



WESTON FINANCIAL

Susan K. Arnold, CFP®

Weston Financial Group, Inc.

100 William Street, Suite 200

Wellesley, MA 02481

781-235-7055

www.westonfinancial.net

June 28, 2019

This Brochure Supplement provides information about Susan K. Arnold that supplements Weston Financial's Brochure. You should have received a copy of that Brochure. Please contact Nicole M. Tremblay at 781-235-7055 or ntremblay@westonfinancial.net if you did not receive Weston Financial's Brochure or if you have any questions about the contents of this Supplement.

Additional information about Susan K. Arnold is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Susan K. Arnold (Year of birth: 1959)

Professional Designation: CFP® practitioner *

Educational Background:

Lake Forest College, Lake Forest, IL, B.A. Biology

Bentley University, Waltham, MA, M.S. Personal Financial Planning

Ms. Arnold is a Vice President and Principal Financial Counselor and has been with Weston Financial (the "Advisor") since 1993. She is a CFP® practitioner and a voting member of the Advisor's Investment Committee. Susan works with high net worth individuals and corporate executives to develop goal oriented financial plans. She also works with her clients on corporate benefit, investment portfolio and tax strategies. She develops long term client relationships through listening and understanding her client needs and financial goals. She received a B.A. in Biology from Lake Forest College and a Masters of Science in Personal Financial Planning from Bentley University.

Business Experience:

Weston Financial Group, Inc., Wellesley, MA

Vice President 8/2005 to Present

Principal Financial Counselor 6/2019 to Present

Senior Financial Counselor 06/2000 to 6/2019

*** CERTIFIED FINANCIAL PLANNER™**

The program is administered by the Certified Financial Planner Board of Standards, Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP certification exam, candidates must also complete qualifying work experience and agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards.

Item 3 - Disciplinary Information

There are no legal or disciplinary items applicable to a client's or prospective client's evaluation of Ms. Arnold. Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

Item 4 - Other Business Activities

Ms. Arnold is a Registered Representative of Weston Securities Corporation ("WSC"), a licensed broker-dealer and sister company to the Advisor and a wholly-owned subsidiary of Washington Trust Bancorp, Inc. In addition, Ms. Arnold is the President of The Park Insurance Agency, Inc. ("Park"), a wholly-owned subsidiary of the Advisor.

WSC acts as an introducing broker-dealer for the placement of securities for certain mutual funds, life and variable annuities, 529 College Savings Plans, and limited partnerships. In addition, Park is an insurance agency that facilitates the placement of fixed annuities and life insurance policies. The Advisor may recommend or manage client investments in such products and as such, Ms. Arnold may receive compensation on commissions and/or service fees ("Trailers"), and insurance commissions for products and services offered by WSC and Park, respectively.

Ms. Arnold also receives from the Advisor a fixed annual salary, and an annual bonus based, in part, on the corporate performance of the Advisor and its parent company. In addition, Ms. Arnold receives compensation from the Advisor based on a portion of client-paid financial planning fees, tax preparation fees and investment advisory fees derived from the value of assets held in managed accounts.

The Advisor has policies and procedures in place to ensure that the products and services recommended by Ms. Arnold are based on the individual needs and objectives of the client rather than any compensation that may be received. Although, the payment of compensation could present a conflict of interest, the client is not under any obligation to engage Ms. Arnold or any other employee of the Advisor, and the client has sole discretion to accept or reject the recommendations made.

Employees of the Advisor may invest in their own personal accounts. As such, the personnel may buy or sell securities also recommended to clients. To deal with any conflicts of interest, the Advisor has adopted a Code of Ethics and Statement for Insider Trading. The Code of Ethics contains provisions reasonably necessary to deter misconduct, conflicts of interest and to detect any trading violations. The Advisor has in place an Insider Trading Statement which bars trading on material non-public information. A summary of the Code of Ethics is located in the Advisor's Brochure and the full Code of Ethics will be provided upon request.

Item 5 - Additional Compensation

Ms. Arnold does not receive compensation from any outside entity other than as disclosed above in "Other Business Activities."

Item 6 - Supervision

Ms. Arnold's investment advisory activities are supervised by **Mark T. Kelly**; Senior Vice President, Managing Director and Principal Financial Counselor of the Advisor. Mr. Kelly monitors the investment advice provided to clients by Ms. Arnold through routine communications with Ms. Arnold. In addition, Mr. Kelly meets regularly with Ms. Arnold to discuss business goals and objectives. Further, Mr. Kelly may periodically participate in client meetings and may also sample various communications provided to clients.

If you should have any questions regarding the supervision or the activities performed by Ms. Arnold; **Mark T. Kelly**; Senior Vice President, Managing Director and Principal Financial Counselor, can be reached at mtkelly@westonfinancial.net or at 781-235-7055 x 7848.

Every employee has a responsibility for knowing and following the Advisor's policies and procedures. Every person in a supervisory role is also responsible for those individuals under his/her supervision. Supervision is evidenced by periodic meetings with the supervising principal and the supervised person as well as independent annual reviews by the Compliance Department. Nicole M. Tremblay, Esq.; Senior Vice President and Chief Compliance Officer (the "CCO"), has the overall responsibility for monitoring and testing compliance with the Firm's policies and procedures. Possible violations of these policies or procedures will be documented and reported to the appropriate department manager for remedial action. Repeated violations, or violations that the CCO deems to be of serious nature, will be reported by the CCO directly to the President, or a similarly designated officer, and/or the Advisor's Board of Directors.



WESTON FINANCIAL

Ronald D. Halterman, CFP[®], CLU[®]

Weston Financial Group, Inc.

100 William Street, Suite 200

Wellesley, MA 02481

781-235-7055

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June 28, 2019

This Brochure Supplement provides information about Ronald D. Halterman that supplements Weston Financial's Brochure. You should have received a copy of that Brochure. Please contact Nicole M. Tremblay at 781-235-7055 or ntremblay@westonfinancial.net if you did not receive Weston Financial's Brochure or if you have any questions about the contents of this Supplement.

Additional information about Ronald D. Halterman is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Ronald D. Halterman (Year of birth: 1982)

Professional Designations: CFP® practitioner * and CLU® **

Educational Background:

Assumption College, Worcester, MA, B.A. Marketing

Ronald is a Vice President and Principal Financial Counselor and has been with Weston Financial (the "Advisor") since 2008. He is a CFP® practitioner, has achieved the CLU® designation, and is a voting member of the Advisor's Investment Committee. Ronald works directly with high-net-worth individuals and corporate executives to provide customized financial plans, investment strategies, estate planning, and tax planning advice. Ronald holds a B.A. degree in Marketing, with a minor in Theology, from Assumption College.

Business Experience:

Weston Financial Group, Inc., Wellesley, MA

Principal Financial Counselor 6/2019 to Present

Vice President 3/2018 to Present

Financial Counselor 9/2017 to 6/2019

Assistant Vice President 9/2016 to 3/2018

Associate Counselor 2/2013 to 9/2017

Assistant Portfolio Manager, New Century Portfolios 8/2011 to

9/2017 Senior Financial Associate 4/2008 to 2/2013

John Hancock Financial Network, Westborough, MA

Investment Advisor Representative 12/2005 to 3/2008

*** CERTIFIED FINANCIAL PLANNER™**

The program is administered by the Certified Financial Planner Board of Standards, Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP certification exam, candidates must also complete qualifying work experience and agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards.

**** CHARTERED LIFE UNDERWRITER®**

CLU® is a designation granted by the American College to individuals who have completed training in life insurance and personal insurance planning. To obtain the designation, individuals have to complete advanced courses and exams in several topics including insurance, investments, taxation, employee benefits, estate planning, accounting, management and economics.

Item 3 - Disciplinary Information

There are no legal or disciplinary items applicable to a client's or prospective client's evaluation of Mr. Halterman. Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

Item 4 - Other Business Activities

Mr. Halterman is a Registered Representative of Weston Securities Corporation (“WSC”), a licensed broker-dealer and sister company to the Advisor and a wholly-owned subsidiary of Washington Trust Bancorp, Inc. In addition, Mr. Halterman is an insurance agent with The Park Insurance Agency, Inc. (“Park”), a wholly-owned subsidiary of the Advisor.

WSC acts as an introducing broker-dealer for the placement of securities for certain mutual funds, life and variable annuities, 529 College Savings Plans, and limited partnerships. In addition, Park is an insurance agency that facilitates the placement of fixed annuities and life insurance policies. The Advisor may recommend or manage client investments in such products and as such, Mr. Halterman may receive compensation on the commissions and/or service fees (“Trailers”) and insurance commissions for products and services offered by WSC and Park respectively. Mr. Halterman also receives from the Advisor a fixed annual salary, and an annual bonus based, in part, on the corporate performance of the Advisor and its parent company. In addition, Mr. Halterman receives compensation from the Advisor based on a portion of client-paid financial planning fees and investment advisory fees derived from the value of assets held in managed accounts.

The Advisor has policies and procedures in place to ensure that the products and services recommended by Mr. Halterman are based on the individual needs and objectives of the client rather than any compensation that may be received. Although, the payment of compensation could present a conflict of interest, the client is not under any obligation to engage Mr. Halterman or any other employee of the Advisor, and the client has sole discretion to accept or reject the recommendations made.

Employees of the Advisor may invest in their own personal accounts. As such, the personnel may buy or sell securities also recommended to clients. To deal with any conflicts of interest, the Advisor has adopted a Code of Ethics and Statement for Insider Trading. The Code of Ethics contains provisions reasonably necessary to deter misconduct, conflicts of interest and to detect any trading violations. The Advisor has in place an Insider Trading Statement which bars trading on material non-public information. A summary of the Code of Ethics is located in the Advisor’s Brochure and the full Code of Ethics will be provided upon request.

Item 5 - Additional Compensation

Mr. Halterman does not receive compensation from any outside entity other than as disclosed above in “Other Business Activities.”

Item 6 - Supervision

Mr. Halterman is supervised by **Mark T. Kelly**, Senior Vice President, Managing Director and Principal Financial Counselor of the Advisor. Mr. Kelly monitors the investment advice provided to clients by Mr. Halterman through routine communications with Mr. Halterman. In addition, Mr. Kelly meets regularly with Mr. Halterman to discuss business goals and objectives. Further, Mr. Kelly may periodically participate in client meetings and may also sample various communications provided to clients. If you should have any questions regarding the supervision or the activities performed by Mr. Halterman; **Mark T. Kelly**, Senior Vice President, Managing Director and Principal Financial Counselor, can be reached at mtkelly@westonfinancial.net or at 781-235-7055 x 7848.

Every employee has a responsibility for knowing and following the Advisor’s policies and procedures. Every person in a supervisory role is also responsible for those individuals under his/her supervision. Supervision is evidenced by periodic meetings with the supervising principal and the supervised person as well as independent annual reviews by the Compliance Department. Nicole M. Tremblay, Esq.; Senior Vice President and Chief Compliance Officer (the “CCO”), has the overall responsibility for monitoring and testing compliance with the Firm’s policies and procedures. Possible violations of these policies or procedures will be documented and reported to the appropriate department manager for remedial action. Repeated violations, or violations that the CCO deems to be of serious nature, will be reported by the CCO directly to the President, or a similarly designated officer, and/or the Advisor’s Board of Directors.



WESTON FINANCIAL

Mark T. Kelly, CFP[®], CFA[®]

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June 28, 2019

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Additional information about Mark T. Kelly is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Mark T. Kelly (Year of birth: 1966)

Professional Designations: CFP® practitioner, Chartered Financial Analyst® *

Educational Background:

Boston College Carroll School of Management; Master of Science Degree in Finance
Bryant College; Bachelor of Science in Business Administration with a Concentration in Finance and Accounting

Mr. Kelly is a Senior Vice President, Managing Director and Principal Financial Counselor and joined Weston Financial (the "Advisor") in 2018. He is a CFP® practitioner and holds the Chartered Financial Analyst (CFA) designation and is a voting member of the Advisor's Investment Committee. Mr. Kelly works primarily with high net-worth individuals, business owners, executives, professionals, and their families to develop goal oriented financial plans. He also works with his clients on corporate benefits, investment portfolios and tax strategies. He develops long-term client relationships through listening and understanding his client needs and financial goals. Mr. Kelly has vast experience in the financial services industry and more specifically the wealth and asset management business. In his work with high net-worth individuals and families, he integrates investment management, financial planning, estate and trust planning, as well as cash flow management and customized lending solutions to deliver comprehensive wealth management to his clients. Mr. Kelly is a Member of the CFA Institute and the Boston Security Analysts Society. He is also a Member of the Financial Planning Association. He is a graduate of the ABA National Trust School at Northwestern University. Mr. Kelly earned a Bachelor of Science in Business Administration with a Concentration in Finance and Accounting from Bryant College, and a Master of Science Degree in Finance from Boston College Carroll School of Management.

Business Experience:

Weston Financial Group, Inc., Wellesley, MA

Senior Vice President, Managing Director 6/2019 to Present

Principal Financial Counselor 12/2018 to Present

Client Service Manager 12/2018 to 6/2019

Bainco International Investors, LLC

Managing Director 12/2015 to 12/2018

Citizens Financial Group

Senior Vice President 10/2014 to 12/2015

Plimoth Investment Advisers/ Plimoth Trust Company

Executive vice President 01/2005 to 08/2014

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*** CHARTERED FINANCIAL ANALYST**

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

Item 3 - Disciplinary Information

There are no legal or disciplinary items applicable to a client's or prospective client's evaluation of Mr. Kelly. Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

Item 4 - Other Business Activities

Mr. Kelly does not receive compensation from any outside entity for "Other Business Activities".

Item 5 - Additional Compensation

Mr. Kelly receives from the Advisor a fixed annual salary, and an annual bonus based, in part, on the corporate performance of the Advisor and its parent company. Further, he is eligible to receive compensation pursuant to the Wealth Management Referral Incentive Plan which relates to business development activities on new clients.

The Advisor has policies and procedures in place to ensure that the products and services recommended by Mr. Kelly are based on the individual needs and objectives of the client rather than any compensation that may be received. Although, the payment of compensation could present a conflict of interest, the client is not under any obligation to engage Mr. Kelly or any other employee of the Advisor, and the client has sole discretion to accept or reject the recommendations made.

Employees of the Advisor may invest in their own personal accounts. As such, the personnel may buy or sell securities also recommended to clients. To deal with any conflicts of interest, the Advisor has adopted a Code of Ethics and Statement for Insider Trading. The Code of Ethics contains provisions reasonably necessary to deter misconduct, conflicts of interest and to detect any trading violations. The Advisor has in place an Insider Trading Statement which bars trading on material non-public information. A summary of the Code of Ethics is located in the Advisor's Brochure and the full Code of Ethics will be provided upon request.

Item 6 - Supervision

Mr. Kelly's investment advisory activities are supervised by **Kathleen A. Ryan**; President of the Advisor. Ms. Ryan monitors the investment advice provided to clients by Mr. Kelly through routine communications with Mr. Kelly. In addition, Ms. Ryan meets regularly with Mr. Kelly to discuss business goals and objectives. Further, Ms. Ryan may periodically participate in client meetings and may also sample various communications provided to clients.

If you should have any questions regarding the supervision or the activities performed by Mr. Kelly; **Kathleen Ryan**, President, can be reached at karyan@washtrust.com or 401-348-1265.

Every employee has a responsibility for knowing and following the Advisor's policies and procedures. Every person in a supervisory role is also responsible for those individuals under his/her supervision. Supervision is evidenced by periodic meetings with the supervising principal and the supervised person as well as independent annual reviews by the Compliance Department. Nicole M. Tremblay, Esq.; Senior Vice President and Chief Compliance Officer (the "CCO"), has the overall responsibility for monitoring and testing compliance with the Firm's policies and procedures. Possible violations of these policies or procedures will be documented and reported to the appropriate department manager for remedial action. Repeated violations, or violations that the CCO deems to be of serious nature, will be reported by the CCO directly to the President, or a similarly designated officer, and/or the Advisor's Board of Directors.



WESTON FINANCIAL

Brett C. Lonergan, CFA®

Weston Financial Group, Inc.

100 William Street, Suite 200

Wellesley, MA 02481

781-235-7055

www.westonfinancial.net

June 28, 2019

This Brochure Supplement provides information about Brett C. Lonergan that supplements Weston Financial's Brochure. You should have received a copy of that Brochure. Please contact Nicole M. Tremblay at 781-235-7055 or ntremblay@westonfinancial.net if you did not receive Weston Financial's Brochure or if you have any questions about the contents of this Supplement.

Additional information about Brett C. Lonergan is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Brett C. Lonergan (Year of birth: 1991)

Professional Designations: Chartered Financial Analyst® (CFA), granted by the CFA Institute (Charlottesville, VA), 9/2017*

Educational Background:

Mr. Lonergan is an Assistant Vice President and Financial Counselor and has been with Weston Financial (the "Advisor") since October 2015. He is a voting member of the Advisor's Investment Committee. Mr. Lonergan works directly with high net worth individuals and corporate executives to provide customized financial plans, investment strategies, estate planning, and tax planning advice; while also providing support to Senior Financial Counselors in creating complex planning solutions for clients. Mr. Lonergan holds a B.S. degree in Finance from the University of Rhode Island.

Business Experience:

Weston Financial Group, Inc., Wellesley, MA
Financial Counselor 6/2019 to Present
Assistant Vice President 1/2019 to Present
Associate Financial Counselor 1/2019 to 6/2019
Senior Financial Associate, Officer 6/2018 to 1/2019
Financial Associate 10/2015 to 6/2018

* The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA 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. Please refer to the following website for more information: <https://www.cfainstitute.org>.

Item 3 - Disciplinary Information

There are no legal or disciplinary items applicable to a client's or prospective client's evaluation of Mr. Lonergan. Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

Item 4 - Other Business Activities

Mr. Lonergan does not receive compensation from any outside entity for "Other Business Activities".

Item 5 - Additional Compensation

Mr. Lonergan does not receive compensation from any outside entity, however, he receives from the Advisor a fixed annual salary, and an annual bonus based, in part, on the corporate performance of the Advisor and its parent company. Further, he is eligible to receive compensation pursuant to the Wealth Management Referral Incentive Plan which relates to business development activities on new clients.

The Advisor has policies and procedures in place to ensure that the products and services recommended by Mr. Lonergan are based on the individual needs and objectives of the client rather than any compensation that may be received. Although, the payment of compensation could present a conflict of interest, the client is not under any obligation to engage Mr. Lonergan or any other employee of the Advisor, and the client has sole discretion to accept or reject the recommendations made.

Employees of the Advisor may invest in their own personal accounts. As such, the personnel may buy or sell securities also recommended to clients. To deal with any conflicts of interest, the Advisor has adopted a Code of Ethics and Statement for Insider Trading. The Code of Ethics contains provisions reasonably necessary to deter misconduct, conflicts of interest and to detect any trading violations. The Advisor has in place an Insider Trading Statement which bars trading on material non-public information. A summary of the Code of Ethics is located in the Advisor's Brochure and the full Code of Ethics will be provided upon request.

Item 6 - Supervision

Mr. Lonergan is supervised by **Mark T. Kelly**; Senior Vice President, Managing Director and Principal Financial Counselor of the Advisor. Mr. Kelly monitors the investment advice provided to clients by Mr. Lonergan through routine communications with him. In addition, Mr. Kelly meets regularly with Mr. Lonergan to discuss business goals and objectives. Further, Mr. Kelly may periodically participate in client meetings and may also sample various communications provided to clients. If you should have any questions regarding the supervision or the activities performed by Brett Lonergan; **Mark T. Kelly**; Senior Vice President, Managing Director and Principal Financial Counselor, can be reached at mtkelly@westonfinancial.net or at 781-235-7055 x 7848.

Every employee has a responsibility for knowing and following the Advisor's policies and procedures. Every person in a supervisory role is also responsible for those individuals under his/her supervision. Supervision is evidenced by periodic meetings with the supervising principal and the supervised person as well as independent annual reviews by the Compliance Department. Nicole M. Tremblay, Esq.; Senior Vice President and Chief Compliance Officer (the "CCO"), has the overall responsibility for monitoring and testing compliance with the Firm's policies and procedures. Possible violations of these policies or procedures will be documented and reported to the appropriate department manager for remedial action. Repeated violations, or violations that the CCO deems to be of serious nature, will be reported by the CCO directly to the President, or a similarly designated officer, and/or the Advisor's Board of Directors.



WESTON FINANCIAL

Walter H. Riester, Jr., CFP®

Weston Financial Group, Inc.

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June 28, 2019

This Brochure Supplement provides information about Walter H. Riester that supplements Weston Financial's Brochure. You should have received a copy of that Brochure. Please contact Nicole M. Tremblay at 781-235-7055 or ntremblay@westonfinancial.net if you did not receive Weston Financial's Brochure or if you have any questions about the contents of this Supplement.

Additional information about Walter H. Riester is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Walter H. Riester, Jr. (Year of birth: 1961)

Professional Designation: CFP® practitioner *

Educational Background:

Colgate University, Hamilton, NY, B.A. Economics

New York University Stern School of Business, New York, NY, MBA, Finance

Completed the CFP® Professional Education Program at Boston University

Walter is an Assistant Vice President and Senior Financial Counselor and has been with Weston Financial (the "Advisor") since 1997. He is a CFP® practitioner and a voting member of the Advisor's Investment Committee. Walter is a member of the Boston Chapter of the Society of Financial Service Professionals. Walter's specialty is retirement planning and income tax management strategies. He takes a goal-oriented approach to designing a financial plan based not only on listening and understanding his client's needs and financial goals but also educating his clients and making client service a priority in the financial planning process. Walter is a graduate of Colgate University with a B.A. in Economics. He is also a graduate of the New York University Stern School of Business where he received an MBA in Finance.

Business Experience:

Weston Financial Group, Inc., Wellesley, MA

Senior Financial Counselor 6/2019 to Present

Assistant Vice President 5/2016 to Present

Financial Counselor 9/2017 to 6/2019

Associate Financial Counselor 1/2011 to 9/2017

Senior Financial Associate 7/2005 to 1/2011

Financial Associate 6/2000 to 7/2005

*** CERTIFIED FINANCIAL PLANNER™**

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Item 3 - Disciplinary Information

There are no legal or disciplinary items applicable to a client's or prospective client's evaluation of Mr. Riester. Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

Item 4 - Other Business Activities

Mr. Riester is a Registered Representative of Weston Securities Corporation ("WSC"), a licensed broker-dealer and sister company to the Advisor and a wholly-owned subsidiary of Washington Trust Bancorp, Inc. In addition, Mr. Riester is an insurance agent with The Park Insurance Agency, Inc. ("Park"), a wholly-owned subsidiary of the Advisor.

WSC acts as an introducing broker-dealer for the placement of securities for certain mutual funds, life and variable annuities, 529 College Savings Plans, and limited partnerships. In addition, Park is an insurance

agency that facilitates the placement of fixed annuities and life insurance policies. The Advisor may recommend or manage client investments in such products and as such Mr. Riester may receive compensation on commissions, and/or service fees (“Trailers”) and insurance commissions for placing business through WSC or Park respectively. Mr. Riester also receives from the Adviser a fixed annual salary, and an annual bonus based, in part, on the corporate performance of the Advisor and its parent company. In addition, Mr. Riester receives compensation from the Advisor based on a portion of client-paid financial planning fees, tax preparation fees and investment advisory fees derived from the value of assets held in managed accounts.

The Advisor has policies and procedures in place to ensure that the products and services recommended by Mr. Riester are based on the individual needs and objectives of the client rather than any compensation that may be received. Although, the payment of compensation could present a conflict of interest, the client is not under any obligation to engage Mr. Riester or any other employee of the Advisor, and the client has sole discretion to accept or reject the recommendations made.

Employees of the Advisor may invest in their own personal accounts. As such, the personnel may buy or sell securities also recommended to clients. To deal with any conflicts of interest, the Advisor has adopted a Code of Ethics and Statement for Insider Trading. The Code of Ethics contains provisions reasonably necessary to deter misconduct, conflicts of interest and to detect any trading violations. The Advisor has in place an Insider Trading Statement which bars trading on material non-public information. A summary of the Code of Ethics is located in the Advisor’s Brochure and the full Code of Ethics will be provided upon request.

Item 5 - Additional Compensation

Mr. Riester does not receive compensation from any outside entity other than as disclosed above in “Other Business Activities.”

Item 6 - Supervision

Mr. Riester’s investment advisory activities are supervised by **Mark T. Kelly**, Senior Vice President, Managing Director and Principal Financial Counselor of the Advisor. Mr. Kelly monitors the investment advice provided to clients by Mr. Riester through routine communications with Mr. Riester. In addition, Mr. Kelly meets regularly with Mr. Riester to discuss business goals and objectives. Further, Mr. Kelly may periodically participate in client meetings and may also sample various communications provided to clients.

If you should have any questions regarding the supervision or the activities performed by Mr. Riester; **Mark T. Kelly**; Senior Vice President, Managing Director and Principal Financial Counselor, can be reached at mtkelly@westonfinancial.net or at 781-235-7055 x 7848.

Every employee has a responsibility for knowing and following the Advisor’s policies and procedures. Every person in a supervisory role is also responsible for those individuals under his/her supervision. Supervision is evidenced by periodic meetings with the supervising principal and the supervised person as well as independent annual reviews by the Compliance Department. Nicole M. Tremblay, Esq.; Senior Vice President and Chief Compliance Officer (the “CCO”), has the overall responsibility for monitoring and testing compliance with the Firm’s policies and procedures. Possible violations of these policies or procedures will be documented and reported to the appropriate department manager for remedial action. Repeated violations, or violations that the CCO deems to be of serious nature, will be reported by the CCO directly to the President, or a similarly designated officer, and/or the Advisor’s Board of Directors.