FIRM BROCHURE

(Part 2A of Form ADV)

ALAMAR
CAPITAL MANAGEMENT

February 2024

Alamar Capital Management, LLC
Firm CCO: John Murphy

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Part 2A of Form ADV (the "Brochure") provides information about the qualifications and business practices of Alamar Capital Management, LLC. If you have any questions about the contents of this Brochure, please contact us at (805) 897-1144 or info@alamarcapital.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), the California Department of Business Oversight, or by any state securities authority.

Alamar Capital Management, LLC is registered as an investment adviser with Securities and Exchange Commission ("SEC") however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.

Additional information about Alamar Capital Management, LLC is also available on the SEC's website at https://www.adviserinfo.sec.gov/ by searching CRD #154413.

Item 2: Material Changes

Alamar Capital Management, LLC is required to notify clients of any information that has changed since the last annual update of the Firm Brochure ("Brochure") that may be important to them. Clients can request a full copy of our Brochure or contact us with any questions that they may have about the changes.

Since our most recent annual amendment filing on March 24, 2023, our firm has the following material changes to disclose:

- Our firm now offers Family Office Services, please see item 4 and 5 of this brochure for more information.
- Our firm now recommends the use of Interactive Brokers as an alternative custodian, more information about this custodian is available in Items 5, 12 and 14 of this brochure.
- Charles Schwab & Co., Inc. has finalized its acquisition of TD Ameritrade, and as such, our firm will no longer recommend the custodial services of TD Ameritrade and instead recommend Charles Schwab & Co., Inc.

Item 3: Table of Contents

ITEM 4: ADVISORY BUSINESS

Founded in November 2010, Alamar Capital Management, LLC ("ACM" or the "Firm") is a limited liability company formed under the laws of the State of California and has been in business as an investment adviser since that time. Our firm is wholly owned by L. John Murphy and George Tharakan. Mr. Murphy serves as the Firm's Chief Executive Officer and Chief Compliance Officer and Mr. Tharakan is the Chief Investment Officer.

Types of Advisory Services Offered

Investment Management Services

ACM provides ongoing discretionary management services based on the goals, objectives, time horizons, and risk tolerances of each client. For discretionary services, the client (as part of the client agreement with ACM) agrees that ACM will have a limited power-of-attorney to act on a discretionary basis with client funds. The Firm's discretionary authority will be subject to conditions or restrictions imposed by a client, such as when a client restricts or prohibits transactions in a particular security.

ACM utilizes both in-person meetings and/or telephonic interviews with the clients to gather information regarding each client's overall investment objectives, goals, and risk tolerance to help determine the appropriate investment strategy for that client. ACM does not and will not assume any responsibility for the accuracy of the information provided by the client.

At times, when deemed by ACM to be in the best interest of the client, the Firm will create a customized portfolio for the client. In such instances, investment advice is customizable, with each account managed according to the investment objectives, needs, guidelines, risk tolerance, and other information as provided by the client. Based upon information received from the client, the Firm selects appropriate investment opportunities and invests client assets in various allocations consisting of individual stocks, bonds, ETFs, options, mutual funds and other public and private securities or investments.

Family Office:

Our firm provides Family Office services to high-net-worth individuals and families. Generally, Family Office clients will be provided with financial planning, consulting services, reporting and asset allocation guidance for held away accounts, and performance reporting services. Our firm strives to assist with all the various and complex issues faced by our clients in their daily lives. Family Office engagements may encompass a wide range of services. The extent and scope of this type of engagement will vary due to each client's unique situation and needs. Our firm does not guarantee the acceptance of any formal request for Family Office services made by a client, and our firm reserves the right to refuse any request of these services without a mutually executed Family Office Services Agreement between our firm and the client.

Family Office Services are available on a standalone basis or combined with our Investment Management service. Fees for Family Office Services may be in addition to our Investment Management fee.

Financial Planning & Consulting

Our firm provides a variety of standalone financial planning and consulting services to clients for the management of financial resources based upon an analysis of current situation, goals, and objectives. Financial planning services will typically involve preparing a financial plan or rendering a financial consultation for clients based on the client's financial goals and objectives. This planning or consulting may encompass Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Corporate and Personal Tax Planning, Cost Segregation Study, Corporate Structure, Real Estate Analysis, Mortgage/Debt Analysis, Insurance Analysis, Lines of Credit Evaluation, or Business and Personal Financial Planning.

Written financial plans or financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the clients. Implementation of the recommendations will be at the discretion of the client. Our firm provides clients with a summary of their financial situation, and observations for financial planning engagements. Financial consultations are not typically accompanied by a written summary of observations and recommendations, as the process is less formal than the planning service. Assuming that all the information and documents requested from the client are provided promptly, plans or consultations are typically completed within 6 months of the client signing a contract with our firm.

Institutional Investment Management:

Independent investment consulting firms can select the Firm's strategies for their clients that wish to utilize one or more of the Firm's investment strategies. The client or the client's representative will make the final decision on selecting the Firm and the appropriate strategy for the client.

The Firm is not a custodian of the client's assets. The client always maintains control of his/her assets through the independent, third-party custodian selected by the client. ACM's authority, as defined in its Investment Advisory Agreement, is to implement investment decisions on behalf of the client entities.

The client can engage other professionals (e.g. lawyers, accountants, consultants) to assist them in establishing their financial goals and objectives. The Firm will often meet with the designated parties to review the appropriateness of the investment strategies employed by ACM, but its role is solely that of investment manager implementing the client's investment strategy by buying securities on his/her behalf.

Retirement Plan Consulting:

Our firm provides retirement plan consulting services to employer plan sponsors on an ongoing basis. Generally, such consulting services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising may include:

- Establishing an Investment Policy Statement – Our firm will assist in the development of a statement that summarizes the investment goals and objectives along with the broad strategies to be employed to meet the objectives.
- Investment Options – Our firm will work with the Plan Sponsor to evaluate existing investment options and make recommendations for appropriate changes.
- Asset Allocation and Portfolio Construction – Our firm will develop strategic asset allocation models to aid Participants in developing strategies to meet their investment objectives, time horizon, financial situation and tolerance for risk.
- Investment Monitoring – Our firm will monitor the performance of the investments and notify the client in the event of over/underperformance and in times of market volatility.
- Participant Education – Our firm will provide opportunities to educate plan participants about their retirement plan offerings, different investment options, and general guidance on allocation strategies.

In providing services for retirement plan consulting, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets"). All retirement plan consulting services shall be in compliance with the applicable state laws regulating retirement consulting services. This applies to client accounts that are retirement or other employee benefit plans ("Plan") governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). If the client accounts are part of a Plan, and our firm accepts appointment to provide services to such accounts, our firm acknowledges its fiduciary standard within the meaning of Section 3(21) or 3(38) of ERISA as designated by the Retirement Plan Consulting Agreement with respect to the provision of services described therein.

Portfolio Monitoring

Our Portfolio Monitoring Service provides for general asset allocation guidance within parameters of a plan held with outside custodians. Our firm will evaluate the securities offered and advise clients on suggested allocations based on their wholistic financial picture. This service is solely consultative in nature and involves no on-going supervision, trading, or discretion with respect to securities transactions. Clients are responsible for placing and executing their own trades, either on their own or with another investment adviser. We provide non-continuous and periodic outside account monitoring.

Participation in Wrap Programs

ACM does not participate in any wrap programs at this time.

Regulatory Assets under Management

As of December 31, 2023 ACM manages $228,419,423 on a discretionary basis.

Item 5: Fees and Compensation

Investment Management and Institutional Asset Management Fee

The maximum Fee for our Investment Management services will not exceed 1.00%. The ultimate fee to be assessed will be outlined in the advisory agreement to be signed by the client. Annualized fees are billed on a pro-rata basis quarterly in arrears based on the value of the account(s) on the last day of the quarter. Fees are negotiable and will be deducted from client account(s). Our firm does not offer direct invoicing. Further, it's important to note that our firm will assess advisory fees on cash and cash equivalents. As part of this process, Clients understand the following:

a) The client's independent custodian sends statements at least quarterly showing the market values for each security included in the Assets and all account disbursements, including the amount of the advisory fees paid to our firm;
b) Clients will provide authorization permitting our firm to be directly paid by these terms. Our firm will send an invoice directly to the custodian; and
c) If our firm sends a copy of our invoice to the client, a legend urging the comparison of information provided in our statement with those from the qualified custodian will be included.

Family Office:

Our Family Office services are billed on a flat fee basis. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client. Our Flat fee for this service generally ranges from $15,000 to $50,000. The fee-paying arrangements will be determined on a case-by-case basis and will be detailed in the signed agreement.

Portfolio Monitoring:

The maximum annual fee charged for this service will not exceed 0.25%. Annualized fees are billed on a pro-rata basis quarterly in arrears based on the value of the account(s) on the last day of the quarter. Fees are negotiable Clients will be directly billed for our portfolio monitoring service according to the terms outlined in their executed agreement. Our firm does not offer direct invoicing. Further, it's important to note that our firm will assess advisory fees on cash and cash equivalents. As part of this process, Clients understand the following:

a) The client's independent custodian sends statements at least quarterly showing the market values for each security included in the Assets and all account disbursements, including the amount of the advisory fees paid to our firm;
b) Clients will provide authorization permitting our firm to be directly paid by these terms. Our firm will send an invoice directly to the custodian; and
c) If our firm sends a copy of our invoice to the client, a legend urging the comparison of information provided in our statement with those from the qualified custodian will be included.

Financial Planning & Consulting:

Our firm does not charge fees for financial plans as this service is offered on a complimentary basis when requested by our Investment Management Clients.

Retirement Plan Consulting Fee:

Our Retirement Plan Consulting services are billed a fee based on the percentage of Plan assets under management. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client. Fees based on a percentage of managed Plan assets will not exceed 1.00%. The fee-paying arrangements will be determined on a case-by-case basis and will be detailed in the signed consulting agreement.

Other Types of Fees & Expenses

Clients will incur transaction fees for trades executed by their chosen custodian, via individual transaction charges. These transaction fees are separate from our firm's advisory fees and will be disclosed by the chosen custodian. It is important to note however, that Charles Schwab & Co., Inc. ("Schwab") and Interactive Brokers' Lite platform ("IBKR Lite") do not charge transaction fees for U.S. listed equities and exchange traded funds.

Item 6: Performance-Based Fees and Side-by-Side Management

Our firm does not charge performance-based fees.

Item 7: Types of Clients

A. Description

ACM provides discretionary investment management services on a continuous basis to individuals, high net worth individuals, trusts, estates, charitable organizations, corporations or other business entities, and qualified and non-qualified retirement and deferred compensation plans.

ACM generally requires a minimum initial investment of $500,000 to open an account with the Firm or a minimum fee of $5000 when assets are allocated in our Alamar Equity, Funds and Income models and $10,000 when invested in the Alamar Diversified model; however, the Firm reserves the right to negotiate or waive the initial investment requirement and accept or decline a potential client for any reason.

There are times when certain restrictions are placed by a client, which prevents ACM from accepting or continuing to manage the account. ACM reserves the right to not accept and/or terminate management of a client's account if it feels that the client-imposed restrictions which would limit or prevent it from meeting and/or maintaining its overall investment strategy.

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

A. Methods of Analysis

ACM's investment strategy is to identify and invest in undervalued businesses with underestimated growth prospects. Additionally, from time to time, ACM will make opportunistic investments in businesses that are benefiting from, or have been unduly punished by, macro-economic circumstances or market disruptions outside of their control.

The Firm utilizes a bottom-up fundamental approach to investing. The Firm differentiate itself by adhering to a long-term investment time horizon, performing its own in-house research, and looking at a broad universe of companies across traditional capitalization and style spectrums.
Typically, the Firm's process results in a portfolio of 35-50 stocks that are selected based on their individual attributes and for the diversity that they provide to the overall portfolio. In addition to this strategy, from time-to-time ACM will strive to secure further diversity in client accounts through the purchase of exchange traded funds (ETF's), mutual funds, put options, and other managed accounts. Generally, the Firm recommends asset allocations based upon information provided by the client reflecting their financial circumstances, investment needs, goals and objectives and risk tolerance. This includes multiple securities asset-classes consisting of stocks, bonds, diversified mutual funds, and/or ETFs and cash equivalents. In these situations, the Firm will use fundamental, technical, or cyclical analysis based upon publicly available research and reports.

Following an investment, ACM will continue to monitor the progress and suitability of portfolio investments as well as market and economic outlook. To help develop its investment recommendations, ACM uses commercially available information services and financial publications dealing with investment research. Such information is obtainable in print, via the internet or by some other means. Issuer-prepared materials (particularly prospectuses) and research releases prepared by third parties are also utilized. ACM also uses research materials prepared by various investment product vendors or custodians. ACM also obtains information by meeting with management, customers, or competitors, attending industry conferences and consulting with experts in the appropriate field.

The investment strategy of ACM is to achieve above-market returns, minimize risk, and preserve capital through an investment and portfolio management process.

B. Investment Strategies

ACM will determine an appropriate portfolio asset allocation utilizing stocks, fixed income securities, ETFs, mutual funds, and/or cash equivalent instruments. Asset allocations are based on each client's investment objectives, risk tolerance, investment guidelines, time horizons, tax status, liquidity requirements, and other important and necessary information provided by the client. ACM will continually monitor each client's investments and asset allocation and make any changes deemed necessary to remain consistent with client objectives.

1. Tax Loss Selling

ACM maintains procedures for executing specific transactions in a client's account for tax reasons. Under these procedures, ACM will generally follow the directions of a client regarding harvesting tax losses or gains, subject to certain scope, amount, and timing limitations. Generally, the directions entail a repurchase of the sold security after the "wash sale" (thirty (30) day) period. Daily market fluctuations can affect the dollar amount of gain or loss with respect to certain investment decisions. The monetary benefit derived from tax loss selling, for example, have the potential to not exceed the risk of not being fully invested during that time. Executing tax sales (and repurchases) can adversely affect performance. ACM is not a tax advisor, and therefore clients should consult with their tax specialist to review their tax situation.

Alamar can invest in exchange traded funds ("ETF's") or other pooled vehicles (including during the wash sale period). ETFs and other funds have certain imbedded costs, including management fees, of which the client account will bear a proportionate share while it is invested in the ETF or other fund.

C. Risk of Loss

Investing in securities involves a significant risk of loss which clients should be prepared to bear. ACM investment recommendations are subject to various market, currency, economic, political and business risks, and such investment decisions will not always be profitable. Clients should be aware that there can be a loss or depreciation to the value of the client's account. There can be no assurance that the client's investment objectives will be obtained and no inference to the contrary should be made.

Past performance is not indicative of future results. Therefore, clients should never assume that future performance of any specific investment or investment strategy will be profitable.

Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there can be varying degrees of risk.

Because of the inherent risk of loss associated with investing, the Firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

The market value of fixed income securities will generally fluctuate inversely with interest rates and other market conditions prior to maturity. Fixed income securities are obligations of the issuer to make payments of principal and/or interest on future dates, and include, among other securities: bonds, notes and debentures issued by corporations; debt securities issued or guaranteed by the U.S. government or one of its agencies or instrumentalities, or by a non-U.S. government or one of its agencies or instrumentalities; municipal securities; and mortgage-backed and asset-backed securities. These securities can pay fixed, variable, or floating rates of interest, and can include zero coupon obligations and inflation-linked fixed income securities. The value of longer duration fixed income securities will generally fluctuate more than shorter duration fixed income securities.

There is no assurance that a mutual fund or ETF will achieve its investment objective. Past performance of investments is no guarantee of future results.

There are certain additional risks associated with the securities recommended and strategies utilized by ACM including, among others:

- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Non-diversification risk – The risk of focusing investments on a small number of issuers, industries or foreign currencies, including being more susceptible to risks associated with a single economic, political or regulatory occurrence than a more diversified portfolio might be.
- Cash & Cash Equivalent Risk: Cash and cash equivalents generally refer to either United States dollars or highly liquid short-term debt instruments such as, but not limited to, treasury bills, bank CD's and commercial papers. Generally, these assets are considered nonproductive and will be exposed to inflation risk and considerable opportunity cost risk. Investments in cash and cash equivalents will generally return less than the advisory fee charged by our firm. Our firm may recommend cash and cash equivalents as part of our clients' asset allocation when deemed appropriate and in their best interest. Our firm considers cash and cash equivalents to be an asset class.
- Equity (stock) Market Risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock

equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.

- Factor Risk – A factor is defined as any variable that contributes risk and/or return to a particular asset or asset class. The strategy employed by the Firm focuses on a portfolio that is biased towards higher earnings growth and price momentum. There involves a risk of focusing on such factors should they fall out of favor and thus limit returns on the Firm's strategy.
- Fixed Income Risk – When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Interest rate risk – The chance that prices of fixed income securities will decline because of rising interest rates. Similarly, the income from fixed income securities can decline because of falling interest rates.
- Reinvestment Risk – The risk that interest and principal payments from a bond will be reinvested at a lower yield than that received on the original bond. During periods of declining interest rates, bond payments can be invested at lower rates; during periods of rising rates, bond payments can be invested at higher rates.
- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs. ETFs typically trade on a securities exchange and the prices of their shares fluctuate throughout the day based on supply and demand, which will not always correlate to their net asset values. Although ETF shares will be listed on an exchange, there can be no guarantee that an active trading market will develop or continue. Owning an ETF generally reflects the risks of owning the underlying securities it is designed to track. ETFs are also subject to secondary market trading risks. In addition, an ETF will not always replicate exactly the performance of the index it seeks to track for several reasons, including transaction costs incurred by the ETF, the temporary unavailability of certain securities in the secondary market, or discrepancies between the ETF and the index with respect to weighting of securities or number of securities held.
- Management Risk – client's investment with the Firm varies with the success and failure of the Firm's investment strategies, research, analysis, and determination of portfolio securities. If the Firm's investment strategies do not produce the expected returns, the value of the investment will decrease.
- Margin Risk – when purchasing securities, the securities can be paid for in full, or it is possible to borrow part of the purchase price from the client's account custodian or clearing firm. If borrowing funds in connection with the client account, the client will be required to open a margin account, which will be carried by the clearing firm. The securities purchased in such an account are the clearing firm's collateral for its loan to the client. If those securities in a margin account decline in value, the value of the

collateral supporting this loan also declines, and as a result, the brokerage firm is required to take action in order to maintain the necessary level of equity in the account. The brokerage firm can issue a margin call and/or sell other assets in your account. It is important that each client fully understand the risks involved in trading securities on margin, which are applicable to any margin account that the client maintains. These risks include the following:

  - The client can lose more funds than deposited in the margin account;
  - The account custodian or clearing firm can force the sale of securities or other assets in the account;
  - The account custodian or clearing firm can sell the client's securities or other assets without contacting the client;
  - The client is not entitled to choose which securities or other assets in the margin account will be liquidated or sold to meet a margin call;
  - The account custodian or clearing firm can move securities held in a cash account to the margin account and pledge the transferred securities;
  - The account custodian or clearing firm can increase its "house" maintenance margin requirements at any time and they are not required to provide the client advance written notice; and/or
  - The client is not entitled to an extension of time on a margin call.

- Opportunity Cost Risk –The risk that an investor can forego profits or returns from other investments.
- Options Risk – below are some of the main risks associated with investing in options:
  - When writing covered call options to produce income for a client's account, there can be times when the underlying stock is "called" (call option contract exercised or assigned) by the investor that purchased the call option. That means the client would be required to sell the underlying security at the exercise (pre-determined) price to that investor.
  - Clients can be required to open a margin account in order to invest in options, which carries additional risks (see above for details) and would result in margin interest costs to the client.
  - Option positions can be adversely affected by company specific issues (the issuer of the underlying security) which can include but are not limited to bankruptcy, insolvency, failing to file with regulatory bodies, being delisted, having trading halted or suspended, corporate reorganizations, asset sales, spin offs, stock splits, mergers and acquisitions. In addition, market related actions, political issues, and economic issues can adversely affect the option market. These factors could restrict, halt, suspend, or terminate option positions written (sold) or purchased.
  - Changes in value of the option will not always correlate with the underlying security, and the account could lose more than principal amount invested.
  - Options involve risk and are not suitable for all clients. Therefore, a client should read the option disclosure document, "Characteristics and Risks of Standardized Options", which can be obtained from any exchange on which options are traded,

at www.optionsclearing.com, or by calling 1-888-OPTIONS, or by contacting your broker/custodian.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

Mr. Crawshaw, in his individual capacity, serves as President and CEO of Church Street Advisors, LLC ("CSA"). CSA is an Illinois general purpose LLC. Christopher Crawshaw is the sole employee and shares in the profits and losses of the firm. CSA provides project based consulting in the area of marketing and business strategy. Clients of CSA may be involved in the investment industry however at no time is CSA offering investment advice or counsel. This outside business activity presents a conflict of interest to the extent that Mr. Crawshaw's multiple roles can take time away from their investment advisory responsibilities. In order to mitigate this conflict of interest Mr. Crawshaw will at all times act in the clients best interest.

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

A. <u>Description of Code of Ethics</u>

ACM is a fiduciary who owes its clients undivided loyalty. This fiduciary obligation imposes upon ACM and its associated persons a duty to deal fairly and to act in the best interest of its clients. In addition, this obligation imposes upon ACM and its associated persons numerous responsibilities, including the duty to render disinterested and impartial advice; to make suitable recommendations within the context of the total portfolio to clients in light of their needs, financial circumstances and investment objectives; to exercise a high degree of care to ensure that adequate and accurate representations of its business and other information about securities are presented to clients; and to not engage in fraudulent, deceptive or manipulative practices.

To this end, ACM has adopted a Code of Ethics ("Code") which establishes standards of conduct for the Firm's supervised persons and includes general requirements that such supervised persons comply with their fiduciary obligations to clients and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest and confidentiality of client information.

ACM's associated persons may transact in the same securities for personal accounts as they are permitted to buy or sell for client accounts; however, ACM has adopted personal securities transaction policies in its Code, which all current and future ACM associated persons must follow. Specifically, the Code requires personnel to report personal trades and holdings and prohibits or requires pre-clearance for certain trades in certain circumstances. The Code also contains procedures for reporting violations and enforcement. The Code is reviewed and distributed to personnel annually. ACM will provide a copy of its Code of Ethics to any client or prospective client upon request. Please contact ACM at (805) 897-1144.

B. Participation or Interest in client Transaction

It is ACM's policy not to enter into any principal transactions or agency cross transactions on behalf of client accounts. Principal transactions occur where an adviser, acting as principal for its own account, buys securities from or sells securities to any advisory client. Agency cross transactions occur where a person acts as an investment adviser in relation to a transaction in which the adviser, or an affiliate of the adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

ACM or individuals associated with ACM are permitted to buy or sell for their personal account(s) securities or investment products identical to those recommended to or already owned by clients. Nevertheless, to mitigate potential conflicts, ACM has adopted a Code of Ethics, which outlines the procedures regarding personal trading that must be followed (see details below). Additionally, as part of ACM's fiduciary duty to clients, ACM, and its supervised persons will endeavor at all times to put the interests of the clients first and at all times are required to adhere to ACM's Code of Ethics.

C. Personal Trading

ACM employees are permitted to buy for their own accounts, securities which ACM also recommends to clients; buy or sell securities or other instruments that ACM has recommended to client; or engage in transactions for their own account in a manner that is consistent with ACM's recommendations to a client. Personal securities transactions by employees raise potential conflicts of interest when such persons trade in a security that is owned by, or considered for purchase or sale for, a client.

In order to mitigate this conflict of interest and to comply with all applicable laws and regulations, ACM's Code of Ethics sets forth the professional and fiduciary standards that all associated persons must follow. The Firm's intention is to protect client interests at all times and to demonstrate ACM's commitment to its fiduciary duties of honesty, good faith, and fair dealing with clients. All associated persons are expected to adhere strictly to the policy and are required to follow specific procedures regarding personal trading, including:

- Adhere to the fundamental standard that employees should not take inappropriate advantage of their position;

- Conduct all personal securities transactions in a manner consistent with the adopted policy;
- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities; and
- Comply with applicable provisions of the federal securities laws.

ACM and its Associated Persons cannot buy or sell specific securities for their own accounts based on personal investment considerations, which ACM does not deem appropriate to buy or sell for clients.

ITEM 12: BROKERAGE PRACTICES

ACM has entered into a relationship with Charles Schwab & Co. ("Schwab") and Interactive Brokers ("IBKR") (herein referred to as "Custodians") to serve as custodian and executing broker/dealer for asset management accounts. In some cases, clients can choose to select another qualified custodian to execute asset management transactions.

A. Best Execution

While ACM strives to achieve the best execution possible for client securities transactions and believes that these custodians have execution procedures that are designed to obtain the best execution possible, there can be no assurance that best execution can be obtained. By selecting a particular custodian, there is the potential for clients to not achieve the most favorable execution. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the overall best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, net price, reputation, financial strength and stability, efficiency of execution and error resolution, the size of the transaction and the market for the security. Consistent with the foregoing, while ACM will seek competitive rates, it does not mean ACM will necessarily obtain the lowest possible commission rates for client transactions.

To ensure that brokerage firms selected by ACM are conducting overall best qualitative execution, ACM will periodically (and no less often than annually) evaluate the trading process and brokers utilized. This evaluation will include, but is not limited to price, commission, timing, research, aggregated trades, capable floor brokers or traders, competent block trading coverage, ability to position, capital strength and stability, reliable and accurate communications and settlement processing, use of automation, knowledge of other buyers or sellers and administrative ability.

Our Custodians generally do not charge ACM client accounts separately for custody services but can be compensated by charging you commissions or other fees on trades that it executes or that settle into your managed account(s). For some accounts, our Custodians will charge you a percentage of the dollar amount of assets in the account in lieu of commissions. Schwab's asset-based fees applicable to ACM client accounts were negotiated based on our commitment to maintain ACM client assets in accounts at Schwab. This commitment benefits you because the overall commission rates and asset-based fees you pay are lower than they would be if ACM had not made the commitment. In addition to commissions, or asset-based fees Schwab charges a flat dollar amount as a "trade away" fee for each trade that ACM executes by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into a Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize trading costs, ACM exclusively recommends the Custodians listed above to execute trades for your account.

We seek to make available only custodians who will hold client assets and execute transactions on terms that we feel are most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, but not limited to the following:

- Combination of transaction execution services along with asset custody services (generally without a separate fee for custody).
- Capability to execute, clear, and settle trades (buy and sell securities for your account).
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.).
- Breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds ("ETF"s), etc.).
- Availability of investment research and tools that assist us in making investment decisions.
- Competitive pricing of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them.
- Reputation, financial strength, and stability of the provider.
- Their prior service to us and our clients.
- Availability of other products and services that benefit us, as discussed below.

Our firm also receives services such as research and administrative functions including portfolio pricing, account statement generation and fee calculations, software and other technology that provide access to client account data, and attendance at conferences, meetings and other educational and/or social events. These services are intended to support our firm in conducting business and in serving the best interests of our clients. Our firm does not receive client brokerage commissions (or markups or markdowns) in exchange for research or other products or services. Our recommendation of a qualified custodian to our clients is based on our clients' interests in receiving the best execution and the level of competitive, professional services that the qualified custodians provide.

B. Soft Dollars and Incidental Benefits

Benefits of Using Schwab as a Custodian

Schwab Advisor Services™ (formerly Schwab Institutional) is Schwab's business serving independent investment advisory firms like ACM. They provide ACM and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services generally are available on an unsolicited basis (i.e., ACM does not have to request them) and at no charge to us as long as we keep a total of at least $10 million of our clients' assets in accounts at Schwab. Below is a detailed description of Schwab's support services:

Schwab Services that Benefit You. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Schwab Services that Perhaps will Not Directly Benefit You. Schwab also makes available to us other products and services that benefit us but perhaps will not directly benefit you or your account. These products and services assist ACM in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. ACM can use this research to service all, some or a substantial number of our clients' accounts. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

Schwab Services that Generally Benefit Only Us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events;
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

Schwab will at times provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also has the option to discount or waive its fees for some of these services or pay all or a part of a third party's fees. In addition, Schwab can provide ACM with other benefits such as occasional business entertainment of our personnel.

ACM's use of Schwab's services stated in the three preceding sections consists of utilizing their access to its institutional brokerage services, including the broad range of investment products, execution of the securities transactions and custody of our client assets. Schwab provides us access to Schwab Advisor Center, which provides us with client account data, facilitates trade execution, pricing and other market data, and facilitates payment of our fees from our clients and other recording keeping functions. ACM does attend some of the education seminars and conferences that Schwab hosts.

ACM's Beneficial Interest in Schwab's Services

The availability of these services from Schwab benefits us because ACM does not have to produce or purchase them. ACM does not have to pay for Schwab's services so long as we commit a certain level of client assets in accounts at Schwab. The asset minimums give ACM an incentive to recommend that you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest.

ACM believes, however, that our selection of Schwab as custodians/brokers is in the best interests of our clients. It is primarily supported by the scope, quality, and price of Schwab's services (based on the factors discussed above) and not Schwab's services that benefit only us. We do not believe that maintaining certain levels of client assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

ACM's Beneficial Interest in IBKR

Interactive Brokers may make certain research and brokerage services available at no additional cost to our firm. Research products and services provided by Interactive Brokers may include: research reports on recommendations or other information about particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by Interactive Brokers to our firm in the performance of our investment decision-making responsibilities. The aforementioned research and brokerage services qualify for the safe harbor exemption defined in Section 28(e) of the Securities Exchange Act of 1934.

ACM's Chief Compliance Officer, L. John Murphy, remains available to address any questions that a client or prospective client have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement creates.

C. Trade Aggregation and Allocation

We perform investment management services for various clients. There are occasions on which portfolio transactions will be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm. Although such concurrent authorizations could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation, and availability of funds, using price averaging, proration, and consistently non-arbitrary methods of allocation.

ACM typically aggregates orders. The advantages to aggregating are that the orders are handled in a way that mitigates market impact (as applicable and possible) and that each client gets the same (average) execution price. We can determine not to aggregate transactions, for example, based on the size of the trades, the number of client accounts, the timing of the trades, the liquidity of the securities, and the discretionary or non-discretionary nature of the trades. If orders are not aggregated, some clients purchasing securities around the same time can potentially receive a less favorable price than other clients. This means that the practice of not aggregating can cost clients more money.

D. Trade Rotation Policy

ACM's policy is to provide a fair and equitable method of trade rotation in placing trades for clients' account. To meet this objective, the Firm has established written trade rotation procedures. Generally, ACM utilizes a trade rotation log, which lists the trade rotation schedule for certain client accounts. The log is designed as an internal control to help the Firm ensure that it does not treat client accounts unfairly to the extent reasonably practicable and that no client account (or group of accounts) receives placement priority over any other participating accounts.

E. Directed Brokerage

Under certain circumstances a client can direct ACM to utilize a certain broker-dealer to execute some or all transactions for the client's accounts; however, ACM cannot guarantee that it will receive a favorable price for execution and the client is responsible for negotiating the terms and arrangements for the account with that broker-dealer.

F. Brokerage for client Referrals

The Firm does not directly or indirectly receive client referrals from a broker-dealer or third parties.

ITEM 13: REVIEW OF ACCOUNTS

A. Periodic Reviews

Accounts are monitored on an ongoing basis, which includes detailed periodic reviews. The frequency of reviews is at the discretion of ACM, but accounts are typically reviewed not less than quarterly. Accounts are reviewed for performance, consistency with the investment strategy and client objectives, and other account parameters in order to determine if any adjustments need to be made. All reviews are performed by George Tharakan, L. John Murphy, and/or Christopher Crawshaw.

B. Other Reviews and Triggering Events

In addition to the periodic reviews described above, reviews can be triggered by changes in a client's personal, tax, or financial status. Account holdings also are reviewed when changing market conditions warrant such review. Clients are encouraged to notify the Firm of any changes in his/her personal financial situation that might affect his/her investment needs, objectives, or time horizon.

C. Regular Reports

Account statements are generated no less than quarterly and are sent directly from the account custodian. These statements list the account positions, activity in the account over the covered period, and other related information, including any fees deducted from the account. Investment management clients are also sent confirmations following each brokerage account transaction unless confirmations have been waived. Clients are urged to carefully review all account statements.

In addition, clients can receive other supporting reports from mutual funds, trust companies, broker-dealers, or insurance companies based on their involvement with the account and their applicable internal reporting requirements.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. Economic Benefits of Being on the Schwab Platforms

Our firm receives economic benefit from Schwab in the form of the support products and services made available to our firm and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit our firm, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability of Schwab's products and services is not based on our firm giving particular investment advice, such as buying particular securities for our clients.

B. Economic Benefits of Being on the IBKR Platform

Our firm does not receive any economic benefits from IBKR other that what is disclosed in item 12 of this brochure.

C. Compensation for client Referrals

In accordance with Rule 206 (4)-1 of the Investment Advisers Act of 1940, our firm does not provide cash or non-cash compensation directly or indirectly to unaffiliated persons for testimonials or endorsements (which include client referrals).

ITEM 15: CUSTODY

While our firm does not maintain physical custody of client assets (which are maintained by a qualified custodian, as discussed above), we are deemed to have custody of certain client assets if given the authority to withdraw assets from client accounts as part of our advisory fee debiting process. All of our clients receive account statements directly from their qualified custodian(s) at least quarterly upon opening of an account. We urge our clients to carefully review these statements. Additionally, if our firm decides to send its own account statements to clients, such statements will include a legend that recommends the client compare the account statements received from the qualified custodian with those received from our firm. Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

ITEM 16: INVESTMENT DISCRETION

A. Discretionary Authority; Limitations

ACM has full investment discretion over (1) which securities are to be bought or sold in client accounts; (2) the amount of securities to be bought or sold in client accounts; and (3) when transactions are made. This means that ACM does not have to obtain prior consent from the client when investing client assets. However, such discretion is to be exercised in a manner consistent with each client's stated investment objectives, risk tolerance, and time horizon. In addition, ACM's authority to trade securities can be limited in certain circumstances by applicable legal and regulatory requirements. In some instances, ACM's discretionary authority can be limited by conditions imposed by clients on ACM's discretionary authority, including restrictions on investing in certain securities or types of securities. All such limitations, restrictions, and investment guidelines must be provided to ACM in writing.

D. Limited Power of Attorney

By signing ACM's Agreement, clients authorize ACM to exercise this full discretionary authority with respect to all investment transactions involving the client's investment management account. Pursuant to such Agreement, ACM is designated as the client's attorney-in-fact with discretionary authority to effect investment transactions in the client's account which authorizes ACM to give instructions to third parties in furtherance of such authority.

Item 17: Voting Client Securities

All proxies received by our firm will be given to our Chief Compliance Officer or designated person for processing. Our Chief Compliance Officer will determine which accounts managed by our firm hold the security to which the proxy relates. These accounts and their shareholdings will be matched to the proxies received for each security. Missing proxies or significant variances in shares held will be investigated.

Our firm seeks to ensure compliance with the new Exchange Act Rule 14a-11. In accordance with the aforementioned rule, our firm provides shareholders with the opportunity to nominate directors at a shareholder meeting under the applicable state or foreign law. Clients also have the ability to have their nominees included in the company proxy materials sent to all of our shareholders. Furthermore, the clients as shareholders also have the ability to use the shareholder proposal process to establish procedures for the inclusion of shareholder director nominations in company proxy materials.

Where voting authority exists, proxies are voted by our firm according to Board recommendations in categories listed below among others unless not deemed to be in the best interests of the client:

- for directors and for management on routine matters;
- for a limit on or reduction of the number of directors, and for an increase in the number of directors on a case by case basis;
- against the creation of a tiered board;
- for the elimination of cumulative voting;
- for independence of auditors;
- for deferred compensation;
- for profit sharing plans;
- for stock option plans unless the plan could result in material dilution to shares outstanding or is excessive;
- for stock repurchases;
- for an increase in authorized shares unless the authorization effectively results in a blind investment pool for shareholders;
- for reductions in the par value of stock;
- for company name changes;
- for routine appointments of auditors.

Our firm abstains on motions to limit directors' liability. Material issues not addressed above (e.g., mergers, poison pills, social investing and miscellaneous shareholder proposals) are dealt with on a case-by-case basis.

Our firm will defer to instruction from clients in all voting matters. Records of all issues and votes are maintained and reported to clients as requested.

Our firm recognizes that under certain circumstances our firm may have a conflict of interest between us and our clients. Such circumstances may include, but are not limited to, situations where our firm or one or more of our affiliates, including officers, directors and employees, has or is seeking a client relationship with the issuer of the security that is the subject of the proxy vote. Our firm shall periodically inform our employees that they are under an obligation to be aware of the potential for conflicts of interest on the part of our firm with respect to voting proxies on behalf of funds, both as a result of our employee's personal relationships and due to circumstances that may arise during the conduct of our business, and to bring conflicts of interest of which they become aware to the attention of the proxy manager. Our firm shall not vote proxies relating to such issuers on behalf of client accounts until our firm has determined that the conflict of interest is not material or a method of resolving such conflict of interest has been agreed upon by our management team. A conflict of interest will be considered material to the extent that it is determined that such conflict has the potential to influence our decision-making in voting a proxy. Materiality determinations will be based upon an assessment of the particular facts and circumstances. If our firm determines that a conflict of interest is not material, our firm may vote proxies notwithstanding the existence of a conflict. If the conflict of interest is determined to be material, the conflict shall be disclosed to our management team and our firm shall follow the instructions of the management team.

Our Chief Compliance Officer will maintain files relating to our proxy voting procedures. Records will be maintained and preserved for 5 years from the end of the fiscal year during which the last entry was made on a record, with records for the last two years kept on our premises. Records of the following will be included in the files:

- a copy of each proxy statement that our firm receives, provided however that our firm may rely on obtaining a copy of proxy statements from the SEC's EDGAR system for those proxy statements that are available;
- a record of each vote that our firm casts;
- a copy of any document our firm created that was material to making a decision how to vote proxies, or that memorializes that decision;
- a copy of each written client request for information on how our firm voted such client's proxies, and a copy of any written response to any client request for information on how our firm voted their proxies.

Information on how particular proxies were voted may contact our Chief Compliance Officer, John Murphy, by phone at (805) 897-1144 or email at john@alamarcapital.com.

ACM typically does not advise or act for clients with respect to any legal matters, including bankruptcies and class actions, for the securities held in clients' accounts.

Item 18: Financial Information

ACM does not require or solicit prepayment of more than $1,200 in fees per client, six months or more in advance and therefore is not required to provide, and has not provided, a balance sheet. ACM does not have any financial commitments that impair its ability to meet contractual and fiduciary obligations to clients and has not been the subject of a bankruptcy proceeding.

FIRM BROCHURE SUPPLEMENT

(Part 2B of Form ADV)

ALAMAR
CAPITAL MANAGEMENT

February 2024

Leo John Murphy, CFA®

Alamar Capital Management, LLC

CRD # 2962473

200 E. Carrillo, Suite 304
Santa Barbara, CA, 93101
Phone: (805) 897-1144

This Brochure Supplement provides information about the qualifications of Leo John Murphy that supplements the Brochure for Alamar Capital Management, LLC. You should have received a copy of that B. Please contact us at (805) 897-1144 or info@alamarcapital.com if you did not receive Alamar Capital Management, LLC's brochure or if you have any questions about the contents of this supplement. Thank you.

Additional information about Leo John Murphy is available on the SEC's website at https://www.adviserinfo.sec.gov/.

Item 1: Cover Page

Please see previous page.

Item 2: Educational Background and Business Experience

Leo John Murphy (DOB: 1971)

Educational Background:

B.A. - California Polytechnic State University, San Luis Obispo, 1993
M.B.A. - University of Southern California, 2002
Chartered Financial Analyst, 2003

Business Background:

Alamar Capital Management, LLC - Co-Founder, President, CEO (2010 - Present)
Sycamore Advisors, LLC - Founder, Managing Member (2008-2009)
Santa Barbara Asset Management - Managing Director (2005-2008)
Santa Barbara Asset Management - Vice President (2001 - 2005)
Canterbury Consulting - Associate (1997-2000)

Explanation of Professional Designation:

Chartered Financial Analyst
The Chartered Financial Analyst (CFA®) charter is a professional designation established in 1962 and awarded by the 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 and equity analysis, alternative, and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders 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

ACM is required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of each investment person providing advice to you. Mr. Murphy has no information required to be disclosed under this Item.

Item 4: Other Business Activities

Mr. Murphy does not have any outside business activities to report which would create a material conflict of interest with our clients.

Item 5: Additional Compensation

Mr. Murphy does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Leo John Murphy is the Chief Executive Officer, President, Chief Compliance Officer, and co-owner of ACM and is responsible for all advice provided to clients and for providing supervisory oversight to the ACM team. Mr. Murphy can be contacted at (805) 897-1144.

Firm Brochure Supplement

(Part 2B of Form ADV)

February 2024

George Mathew Tharakan, CFA®
Alamar Capital Management, LLC

CRD # 4913320

200 E. Carrillo, Suite 304
Santa Barbara, CA, 93101
Phone: (805) 897-1144

This Brochure Supplement provides information about the qualifications of George Tharakan that supplements the Brochure for Alamar Capital Management, LLC. You should have received a copy of that Brochure. Please contact us at (805) 897-1144 or info@alamarcapital.com if you did not receive Alamar Capital Management, LLC's brochure or if you have any questions about the contents of this supplement. Thank you.

Additional information about George Tharakan is available on the SEC's website at https://www.adviserinfo.sec.gov/.

Item 1: Cover Page

Please see previous page.

Item 2: Educational Background and Business Experience

George Tharakan (DOB: 1968)

Educational Background:

Indian Institute of Technology - (B.S. Electrical Engineering - 1990)
University of Illinois (Urbana Campus) - (M.S. Computer Engineering - 1992)
The Anderson School at UCLA (M.B.A. Finance - 1997)
Chartered Financial Analyst, 1999

Business Background:

Alamar Capital Management, LLC - Co-Founder, Chief Investment Officer (2010 - Present)
Santa Barbara Asset Management - Portfolio Manager, Director of Research (2003-2009)
Vantis Capital Management - Senior Vice President, Research (2002-2003)
Roxbury Capital Management - Analyst, Portfolio Manager (1997-1998)
Roxbury Capital Management - AVP, Analyst, Portfolio Manager (1998-1999)
Roxbury Capital Management - VP, Analyst, Portfolio Manager (1999-1999)
Roxbury Capital Management - Senior VP, Analyst, Portfolio Manager (1999-2001)
Intel Corporation - Senior Design Engineer (1994-1995)
Intel Corporation - Design Engineer (1992-1994)

Explanation of Professional Designation:

Chartered Financial Analyst
The Chartered Financial Analyst (CFA®) charter is a professional designation established in 1962 and awarded by the 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 and equity analysis, alternative, and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders 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

ACM is required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of each investment person providing advice to you. Mr. Tharakan has no information required to be disclosed under this Item.

Item 4: Other Business Activities

Mr. Tharakan does not have any outside business activities to report which would create a material conflict of interest with our clients.

Item 5: Additional Compensation

Mr. Tharakan does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Mr. Tharakan is supervised by Leo John Murphy. Mr. Murphy is the Chief Executive Officer, President, Chief Compliance Officer, and co-owner of ACM and is responsible for all advice provided to clients and for providing supervisory oversight to the ACM team. Mr. Murphy can be contacted at (805) 897-1144.

FIRM BROCHURE SUPPLEMENT

(Part 2B of Form ADV)

February 2024

Christopher Dyson Crawshaw, CFA®

Alamar Capital Management, LLC

CRD # 2951553

200 E. Carrillo, Suite 304
Santa Barbara, CA, 93101
Phone: (805) 897-1144

This Brochure Supplement provides information about the qualifications of Christopher Crawshaw that supplements the Brochure for Alamar Capital Management, LLC. You should have received a copy of that Brochure. Please contact us at (805) 897-1144 or info@alamarcapital.com if you did not receive Alamar Capital Management, LLC's brochure or if you have any questions about the contents of this supplement. Thank you.

Additional information about Christopher Crawshaw is available on the SEC's website at https://www.adviserinfo.sec.gov/.

Item 1: Cover Page

Please see previous page.

Item 2: Educational Background and Business Experience

Christopher Dyson Crawshaw (DOB: 1966)

Educational Background:

University of Tulsa - (B.A. Finance - 1988)
DePaul University – (MBA, Finance - 1992)
Chartered Financial Analyst, (1998)

Business Background:

Alamar Capital Management, LLC – Managing Director (2019 - Present)
Paskin Capital Management – Managing Director (2017-2019)
Advisory Research, Inc. – CEO (2014-2017)
Advisory Research, Inc. – President (2010-2014)
Advisory Research, Inc. – Managing Director (2005-2010)
Advisory Research, Inc. – Vice President (2000-2005)
Syndicated Capital, Inc. – Analyst (1999-2000)
Pacific Income Advisors, Inc. – Vice President / Consultant (1997-2000)
Canterbury Capital Services, Vice President / Consultant (1996-1997)
Marquette Associates, Inc. – Vice President / Consultant (1991-1996)
William Mercer Asset Planning – Investment Analyst (1989-1991)
Fiduciary Capital Advisors – Analyst (1988-1989)

Explanation of Professional Designation:

Chartered Financial Analyst
The Chartered Financial Analyst (CFA®) charter is a professional designation established in 1962 and awarded by the 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 and equity analysis, alternative, and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders 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

ACM is required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of each investment person providing advice to you. Mr. Crawshaw has no information required to be disclosed under this Item.

Item 4: Other Business Activities

Mr. Crawshaw does not have any outside business activities to report which would create a material conflict of interest with our clients.

Item 5: Additional Compensation

Mr. Crawshaw does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Mr. Crawshaw is supervised by Leo John Murphy. Mr. Murphy is the Chief Executive Officer, President, Chief Compliance Officer, and co-owner of ACM and is responsible for all advice provided to clients and for providing supervisory oversight to the ACM team. Mr. Murphy can be contacted at (805) 897-1144.

Alamar Capital Management

PRIVACY NOTICE

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Alamar Capital Management ("ACM").

Information We Collect: In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others;
- Information about your visits to our website. We store records of the activities on our sites in our web server logs, which automatically capture and save the information electronically. The information we collect helps us administer the site, analyze its usage, protect the website and its content from inappropriate use, and improve the user's experience.
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

Categories of Information We Disclose: We may only disclose information that we collect in accordance with this policy. ACM does not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at ACM, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company, other investment advisers;
- To consumer reporting agencies,
- To third parties who perform services or marketing, client resource management, or other parties to help manage your account on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants, or auditors; and
- To government entities or other third parties in response to subpoenas or other legal processes as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, client relationship management technology, technical systems consultants, and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts/non-public information** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or ACM;
- **To service your accounts,** such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. ACM does not receive information regarding marketing eligibility from affiliates to make solicitations.

Regulation S-ID: Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red-flags to prevent and mitigate identity theft.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Cyber Security: Internal policies and procedures are in place to address cyber security. A copy of this policy is available upon request.

Departing Investment Adviser Representatives ("IARs"): If your IAR's affiliation with ACM ends and he or she joins a non-affiliated securities broker-dealer or registered investment adviser, ACM will permit the IAR to use certain client contact information to solicit clients to join the IAR's new financial services provider. The client contact information that the IAR may use is limited to your name, address, email address, phone number and account title.

Certain states have adopted a requirement for you to approve the sharing of information in advance, otherwise known as an "opt-in" choice. If you live in an "opt-in" state (e.g., California, Massachusetts, Maine, Alaska, North Dakota or Vermont), then ACM will require your consent to share your information with unaffiliated third parties who are not servicing your account. State requirements vary and may change without notice.

Succession Planning: In the event that the owner(s) of ACM retire, become incapacitated, or perish unexpectedly, your information would be disclosed to an unaffiliated third party for the purposes of facilitating a business succession plan. A change in control of ownership of ACM would require your consent, as dictated by your signed agreement with ACM, in order to continue providing services to you.

Your Right to Opt Out: Federal privacy laws give you the right to restrict us from sharing your personal financial information. These laws balance your right to privacy with ACM's need to provide information for normal business purposes. You have the right to opt out of sharing certain information with affiliated and unaffiliated companies of our firm. Choosing to restrict the sharing of your personal financial information will not apply to (1) your information that we may share with companies that help promote and market our own products or products offered under a joint agreement with another company; (2) records of your transactions--such as your loan payments, credit card or debit card purchases, and checking and savings account statements--to firms that provide data processing and mailing services for our firm; (3) information about you in response to a court order; and (4) your payment history on loans and credit cards to credit bureaus. If you opt out, you limit the extent to which ACM can provide your personal financial information to non-affiliated companies. If you wish to exercise your right to opt-out, please contact ACM at (805) 897-1144.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to: John Murphy at Alamar Capital Management, 200 E Carrillo, Suite 304, Santa Barbara CA, 93101; (805) 897-1144.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Alamar Capital Management, 200 E Carrillo, Suite 304, Santa Barbara CA, 93101; (805) 897-1144.