

Portland Global Advisors, LLC

Form ADV Part 2B

(Brochure Supplement)

Supervised Persons:

John B. Sullivan

Richard S.F. Strabley

Derek C. Jaskulski

Heidi N. Peterson

David E. Smith

Thomas C. Wells

Courtney H. Walsh

Leslie K. Klenk

**Portland Global Advisors, LLC
217 Commercial Street, Suite 400
Portland, Maine 04101
Phone: (207) 773-2773; Fax: (207) 773-2602
www.portlandglobal.com**

March 29, 2023

This Brochure Supplement provides information about the above-referenced supervised persons of Portland Global Advisors, LLC (“PGA”) and supplements the PGA Firm Brochure. You should have received a copy of that brochure. Please contact Ms. Leslie Klenk, PGA’s Chief Compliance Officer, at (207) 773-2773 if you did not receive PGA’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Sullivan, Mr. Jaskulski, Mr. Strabley, Ms. Peterson, Mr. Smith, Mr. Wells, Ms. Walsh and Ms. Klenk is available on the SEC’s website at www.adviserinfo.sec.gov.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

John B. Sullivan

Item 2: Educational Background and Business Experience

John B. Sullivan, a PGA Principal and Chief Executive Officer, is involved in all aspects of the firm’s business. He is responsible for client relationship management, client asset allocation and the management of clients’ equity portfolios. Mr. Sullivan also directly manages client relationships. He served as PGA’s Chief Compliance Officer until February 2016. Mr. Sullivan was born in 1965 and earned a B.A. in English from Amherst College in 1987.

Prior to founding a predecessor of PGA in 1994, Mr. Sullivan served as a Vice President, Securities Trading, at Lehman Brothers in New York, New York from 1989-1994 and as a Vice President, Securities Trading, at Bankers Trust Co. in New York, New York from 1987-1989.

Mr. Sullivan is a Director of the John T. Gorman Foundation (focuses on building resiliency and wellbeing of Maine children and their families) and serves on the Investment Committees of the John T. Gorman Foundation and the Maine Community Foundation. He is a former Director of the Maine Community Foundation and the Gulf of Maine Research Institute.

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client’s or prospective client’s evaluation of Mr. Sullivan.

Item 4: Other Business Activities

Mr. Sullivan is not actively engaged in any other business or occupation for compensation that provides a substantial source of income or involves a substantial amount of time.

Item 5: Additional Compensation

Mr. Sullivan receives a percentage of PGA’s quarterly net income in excess of operating cash reserves. He does not receive any other economic benefit for providing advisory services on behalf of PGA.

Item 6: Supervision

Mr. Sullivan’s performance is collectively supervised by the firm’s President, Mr. Richard S.F. Strabley, who is responsible for fixed income research and the management of clients’ fixed

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

income portfolios and cash positions; and the firm’s Chief Financial Officer, Mr. Derek C. Jaskulski, who is responsible for equity research and the management of clients’ equity portfolios.

These officers collectively supervise Mr. Sullivan’s activities through frequent office interaction and/or tele-conference/telephone communications. On an ongoing basis, these officers collectively oversee the review of each client account to help ensure that the asset allocation and investments continue to be consistent with the client’s investment goals/outcomes, investment time horizon, income requirements, expected future expenses (e.g., liquidity needs), and tolerance for investment risk, tax and estate planning needs and philanthropic objectives.

PGA also maintains a Compliance Committee comprised of Mr. Sullivan and Mr. Jaskulski. The Compliance Committee is responsible for overseeing PGA’s compliance with applicable law including the Investment Advisers Act of 1940, as amended, and its own written internal policies and procedures. Ms. Leslie K. Klenk serves as PGA’s Chief Compliance Officer, reports to the Compliance Committee and is responsible for administering PGA’s policies and procedures which must be adhered to by all PGA employees.

Any client with questions or concerns regarding the supervision of Mr. Sullivan is asked to contact Mr. Richard S.F. Strabley, President, at (207) 773-2773.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

Richard S.F. Strabley

Item 2: Educational Background and Business Experience

Richard S.F. Strabley, a PGA Principal and President, is involved in all aspects of the firm's business. He is responsible for fixed income research and the management of clients' fixed income portfolios and cash positions. Mr. Strabley also directly manages client relationships. He was born in 1964 and earned a B.A. in Economics from Hamilton College in 1986.

Prior to joining PGA in 1997, Mr. Strabley served as a Vice President, Fixed Income Division, at Morgan Stanley in New York, New York from 1995-1997 and focused on international fixed income investments. From 1994-1995, he served as a Manager, International Fixed Income Sales Group, at CS First Boston in New York, New York. From 1986-1993, he served as a Vice President, Fixed Income Division, at Lehman Brothers in New York, New York and worked on the fixed income trading desk.

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Strabley.

Item 4: Other Business Activities

Mr. Strabley is not actively engaged in any other business or occupation for compensation that provides a substantial source of income or involves substantial amount of time.

Item 5: Additional Compensation

Mr. Strabley receives a percentage of PGA's quarterly net income in excess of operating cash reserves. He does not receive any other economic benefit for providing advisory services on behalf of PGA.

Item 6: Supervision

Mr. Strabley's performance is collectively supervised by the firm's Chief Executive Officer, Mr. John B. Sullivan, who is responsible for client relationship management, client asset allocation and the management of clients' equity portfolios; and the firm's Chief Financial Officer, Mr. Derek C. Jaskulski who is responsible for equity research and the management of clients' equity portfolios.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

These officers collectively supervise Mr. Strabley’s activities through frequent in person and/or teleconference/telephone interaction. On an ongoing basis, these officers collectively oversee the review of each client account to help ensure that the asset allocation and investments continue to be consistent with the client’s investment goals/outcomes, investment time horizon, income requirements, expected future expenses (e.g., liquidity needs), and tolerance for investment risk, tax and estate planning needs and philanthropic objectives.

PGA also maintains a Compliance Committee comprised of Mr. Sullivan and Mr. Jaskulski. The Compliance Committee is responsible for overseeing PGA’s compliance with applicable law including the Investment Advisers Act of 1940, as amended, and its own written internal policies and procedures. Ms. Leslie K. Klenk serves as PGA’s Chief Compliance Officer, reports to the Compliance Committee and is responsible for administering PGA’s policies and procedures which must be adhered to by all PGA employees.

Any client with questions or concerns regarding the supervision of Mr. Strabley is asked to contact Mr. John B. Sullivan, Chief Executive Officer, at (207) 773-2773.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

Derek C. Jaskulski

Item 2: Educational Background and Business Experience

Derek C. Jaskulski, a PGA Principal and Chief Financial Officer, is involved in all aspects of the firm’s business. He is responsible for equity research and the management of clients’ equity portfolios. Mr. Jaskulski also directly manages client relationships. He was born in 1952. Mr. Jaskulski earned a B.A. in Political Science from Amherst College in 1975, an M.A. in Political Science from Columbia University in 1976 and an M.B.A. from Harvard University in 1982.

Prior to joining PGA in 1995, Mr. Jaskulski served as a Vice President, Securities Trading, at Lehman Brothers in New York, New York from 1993-1995. From 1991-1993, he was self-employed as a song writer in San Francisco. From 1989-1991, he served as a Vice President, Securities Trading, at Merrill Lynch in New York, New York and in Tokyo, Japan. Prior to that, he served as a Manager, Foreign Exchange Department, at Bankers Trust Co. in Hong Kong, China from 1985-1988 and as Vice President, Securities Trading, at Bankers Trust Co. in New York, New York from 1982-1985 and in 1989.

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client’s or prospective client’s evaluation of Mr. Jaskulski.

Item 4: Other Business Activities

Mr. Jaskulski is not actively engaged in any other business or occupation for compensation that provides a substantial source of income or involves a substantial amount of time.

Item 5: Additional Compensation

Mr. Jaskulski receives a percentage of PGA’s quarterly net income in excess of operating cash reserves. He does not receive any other economic benefit for providing advisory services on behalf of PGA.

Item 6: Supervision

Mr. Jaskulski’s performance is collectively supervised by the firm’s Chief Executive Officer, Mr. John B. Sullivan, who is responsible for client relationship management, client asset allocation and the management of clients’ equity portfolios; and the firm’s President, Mr. Richard S.F.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

Strabley, who is responsible for fixed income research and the management of clients' fixed income portfolios and cash positions.

These officers collectively supervise Mr. Jaskulski's activities through frequent in person and/or teleconference/telephone interaction. On an ongoing basis, these officers also collectively oversee the review of each client account to help ensure that the asset allocation and investments continue to be consistent with the client's investment goals/outcomes, investment time horizon, income requirements, expected future expenses (e.g., liquidity needs), and tolerance for investment risk, tax and estate planning needs and philanthropic objectives.

PGA also maintains a Compliance Committee comprised of Mr. Sullivan and Mr. Jaskulski. The Compliance Committee is responsible for overseeing PGA's compliance with applicable law including the Investment Advisers Act of 1940, as amended, and its own written internal policies and procedures. Ms. Leslie K. Klenk serves as PGA's Chief Compliance Officer, reports to the Compliance Committee and is responsible for administering PGA's policies and procedures which must be adhered to by all PGA employees.

Any client with questions or concerns regarding the supervision of Mr. Jaskulski is asked to contact Mr. John B. Sullivan, Chief Executive Officer, at (207) 773-2773.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

Heidi N. Peterson

Item 2: Educational Background and Business Experience

Heidi N. Peterson, a PGA Director, oversees the implementation of client philanthropic interests and goals and directly manages client relationships. She also supports other client relationship management teams. Ms. Peterson was born in 1970. Ms. Peterson earned a B.A. in English/American Studies from Princeton University in 1993 and an M.B.A. from The Tuck School of Business at Dartmouth College in 2001.

Prior to joining PGA in 2017, Ms. Peterson served as a Development Officer at Bowdoin College and worked closely with donors to the Bowdoin College Museum of Art in Brunswick, Maine from 2015-2017. From 2012-2015, she stayed at home in Cape Elizabeth, Maine to raise her children and was self-employed in Lebanon, New Hampshire as a Consultant from 2010-2012. Prior to that, she served as the Director of Client Service & Business Development at Global Forest Partners LP (private equity firm) in Lebanon, New Hampshire from 2008-2010.

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client’s or prospective client’s evaluation of Ms. Peterson.

Item 4: Other Business Activities

Ms. Peterson is not actively engaged in any other business or occupation for compensation that provides a substantial source of income or involves a substantial amount of time.

Item 5: Additional Compensation

PGA pays Ms. Peterson a fixed annual cash salary plus a discretionary annual bonus. The annual bonus is based on PGA’s profitability. She does not receive any other economic benefit for providing advisory services on behalf of PGA.

Item 6: Supervision

Ms. Peterson’s performance is collectively supervised by the firm’s Chief Executive Officer, Mr. John B. Sullivan, who is responsible for client relationship management, client asset allocation and the management of clients’ equity portfolios; the firm’s President, Mr. Richard S.F. Strabley, who is responsible for fixed income research and the management of clients’ fixed income

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

portfolios and cash positions; and the firm’s Chief Financial Officer, Mr. Derek C. Jaskulski, who is responsible for equity research and the management of clients’ equity portfolios.

These officers collectively supervise Ms. Peterson’s activities through frequent in person and/or teleconference/telephone interaction. On an ongoing basis, these officers also collectively oversee the review of each client account to help ensure that the asset allocation and investments continue to be consistent with the client’s investment goals/outcomes, investment time horizon, income requirements, expected future expenses (e.g., liquidity needs), and tolerance for investment risk, tax and estate planning needs and philanthropic objectives.

PGA also maintains a Compliance Committee comprised of Mr. Sullivan and Mr. Jaskulski. The Compliance Committee is responsible for overseeing PGA’s compliance with applicable law including the Investment Advisers Act of 1940, as amended, and its own written internal policies and procedures. Ms. Leslie K. Klenk serves as PGA’s Chief Compliance Officer, reports to the Compliance Committee and is responsible for administering PGA’s policies and procedures which must be adhered to by all PGA employees.

Any client with questions or concerns regarding the supervision of Ms. Peterson is asked to contact Mr. John B. Sullivan, Chief Executive Officer, at (207) 773-2773.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

David E. Smith

Item 2: Educational Background and Business Experience

David E. Smith, PGA’s Treasurer, manages client relationships. He also supports other client relationship management teams. Mr. Smith was born in 1958 and earned a B.S. in Public Accounting from Husson College in 1981.

Prior to joining PGA in 2020, Mr. Smith served as a Partner at Marcum LLP, an international accounting firm, and was a founding principal of Dawson, Smith, Purvis & Bassett, P.A. which merged into Marcum LLP in 2019. From 1981-1990, he was an Accountant at Ernst & Young.

Mr. Smith is a Director of the Gulf of Maine Research Institute.

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client’s or prospective client’s evaluation of Mr. Smith.

Item 4: Other Business Activities

Mr. Smith is not actively engaged in any other business or occupation for compensation that provides a substantial source of income or involves a substantial amount of time.

As a Director of the Gulf of Maine Research Institute (“Institute”), Mr. Smith has an incentive to encourage PGA clients to donate or loan to the Institute. While PGA may present the Institute as a charity option to clients with philanthropic intent, Mr. Smith’s associated with the Institute is disclosed upon presentation of the option.

Item 5: Additional Compensation

PGA pays Mr. Smith a fixed annual cash salary plus a discretionary annual bonus. The annual bonus is based on PGA’s profitability. He does not receive any other economic benefit for providing advisory services on behalf of PGA.

Item 6: Supervision

Mr. Smith’s performance is collectively supervised by the firm’s Chief Executive Officer, Mr. John B. Sullivan, who is responsible for client relationship management, client asset allocation

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

and the management of clients' equity portfolios; the firm's President, Mr. Richard S.F. Strabley, who is responsible for fixed income research and the management of clients' fixed income portfolios and cash positions; and the firm's Chief Financial Officer, Mr. Derek C. Jaskulski, who is responsible for equity research and the management of clients' equity portfolios.

These officers collectively supervise Mr. Smith's activities through frequent in person and/or teleconference/telephonic interaction. On an ongoing basis, these officers also collectively oversee the review of each client account to help ensure that the asset allocation and investments continue to be consistent with the client's investment goals/outcomes, investment time horizon, income requirements, expected future expenses (e.g., liquidity needs), and tolerance for investment risk, tax and estate planning needs and philanthropic objectives.

PGA also maintains a Compliance Committee comprised of Mr. Sullivan and Mr. Jaskulski. The Compliance Committee is responsible for overseeing PGA's compliance with applicable law including the Investment Advisers Act of 1940, as amended, and its own written internal policies and procedures. Ms. Leslie K. Klenk serves as PGA's Chief Compliance Officer, reports to the Compliance Committee and is responsible for administering PGA's policies and procedures which must be adhered to by all PGA employees.

Any client with questions or concerns regarding the supervision of Mr. Smith is asked to contact Mr. John B. Sullivan, Chief Executive Officer, at (207) 773-2773.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

Thomas C. Wells

Item 2: Educational Background and Business Experience

Thomas C. Wells, a PGA Director, oversees trade execution and trade support personnel. In addition to providing equity and fixed income research support to Mr. Jaskulski and Mr. Strabley, he also actively assists Mr. Sullivan in monitoring client portfolio asset allocation targets and supports client relationship management teams. Mr. Wells was born in 1993 and earned a B.A. in Biology and Economics from Bowdoin College in 2015.

Prior to joining PGA in 2018, Mr. Wells served as a Financial Representative at Fidelity Brokerage Services LLC in Burlington, Massachusetts from 2015-2018 and provided client service and introductory financial planning to retail investors.

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client’s or prospective client’s evaluation of Mr. Wells.

Item 4: Other Business Activities

Mr. Wells is not actively engaged in any other business or occupation for compensation that provides a substantial source of income or involves a substantial amount of time.

Item 5: Additional Compensation

PGA pays Mr. Wells a fixed annual cash salary plus a discretionary annual bonus. The annual bonus is based on PGA’s profitability. He does not receive any other economic benefit for providing advisory services on behalf of PGA.

Item 6: Supervision

Mr. Wells’ performance is collectively supervised by the firm’s Chief Executive Officer, Mr. John B. Sullivan, who is responsible for client relationship management, client asset allocation and the management of clients’ equity portfolios; the firm’s President, Mr. Richard S.F. Strabley, who is responsible for fixed income research and the management of clients’ fixed income portfolios and cash positions; and the firm’s Chief Financial Officer, Mr. Derek C. Jaskulski, who is responsible for equity research and the management of clients’ equity portfolios.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

These officers collectively supervise Mr. Wells’ activities through frequent in person and/or teleconference/telephonic interaction. On an ongoing basis, these officers also collectively oversee the review of each client account to help ensure that the asset allocation and investments continue to be consistent with the client’s investment goals/outcomes, investment time horizon, income requirements, expected future expenses (e.g., liquidity needs), and tolerance for investment risk, tax and estate planning needs and philanthropic objectives.

PGA also maintains a Compliance Committee comprised of Mr. Sullivan and Mr. Jaskulski. The Compliance Committee is responsible for overseeing PGA’s compliance with applicable law including the Investment Advisers Act of 1940, as amended, and its own written internal policies and procedures. Ms. Leslie K. Klenk serves as PGA’s Chief Compliance Officer, reports to the Compliance Committee and is responsible for administering PGA’s policies and procedures which must be adhered to by all PGA employees.

Any client with questions or concerns regarding the supervision of Mr. Wells is asked to contact Mr. John B. Sullivan, Chief Executive Officer, at (207) 773-2773.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

Courtney H. Walsh

Item 2: Educational Background and Business Experience

Courtney H. Walsh, a PGA Director, supports the relationship management teams. She also assists Thomas C. Wells with trade execution and Mr. Strabley with the management of clients’ cash positions. Ms. Walsh was born in 1987 and earned a B.S. in English from Radford University in 2010 and a M.A. in Financial Planning from Kansas State University in 2022.

Prior to joining PGA in 2021, Ms. Walsh was a Financial Advisor at Wells Fargo Advisors from 2010-2021 and provided financial advice and portfolio management services to individuals and non-profit organizations.

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client’s or prospective client’s evaluation of Ms. Walsh.

Item 4: Other Business Activities

Ms. Walsh is not actively engaged in any other business or occupation for compensation that provides a substantial source of income or involves a substantial amount of time.

Item 5: Additional Compensation

PGA pays Ms. Walsh a fixed annual cash salary plus a discretionary annual bonus. The annual bonus is based on PGA’s profitability. She does not receive any other economic benefit for providing advisory services on behalf of PGA.

Item 6: Supervision

Ms. Walsh’s performance is collectively supervised by the firm’s Chief Executive Officer, Mr. John B. Sullivan, who is responsible for client relationship management, client asset allocation and the management of clients’ equity portfolios; the firm’s President, Mr. Richard S.F. Strabley, who is responsible for fixed income research and the management of clients’ fixed income portfolios and cash positions; and the firm’s Chief Financial Officer, Mr. Derek C. Jaskulski, who is responsible for equity research and the management of clients’ equity portfolios.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

These officers collectively supervise Ms. Walsh’s activities through frequent in person and/or teleconference/telephonic interaction. On an ongoing basis, these officers also collectively oversee the review of each client account to help ensure that the asset allocation and investments continue to be consistent with the client’s investment goals/outcomes, investment time horizon, income requirements, expected future expenses (e.g., liquidity needs), and tolerance for investment risk, tax and estate planning needs and philanthropic objectives. Thomas C. Wells oversees Ms. Walsh’s trade execution activity through the review of trade sheets and provides feedback to the PGA officers.

PGA also maintains a Compliance Committee comprised of Mr. Sullivan and Mr. Jaskulski. The Compliance Committee is responsible for overseeing PGA’s compliance with applicable law including the Investment Advisers Act of 1940, as amended, and its own written internal policies and procedures. Ms. Leslie K. Klenk serves as PGA’s Chief Compliance Officer, reports to the Compliance Committee and is responsible for administering PGA’s policies and procedures which must be adhered to by all PGA employees.

Any client with questions or concerns regarding the supervision of Ms. Walsh is asked to contact Mr. John B. Sullivan, Chief Executive Officer, at (207) 773-2773.

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

Leslie K. Klenk

Item 2: Educational Background and Business Experience

Leslie K. Klenk, a PGA Director and Chief Compliance Officer, administers the firm’s compliance activities and supports the client operations and client relationship management teams. Ms. Klenk was born in 1964 and earned a B.A. in English from the University of Virginia in 1986 and a J.D. from Brooklyn Law School in 1993.

Prior to joining PGA in 2016, Ms. Klenk was Of Counsel at Bernstein Shur Sawyer & Nelson in Portland, Maine from 2009-2015 and focused on securities-related legal matters. From 2006-2009, she served as a Director at Foreside Compliance Services in Portland, Maine and provided Chief Compliance Officer services to various mutual funds. From 1998-2006, she served as a Senior Vice President and in-house counsel at Citi Global Transaction Services in Portland, Maine and provided legal advice to the fund administration, fund accounting and transfer agency business lines. Before that, she was Vice President and Associate General Counsel at Smith Barney, Inc. in New York from 1993-1998.

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client’s or prospective client’s evaluation of Ms. Klenk.

Item 4: Other Business Activities

Ms. Klenk is not actively engaged in any other business or occupation for compensation that provides a substantial source of income or involves substantial amount of time.

Item 5: Additional Compensation

PGA pays Ms. Klenk a fixed annual cash salary plus a discretionary annual bonus. The annual bonus is based on PGA’s profitability. She does not receive any other economic benefit for providing advisory services on behalf of PGA.

Item 6: Supervision

Ms. Klenk’s performance is collectively supervised by the firm’s Chief Executive Officer, Mr. John B. Sullivan, who is responsible for client relationship management, client asset allocation and the management of clients’ equity portfolios; the firm’s President, Mr. Richard S.F. Strabley,

Form ADV Part 2B	Applicant: Portland Global Advisors, LLC	SEC File No. 801-54256	Date: March 29, 2023
------------------	---	---------------------------	-------------------------

who is responsible for fixed income research and the management of clients’ fixed income portfolios and cash positions; and the firm’s Chief Financial Officer, Mr. Derek C. Jaskulski, who is responsible for equity research and the management of clients’ equity portfolios.

These officers collectively supervise Ms. Klenk’s activities through frequent in person and/or teleconference/telephonic interaction. On an ongoing basis, these officers also collectively oversee the review of each client account to help ensure that the asset allocation and investments continue to be consistent with the client’s investment goals/outcomes, investment time horizon, income requirements, expected future expenses (e.g., liquidity needs), and tolerance for investment risk, tax and estate planning needs and philanthropic objectives

PGA also maintains a Compliance Committee comprised of Mr. Sullivan and Mr. Jaskulski. The Compliance Committee is responsible for overseeing PGA’s compliance with applicable law including the Investment Advisers Act of 1940, as amended, and its own written internal policies and procedures. Ms. Leslie K. Klenk serves as PGA’s Chief Compliance Officer, reports to the Compliance Committee and is responsible for administering PGA’s policies and procedures which must be adhered to by all PGA employees.

Any client with questions or concerns regarding the supervision of Ms. Klenk is asked to contact Mr. John B. Sullivan, Chief Executive Officer, at (207) 773-2773.