

The Corundum Group (a Division of Central Bancorp)
Client Relationship Summary (CRS)– Form ADV Part 3- March 23, 2021

Item 1. Introduction

The Corundum Group (TCG) is a registered investment adviser with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to the public in order to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2. Relationship and Services

What investment services and advice can you provide to me?

TCG offers investment advisory services to individuals, trusts, foundations, retirement plans, partnerships and nonprofit organizations. Advice is provided through consultation with the client and may include determination of financial objectives, identifications of financial problems, cash flow management, tax planning support, estate planning support, retirement planning, insurance review and education funding. TCG offers broad asset allocation choices including equities, fixed income, real estate and private equity, and may include proprietary products.

Monitoring: Investment accounts are monitored at least annually, but reviews can be performed more frequently when market conditions dictate or for changes in tax laws, new investment information, and changes in a client's personal situation. Management, monitoring and advice are part of TCG's standard services.

Investment Authority: We offer investment management services on both a discretionary and non-discretionary basis. Clients may place restrictions on our discretionary authority.

Limited Investment Offering: We do not limit our investment offerings.

Account Minimums and Other Requirements: TCG does not have specific account minimums.

Additional Information: More detailed information about TCG's services is available on Part 2 of our Form ADV, which is available at <https://adviserinfo.sec.gov/firm/summary/106490>.

Conversation Starters. Ask your financial professional:

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

Item 3. Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

Advisory fees are based on a percentage of assets under management and are negotiable based on the size and complexity of the account, the investment products used, the level of specialized service and the historical relationship. The standard advisory fee schedule is as follows:

<u>Market Value of Assets</u>	<u>Annual Advisory Fee</u>
\$0 - \$2,000,000	1.00%
\$2,000,000 - \$4,000,000	0.90%
\$4,000,000 - \$6,000,000	0.80%
\$6,000,000 - \$8,000,000	0.70%
\$8,000,000 and above	0.60%

A third-party broker can charge transaction fees or asset-based fees in a separately-managed portfolio. If mutual funds are used, clients could pay mutual fund fees in addition to the advisory fees paid to TCG. A large portion of TCG's assets under management are invested in Private Funds. The Private Funds are generally charged a fee by the manager (TCG including its affiliate Corundum Partners, Inc., and in some cases by third-party investment managers), which is paid from fund assets. These management fees are in addition to the advisory fees paid by clients to TCG. The amount of the management fee depends on the type of Private Fund and is disclosed in the operating agreement for the fund and in the offering materials if applicable. The fee is typically based on the net asset value as of the previous quarter end and on capital contributions during the quarter.

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.

Additional information about TCG's fees and costs is available on Part 2 of our Form ADV, which is available at <https://adviserinfo.sec.gov/firm/summary/106490>.

Conversation Starter. Ask your financial professional—

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

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

When we provide you with a recommendation, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. Here are some examples to help you understand what this means. Because TCG charges advisory fees based on a percentage of assets, TCG has an incentive to encourage you to increase the assets in the account and an incentive to increase the valuations of the assets. Because TCG also charges a management fee for its private funds, it has an incentive to recommend those private funds or invest client's funds in them. TCG has private funds that invest in apartments and for which it receives a management fee from the third-party investment manager. TCG could also receive a performance fee in connection with those investments. TCG has an incentive to recommend those investments or invest client's funds in them. Allocations of investment opportunities in the private funds will not be uniform among clients. TCG has transactions with affiliates that create conflicts of interest. In certain cases, loans are made between clients, family partnerships and/or TCG employees. TCG uses RBC Wealth Management as a broker-dealer from whom TCG receives research and other products and services.

Conversation Starter. Ask your financial professional—

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

Additional information about conflicts of interest between TCG and its clients is available on Part 2 of our Form ADV, which is available at <https://adviserinfo.sec.gov/firm/summary/106490>.

How do your financial professionals make money?

TCG's financial professionals receive incentive compensation based on certain fees earned by TCG. This will be affected by the amount of client assets and which investments are selected and as a result creates a conflict of interest, because the financial professionals have an incentive to encourage clients to add assets and to recommend investments that provide incentive compensation.

Item 4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history? Yes No

Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starter. Ask your financial professional—

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

Item 5. Additional Information

Updated copies of this form, and additional information about TCG, can be found at <https://adviserinfo.sec.gov/firm/summary/106490>. If you have any questions about this brochure or if you would like to request a copy of this Relationship Summary, please contact John Foss by calling (719)228-1080.

Conversation Starter. Ask your financial professional—

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