unrelated objectives.

The duty of prudence requires that proxy voting authority be exercised with the care, skill, prudence, and diligence that a similarly situated prudent person knowledgeable in such matters would exercise. In keeping with its fiduciary responsibilities, Congress Asset Management Company will vote proxies in accordance with the "economic best interests" of its clients, plan participants and beneficiaries. Congress Asset Management Company will consider the long-term impact of business plans on all affected parties including shareholders, debt holders, employees, retired workers, and communities in which the firm operates.

Decisions Free of Outside Influence

Generally, Congress Asset Management Company will vote on the recommendation of the issuer's management. However, Congress shall take into consideration the general positions of trustees and other fiduciaries in deciding how to vote proxies. Congress Asset Management Company currently utilizes the services of Broadridge Investor Communications, an independent administrator of proxy voting services. Such services may include voting execution, comprehensive reporting, and supporting justification. However, any influence imposed upon us by a person or persons who have a direct personal or financial interest in the outcome will be rejected as a violation of ERISA and our moral obligation to plan participants, and clients. On contested issues the guiding principle shall be the long term "economic best interests" of all affected parties. The interest of any one group shall not dominate the decision to the detriment of other affected parties.

Clients and prospective clients should be aware that Congress Asset Management typically follows the recommendation of the AFL-CIO when voting proxies for Taft-Hartley clients, while at the same time actively soliciting new business from the Taft-Hartley market. Voting to such recommendations may at times be different from how we vote our other clients' proxies and in opposition to the interests of such other clients. In addition, Congress will typically consider Glass Lewis ESG recommendations when voting proxies for ESG clients.

Congress Asset Management, at the direction of a client's Investment Policy statement, has the ability to direct proxy voting decisions to a 3rd party proxy advice vendor. These voting recommendations may at times be different from how we vote other clients' proxies and in opposition to the interests of such other clients.

PROXY PROCEDURES

Proxy Committee

The Proxy Committee shall have responsibility for setting the proxy voting policy at Congress Asset Management Company. Proxies will be voted in the economic best interest of each individual client, ERISA plan participant, and beneficiaries. The Proxy Committee will use available resources as needed to assist in evaluating proxy issues and setting policies that are appropriate for each client. Congress Asset Management Company has an agreement with Broadridge Investor Communications to provide integrated third-party research and electronic, automated, rules-based voting capabilities via the Broadridge ProxyEdge service for each individual proxy.

In the event of a vote that falls outside of the standard proxy voting rules for Congress Asset Management Company, the Proxy Committee will meet to review a specific vote. When the Proxy Committee reaches a decision concerning the proxy vote in question, Broadridge ProxyEdge shall be instructed to vote accordingly, and no further action shall be required. A simple majority of the Proxy Committee shall be required for a final ruling on proxy issues.

Record Keeping

1) Proxy Committee minutes and meeting material including the basis for any voting decision including whether the advice of any individual outside of the organization was acted upon.
2) Records will be maintained detailing how proxies were voted, and for which accounts they were voted.

Records of proxy voting will be made available to Clients and ERISA Plan Sponsors upon a written request by email to proxies@congressasset.com or by mail to Congress Asset Management Company, 2 Seaport Lane, 5th Floor, Boston, MA 02210.