

Polen Capital Management, LLC
FORM CRS – CUSTOMER RELATIONSHIP SUMMARY
March 27, 2024

Item 1. <u>Introduction</u>	<p>Polen Capital Management, LLC is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.</p>
Item 2. <u>Relationships and Services</u>	<p>What investment services and advice can you provide me?</p> <p>We offer investment advisory services to retail investors, with investment management services provided in the form of individually managed accounts that invest in one or more of our model portfolios: Focus Growth strategy, Global Growth strategy, International Growth strategy, U.S. Small Company Growth strategy, U.S. SMID Company Growth strategy, or Global SMID Company Growth strategy. We also serve as portfolio manager for wrap fee programs as well as advise certain mutual funds and other pooled investment vehicles in which retail investors may invest.</p> <p>Monitoring</p> <p>A member of the operations team reviews each client’s account against the model portfolio daily and escalates any potential violations to the Chief Compliance Officer.</p> <p>Investment Authority</p> <p>We have discretionary authority to determine the type and amount of securities to be bought and sold without obtaining specific client consent. Each client has the responsibility to advise us of the investment objectives of, and any specific investment restrictions applicable to, their account.</p> <p>Limited Investment Offering</p> <p>Our model strategies invest in equity securities of companies worldwide with growing earnings driven by what we believe to be solid franchises, strong balance sheets, experienced management teams and leading products/services. Our investment team maintains our model portfolios based on preferred weights or other guidelines.</p> <p>Account Minimums and Other Requirements</p> <p>We generally impose a \$1,000,000 minimum for starting and maintaining a separately managed account in the U.S. Small Company Growth and U.S. SMID Company Growth strategies, a \$10,000,000 minimum in the Global Growth, International Growth, and Global SMID Company Growth strategies (\$20,000,000 in the case of accounts invested in strategies where investments are made in non-U.S. ordinary shares rather than ADRs), and a \$30,000,000 minimum in the Focus Growth strategy, and \$100,000 for starting and maintaining a wrap account, subject to modification at the discretion of Polen Capital.</p> <p>More information about our services can be found on Part 2 of our Form ADV, which is available at https://adviserinfo.sec.gov/firm/summary/106093.</p> <p>Conversation Starters. Ask your financial professional—</p> <ul style="list-style-type: none">• 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.A <u>Fees, Costs, Conflicts, and Standard of Conduct</u>	<p>What fees will I pay?</p> <p>Our standard fee charged to individually managed clients is based on the amount of assets under management and the investment strategy model, and range between 0.55% - 1.00% for institutional investors, and between 1.00% - 1.75% for high net worth investors. Such fees are payable quarterly, either in advance or in arrears. All fees are subject to negotiation based on the circumstances of the client and other factors. Fee breakpoints are generally applied for each strategy; account balances will not be aggregated across multiple investment strategies for individual clients. In addition, we are paid a fee based upon the performance of certain clients’ accounts versus a benchmark. Find more information about our firm’s fees here: https://adviserinfo.sec.gov/firm/summary/106093.</p> <p>Our advisory fee does not cover charges imposed by third parties for investments held in the account. Clients may incur brokerage and other transaction costs, and the advisory fee does not cover debit balances or related margin interest, commissions, or SEC fees or other fees or taxes required by law.</p>

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	<p>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.</p> <p>Conversation Starter. Ask your financial professional—</p> <ul style="list-style-type: none">• 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?
Item 3.B <u>Fees, Costs, Conflicts, and Standard of Conduct</u>	<p>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?</p> <p>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 to you. Here are some examples to help you understand what this means.</p> <ul style="list-style-type: none">• We can potentially receive greater fees from client accounts that have a performance-based compensation structure than from those accounts charged a fee unrelated to performance (e.g., an asset-based fee). As a result, we may have an incentive to direct the best investment ideas to, or to allocate or sequence trades in favor of, the client account that pays a performance fee.• We may suggest investing clients' additional assets in one of the mutual funds or the UCITS product for which we serve as investment adviser. Due to the asset-based fee paid to us by each of these entities, we may have an incentive to recommend them to clients in order to increase their assets. <p>Conversation Starter. Ask your financial professional—</p> <ul style="list-style-type: none">• How might your conflicts of interest affect me, and how will you address them? <p>More information about conflicts of interest between us and our clients is available on Part 2 of our Form ADV, which can be found at https://adviserinfo.sec.gov/firm/summary/106093.</p>
Item 3.C <u>Compensation</u>	<p>How do your financial professionals make money?</p> <p>Our financial professionals receive a salary and may receive a discretionary bonus. All employees also participate in a 401(k)/Profit-Sharing Plan, and some employees are equity owners in the company or participate in a long-term incentive plan tied to company profits. Distribution team members may receive an additional bonus from a revenue-based pool. Other additional year-end bonuses are available based on factors such as client retention.</p>
Item 4. <u>Disciplinary History</u>	<p>Do you or your financial professionals have legal or disciplinary history?</p> <p style="text-align: center;">Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.</p> <p>Conversation Starter. Ask your financial professional—</p> <ul style="list-style-type: none">• As a financial professional, do you have any disciplinary history? For what type of conduct?
Item 5. <u>Additional Information</u>	<p>More information about our services can be found at https://www.polencapital.com/. If you would like additional, up-to-date information or would like to request a copy of this relationship summary, please contact our Chief Compliance Officer, at 1 (561) 241-2425, facsimile 1 (561) 241-2710, or via email at compliance@polencapital.com.</p> <p>Conversation Starter. Ask your financial professional—</p> <ul style="list-style-type: none">• 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?