

ADV Brochure, Part 2B

1212 N. Washington St., Suite 300, Spokane WA 99201 (509) 624-5591 (800) 624-3833 (509) 624-7215 fax clientservices@palousecap.com

Palouse Capital Management, Inc.

www.palousecap.com

Supplement

Biographical information for all supervised persons that formulate investment advice for clients, have discretionary authority over client assets, or have direct client contact.

March 31, 2025

This brochure supplement provides information about Bryn D. Harman and Spencer T. Shelman. It supplements PCM's accompanying Form ADV 2A brochure. Please contact Christopher K. Hicks, PCM's Chief Compliance Officer, at (503) 445-1957 if you have any questions about the Form ADV 2A brochure or this supplement, or if you would like to request additional or updated copies of either document.

Additional information about Bryn D. Harman and Spencer T. Shelman is available on the SEC's website at www.adviserinfo.sec.gov.

Bryn D. Harman, CFA

Year of Birth 1969

Education: Chartered Financial Analyst designation, August 1997

Bachelor of Commerce, University of Saskatchewan, 1992

Business Background:

Employment: July 2011 to present

Current Position: Chief Executive Officer, Chief Investment Officer, Portfolio Manager, Member, Investment

Committee

Palouse Capital Management, Inc.

December 2009 to November 2013 Director

Hunt Mining Corp.

April 2011 to July 2011 Controller

MDC America, Inc.

December 2009 to March 2011 Chief Financial Officer, Secretary

Hunt Mining Corp.

November 2007 to February 2010 Chief Financial Officer

Hunt Mountain Resources

July 2002 to November 2007 Vice President & Director of Research

ICM Asset Management, Inc.

Disciplinary Information

Mr. Harman has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Harman or of PCM.

Other Business Activities

Mr. Harman is not engaged in any other investment related business, and does not receive compensation in connection with any business activity outside of PCM.

Additional Compensation

Mr. Harman does not receive economic benefits from any person or entity other than PCM in connection with the provision of investment advice to clients.

Supervision

Christopher K. Hicks, Chief Compliance Officer, (503) 292-5853, is involved in supervising the activities of Mr. Harman. Oversight is done through a review of several activities in our management systems which incorporate documentation of client interactions, paper flows and trading activities.

The Chartered Financial Analyst (CFA) designation is offered by the CFA Institute. In addition to 4 years of professional experience, candidates must successfully complete a series of 3 6-hour long examinations administered annually. The curriculum includes modern economics, investment strategies, financial reporting, ethics, equity analysis, derivatives, alternative investments, and portfolio management.

Spencer T. Shelman, CFA

Year of Birth: 1983

Education: Chartered Financial Analyst designation, September 2010

B.A., Washington State University, 2006

Business Background (preceding 5 years):

Employment: June 2015 to present

Current Position: Portfolio Manager, Member, Investment Committee

Palouse Capital Management, Inc.

Employment: November 2013 to May 2015 Research Analyst & Trade Administrator

Signia Capital Management LLC

Employment: August 2011 to October 2013 Portfolio Manager

Asset Planning & Management, Inc.

Employment: July 2006 to July 2011 Research Analyst

ICM Asset Management, Inc.

Disciplinary Information

Mr. Shelman has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Shelman or of PCM.

Other Business Activities

Mr. Shelman is a member of the National Board of Advisors for the Washington State University College of Business. He does not receive compensations for this role and he does not devote a substantial amount of time to this activity.

Mr. Shelman serves on the Foundation Board of Trustees for the Joya Child & Family Development Center (formerly the Spokane Guilds' School Foundation). He does not receive compensation for this role and he does not devote a substantial amount of time to this activity."

Additional Compensation

Mr. Shelman does not receive economic benefits from any person or entity other than PCM in connection with the provision of investment advice to clients.

Supervision

Christopher K. Hicks, Chief Compliance Officer, (503) 292-5853, is involved in supervising the activities of Mr. Menne. Oversight is done through a review of several activities in our management systems which incorporate documentation of client interactions, paper flows and trading activities.

The Chartered Financial Analyst (CFA) designation is offered by the CFA Institute. In addition to 4 years of professional experience, candidates must successfully complete a series of 3 6-hour long examinations administered annually. The curriculum includes modern economics, investment strategies, financial reporting, ethics, equity analysis, derivatives, alternative investments, and portfolio management.