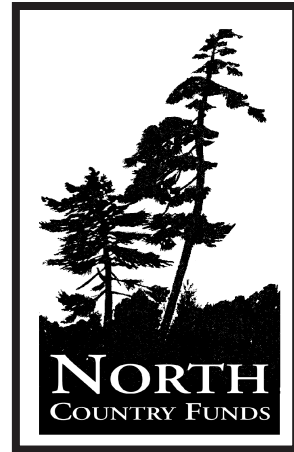


# The North Country Funds

## Large Cap Equity Fund



Annual Report  
November 30, 2023

### **Investment Adviser**

North Country Investment Advisers, Inc.  
250 Glen Street  
Glens Falls, NY 12801

### **Administrator and Fund Accountant**

Ultimus Fund Solutions, LLC  
225 Pictoria Drive, Suite 450  
Cincinnati, Ohio 45246

***Investor Information: (888) 350-2990***

This report and the financial statements contained herein are submitted for the general information of shareholders and are not authorized for distribution to prospective investors unless preceded or accompanied by an effective prospectus. Nothing herein contained is to be considered an offer of sale or solicitation of an offer to buy shares of The North Country Funds. Such offering is made only by prospectus, which includes details as to offering price and other material information. Investors should consider the Fund's investment objectives, risks, charges and expenses carefully before investing. The prospectus contains this and other important information about the Fund. Please read the prospectus carefully before investing.

# **The North Country Funds**

## **ANNUAL REPORT**

**November 30, 2023**

### **ECONOMIC SUMMARY**

As we entered 2023, most predictions were fairly somber. Inflation peaked during the middle of 2022 but was still well above the Federal Reserve's 2 percent target rate as we entered the New Year. The Fed was continuing to tighten monetary policy, and it was largely believed that the economy would slow and possibly enter a recession during the year. The Fed continued to raise rates early in the year and shrink its balance sheet. However, the economy held up in the first half of the year, inflation fell precipitously, the labor market remained strong and equity markets rallied.

As we entered July and August, the improvement we saw on the inflation front lost momentum as the price of oil spiked. Both equity and fixed income markets sold off. Equity markets suffered a sharp correction from early August through late October. Yields spiked, with the benchmark 10-Year U.S. Treasury briefly touching 5 percent. This pushed the average 30-year mortgage rate over 8 percent, causing a downturn in the housing market.

During the fall, we saw the return of better inflation data. Third-quarter GDP came in at a strong 4.9 percent and the labor market remained solid. This Goldilocks environment led to a sharp rally in both equities and bonds, which continued as we closed out November.

### **The Large Cap Equity Fund**

Global economies faced multiple headwinds throughout 2023 led by a combination of concerns including inflation and rising interest rates, the possibility of a painful recession or a "soft landing," an unexpected regional banking crisis, and rising geopolitical tensions around the world. However, the stock market breathed a sigh of relief as inflation showed signs of easing and the Federal Reserve's rhetoric indicated rate cuts in 2024. Many U.S. stocks, especially those that were hit so hard in 2022, recovered a lot of their lost ground. Technology, Communication Services and Consumer Discretionary stocks showed the strongest performance in 2023 as investors shifted focus from rising interest rates to the possibility of early 2024 rate cuts. Defensive sectors, including Utilities, Healthcare and Consumer Staples, were the biggest laggards.

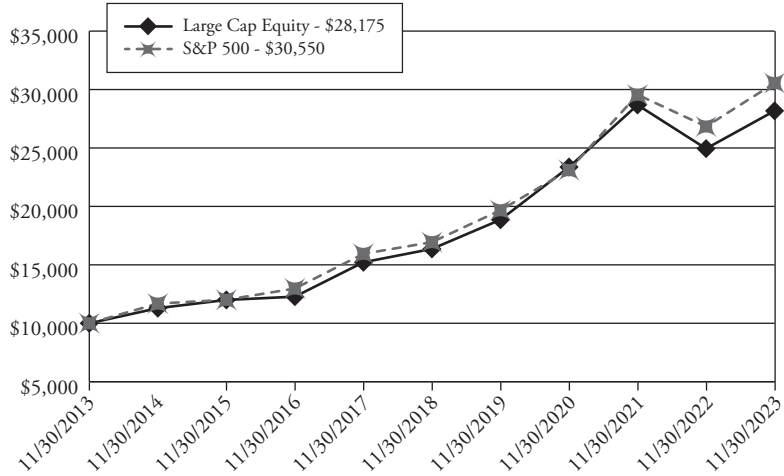
Among the 2023 market leaders were the so-called "Magnificent 7" mega cap tech stocks – Apple, Amazon, Alphabet, Nvidia, Meta Platforms, Microsoft, and Tesla. All seven stocks have more than doubled the S&P 500's gains during the year. These companies played a significant role in fueling the large U.S. equity returns in the first half of the year but showed a return to more balanced and diverse market dynamics in the second half.

For the one-year period ending November 30, 2023, the North Country Large Cap Equity Fund returned 12.95% while the S&P 500 returned 13.84%. On an annualized basis, the three, five and 10-year total returns for the North Country Large Cap Equity Fund were 6.44%, 11.48% and 10.91% versus the S&P 500 at 9.76%, 12.51% and 11.82%, respectively.



## North Country Large Cap Equity Fund Growth of \$10,000 Investment (Unaudited)

This chart illustrates the comparison of a hypothetical investment of \$10,000 in the North Country Large Cap Equity Fund (assuming reinvestment of all dividends and distributions) versus the Fund's benchmark index.



### Average Annual Total Returns as of November 30, 2023

	1 Year	5 Years	10 Years
North Country Large Cap Equity Fund	12.95%	11.48%	10.91%
S&P 500	13.84%	12.51%	11.82%

The S&P 500 is a market capitalization-weighted index of 500 widely held common stocks. Indexes and benchmarks are unmanaged and do not reflect the deduction of expenses associated with a mutual fund, such as investment management and fund accounting fees. Investors cannot invest directly in an index or benchmark, although they can invest in its underlying securities or funds.

**Past performance is not indicative of future results.** The investment return and NAV will fluctuate, so that an investor's shares, when redeemed, may be worth more or less than their original cost. Total returns are calculated assuming reinvestment of all dividends and capital gains distributions.

The returns do not reflect a reduction for taxes a shareholder would pay on the redemption of fund shares or fund distributions.

# North Country Large Cap Equity Fund

## Portfolio Summary (Unaudited)

November 30, 2023

Industries	% of Net Assets	Industries	% of Net Assets
<b>Common Stock</b>	<b>97.2%</b>	Technology Services	1.8%
Software	15.6%	Electrical Equipment	1.7%
Technology Hardware	9.3%	Home Construction	1.7%
Internet Media & Services	6.4%	Insurance	1.6%
Medical Equipment & Devices	6.3%	Diversified Industrials	1.5%
Semiconductors	4.8%	Data Center REIT	1.3%
Biotech & Pharma	4.8%	Commercial Support Services	1.2%
Retail - Discretionary	4.2%	Electric Utilities	1.1%
Banking	3.8%	Entertainment Content	1.0%
E-Commerce Discretionary	3.8%	Apparel & Textile Products	0.8%
Institutional Financial Services	3.3%	Specialty Finance	0.7%
Retail - Consumer Staples	3.2%	Leisure Facilities & Services	0.6%
Oil & Gas Producers	2.6%	Wholesale - Consumer Staples	0.5%
Machinery	2.3%	Self-Storage REIT	0.4%
Health Care Facilities & Services	2.3%	Infrastructure REIT	0.4%
Asset Management	2.2%	Construction Materials	0.2%
Chemicals	2.1%	<b>Money Market Funds</b>	<b>2.7%</b>
Beverages	1.9%	<b>Other assets in excess of liabilities</b>	<b>0.1%</b>
Household Products	1.8%	<b>Total Net Assets</b>	<b>100%</b>

Top Ten Holdings	% of Net Assets	Top Ten Holdings	% of Net Assets
Apple, Inc.	8.0%	Adobe, Inc.	3.1%
Microsoft Corporation	8.0%	Home Depot, Inc	2.5%
Amazon.com, Inc.	3.8%	Salesforce, Inc.	2.4%
Alphabet, Inc.	3.6%	UnitedHealth Group, Inc.	2.3%
NVIDIA Corporation	3.5%	BlackRock, Inc.	2.2%

# THE NORTH COUNTRY FUNDS

## NORTH COUNTRY LARGE CAP EQUITY FUND SCHEDULE OF INVESTMENTS

November 30, 2023

Shares	Fair Value	Shares	Fair Value
<b>COMMON STOCKS — 97.2%</b>		<b>E-COMMERCE DISCRETIONARY - 3.8%</b>	
<b>APPAREL &amp; TEXTILE PRODUCTS - 0.8%</b>		30,100	Amazon.com, Inc. <sup>(a)</sup> \$ 4,397,309
8,500	NIKE, Inc., Class B \$ 937,295	<b>ELECTRIC UTILITIES - 1.1%</b>	
<b>ASSET MANAGEMENT - 2.2%</b>		8,000	Dominion Energy, Inc. 362,720
3,350	BlackRock, Inc. 2,516,621	5,500	NextEra Energy, Inc. 321,805
<b>BANKING - 3.8%</b>		9,150	Southern Company (The) 649,467
69,500	Bank of America Corporation 2,119,055	1,333,992	
15,750	JPMorgan Chase & Company 2,458,259	<b>ELECTRICAL EQUIPMENT - 1.7%</b>	
4,577,314		22,000	Amphenol Corporation, Class A 2,001,780
<b>BEVERAGES - 1.9%</b>		<b>ENTERTAINMENT CONTENT - 1.0%</b>	
13,200	PepsiCo, Inc. 2,221,428	12,950	Walt Disney Company (The) <sup>(a)</sup> 1,200,336
<b>BIOTECH &amp; PHARMA - 4.8%</b>		<b>HEALTH CARE FACILITIES &amp; SERVICES - 2.3%</b>	
5,700	Amgen, Inc. 1,536,948	4,900	UnitedHealth Group, Inc. 2,709,533
3,400	Eli Lilly and Company 2,009,536	<b>HOME CONSTRUCTION - 1.7%</b>	
9,500	Johnson & Johnson 1,469,270	33,000	Masco Corporation 1,998,150
1,500	Vertex Pharmaceuticals, Inc. <sup>(a)</sup> 532,215	1,998,150	
5,547,969		<b>HOUSEHOLD PRODUCTS - 1.8%</b>	
<b>CHEMICALS - 2.1%</b>		13,625	Procter & Gamble Company (The) 2,091,710
2,700	Air Products and Chemicals, Inc. 730,485	<b>INFRASTRUCTURE REIT - 0.4%</b>	
3,900	Ecolab, Inc. 747,747	2,350	American Tower Corporation 490,633
2,000	LyondellBasell Industries N.V., Class A 190,200	<b>INSTITUTIONAL FINANCIAL SERVICES - 3.3%</b>	
2,750	Sherwin-Williams Company (The) 766,700	2,600	Goldman Sachs Group, Inc. (The) 888,004
2,435,132		18,000	Intercontinental Exchange, Inc. 2,049,120
<b>COMMERCIAL SUPPORT SERVICES - 1.2%</b>		11,300	Morgan Stanley 896,542
8,000	Waste Management, Inc. 1,367,920	3,833,666	
<b>CONSTRUCTION MATERIALS - 0.2%</b>		<b>INSURANCE - 1.6%</b>	
1,100	Vulcan Materials Company 234,916	5,100	Berkshire Hathaway, Inc., Class B <sup>(a)</sup> 1,836,000
<b>DATA CENTER REIT - 1.3%</b>		<b>INTERNET MEDIA &amp; SERVICES - 6.4%</b>	
11,000	Digital Realty Trust, Inc. 1,526,580	31,800	Alphabet, Inc., Class A <sup>(a)</sup> 4,214,454
<b>DIVERSIFIED INDUSTRIALS - 1.5%</b>		5,500	Meta Platforms, Inc., Class A <sup>(a)</sup> 1,799,325
9,000	Honeywell International, Inc. 1,763,280	3,000	Netflix, Inc. <sup>(a)</sup> 1,421,910
		7,435,689	

*The accompanying notes are an integral part of these financial statements.*

# THE NORTH COUNTRY FUNDS

## NORTH COUNTRY LARGE CAP EQUITY FUND

### SCHEDULE OF INVESTMENTS *(Continued)*

November 30, 2023

Shares	Fair Value	Shares	Fair Value		
<b>LEISURE FACILITIES &amp; SERVICES - 0.6%</b>		<b>SOFTWARE - 15.6%</b>			
2,600	McDonald's Corporation	\$ 732,784	6,000	Adobe, Inc. <sup>(a)</sup>	\$ 3,666,060
<b>MACHINERY - 0.7%</b>		24,500	Microsoft Corporation	9,283,294	
6,300	Caterpillar, Inc.	1,579,536	12,700	Oracle Corporation	1,475,867
14,300	Ingersoll Rand, Inc.	1,021,449	1,600	Palo Alto Networks, Inc. <sup>(a)</sup>	472,144
1,666	Veralto Corporation <sup>(a)</sup>	128,699	11,000	Salesforce, Inc. <sup>(a)</sup>	2,770,900
		<u>2,729,684</u>	2,500	Snowflake, Inc. <sup>(a)</sup>	469,200
<b>MEDICAL EQUIPMENT &amp; DEVICES - 6.3%</b>				<u>18,137,465</u>	
20,000	Abbott Laboratories	2,085,800	<b>SPECIALTY FINANCE - 0.7%</b>		
5,000	Danaher Corporation	1,116,550	6,800	Capital One Financial Corporation	759,288
6,500	Stryker Corporation	1,926,145	<b>TECHNOLOGY HARDWARE - 9.3%</b>		
4,600	Thermo Fisher Scientific, Inc.	2,280,495	48,900	Apple, Inc.	9,288,555
		<u>7,408,990</u>	30,750	Cisco Systems, Inc.	1,487,685
<b>OIL &amp; GAS PRODUCERS - 2.6%</b>				<u>10,776,240</u>	
6,600	Chevron Corporation	947,760	<b>TECHNOLOGY SERVICES - 1.8%</b>		
8,200	Exxon Mobil Corporation	842,468	8,000	Visa, Inc., Class A	2,053,440
34,400	Williams Companies, Inc. (The)	1,265,576	<b>WHOLESALE - CONSUMER STAPLES - 0.5%</b>		
		<u>3,055,804</u>	7,500	Sysco Corporation	541,275
<b>RETAIL - CONSUMER STAPLES - 3.2%</b>			<b>TOTAL COMMON STOCKS</b>		
2,075	Costco Wholesale Corporation	1,229,936	(Cost \$44,689,826)	<u>\$113,540,603</u>	
4,100	Dollar Tree, Inc. <sup>(a)</sup>	506,719	<b>SHORT-TERM INVESTMENTS — 2.7%</b>		
13,400	Walmart, Inc.	2,086,246	<b>MONEY MARKET FUNDS - 2.7%</b>		
		<u>3,822,901</u>	3,129,441	BlackRock Liquidity Funds Treasury Trust Fund	
<b>RETAIL - DISCRETIONARY - 4.2%</b>				Portfolio Institutional Class,	
9,200	Home Depot, Inc. (The)	2,884,108		Institutional Class, 5.27%	
23,050	TJX Companies, Inc. (The)	2,030,936		(Cost \$3,129,441) <sup>(b)</sup>	\$ 3,129,441
		<u>4,915,044</u>	<b>TOTAL INVESTMENTS - 99.9%</b>		
<b>SELF-STORAGE REIT - 0.4%</b>			(Cost \$47,819,267)	\$ 116,670,044	
1,900	Public Storage	491,644	<b>OTHER ASSETS IN</b>		
<b>SEMICONDUCTORS - 4.8%</b>			<b>EXCESS OF LIABILITIES - 0.1%</b>		
20,000	Marvell Technology, Inc.	1,114,600	67,542		
8,730	NVIDIA Corporation	4,083,021	<b>NET ASSETS - 100.0%</b>		
5,000	Teradyne, Inc.	461,150	<u>\$116,737,586</u>		
		<u>5,658,771</u>			

N.V. - Naamioze Vennootschap  
REIT - Real Estate Investment Trust

(a) Non-income producing security.

(b) Rate disclosed is the seven day effective yield as of November 30, 2023.

*The accompanying notes are an integral part of these financial statements.*

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# THE NORTH COUNTRY FUNDS

## STATEMENTS OF ASSETS AND LIABILITIES

November 30, 2023

	<u>Large Cap Equity Fund</u>
<b>ASSETS:</b>	
Investments in securities, at fair value (Cost \$47,819,267)	\$ 116,670,044
Dividends and interest receivable	187,249
Receivable for fund shares sold	299
Prepaid expenses and other assets	7,122
Total Assets	<u>116,864,714</u>
<b>LIABILITIES:</b>	
Accrued advisory fees	70,403
Payable for fund shares redeemed	13,080
Payable to related parties	15,641
Accrued audit fees	17,999
Accrued expenses and other liabilities	10,005
Total Liabilities	<u>127,128</u>
Net Assets	<u><u>\$ 116,737,586</u></u>
<b>NET ASSETS CONSIST OF:</b>	
Paid in capital	\$ 30,952,860
Accumulated earnings	85,784,726
Net Assets	<u><u>\$ 116,737,586</u></u>
Shares outstanding (unlimited number of shares authorized; no par value)	<u>5,621,773</u>
Net asset value, offering and redemption price per share (\$116,737,586/5,621,773)	<u><u>\$ 20.77</u></u>

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*The accompanying notes are an integral part of these financial statements.*



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# THE NORTH COUNTRY FUNDS

## STATEMENTS OF OPERATIONS

For the Year Ended November 30, 2023

	<u>Large Cap Equity Fund</u>
<b>INVESTMENT INCOME:</b>	
Dividends	\$ 1,873,801
Interest	151,763
Total investment income	<u>2,025,564</u>
<b>EXPENSES:</b>	
Investment advisory fees	926,711
Administration and fund accounting fees	182,801
Legal fees	63,810
Transfer agency fees	42,480
Trustees' fees	23,884
Audit fees	19,250
Registration and filing fees	16,935
Chief Compliance Officer fees	16,002
Printing expense	15,021
Insurance expense	11,924
Custody fees	10,501
Shareholder Service fees	20
Miscellaneous expenses	4,376
Total expenses	<u>1,333,715</u>
Net investment income	<u>691,849</u>
<b>NET REALIZED AND UNREALIZED GAIN/(LOSS) ON INVESTMENTS:</b>	
Net realized gain from investment transactions	18,747,047
Net change in unrealized depreciation of investments	<u>(4,498,320)</u>
Net realized and unrealized gain on investments	<u>14,248,727</u>
Net increase in net assets resulting from operations	<u>\$ 14,940,576</u>

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*The accompanying notes are an integral part of these financial statements.*

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**THE NORTH COUNTRY FUNDS****LARGE CAP EQUITY FUND  
STATEMENTS OF CHANGES IN NET ASSETS**

	<b>For the Year Ended Nov. 30, 2023</b>	<b>For the Year Ended Nov. 30, 2022</b>
<b>FROM OPERATIONS:</b>		
Net investment income	\$ 691,849	\$ 720,871
Net realized gain from investment transactions	18,747,047	14,498,058
Net change in unrealized depreciation	(4,498,320)	(36,088,146)
Net increase (decrease) in net assets resulting from operations	<u>14,940,576</u>	<u>(20,869,217)</u>
<b>DISTRIBUTIONS TO SHAREHOLDERS:</b>		
Total distributions to shareholders	<u>(14,322,130)</u>	<u>(13,679,110)</u>
<b>CAPITAL SHARE TRANSACTIONS (Note 4)</b>		
<b>NET ASSETS:</b>	(15,452,119)	(39,054,350)
Net decrease in net assets	<u>(14,833,673)</u>	<u>(4,506,023)</u>
Beginning of year	<u>131,571,259</u>	<u>170,625,609</u>
End of year	<u>\$ 116,737,586</u>	<u>\$ 131,571,259</u>

*The accompanying notes are an integral part of these financial statements.*

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# THE NORTH COUNTRY FUNDS

## LARGE CAP EQUITY FUND FINANCIAL HIGHLIGHTS

(For a fund share outstanding throughout each year)

	For the Year Ended November 30,				
	2023	2022	2021	2020	2019
Net asset value, beginning of year	\$ 20.73	\$ 25.86	\$ 23.48	\$ 20.32	\$ 18.99
<b>INCOME FROM INVESTMENT OPERATIONS:</b>					
Net investment income <sup>(1)</sup>	0.11	0.11	0.07	0.08	0.08
Net realized and unrealized gain (loss) on investments	2.19	(3.16)	4.74	4.44	2.55
Total from investment operations	2.30	(3.05)	4.81	4.52	2.63
<b>LESS DISTRIBUTIONS:</b>					
Dividends from net investment income	(0.12)	(0.07)	(0.10)	(0.08)	(0.05)
Distribution from net realized gains	(2.14)	(2.01)	(2.33)	(1.28)	(1.25)
Total distributions	(2.26)	(2.08)	(2.43)	(1.36)	(1.30)
Net asset value, end of year	\$ 20.77	\$ 20.73	\$ 25.86	\$ 23.48	\$ 20.32
Total return <sup>(2)</sup>	12.95%	(13.02)%	22.73%	23.90%	15.25%
<b>RATIOS/SUPPLEMENTAL DATA:</b>					
Net assets, end of year (in 000's)	\$ 116,738	\$ 131,571	\$ 170,626	\$ 151,343	\$ 136,366
Ratios to average net assets:					
Expenses	1.08%	1.02%	0.99%	1.02%	1.04%
Net investment income	0.56%	0.51%	0.31%	0.40%	0.41%
Portfolio turnover rate	8%	7%	7%	5%	15%

(1) Net investment income per share is based on average shares outstanding during the year or period.

(2) Total returns are historical and assume changes in share price and reinvestment of dividends and capital gain distributions, if any. Total return does not reflect the deductions of taxes that a shareholder would pay on distributions or on the redemption of shares.

*The accompanying notes are an integral part of these financial statements.*

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# THE NORTH COUNTRY FUNDS

## NOTES TO FINANCIAL STATEMENTS

November 30, 2023

### NOTE 1. ORGANIZATION

The North Country Funds (the “Trust”) was organized as a Massachusetts business trust on June 1, 2000, and registered under the Investment Company Act of 1940 (the “1940 Act”) as an open-end, diversified, management investment company on September 11, 2000. The Trust currently offers one series: the North Country Large Cap Equity Fund (the “Fund”). The Fund’s principal investment objective is to provide investors with long-term capital appreciation. The Fund commenced operations on March 1, 2001.

The Fund was initially organized on March 26, 1984 under New York law as a Collective Investment Trust sponsored by Glens Falls National Bank & Trust Company. Prior to its conversion to a regulated investment company (mutual fund), investor participation was limited to qualified employee benefit plans.

### NOTE 2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The following is a summary of the significant accounting policies followed by the Trust in the preparation of its financial statements. These policies are in conformity with accounting principles generally accepted in the United States of America (“GAAP”). The preparation of financial statements in conformity with these generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the year. Actual results could differ from these estimates. The Fund is an investment company and accordingly follows the investment company accounting and reporting guidance of the Financial Accounting Standards Board (“FASB”) Accounting Standard Codification Topic 946 Financial Services - Investment Companies.

**Security Valuation** – Securities which are traded on a national securities exchange are valued at the last quoted sale price. NASDAQ traded securities are valued using the NASDAQ official closing price (“NOCP”). Investments for which no sales are reported are valued at the mean between the current bid and ask prices on the day of valuation. To the extent these securities are actively traded and valuation adjustments are not applied, they are categorized in level 1 of the fair value hierarchy described below. When an equity security is valued by the independent pricing service using factors other than market quotations or the market is considered inactive, they will be categorized in level 2.

Any securities or other assets for which market quotations are not readily available, or securities for which the last bid price does not accurately reflect the current value, are valued at fair value pursuant to the Fund’s fair value pricing policies and procedures, as approved by the Board (the “Valuation Policy”). The Board has designated North Country Investment Advisers, Inc., the Fund’s investment adviser (the “Adviser”), as the “Valuation Designee” pursuant to Rule 2a-5 under the 1940 Act to make fair value determinations for all of the Fund’s investments for which market quotations are not readily available (or are deemed unreliable). The Board will oversee the Adviser’s fair value determinations and the Adviser’s performance as Valuation Designee. Pursuant to the Valuation Policy, the Valuation Designee will take into account all relevant factors and circumstances in determining the fair value of a security, which may include: (i) the nature and pricing history (if any) of the security; (ii) whether any dealer quotations for the security are available; (iii) possible valuation methodologies that could be used to determine the fair value of the security; (iv) the recommendation of the portfolio manager of the Fund with respect to the valuation of the security; (v) whether the same or similar securities are held by other funds managed by the Adviser or other funds and the method used to price the security in those funds; (vi) the extent to which the fair value to be determined for the security will result from the availability and use of data, reports or formulae produced

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# THE NORTH COUNTRY FUNDS

## NOTES TO FINANCIAL STATEMENTS (*Continued*)

November 30, 2023

by third parties independent of the Adviser; (vii) the liquidity or illiquidity of the market for the security; (viii) the size of the Fund's holdings; (ix) the existence of any extraordinary event relating to the security; (x) changes in the market environment; and (xi) any other matters considered relevant by the Valuation Designee. In the absence of readily available market quotations, or other observable inputs, securities valued at fair value pursuant to the Procedures would be categorized as level 3.

Money market funds are valued at their net asset value of \$1.00 per share and are categorized as level 1. Securities with maturities of 60 days or less may be valued at amortized cost, which approximates fair value and would be categorized as level 2. The ability of issuers of debt securities held by the Fund to meet its obligations may be affected by economic or political developments in a specific country or region.

The Fund utilizes various methods to measure the fair value of its investments on a recurring basis. GAAP establishes a hierarchy that prioritizes inputs to valuation methods. The three levels of input are:

**Level 1** – Unadjusted quoted prices in active markets for identical assets and liabilities that the Fund has the ability to access.

**Level 2** – Observable inputs other than quoted prices included in level 1 that are observable for the asset or liability, either directly or indirectly. These inputs may include quoted prices for the identical instrument on an inactive market, prices for similar instruments, interest rates, prepayment speeds, credit risk, yield curves, default rates and similar data.

**Level 3** – Unobservable inputs for the asset or liability, to the extent relevant observable inputs are not available, including the Valuation Designee's assumptions used in determining the fair value of priced instruments.

The availability of observable inputs can vary from security to security and is affected by a wide variety of factors, including, for example, the type of security, whether the security is new and not yet established in the marketplace, the liquidity of markets, and other characteristics particular to the security. To the extent that valuation is based on models or inputs that are less observable or unobservable in the market, the determination of fair value requires more judgment. Accordingly, the degree of judgment exercised in determining fair value is greatest for instruments categorized in Level 3.

The inputs used to measure fair value may fall into different levels of the fair value hierarchy. In such cases, for disclosure purposes, the level in the fair value hierarchy within which the fair value measurement falls in its entirety, is determined based on the lowest level input that is significant to the fair value measurement in its entirety.

# THE NORTH COUNTRY FUNDS

## NOTES TO FINANCIAL STATEMENTS *(Continued)*

November 30, 2023

The following is a summary of inputs used as of November 30, 2023, in valuing the Funds' assets carried at fair value.

### North Country Large Cap Equity Fund:

Assets	Level 1	Level 2	Level 3*	Total
Common Stock**	\$ 113,540,603	\$ —	\$ —	\$ 113,540,603
Money Market Fund	3,129,441	—	—	3,129,441
Total	\$ 116,670,044	\$ —	\$ —	\$ 116,670,044

\* The Fund did not hold any Level 3 investments during the period.

\*\* See Schedule of Investments for industry classifications.

**Federal Income Taxes** – The Fund makes no provision for federal income or excise tax. The Fund intends to qualify each year as regulated investment companies (“RICs”) under subchapter M of the Internal Revenue Code of 1986, as amended, by complying with the requirements applicable to RICs and by distributing substantially all of its taxable income. The Fund also intends to distribute sufficient net investment income and net capital gains, if any, so that it will not be subject to excise tax on undistributed income and gains. If the required amount of net investment income or gains is not distributed, the Fund could incur a tax expense.

Management has analyzed the Fund's tax positions and has concluded that no liability for unrecognized tax benefits should be recorded related to uncertain tax positions taken on returns filed for open tax years November 30, 2020, to November 30, 2022, or expected to be taken in the Fund's November 30, 2023, year-end tax returns. The Fund recognizes interest and penalties, if any, related to unrecognized tax benefits as income tax expense in the statements of operations. The Fund identifies its major tax jurisdictions as U.S. Federal and New York State.

During the fiscal year ended November 30, 2023, the Fund utilized tax equalization which is the use of earnings and profits distributions to shareholders on redemption of shares as part of the dividends paid deduction for income tax purposes. Permanent book and tax differences, primarily attributable to the book/tax treatment of use of tax equalization credits, resulted in reclassifications for the Fund for the fiscal year ended November 30, 2023, as follows:

Paid In Capital	Distributable Earnings
\$ 2,510,016	\$ (2,510,016)

**Dividends and Distributions** – The Fund will pay dividends from net investment income, if any, on an annual basis. The Fund will declare and pay distributions from net realized capital gains, if any, annually. Income and capital gain distributions to shareholders are recorded on the ex-dividend date and are determined in accordance with income tax regulations, which may differ from generally accepted accounting principles.

**Security Transactions** – Securities transactions are recorded no later than the first business day after the trade date, except for reporting purposes when trade date is used. Realized gains and losses on sales of securities are calculated on the identified cost basis. Dividend income is recorded on the ex-dividend date and interest income is recorded on an accrual basis. Discounts and premiums on securities purchased are amortized over the life of the respective securities using the effective yield method. Withholding taxes on foreign dividends have been provided for in accordance with the Fund's understanding of the applicable country's tax rules and rates.

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# THE NORTH COUNTRY FUNDS

## NOTES TO FINANCIAL STATEMENTS (*Continued*)

November 30, 2023

**Indemnification** – The Trust indemnifies its officers and trustees for certain liabilities that may arise from the performance of their duties to the Trust. Additionally, in the normal course of business, the Fund enters into contracts that contain a variety of representations and warranties and which provide general indemnities. The Fund’s maximum exposure under these arrangements is unknown, as this would involve future claims that may be made against the Fund that have not yet occurred. However, based on experience, the Fund expects the risk of loss due to these warranties and indemnities to be remote.

**Cash and cash equivalents** – Cash and cash equivalents are held with a financial institution. The assets of the Fund may be placed in deposit accounts at U.S. banks and such deposits generally exceed Federal Deposit Insurance Corporation (“FDIC”) insurance limits. The FDIC insures deposit accounts up to \$250,000 for each account holder. The counterparty is generally a single bank rather than a group of financial institutions; thus there may be a greater counterparty credit risk. The Fund places deposits only with those counterparties which are believed to be creditworthy and there has been no history of loss.

### NOTE 3. INVESTMENT ADVISORY AGREEMENT AND TRANSACTIONS WITH RELATED PARTIES

The Trust has entered into an investment advisory agreement (the “Advisory Agreement”) with North Country Investment Advisers, Inc. (the “Adviser”). Pursuant to the Advisory Agreement, the Adviser is responsible for formulating the Trust’s investment programs, making day-to-day investment decisions and engaging in portfolio transactions, subject to the authority of the Board of Trustees. Under the terms of the agreement, the Fund pays a fee, calculated daily and paid monthly, at an annual rate of 0.75% of the average daily net assets of the Fund. For the year ended November 30, 2023, the Adviser received advisory fees of \$926,711.

The Trust has entered into an Underwriting Agreement with Northern Lights Distributors, LLC (“the Distributor”) to serve as the principal underwriter for the Fund and distributor for the Fund’s shares.

In addition, certain affiliates of the Distributor provide services to the Fund as follows:

Ultimus Fund Solutions, LLC (“UFS”) – UFS, an affiliate of the Distributor, provides administration, fund accounting, and transfer agent services to the Trust. Pursuant to separate servicing agreements with UFS, the Fund pays UFS customary fees for providing administration, fund accounting, and transfer agency services to the Fund. Certain officers of the Trust are also officers of UFS, and are not paid any fees directly by the Fund for serving in such capacities.

Northern Lights Compliance Services, LLC (“NLCS”) – NLCS, an affiliate of UFS and the Distributor, provides a Chief Compliance Officer to the Trust, as well as related compliance services, pursuant to a consulting agreement between NLCS and the Trust. Under the terms of such agreement, NLCS receives customary fees from the Fund.

BluGiant, LLC (“BluGiant”), an affiliate of UFS and the Distributor, provides EDGAR conversion and filing services as well as print management services for the Fund on an ad-hoc basis. For the provision of these services, BluGiant receives customary fees from the Fund.

Certain officers and/or trustees of the Adviser are also officers/trustees of the Trust.

# THE NORTH COUNTRY FUNDS

## NOTES TO FINANCIAL STATEMENTS *(Continued)*

November 30, 2023

### NOTE 4. CAPITAL SHARE TRANSACTIONS

At November 30, 2023, there were an unlimited number of shares authorized with no par value.

Transactions in capital shares were as follows:

	For the Year Ended November 30, 2023		For the Year Ended November 30, 2022	
	Shares	Amount	Shares	Amount
Shares sold .....	223,652	\$ 4,042,425	338,914	\$ 7,300,809
Shares issued for reinvestment of dividends.	772,470	13,688,179	521,834	12,764,060
Shares redeemed .....	(1,721,579)	(33,182,723)	(1,110,409)	(24,570,892)
Net decrease .....	(725,457)	\$ (15,425,119)	(249,661)	\$ (4,506,023)

### NOTE 5. INVESTMENTS

The cost of purchases and proceeds from the sales of securities, other than short-term investments, for the year ended November 30, 2023, amounted to \$9,225,169 and \$38,417,587, respectively.

### NOTE 6. AGGREGATE UNREALIZED APPRECIATION AND DEPRECIATION – TAX BASIS

The identified cost of investments in securities owned by the Fund for federal income tax purposes, and its gross unrealized appreciation and depreciation at November 30, 2023, were as follows:

Tax Cost	Gross Unrealized Appreciation	Gross Unrealized Depreciation	Net Unrealized Appreciation (Depreciation)
\$ 47,765,857	\$ 69,770,197	\$ (866,010)	\$ 68,904,187

### NOTE 7. TAX INFORMATION

The tax character of distributions paid during the fiscal year ended November 30, 2023, and fiscal year ended November 30, 2022, was as follows:

	Fiscal Year Ended November 30, 2023	Fiscal Year Ended November 30, 2022
Ordinary Income .....	\$ 732,450	\$ 594,998
Long-Term Capital Gain .....	13,589,680	13,084,112
Return of Capital .....	-	-
	\$ 14,322,130	\$ 13,679,110



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# THE NORTH COUNTRY FUNDS

## NOTES TO FINANCIAL STATEMENTS (*Continued*)

November 30, 2023

As of November 30, 2023, the components of distributable earnings/ (deficit) on a tax basis were as follows:

<u>Undistributed Ordinary Income</u>	<u>Undistributed Long-Term Gains</u>	<u>Post October Loss and Late Year Loss</u>	<u>Capital Loss Carry Forwards</u>	<u>Other Book/Tax Differences</u>	<u>Unrealized Appreciation/ (Depreciation)</u>	<u>Total Distributable Earnings/ (Accumulated Deficits)</u>
\$ 720,087	\$ 16,160,452	\$ —	\$ —	\$ —	\$ 68,904,187	\$ 85,784,726

The difference between book basis and tax basis unrealized appreciation/(depreciation) from investments is primarily attributable to the adjustments for C-Corporation return of capital distributions.

### NOTE 8. CONTROL OWNERSHIP

The beneficial ownership, either directly or indirectly, of more than 25% of the voting securities of a Fund creates presumption of control of the Fund, under Section 2(a) 9 of the 1940 Act. As of November 30, 2023, SEI Private Trust Company, an account holding shares for the benefit of others in nominee name, held approximately 85% of the voting securities of the Fund.

### NOTE 9. RECENT REGULATORY UPDATES

On January 24, 2023, the SEC adopted rule and form amendments to require mutual funds and ETFs to transmit concise and visually engaging streamlined annual and semiannual reports to shareholders that highlight key information. Other information, including financial statements, will not appear in a streamlined shareholder report but must be available online, delivered free of charge upon request, and filed on a semiannual basis on Form N-CSR. The rule and form amendments have a compliance date of July 24, 2024. At this time, management is evaluating the impact of these amendments on the shareholder reports for the Fund.

### NOTE 10. SUBSEQUENT EVENTS

Subsequent events after the date of the Statement of Assets and Liabilities have been evaluated through the date the financial statements were issued. Except as noted below, management has concluded that there are no events requiring additional adjustment or disclosure in the financial statements. On December 6, 2023, the Fund paid an ordinary income dividend of \$0.1164 per share, a short-term capital gain dividend of \$0.0136 per share and a long-term capital gain dividend of \$2.8761 per share to shareholders of record on December 5, 2023. Effective April 1, 2024, the adviser will voluntarily waive 0.05% of its advisory fee.

## REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Shareholders and Board of Trustees of  
The North Country Funds

### Opinion on the Financial Statements

We have audited the accompanying statement of assets and liabilities, including the schedule of investments, of The North Country Funds comprising North Country Large Cap Equity Fund (the “Fund”) as of November 30, 2023, the related statement of operations for the year then ended, the statements of changes in net assets for each of the two years in the period then ended, the related notes, and the financial highlights for each of the five years in the period then ended (collectively referred to as the “financial statements”). In our opinion, the financial statements present fairly, in all material respects, the financial position of the Fund as of November 30, 2023, the results of its operations for the year then ended, the changes in net assets for each of the two years in the period then ended, and the financial highlights for each of the five years in the period then ended, in conformity with accounting principles generally accepted in the United States of America.

### Basis for Opinion

These financial statements are the responsibility of the Fund’s management. Our responsibility is to express an opinion on the Fund’s financial statements based on our audits. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) (“PCAOB”) and are required to be independent with respect to the Fund in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audits in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement whether due to error or fraud.

Our audits included performing procedures to assess the risks of material misstatement of the financial statements, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements. Our procedures included confirmation of securities owned as of November 30, 2023, by correspondence with the custodian. Our audits also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that our audits provide a reasonable basis for our opinion.

We have served as the Funds’ auditor since 2004.



COHEN & COMPANY, LTD.  
Milwaukee, Wisconsin  
January 24, 2024

COHEN & COMPANY, LTD.  
800.229.1099 | 866.818.4538 fax | [cohencpa.com](http://cohencpa.com)

Registered with the Public Company Accounting Oversight Board

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# THE NORTH COUNTRY FUNDS

## ADDITIONAL INFORMATION (Unaudited)

### FACTORS CONSIDERED BY THE INDEPENDENT TRUSTEES IN APPROVING THE INVESTMENT ADVISORY AGREEMENT

At a meeting (the “Meeting”) of the Board of Trustees (the “Board” or the “Trustees”) held on July 18, 2023, a majority of the Board, including a majority of trustees who are not “interested persons” of the Trust, as that term is defined in Section 2(a)(19) of the Investment Company Act of 1940, as amended (hereafter, the “Independent Trustees”), unanimously approved the continuance of the investment advisory agreement (the “Advisory Agreement”) between North Country Investment Advisers, Inc. (“NCIA” or the “Adviser”) and the North Country Large Cap Equity Fund (the “Large Cap Fund” or “Fund”). Fund counsel discussed with the Board its fiduciary responsibility to shareholders and the importance of assessing certain specific factors in its deliberations. Prior to the Meeting, the Adviser provided the Board with a number of written materials, including information relating to: a) the terms of the Advisory Agreement and fee arrangements with the Fund; b) the Adviser’s management and investment personnel; c) the financial condition and stability of the Adviser; d) data comparing the Fund’s fees, operating expenses and performance with that of a group of mutual funds in the same category, that the Adviser determined were similar in size to the Fund (the “Peer Group”); and e) past performance of the Fund as compared to its benchmark. In addition, the Board engaged in in-person discussions with representatives of the Adviser. The Board also met outside the presence of the Adviser to consider this matter and consulted with independent counsel and the Fund’s Chief Compliance Officer.

The Board, including the Independent Trustees, unanimously approved continuance of the Advisory Agreement based upon its review of the written materials provided at the Meeting, the reports provided at each quarterly meeting of the Board, the Board’s discussions with key personnel of the Adviser, and the Board’s deliberations. In their deliberations, the Trustees did not identify any particular information that was all-important or controlling, and individual Trustees may have attributed different weights to the various factors. Below is a summary of the Board’s conclusions regarding various factors relevant to approval of continuance of the Advisory Agreement:

*Nature, Extent and Quality of Services.* In considering the renewal of the Advisory Agreement the Board considered the nature, extent and quality of services that NCIA provided to the Fund, including NCIA’s personnel and resources. The Board reviewed the services NCIA provided in serving as investment adviser and the backgrounds of the personnel providing services to the Fund, including portfolio managers. They also reviewed information provided regarding trading and brokerage practices, risk management and compliance and regulatory matters. The Board also considered the structure of portfolio manager compensation. The Board concluded that the services NCIA provided were satisfactory.

*Performance of the Adviser.* The Board reviewed performance information for the Fund compared to the Benchmark Index and Peer Group for the one-, two-, three-, four-, five- and ten-year periods ended May 31, 2023. The Board also reviewed information on the construction of the Fund’s Peer Group. The Board reviewed the Fund’s total returns compared to the total returns of its Peer Group and Benchmark Index (Lipper Large Cap Core Funds Index). The Board considered the performance of the Fund against the Peer Group and Benchmark Index for the one-, two-, three-, four-, five-, and ten-year periods. The Board concluded that the performance of the Fund was satisfactory.

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## THE NORTH COUNTRY FUNDS

### ADDITIONAL INFORMATION (Unaudited) (Continued)

*Cost of Services.* The Board reviewed the Fund's contractual advisory fee and expense ratio taking into account the Fund's net asset size, and reviewed information comparing the advisory fee and expense ratio to those of the Fund's Peer Group. The Board discussed the level of work involved in NCIA's management and oversight of the Fund and the other services that NCIA provided to the Funds. The Board considered the nature and scope of the services provided by NCIA, including supervision of outside service providers. In light of the nature, quality and extent of services NCIA provided, the Board concluded that the Fund's advisory fee was appropriate. The Board also requested that NCIA consider again the possible appropriateness of a five-basis point fee waiver, whether an expense cap might be appropriate, and whether there might be some other way to lower the total expenses of the Fund.

*Profitability.* The Board reviewed the profitability of NCIA with respect to the Fund. The Board considered the methodology for calculating profitability. Using such methodology, the Board noted that NCIA earned a profit from the Fund. The Board concluded that the profitability of NCIA in connection with the management of the Fund was not excessive given the nature, extent and quality of the services provided.

*Economies of Scale.* The Trustees noted that the Adviser represented that certain efficiencies may be realized when the level of assets under management in the Fund nears \$500 million. The Trustees concluded that they would re-visit the issue of certain benefits to the Fund's shareholders that might ensue from economies of scale following any significant growth in Fund assets or other change in circumstances.

*Fallout Benefits.* Because of its relationship with the Fund, NCIA and its affiliates may derive ancillary benefits from Fund operations, including those derived from the allocation of Fund brokerage and the use of commission dollars to pay for research and other similar services. The Board noted that NCIA did not anticipate any fallout benefits at this time.

*Conclusion.* Based on all of the information considered and the conclusions reached, the Board determined that the compensation to be paid under the Advisory Agreement is appropriate in light of the nature, quality and extent of services provided by NCIA, and that the continuance of the Advisory Agreement be approved.

# THE NORTH COUNTRY FUNDS

## INFORMATION REGARDING TRUSTEES AND OFFICERS (Unaudited)

The following table provides information regarding each Independent Trustee:

Name, Address <sup>(1)</sup> and Year of Birth	Position(s) Held with the Fund	Term of Office and Length of Time Served	Principal Occupation(s) During Past 5 Years	Number of Portfolios in Fund Complex Overseen by Trustee	Other Directorships Held by Trustees
John C. Olsen <sup>(2)</sup> Born in 1955	Chairman of the Board and Trustee	Indefinite Since 2004 (Chairman since 2021)	Retired (2019–Present); Firm Ambassador, Bonadio & Co., LLP (2018–2020).	1	None
James E. Amell Born in 1959	Trustee	Indefinite Since 2017	Director and Shareholder of MMB + CO (CPA Firm) (1981–Present).	1	None
Keith P. McAfee <sup>(3)</sup> Born in 1963	Trustee	Indefinite Since 2017	Retired (2020–Present); Vice President of Electric Operations for New York, National Grid (2011–2020); Employee, National Grid (1992–2020).	1	None
Amie Gonzales Born in 1980	Trustee	Indefinite Since 2021	President, Hunt Companies Inc. (2019–Present); Project Manager, Hunt Companies Inc. (2012–2019).	1	None

(1) The business address for each Trustee is 4221 North 203rd Street, Elkhorn, Nebraska 68022.

(2) Resigned as Chairman of the Board December 12, 2023. Resigned as Trustee January 16, 2024.

(3) Elected Chairman of the Board December 12, 2023.

Name, Address and Age	Position(s) Held with the Fund	Term of Office* and Length of Time Served	Principal Occupation(s) During Past 5 Years	Number of Portfolios in Fund Complex Overseen by Trustee	Other Directorships Held by Trustees
James Colantino <sup>(1)</sup> Born in 1969	President	Since 2012	Senior Vice President of Fund Administration (2012–Present), Ultimus Fund Solutions, LLC.	N/A	None
James Ash <sup>(1)</sup> Born in 1976	Chief Compliance Officer	Since 2019	Senior Vice President and Head of Fund Compliance (since 2023) and Senior Compliance Officer, Northern Lights Compliance, LLC (2019–2023); Senior Vice President, National Sales Gemini Fund Services, LLC (2017–2019).	N/A	None
Richard Gleason <sup>(1)</sup> Born in 1977	Treasurer	Since 2017	Assistant Vice President of Fund Administration (2012–Present), Ultimus Fund Solutions, LLC.	N/A	None
Jared Lahman <sup>(1)</sup> Born in 1986	AML Compliance Officer	Since 2022	Compliance Analyst II, Northern Lights Compliance Services, LLC (2019–Present).	N/A	None
Sean Lawler <sup>(1)</sup> Born in 1987	Secretary	Since 2020	Senior Legal Administrator (2020–Present), Ultimus Fund Solutions, LLC; Legal Administrator (2014–2020), Gemini Fund Services, LLC.	N/A	None

\* Officers of the Trust are elected annually.

(1) The business address of this officer is 4221 North 203rd Street, Elkhorn, Nebraska 68022

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# THE NORTH COUNTRY FUNDS

## ADDITIONAL INFORMATION (Unaudited)

### LIQUIDITY RISK MANAGEMENT PROGRAM

The Fund has adopted and implemented a written liquidity risk management program as required by Rule 22e-4 (the “Liquidity Rule”) under the Investment Company Act. The program is reasonably designed to assess and manage the Fund’s liquidity risk, taking into consideration, among other factors, the Fund’s investment strategy and the liquidity of its portfolio investments during normal and reasonably foreseeable stressed conditions; its short and long-term cash flow projections; and its cash holdings and access to other funding sources.

During the year ended November 30, 2023, the Trust’s Liquidity Risk Management Program Committee (the “Committee”) reviewed the Fund’s investments and determined that the Fund held adequate levels of cash and highly liquid investments to meet shareholder redemption activities in accordance with applicable requirements. Accordingly, the Committee concluded that (i) the Fund’s liquidity risk management program is reasonably designed to prevent violations of the Liquidity Rule and (ii) the Fund’s liquidity risk management program has been effectively implemented.

# THE NORTH COUNTRY FUNDS

## DISCLOSURE OF FUND EXPENSES (Unaudited)

As a shareholder of the Fund, you incur ongoing costs, including management fees and other Fund expenses. This example is intended to help you understand your ongoing costs (in dollars) of investing in the Fund and to compare these costs with the ongoing costs of investing in other mutual funds. Please note, the expenses shown in the tables are meant to highlight ongoing costs only and do not reflect any transactional costs, such as sales charges (loads), or contingent deferred sales charges (CDSCs) on redemptions.

This example is based on an investment of \$1,000 invested at June 1, 2023 and held until November 30, 2023.

**Actual Expenses:** The “Actual” section of the table provides information about actual account values and actual expenses. You may use the information in this line, together with the amount you invested, to estimate the expenses that you paid over the period. Simply divide your account value by \$1,000 (for example, an \$8,600 account value divided by \$1,000 = 8.6), then multiply the result by the number in the column under the heading entitled “Expenses Paid During the Period” to estimate the expenses you paid on your account during the period.

**Hypothetical Examples for Comparison Purposes:** The “Hypothetical” section of the table below provides information about hypothetical account values and hypothetical expenses based on the Fund’s actual expense ratio and an assumed rate of return of 5% per year before expenses, which is not the Fund’s actual return. The hypothetical account values and expenses may not be used to estimate the actual ending account balance or expenses you paid for the period. You may use this information to compare the ongoing costs of investing in the Fund with other funds. To do so, compare this 5% hypothetical example with the 5% hypothetical examples that appear in the shareholder reports of other funds.

Please note that the expenses shown in the table are meant to highlight your ongoing costs only and do not reflect any transactional costs which may be applicable to your account. Therefore, the “Hypothetical” example is useful in comparing ongoing costs only, and will not help you determine the relative total costs of owning different funds. In addition, if transactional costs were included, your costs would have been higher.

	<b>Beginning Account Value (6/1/23)</b>	<b>Ending Account Value (11/30/23)</b>	<b>Expense Ratio (Annualized)</b>	<b>Expenses Paid During the Period* (6/1/23-11/30/23)</b>
<b>Large Cap Equity Fund</b>				
Actual	\$1,000.00	\$1,108.30	1.10%	\$5.81
Hypothetical (5% return before expenses)	\$1,000.00	\$1,019.55	1.10%	\$5.57

\* Expenses are equal to the Fund’s annualized expense ratio multiplied by the average account value over the period, multiplied by 183 days divided by 365 days.

# FACTS

## WHAT DO THE NORTH COUNTRY FUNDS DO WITH YOUR PERSONAL INFORMATION?

Rev. July 2011

### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do

### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and wire transfer instructions
- account transactions and transaction history
- investment experience and purchase history

When you are *no longer* our customer, we continue to share your information as described in this notice.

### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons The North Country Funds ("The Funds") choose to share; and whether you can limit this sharing.

Reasons we can share your personal information	Do The Funds share?	Can you limit this sharing?
<b>For our everyday business purposes</b> – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes</b> – to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes</b> – information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes</b> – information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

### Questions?

Call 1-888-350-2990



Who we are	
<b>Who is providing this notice?</b>	The North Country Funds
What we do	
<b>How do The Funds protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you.
<b>How do The Funds collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>• open an account or deposit money</li> <li>• direct us to buy securities or direct us to sell your securities</li> <li>• seek advice about your investments</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for non-affiliates to market to you</li> <li>• State laws and individual companies may give you additional rights to limit sharing.</li> </ul>
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• Our affiliates include financial companies such as Glens Falls National Bank and Trust Company and North Country Investment Advisers.</li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• The Funds do not share with nonaffiliates so they can market you.</li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>• The Funds do not jointly market.</li> </ul>

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### **How to Obtain Proxy Voting Information**

Information regarding how the Fund voted proxies relating to portfolio securities during the most recent 12-month period ending June 30, as well as a description of the policies and procedures that the Fund uses to determine how to vote proxies is available without charge, upon request, by calling toll-free 1-888-350-2990 or by referring to the Securities and Exchange Commission's ("SEC") website at <http://www.sec.gov>.

### **How to Obtain 1st and 3rd Fiscal Quarter Portfolio Holdings**

The Fund files its complete schedule of portfolio holdings with the SEC for the first and third quarters of each fiscal year as an exhibit on Form N-PORT, within sixty days of the end of the period. Form N-PORT is available on the SEC's website at <http://www.sec.gov>. The information on Form N-PORT is available without charge, upon request, by calling 1-888-350-2990.