March 31, 2026

New England Asset Management, Inc.

Form CRS – Client Relationship Summary[1]

New England Asset Management, Inc. ("NEAM", "we", "us" or "our") is an investment adviser, registered with the United States Securities and Exchange Commission ("SEC"). We provide advisory services for a fee rather than for brokerage commissions. Investment advisory and brokerage services and fees differ, and this document outlines these important 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 advisors, and investing.

What investment services and advice can you provide me?

While we provide investment advisory services to a limited number of retail investors[2] **we are not seeking *new* retail investors**. For our retail investors, we primarily provide advice about equities, exchange traded funds ("ETFs") open-ended mutual funds and/or fixed income securities.

We generally manage your accounts on a **discretionary** basis, which means that we decide which security(ies) and the amount of security(ies) to buy or sell without asking you in advance, based on your written investment guidelines and/or other written instructions or restrictions. We regularly monitor your account and provide periodic market commentary and investment research pieces at no additional charge. In addition, we can make a recommendation to participate in the Polen U.S. Opportunistic High Yield Fund (the "Fund"). Your participation in the fund is ultimately your decision. Our account minimum is $1,500,000. Our sole retail investor is a former employee of a past NEAM client.

For additional Information, please see our Form ADV Part 2A, with special emphasis on Items 4 and 5.

Conversation Starters:

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?

What fees will I pay?

You will pay an **asset-based fee,** meaning that it is calculated as a percentage of the market value of your account at month-end valuations. The more assets you have in your advisory account, the more you will pay us in fees, therefore we have an incentive to encourage you to increase the assets in your account. You will also pay fees for operational services for your account provided by your custodian bank, such as custodial fees and account maintenance fees. Your custodian, and not NEAM, charges these fees. NEAM does not offer services as a custodian and will never have physical or legal custody of your assets.

You will pay for other costs and expenses related to securities transactions such as brokerage commissions for equity transactions and fixed income trading costs (included in the net price of bonds). ETFs and mutual funds charge management and administrative fees, which are set out in the fund's prospectus, and you will pay your share of these fees as a shareholder in the fund. NEAM does not receive any of these fees.

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.

For more information regarding NEAM's fees and costs, review ADV Part 2A Item 5.

[1] This disclosure is provided to comply with the SEC's Form CRS disclosure requirements and those under the Investment Advisers Act of 1940. It does not create or modify any agreement, relationship, or obligation between you and NEAM. Please consult your agreements for all terms and conditions controlling your account. Additional information is available on our website at www.neamgroup.com

[2] Form CRS defines "retail investor" as a natural person, or the legal representative of a natural person, who receives or seeks to receive services primarily for personal, family, or household purposes. You are not a retail investor if you use our services primarily for purposes other than personal, family, or household purposes.

Conversation Starters:

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

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

When we act as your investment adviser, we are a fiduciary and we will 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 you. Here are some examples to help you understand what this means.

On occasion, our financial professionals recommend to clients, or buy or sell for a client account, securities that they own in their personal accounts. This presents them with a conflict of interest, because they have an incentive to favor their own accounts over client accounts, or to trade before we trade for clients, to seek a better price.

Revenue-Sharing: If you invest your assets in the Polen U.S. Opportunistic High Yield Fund (the "Fund"), based on our recommendation; the Fund's manager compensates us from their own profits or retained earnings and not directly from the Fund assets. This payment continues as long as you are a NEAM client and we have a sub-advisory relationship with the Fund manager. This practice is called "revenue-sharing" and is a conflict of interest for us because we have an incentive to recommend this Fund over another fund whose manager does not pay us.

Conversation Starters:

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

For more information about our conflicts of interest, please see our ADV Part 2A, Items 4, 6, 10, 11, 14 and 17.

How do your financial professionals make money?

We pay our financial professionals a salary and bonus. None of NEAM's employees are compensated for the volume or size of transactions in your account(s) or the amount of client assets they service.

Do you or your financial professionals have legal or disciplinary history?

Conversation Starters:

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

Neither NEAM nor any of its financial professionals have a disciplinary history. Visit Investor.gov/CRS for a free and simple search tool to research NEAM and our financial professionals.

Additional Information: **For additional information about our services**, please visit our website at www.neamgroup.com or the SEC website at www.adviserinfo.sec.gov (CRD # 105900). If you would like to speak with us or request an up-to-date copy of this relationship summary or additional information, please call (860) 676-8722.

Conversation Starters:

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?

You will have a representative assigned to you who will address questions you have about your investments. Please call (860) 676-8722 for any additional information.