



SEC Form ADV Part 3 – Client Relationship Summary (CRS)
Wilkins Investment Counsel, Inc.
April 14, 2026

Wilkins Investment Counsel, Inc. is registered with the Securities and Exchange Commission (SEC) as an investment adviser. We provide investment advisory services, not brokerage services. Fees for investment advisory services and brokerage services differ and it is important for the retail investor to understand these differences. This document gives you a summary of the types of services we offer and fees we charge. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational materials about investment advisers, broker-dealers, and investing.

What investment services and advice can you provide me?

We provide investment advisory services to high net worth retail investors including investment counseling and portfolio management. We construct portfolios of individual stocks, bonds, and cash based on our conversations with you and our assessment of your financial situation. We monitor your account continuously and our management of it is a *discretionary* arrangement whereby *we will decide* which investments to buy or sell for your account. You may limit the types of investments that can be utilized by communicating those restrictions to us. The minimum relationship size for which we offer our services is \$2 million, though we may waive this minimum at our discretion. For additional information, please see our Form ADV, Part 2A brochure (Items 4 and 7) at <https://adviserinfo.sec.gov/firm/summary/104913>.

Conversation starters and key questions to ask a financial professional:

- *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?

Our management fee is asset-based, payable quarterly in arrears. It is determined by the value of your account. Thus, the more assets in your account the more you will pay in fees. You pay our fee independent of the number of transactions and type of investments selected.

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. The specific fee schedule that applies to your account is stated in our investment advisory agreement. Clients could incur additional fees and expenses related to our advisory services but not paid to us including commissions, custodian fees, transaction charges, and foreign tax withholding. For more detailed information please see our Form ADV, Part 2A disclosure (specifically Item 5) at <https://adviserinfo.sec.gov/firm/summary/104913>.

Conversation starter:

- *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 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 you. Here is an example to help you understand what this means:

- Your custodian provides us with access to electronic systems that assist us in managing your account. This economic benefit could give our firm an incentive to recommend a custodian over another custodian that does not provide similar benefits.

Refer to our Form ADV Part 2A at <https://adviserinfo.sec.gov/firm/summary/104913> to help you understand what conflicts exist. We make money only from the advisory fees our clients pay us.

Conversation starter:

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

How do your financial professionals make money?

Our financial professionals are compensated in the form of a salary, bonus, profit-sharing plan and certain other benefits based upon the personal performance of an individual as well as the firm's overall performance. Such compensation is driven only by the advisory fees we receive from you. None of our financial professionals are paid referral fees of any kind nor do they receive commissions from third parties.

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

No, our firm and our financial professionals do not have any legal or disciplinary history to disclose. You can use a free and simple tool to research our financial professionals at investor.gov/CRS.

Conversation starter:

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

Additional information about our services

You can find additional information about our investment advisory services by accessing our Form ADV and firm brochure at <https://adviserinfo.sec.gov/firm/summary/104913>. You may request up-to-date information and request a copy of the relationship summary at 617-951-9969.

Conversation starter:

- *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?*

**Exhibit to Amended Form CRS for
Wilkins Investment Counsel, Inc.
Summary of Material Changes**

April 14, 2026

This Exhibit to Amended Form CRS describes the material changes made since our most recent Form CRS amendment which was filed on March 16, 2026. The change that was made pertains to:

- Item 3: Fees, Costs, Conflicts and Standards of Conduct – Revising our response to conflicts of interest question that the Firm can receive direct or indirect benefits from the relationships clients have with a custodian.