



Standish Capital Management, LLC
Registered Investment Adviser
info@standishcapital.co

Standish Capital Management, LLC

CRD #: 334325

31 Standish Rd
Watertown, MA 02472

Telephone: 716-348-7609

January 13th, 2026

FORM ADV PART 2A Brochure

This brochure provides information about the qualifications and business practices of Standish Capital Management, LLC. If you have any questions about the contents of this brochure, please contact us at 716-348-7609. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Standish Capital Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Standish Capital Management, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Summary of Material Changes

This brochure, dated January 13th, represents the annual updating amendment to Standish Capital Management, LLC's Form ADV Part 2A. The following material changes have been made since the prior filing:

- Updated to reflect a change in the Firm's primary qualified custodian from Interactive Brokers LLC to Charles Schwab & Co., Inc.
- Disclosure added regarding the Firm's custodian transition.
- Updated to reflect the Firm's website.
- Updated to disclose the Firm's use of firm-controlled social media accounts (X and Instagram).

Clients may request a copy of this brochure at any time, free of charge, by contacting:

Standish Capital Management, LLC
31 Standish Rd, Watertown, MA 02472
(716) 348-7609
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Item 4 Advisory Business

Firm Description

Standish Capital Management (“SCM” or “the Firm”) is a state-registered investment adviser founded in 2024 by Pavan Neti, who serves as the sole Principal and Chief Investment Officer. SCM is structured as a single-member LLC.

SCM provides discretionary investment management services to individual, high-net-worth, and small business entity clients through separately managed accounts (SMAs). Business entity clients may include corporations, limited liability companies, partnerships, or trusts seeking professional management of corporate cash or investment portfolios. The firm’s primary offering is a systematic, large/mid cap growth-based equity strategy tailored to clients seeking tactical exposure to U.S. equity markets, with customization available for each entity’s objectives, liquidity needs, and governance requirements.

Types of Advisory Services

Asset Management:

SCM manages client assets on a discretionary basis under an SMA structure, using a large/mid cap growth-based strategy that invests in publicly traded equity securities and exchange-traded funds (ETFs). SCM will offer clients ongoing asset management services by determining each client’s investment objectives, risk tolerance, time horizon, liquidity needs, and documented constraints. Overall investment strategy will be based on the above described factors. Client portfolios are individually owned and held in custody with a third-party broker-dealer or custodian, currently Charles Schwab & Co., Inc., SCM will operate through a discretionary authority to execute investment program transactions as stated within Investment Advisory Agreement. For certain clients who expressly request and authorize it in writing, SCM may utilize limited margin as part of implementation. Use of margin can increase both gains and losses; see Item 8 for related risks.

Tailored Investment Strategies:

While the core investment strategy is systematic and rules-based, clients may request certain customizations, including:

- Exclusion of specific securities or sectors
- Application or limitation of leverage (where authorized)
- Trading restrictions based on client objectives

Wrap Fee Programs

SCM does not offer or participate in any wrap fee programs.

Financial Planning

SCM does not provide financial planning, tax advice, or non-discretionary investment consulting at this time.

Assets Under Management

As of December 30th, 2025, SCM had the following assets under management:

Discretionary	Non-Discretionary	Total
Assets: \$5	Assets: \$0	Assets: \$5

Minimum Investment Requirement

SCM generally requires a minimum account size of \$100,000 to open and maintain a separately managed account. The minimum may be waived at the discretion of the firm for strategic relationships or pilot accounts.

Item 5 Fees and Compensation

Methods of Compensation and Fee Schedules

Asset Management

SCM charges investment management fees of 1% based on total assets under management. For example, a client with \$500,000 under management would pay \$5,000 on an annual basis. Each quarter the fee for this account will be calculated as follows: Account balance at quarter end X (1%/4) = Quarterly Fee.

Fees for small-business-entity accounts (e.g., corporations, LLCs, partnerships, or trusts) follow the same standard 1% annual management-fee schedule unless otherwise negotiated in writing. Entity clients may authorize fee deductions from a designated operating or investment account held in the entity's name at the qualified custodian.

Fees are billed quarterly in arrears, based on the end-of-quarter value of the account. Fees may be debited directly from the client's custodial account with written authorization.

Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. Clients may terminate advisory services with thirty (30) days written notice. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to SCM.

Clients shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

Other Fees and Expenses

Clients may incur additional costs, including but not limited to:

- Brokerage commissions and execution costs
- Custodial fees
- ETF expense ratios

SCM does not receive any portion of these third-party fees

Fee Negotiability

In certain circumstances, SCM may waive or modify its standard fees for strategic relationships, legacy clients, or large account balances.

Prepayment of Client Fee

SCM does not require any prepayment of fees.

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

SCM does not charge performance-based fees because of the conflict of interest. Performance-based fee structure can create incentive to recommend an investment that may carry a higher risk to the client.

Item 7 Types of Clients

SCM provides investment advisory services to:

- Individuals
- High-net-worth individuals
- Small business entities (including corporations, LLCs, partnerships, and trusts) seeking discretionary portfolio management for corporate or treasury assets.

All clients must meet SCM's minimum investment requirement of \$100,000 to open an account. In certain instances SCM reserves the right to lower or waive account minimums for strategic or legacy clients.

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

Methods of Analysis

Security analysis methods include fundamental and technical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not an indicator of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings.

Technical analysis is a method of evaluating securities by analyzing statistical trends such as price movements and

trading volume. It operates on the premise that all known information is already reflected in a stock's price, and that historical patterns often repeat due to market psychology.

Investment Strategy

The investment strategy for specific clients is based upon the objectives stated by the client during consultations. Standish Capital Management employs a systematic large/mid cap growth based strategy using fundamental and quantitative indicators to identify trends in liquid U.S. equities and ETFs. Entry and exit decisions are rules-based and consistent across all client accounts.

SCM does not engage in short-term trading as a strategy. However, in certain market conditions, some securities may be held for periods of less than thirty (30) days when the firm's rules-based model signals that momentum has stalled or reversed. These transactions are driven by systematic risk management and not speculative short-term trading.

SCM does not purchase or subscribe to paid third-party research services. Fundamental analysis is conducted using publicly available information, issuer filings, and internally generated analysis.

Risks associated with the strategy include:

- **Market Risk:** Portfolio returns are subject to fluctuations in equity markets due to conditions affecting general economy; overall market changes; economic instability and currency, interest rate and commodity price fluctuations
- **Equity Risk:** Equities tend to be more volatile than ETFs or the market in general. Small-cap companies are subject to additional risk as they may experience greater volatility, higher failure rates and lower trading volumes which may disproportionately impact their prices
- **ETF Risk:** ETFs may not perfectly mirror its underlying index due to fees, imperfect replication strategies, or rebalancing methodologies. Thinly traded ETFs may experience wider spreads or lower trading volumes, particularly during volatile markets. This can make it difficult to transact without materially impacting the price.
 - **Margin Risk:** Margin has an effect of magnifying both gains and losses, the rates at which clients can borrow also has an impact on profitability of the client's account. SCM limits the use of margin to no more than 25% of the client's total portfolio value, and only when expressly authorized in writing by the client.
- **Manager Risk:** The advisor's investment approach might fail to produce intended results. If the assumptions regarding the performance of a specific asset class fail to materialize in the expected time frame then the overall performance of the client portfolio can suffer.
- **Reinvestment Risk:** This is the risk that the proceeds from investments might have to be reinvested at a lower rate of returns.

SCM monitors accounts to ensure strategy integrity and equitable outcomes for all investors.

Item 9 Disciplinary Information

SCM has no disciplinary history to disclose. Neither the firm nor its principal has been involved in any legal or regulatory events that are material to a client's evaluation of the firm or its integrity.

For Massachusetts Residents: Clients can obtain the disciplinary history, if any, of SCM and its representatives from the Massachusetts Securities Division (617-727-3548) upon request.

Item 10 Other Financial Industry Activities and Affiliations

Neither SCM nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer, Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities and is not engaged in any other financial activities.

Neither SCM nor its representatives have any material relationships with this advisory business that would present a possible conflict of interest.

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

SCM has adopted a Code of Ethics pursuant to Rule 204A-1 under the Investment Advisers Act of 1940 and Massachusetts regulations. The Code requires all supervised persons to act in a fiduciary capacity, placing client interests ahead of their own, and to adhere to high standards of honesty, integrity, and professionalism.

The Code addresses, among other things:

- **Fiduciary Duty:** Act as a fiduciary.
- **Personal Securities Transactions:** Employees must report holdings and transactions, pre-clear certain trades, and are prohibited from front-running, insider trading, or favoring personal accounts.
- **Conflicts of Interest:** Employees must avoid or disclose conflicts, including gifts, outside business activities, and political contributions.
- **Confidentiality & Cybersecurity:** Client data must be safeguarded under SCM's Privacy and Cybersecurity Policies.
- **Senior Investor Protection:** Employees must escalate concerns if they suspect diminished capacity or possible exploitation of clients age 65 and older.

The Chief Compliance Officer (CCO) of Standish Capital Management, LLC is Mr. Pavan Neti, who is responsible for administering and enforcing the firm's Code of Ethics.

A copy of SCM's full Code of Ethics is available to clients or prospective clients upon request.

Item 12 Brokerage Practices

Client accounts are held with a qualified custodian, currently **Charles Schwab & Co., Inc.**, which provides trade execution, clearing, and account reporting. Clients receive account statements directly from Charles Schwab & Co., Inc. at least quarterly. The Firm has transitioned its primary custodial relationship to Charles Schwab & Co., Inc.; however, certain unfunded or transitioning accounts may have previously been maintained with another qualified custodian.

Best Execution: SCM seeks to obtain best execution for client transactions, considering price, commissions, and overall quality of services.

Soft Dollars: SCM does not have soft dollar arrangements.

Aggregation of Trades: When appropriate, SCM may aggregate ("block") client trades to achieve more efficient execution. Trades are allocated fairly and equitably.

Directed Brokerage: Clients are generally required to use Charles Schwab & Co., Inc.. SCM does not allow directed brokerage at other custodians, as this may limit best execution and service consistency.

Item 13 Review of Accounts

SCM monitors client accounts on an ongoing basis.

- **Quarterly reviews** are conducted for all accounts to evaluate performance, asset allocation, benchmark comparisons, and alignment with the client's IPS. Clients receive a **Quarterly Client Review Packet** and a one-page **Tear Sheet**.
- **Additional reviews** occur if market conditions warrant, if requested by the client, or if there are material changes in the client's financial situation or objectives.
- Reviews are conducted by **Pavan Neti, Founder & Chief Investment Officer**, who is responsible for all investment decisions and oversight.

In addition, clients receive official custodial statements directly from Charles Schwab & Co., Inc.. Clients are encouraged to compare these statements with SCM's reports.

Item 14 Client Referrals and Other Compensation

SCM does not currently engage in client referral arrangements and does not receive compensation from third parties for client introductions.

If SCM compensates solicitors in the future, it will do so in compliance with both SEC Rule 206(4)-3 and Massachusetts-specific solicitor requirements, including written solicitor agreements, required disclosures, and adviser supervision of solicitor activities.

Item 15 Custody

SCM does not maintain physical custody of client assets. All client funds and securities are held with a qualified custodian, currently Charles Schwab & Co., Inc., in the client's name. Clients will receive account statements directly from Charles Schwab & Co., Inc. at least quarterly.

In connection with the Firm's custodial transition, limited residual custody may exist for unfunded or transitioning accounts; however, all active client accounts are maintained with a qualified custodian that delivers account statements directly to clients at least quarterly.

SCM has authority to deduct advisory fees directly from client accounts at Charles Schwab & Co., Inc., which is deemed "custody" for regulatory purposes. Clients will receive invoices showing the calculation of advisory fees, and are encouraged to compare SCM's invoices with custodial account statements for accuracy.

Item 16 Investment Discretion

SCM manages client accounts on a discretionary basis pursuant to the Investment Advisory Agreement. Discretionary authority includes the ability to determine:

- Which securities, ETFs, and other permitted investments to buy or sell.
- The amount of securities to transact.
- Timing of transactions and broker selection (limited to Charles Schwab & Co., Inc.).

If authorized in the client intake forms and documented in the IPS, SCM may also employ margin within agreed limits. Clients grant discretionary authority through their signed Advisory Agreement, which remains in effect until terminated in writing.

SCM does not receive any portion of the transaction fees or commissions paid by the client to the custodian.

Clients may impose reasonable limitations on SCM's discretionary authority, such as prohibiting the use of margin, excluding certain securities or sectors, or restricting investment types, provided such limitations are agreed upon in writing.

Item 17 Voting Client Securities

SCM does not vote proxies on behalf of clients. Clients retain responsibility for receiving and voting proxies related to securities held in their accounts. Clients should contact their custodian (e.g., Charles Schwab & Co., Inc.) for proxy information and support.

Item 18 Financial Information

A balance sheet is not required to be provided because SCM does not serve as custodian for client funds or securities and SCM does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. The firm has no financial condition that would impair its ability to meet contractual commitments to clients.

SCM has not been the subject of any bankruptcy petition.

Item 19 Requirements for State-Registered Advisers

Principal Executive Officers and Management Persons; Their Formal Education and Business Background:

SCM is principally owned by Pavan Neti. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

Calculation of Performance-Based Fees and Degree of Risk to Clients

SCM does not charge performance-based fees

Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organizations or arbitration proceedings to report under this section.

Material Relationships That Management Persons Have With Issuers of Securities (If Any)

Neither SCM or Pavan Neti has any relationships or arrangements with issuers of securities.

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January 13th, 2026

FORM ADV PART 2B - Brochure Supplement

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Item 2: Educational Background and Business Experience

Pavan Neti

Born: 1979

Education: B.S. in Computer Science, University at Buffalo, SUNY (2005)

Licenses: Series 65

Employment History:

- Standish Capital Management, LLC – Chief Investment Officer (Dec 2024–Present)
- Individual Investor – (2019–Present)
- Citizens Financial Group – VP, Consumer Finance (2013–2018)
- Deloitte & Touche LLP – Senior Consultant, Credit Risk (2012–2013)
- Ernst & Young LLP – Senior Consultant, Stress Testing (2009–2012)

Mr. Neti brings over 15 years of experience in consumer finance, investment strategy, and model validation.

Item 3: Disciplinary Information

Mr. Neti has no disciplinary history to report.

Item 4: Other Business Activities

Mr. Neti does not have any other business activities.

Item 5 – Additional Compensation

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

Item 6 – Supervision

Mr. Pavan Neti serves as the Founder, Chief Investment Officer (CIO), and Chief Compliance Officer (CCO) of Standish Capital Management, LLC. As CIO, Mr. Neti is responsible for all investment management decisions, including portfolio construction, security selection, and risk management. As CCO, Mr. Neti is responsible for maintaining and enforcing the firm's compliance program. Mr. Neti can be reached directly at: (716) 348-7609 or pneti@standishcapital.co

Item 7 – Requirements for State Registered Advisors

Arbitrations and Regulatory Proceedings

State regulations require disclosure if any Supervised Person of the Advisor is subject to:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.

Mr. Neti does not have any disclosures to make regarding this Item.

Bankruptcy

If a Supervised Person has been the subject of a bankruptcy petition, that fact and the details must be disclosed. Mr. Neti does not have any disclosures to make regarding this Item.

Privacy Policy for Standish Capital Management, LLC

Standish Capital Management, LLC (“SCM”) recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. Standish Capital Management, LLC will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information. SCM will provide this privacy statement to all clients annually. We want our clients to understand what information we collect, how we use it, and how we protect it responsibly.

Why We Collect Your Information

We gather information about you so that we can:

- Help design and implement the investment advisory services; and
- Comply with the Federal and State laws and regulations that govern us.

What Information We Collect and Maintain

We may collect the following types of “nonpublic personal information” about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.

What Information We Disclose

We will not disclose information regarding you or your account except under the following circumstances:

- We receive your prior written consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient

Arrangements with companies not affiliated with SCM will be subject to confidentiality agreements.

Security Policy

Privacy has always been important to SCM. We restrict and limit access to client information only to those who need to carry out their business functions. We educate employees about safeguarding client information and preventing its unauthorized access, disclosure, or use. Employees will be required to acknowledge their acceptance and understanding of the privacy policy in writing. We maintain physical, electronic and procedural safeguards to protect your confidential personal information.

Opt-In Policy

Non-public personal confidential information is any personal information, not available from public sources, about a client or consumer. It generally includes name, address, age, social security number, assets, income, net-worth, account balances, account numbers, beneficiary information, or investment history that cannot be found in public sources. Our firm would like you to know that SCM may disclose clients' non-public confidential information to non-affiliated third parties. Our firm will cease disclosing client's information upon that client's termination from our firm. Our firm cannot share confidential information to non-affiliated third parties without first obtaining a signed statement in which the person makes an affirmative declaration of permission to disclose such information.

I hereby opt-in to allow SCM to disclose my non-public confidential information to non-affiliated third parties.

(Client Initial Here)
 (Client Initial Here)

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.

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:
Standish Capital Management, LLC, 31 Standish Rd, Watertown, MA 02472; (716) 348-7609.

Complaint Notification

Please direct complaints to:
Standish Capital Management, LLC, 31 Standish Rd, Watertown, MA 02472; (716) 348-7609.