



2020 Annual Notice to Clients

(1) Non-Bank Affiliate of BB&T

Sterling Advisors is a division of BB&T Securities, LLC which is a registered broker/dealer and a wholly owned subsidiary of Truist Financial Corporation.

(2) Disclosure of Financial Condition

BB&T Securities makes available periodic reports of its Statement of Financial Condition. The Statement is available via our internet site at www.bbtsecurities.com in the Disclosures section or you may request a copy from your brokerage firm.

(3) Net Capital Requirement

On December 31, 2019 BB&T Securities, LLC had regulatory net capital of \$120,488,803 which was 107.62% of the aggregate debit balances. Its net capital was \$118,249,646 in excess of the minimum requirement of 2,239,157.

(4) Important Information about Procedures for Opening a New Account

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you – when you open an account, we will ask you for your name, address, date of birth and other information that will allow us to identify you. We may ask to see your driver's license or other identifying documents.

(5) Margin Disclosure Statement

Securities purchased on margin are BB&T Securities' collateral for the loan to you. If you are a current margin account holder, it is important that you understand the risks involved in trading securities on margin. Such risks include, but are not limited to:

- The market value of the securities you pledge as collateral may decline
- The possibility of losing proxy voting rights for securities held in margin accounts
- Receiving payments-in-lieu of dividends on securities that are loaned out.

If the equity of the market value falls below the required minimum, it falls into a margin call status. BB&T Securities will require additional collateral or you will be required to liquidate some or all of the assets in the account to restore the correct ratio of equity to debit balance. BB&T Securities can liquidate your securities in any account without prior notice in order to meet a maintenance (margin) call. The firm can also increase its "house" maintenance margin requirements at any time without prior notice.

You are not entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call and are not entitled to an extension of time. In addition, if you have a margin debit balance, BB&T Securities has the right to lend shares of the securities held in margin accounts whereby you, as the margin customer may lose the ability to vote the securities held in such margin accounts. Margin customers are at risk of receiving payments-in-lieu of dividends on shares

that are lent past the ex-dividend date (the last date the seller/loaner of the stock would be entitled to the recently announced dividend payment). BB&T Securities is required to report to the IRS such payments as ordinary income, which may cause customers with taxable accounts to lose the benefit of preferential tax rates on dividends. Please consult with your professional tax advisor for specifics.

(6) Electronic Fund Transfers–Error Dispute Notification

In case of errors or questions about your checkwriting and debit card electronic transactions, please call or write UMB at the following phone number or address:

UMB Bank
PO Box 419734
Kansas City, MO 64141
1-800-449-9176

ACH payments/debits that were initiated by using the transit and routing information on your fund checkbook and Visa Check Card items are examples of electronic transactions. UMB Bank processes Visa Check Card transactions and certain other electronic transactions.

Contact UMB Bank as soon as you can, if you think your statement or receipt is wrong or if you need more information about a transfer listed on the statement or receipt. They must hear from you within 60 days after you were sent the FIRST statement on which the problem or error appeared.

How to report a problem:

- Tell UMB Bank your name and account number.
- Describe the error or the transfer you are unsure about, and explain why you believe it is an error or why you need more information.
- Tell UMB Bank the dollar amount of the suspected error. If you tell them orally, they may require that you send your complaint or question in writing within 10 business days.

Reporting back to you:

UMB Bank will determine whether an error occurred within 10 business days after they hear from you and will correct any error promptly. If they need more time, however, they may take up to 45 days to investigate your complaint or question. If they decide to do this, they will credit your account within 10 business days for the amount you think is in error, so that you will have the use of the money during the time it takes them to complete their investigation. If they ask you to put your complaint or question in writing and they do not receive it within 10 business days, they may not credit your account. For errors involving new accounts, point-of-sale, or foreign-initiated transactions, UMB Bank may take up to 90 days to investigate your complaint or question. For new accounts, they may take up to 20 business days to credit your account for the amount you think is in error. UMB Bank will tell you the results within three business days after they finish their investigation. If UMB Bank decides there was no error, they will send you a written explanation. You may ask for copies of the documents that they used in their investigation.

(7) FINRA BrokerCheck Brochure

An investor brochure is available from FINRA that describes its BrokerCheck Program (formerly the Public Disclosure Program). The brochure may be obtained by calling FINRA at (800) 289-9999. You may also visit the FINRA website at <http://www.finra.org>.

(8) Customer Account Information

In order to properly service your account, it is important that we have

current information on file regarding your investment objectives and financial situation. Please notify your Financial Advisor promptly of any material changes in your account information so that we can update our records.

(9) Advisory Accounts

BB&T Securities, LLC, a registered investment advisor under the Investment Advisers Act of 1940, urges all advisory clients to compare any account-related statements received directly from the firm with account statements received from your qualified custodian. A qualified custodian is a bank or savings association, broker-dealer, or futures commission merchant holding assets in customer accounts, or a foreign financial institution that customarily holds client assets in segregated accounts. Please refer to Investment Advisers Act Rule 206(4)-2 for a complete definition. If you would like to receive a copy of the firm's ADV 2A (Firm Brochure) and/or individual programs brochure please contact your Investment Advisor Representative.

(10) Important Information Relating to the Firm's Privacy Notice:

Financial advisors may change brokerage and/or investment advisory firms, and the nonpublic personal information collected by us and your advisor may be provided to the new firm, so your advisor can continue to service your account(s). If you do not want your financial advisor to provide this information to the new firm, please call 877-679-5463 to opt out of this sharing. Opt-in states, such as California and Vermont and others, require your affirmative consent before the advisor can provide your nonpublic information to the new firm. You can provide or withdraw this consent at any time by contacting 877-679-5463.

(11) Account Inquiries

All inquiries regarding your account or its activity should be directed to Sterling Advisors. Please report any inaccuracy or discrepancy in your account in writing to the office servicing your account and to BB&T Securities, LLC, 8006 Discovery Drive, Suite 200, Richmond, Virginia 23229. If you have any concerns about your account, or if you have a complaint, contact Compliance Department, 901 East Byrd Street, Suite 210, Richmond, Virginia, 23219, 877-679-5463. BB&T Securities, LLC is registered with the U.S. Securities and Exchange Commission ("SEC") and Municipal Securities Rulemaking Board ("MSRB"). More information on the MSRB can be found at www.msrb.org. An investment brochure is available on the MSRB's website and it describes the protections that may be provided by the MSRB's rules and how to file a complaint with an appropriate regulatory authority.

(12) Relationship with Third Parties

Like many securities firms, BB&T Securities, LLC, receives payments from third parties whose products we distribute, including mutual fund companies, money market funds, and insurance companies. Payments from mutual fund, money market fund, and insurance companies may include sales loads, rule 12b-1 fees, reimbursements for education, and expenses related to marketing support and training.

In addition, BB&T Securities has entered into a "revenue sharing" arrangement with the adviser and distributor of the money market funds used for cash management services. BB&T Securities believes that all payments are in accordance with industry rules and regulations as currently in effect. The maximum aggregate payment that BB&T Securities receives from money market funds (including an adviser or distributor thereof) ranges from 0.0% to 0.86% annually, depending on fund type and share class.

Please contact your Financial Advisor if you have any questions regarding such relationships, payments, or the extent to which your Financial Advisor benefits from such payments. You should also refer to the prospectuses and Statements of Additional Information of the mutual funds, money market funds, and insurance products in which you invest for further information regarding these payments.

Mutual Fund Omnibus and Networking Fees - BB&T Securities receives payments from mutual funds or their affiliated service providers for providing certain recordkeeping and related services to the funds. BB&T Securities processes some mutual fund business with fund families on an omnibus basis, which means clients' trades are consolidated into one daily trade with the fund. We receive omnibus fee payments as compensation for the services we provide when trading mutual funds on an omnibus basis. We trade other fund families on a networked basis, which means we submit a separate trade for each individual client and may receive networking fee payments for each client mutual fund position we hold with the fund.

BB&T Securities also receives fees for services provided in connection with the Insured Deposit Program (The Program). As with the purchase of money market mutual funds, BB&T Securities may receive compensation based on their clients' deposits in The Program. For Program Deposits into affiliated depository institutions, the balances provide a relatively low cost source of financing for the lending and other investments of the depository institution which allows the depository institution to earn a spread between the cost of funds and the assets of the depository institution.

(13) Account Protection

All accounts carried by BB&T Securities are protected by the Securities Investor Protection Corporation (SIPC) up to \$500,000 per eligible account, subject to a \$250,000 limit on cash balances pending investment. BB&T Securities carries insurance coverage issued by Lloyd's of London in excess of the standard SIPC coverage with a maximum limit per customer of \$50,000,000 and a \$200,000,000 total aggregate over all customers and every situation during the policy period. Further information about SIPC, including the SIPC brochure, may be obtained by calling SIPC at 202-371-8300 or by visiting the SIPC website at www.sipc.org.

The Insured Deposit Program (The Program) balances are insured by the Federal Deposit Insurance Corporation (FDIC), an independent agency of the federal government backed by the full faith and credit of the U.S. government, up to \$250,000 per depositor per Program Bank for each category of legal ownership. To provide additional coverage, The Program uses a network of Program Banks in a manner designed to provide you with a maximum deposit insurance limit of \$2,500,000 per depositor for each category of legal ownership. As of the publication of this notice, the participating Program Banks are:

- Associated Bank NA, Green Bay, WI
- Bremer Bank, St. Paul, MN
- BankUnited NA, Miami Lakes, FL
- EagleBank, Bethesda, MD
- Enterprise Bank & Trust, Clayton, MO
- East West Bank, Pasadena, CA
- First Horizon Bank, Memphis, TN
- First Internet Bank of Indiana, Fishers, IN
- Manufacturers Bank, Los Angeles, CA
- Morton Community Bank, Morton, IL

- Progress Bank and Trust, Huntsville, AL
- Simmons Bank, Pine Bluff, AR
- Sterling National Bank, Montebello, NY
- Truist Bank, Charlotte, NC
- Umpqua Bank, Roseburg, OR
- Union Bank & Trust, Lincoln, NE
- United Community Bank, Blairsville, GA

If you have or make deposits on your own with a Program Bank, BB&T Securities would not be aware of these deposits. You are responsible for monitoring the total amount of all deposits you have at each Program Bank for purposes of calculating your FDIC insurance coverage. If your total funds on deposit at any individual Program Bank exceed the maximum deposit insurance limit, the FDIC will not insure your funds in excess of the limit.

For additional information and any other questions about FDIC Deposit Insurance Coverage, you may wish to seek advice from your own legal advisor. You may also obtain information by contacting the FDIC, Division of Supervision and Consumer Protection, by letter (550 17th Street, N.W., Washington, D.C. 20429), by phone (877-275-3342, 800-925-4618 (TDD)), by e-mail (dcainternet@fdic.gov), or by accessing the FDIC Web site at www.fdic.gov.

(14) Business Continuity Plan

In today's environment, a disaster can occur anytime and significantly affect our Firm's ability to conduct business. As such, BB&T Securities maintains a Business Continuity Plan that documents the procedures the firm and its employees will follow when responding to any type of business disruption. Disruptions may occur via a wide variety of events or circumstances; as such, BB&T Securities has instituted recovery planning that is flexible enough to respond to even the worst-case scenarios.

BB&T Securities has executive representation on a Business Recovery Management Team (BRMT) that manages the recovery of critical business functions in a timely manner following any significant business disruption. If BB&T Securities, a self-regulatory organization, or an agency of the federal government declares a Disaster Event, the BRMT will assemble and operate from a Crisis Command Center. BB&T Securities has the ability to relocate essential personnel to back-up facilities from which our employees can conduct business.

We recognize that technology and communications are vital to client service. As such, BB&T Securities' supporting infrastructure is maintained in two separate, geographically dispersed data centers. Both facilities contain redundant systems and communication links to ensure prompt access to client data. Additionally, BB&T Securities has an effective cybersecurity program to detect and respond to cybersecurity threats. BB&T Securities also ensures that critical server providers have appropriate data and network security controls in place to defend against cybersecurity threats and protect client data. Our goal is to help ensure clients' access to their accounts despite any disruptions, realizing that there may be circumstances beyond our control. However, we are committed to constantly and consistently improving our resiliency and will continue to strive towards achieving our goal.

BB&T Securities has developed a Business Continuity Plan and the supporting procedures to ensure our introducing firms will have prompt access to their securities and funds following most types of business disruptions. With regard to client assets, nearly all physical securities are held in central depositories or custodian banks. This allows BB&T

Securities and its introducing firms a higher level of liquidity and security of their assets in any type of business disruption.

The following are some very important guidelines that you can use in the event our Firm is operating under emergency conditions:

- **Primary Contact:** Your Sterling Advisor or BB&T Securities at 866-436-1185
- **Secondary Contact:** Information regarding the status of BB&T Securities can be found on our website, www.bbtsecurities.com

BB&T Securities has taken significant steps to strengthen its Business Continuity Plans; however it cannot guarantee that all systems will be immediately available following a significant business disruption. Nonetheless, our clients can be assured the employees of BB&T Securities are committed to resuming all business operations as quickly as possible and continuing our service in a professional and courteous manner.

BB&T Securities will update its Business Continuity Plan and this Statement as circumstances dictate.

(15) Compensation on Order Flow

Consistent with securities industry practice, BB&T Securities may receive payment for order flow in the form of monetary compensation per share or reciprocal business from other dealers or market centers. Absent specific instructions from you, orders are routed to such dealers or market centers that execute orders at prices consistent with their obligation to provide the best execution of all client orders. The source and nature of any compensation received in connection with your orders will be provided upon written request.

In accordance with SEC Rules 606, BB&T Securities makes publicly available monthly reports on the Firm's execution quality and quarterly reports on the Firm's order routing practices, respectively. These reports are available on www.bbtsecurities.com. A written copy will be furnished upon request.

(16) Extended Trading Hours

BB&T Securities does not offer extended trading hours. The following risks, however, are assumed when trading during extended trading hours:

Risk of Lower Liquidity. Liquidity refers to the ability of market participants to buy and sell securities. Generally, the more orders that are available in a market, the greater liquidity. Liquidity is important because with greater liquidity it is easier for investors to buy or sell securities, and as a result, investors are more likely to pay or receive a competitive price for securities purchased or sold. There may be lower liquidity in extended hours trading as compared to regular market hours. As a result, your order may receive an inferior price.

Risk of Higher Volatility. Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be greater volatility in extended hours trading than in regular market hours. As a result, your order may only be partially executed, or not at all, or you may receive an inferior price in extended hours trading than you would during regular market hours.

Risk of Changing Prices. The prices of securities traded in extended hours trading may not reflect the prices either at the end of regular market hours, or upon the opening the next morning. As a result, you may

receive an inferior price in extended hours trading than you would during regular market hours.

Risk of Unlinked Markets. Depending on the extended hours trading system or the time of day, the prices displayed on a particular extended hours trading system may not reflect the prices in other concurrently operating extended hours trading systems dealing with the same securities. Accordingly, you may receive an inferior price in an extended hours trading system than you would in another extended hours trading system.

Risk of New Announcements. Normally, issuers make news announcements that may affect the price of their securities after regular market hours. Similarly, important financial information is frequently announced outside of regular market hours. In extended hours trading, these announcements may occur during trading, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of the security.

Risk of Wider Spreads. The spread refers to the difference in price between what you can buy a security for and what you can sell it for. Lower liquidity and higher volatility in extended hours trading may result in wider than normal spreads for a particular security.

(17) Stop Orders in Fast Moving Markets

A stop order is an order to buy or sell a stock once the price of the stock reaches a specified price, known as the stop price. When the specified price is reached, the order becomes a market order. Buy stop orders are used when buying stock to limit a loss or protect a profit on short sales. The order is entered at a price that is always above the current market price. Sell stop orders are used to help avoid further losses or protect a profit that exists if a stock price continues to drop. A stop order to sell is always entered below the current market price. There are risks associated with stop orders. The disadvantage is that the stop price could be activated by a very short term fluctuation in a fast moving market that could result in an execution that is far away from the desired stop price.

(18) What is EMMA?

EMMA, the Electronic Municipal Market Access system, is a website (www.emma.msrb.org) that provides free public access to information about individual municipal securities, including official statements, continuing disclosures and real-time trade data. Investors can access and download for free all documents and data on EMMA, and also obtain educational information geared toward retail investors. EMMA is operated by the Municipal Securities Rulemaking Board, the regulatory agency that protects investors and ensures a fair and efficient municipal bond market.

Information Available on EMMA

- Official statements and advance refunding documents (Investors can still obtain a printed copy of an official statement by requesting it from their brokerdealer)
- Continuing disclosures, including annual financial statements and notices of material events
- Real-time and historical trade data
- Interest rates and auction results for municipal auction rate securities
- Interest rates for variable rate demand obligations
- Daily market statistics and educational material about municipal bonds.

How to Find Official Statements and Continuing Disclosures on EMMA

The easiest way to search for an official statement or continuing disclosure document associated with a particular security on EMMA is to use the “Muni Search” tab and enter a CUSIP number—a unique 9-character

identifier with numbers and letters, for example, “123456AAB.” CUSIP numbers for an investor’s security appear on a trade confirmation or brokerage statement. Investors can also search for a particular security by entering the name of the bond issuer into EMMA’s “Muni Search” function or by entering other parameters such as issue description, state name, maturity date and date of issuance into EMMA’s “Advanced Muni Search” function. However searching by a CUSIP number produces the best results.

Learn More about EMMA

Go to EMMA’s home page and click on the video tutorial located in the lower-left corner of the page.

(19) European Financial Transaction Taxes

France introduced a financial transaction tax (FTT) on August 1, 2012. The French FTT includes a tax on the acquisition of shares in listed French companies with a market capitalization of over 1 billion Euros. In addition, Italy also enacted separate financial transaction tax that may affect some investors. The tax situation in Europe continues to develop and clients are invited to discuss what impact (if any) these developments have on their accounts with their broker.

(20) Allocation Procedures for Securities Subject to Call or Redemption

The lottery process for a partial call, pre-refund or defeasement is a random process designed to allocate called securities on a fair and impartial basis. The lottery process is based on a mathematical formula to randomly select accounts for allocation. For calls that are deemed favorable to the security-holder, firm accounts, as well as accounts of associated persons of broker-dealers are excluded until all client positions have been allocated. A favorable call occurs when the call price exceeds the current market price reflected in the back office application. If no price is available in the back office system, the call is presumed favorable. If a call is not deemed favorable to the security-holder, firm and associated persons’ accounts are included in the lottery. Additional details concerning the lottery process will be provided upon request. (www.bbtsottstringfellow.com/aboutus/disclosures)

(21) Municipal Advisory Disclosure

If this account is for a Municipal Entity that is able to issue tax-exempt bonds (e.g city, town, hospital, high school, university, etc.) and if the proceeds from bonds issued by the client (“bond proceeds”) are deposited or otherwise invested through the account, or if the client is unaware of the presence of bond proceeds, please be aware that BB&T Securities is acting in its capacity as a Registered Investment Adviser, registered under the Investment Advisers Act of 1940, in the management of the account. BB&T Securities is not providing and will not provide “advice” as defined in the Municipal Advisor Rule, and any information or communication from BB&T Securities with respect to the account is not intended to be and should not be construed as “municipal advice” as defined in the Municipal Advisory Rule. As the client you are responsible for alerting the Registered Representative of any change in this arrangement.

Schedule of Operational and Other Service Fees

Please read the below fee schedule carefully. Any charges incurred are the responsibility of the account owner(s). BB&T Scott & Stringfellow may change this fee schedule at any time. In addition to these fees, please note that certain other operational or other fees or charges may apply. If you have any questions regarding the applicability of these fees, please contact your Financial Advisor.

Account Services	
Account Transfers	
Incoming Account Transfer	No charge
Outgoing Account Transfer	\$95
Annual Account Fee (standard brokerage) ¹	\$60
Asset Management Account - Initial Check Order	No charge
Debit Card Annual Fee - First year's fees waived	\$40
ATM Fees ²	No charge
Returned Items (Insufficient Funds)	\$30
Check Reorder Fee	\$15
Transfer of Securities on Death (TOD)	
Setup	\$45
Modifications	\$25
Distributions (external)	\$100
IRAs	
Annual Custody	\$45
Conversions	No charge
Terminations	\$95
Cash Management	
Automated Clearing House (ACH) Transfers	
Incoming ACH Transfer	No charge
Outgoing ACH Transfer	No charge
Late Payment for a Trade	Broker call rate + 2.875%
Money Market Early Redemption	Daily interest
Prepayment of the proceeds of a trade prior to settlement date	\$18 plus interest (minimum interest of \$2)
Margin and COD Extension	\$1-49,999 – BC + 2.875% \$50,000-99,000 – BC + 2.625% \$100,000-499,999 – BC + 2.250% \$500,000+ – BC + 1.75%
Returned Items (Insufficient Funds)	No charge
Stop Payment	\$25
Wire Transfers	
Incoming	No charge
Outgoing Domestic	\$25
Outgoing International	\$40
Securities Processing	
Foreign Security Conversion (Ordinary to ADR)	All agent fees
Foreign Security Transfers	\$250
Legal and GMNA Transfers	No charge if going Street Name
Accommodation Transfer	No charge
Direct Registration	Outgoing \$10
Physical Certificates Rejects	\$125
Legal Transfers into Street Name	No charge
Non-Transferable Securities Custody	\$11 per security per month
Outgoing Direct Registration System (DRS) Transfers	\$10
Physical Certificate Custody & Safekeeping	\$5 per security per month
Restricted Legal Transfers	\$50 plus all agent fees
Deposit & Withdrawal At Custodian (DWAC Gifting/Delivery/Deposit)	All agent fees

Schedule of Operational and Other Service Fees

Please read the below fee schedule carefully. Any charges incurred are the responsibility of the account owner(s). BB&T Scott & Stringfellow may change this fee schedule at any time. In addition to these fees, please note that certain other operational or other fees or charges may apply. If you have any questions regarding the applicability of these fees, please contact your Financial Advisor.

Transaction Processing	
Corporate Action Redemptions/Exchanges (when registered in Client Name)	\$90
Corporate Action Withdrawal of Previously Tendered Shares	\$77
Mutual Fund Exchanges	No charge
DK Item - US	\$0
DK Item - Non-US	\$0
Prime Brokerage Receive and Deliver Fees	\$25 per event
Dividend Reinvestment Purchases	No charge
Dividend Reinvestment Liquidation of Fractional Shares	No charge
Overnight Charges - Weekday Delivery	\$12
Overnight Charges - Saturday Delivery	\$21
Processing & Handling ³	\$2 per transaction
Commissions	
Equities (Market and Limit Orders)	Current commission schedule
Options (Market and Limit Orders) ⁴	\$25
Fixed Income	\$25
Mutual Funds ⁵	\$25

¹ BB&T Scott & Stringfellow offers clients many options to avoid annual fees. Account fees are waived for clients holding \$250,000 or more in brokerage assets, accounts enrolled in fee-based advisory programs, clients holding \$15,000 or more in open-end mutual funds or annuities, and many more situations. Please contact your Financial Advisor for more details.

² Other Institutions' ATM fees may apply.

³ The fee does not apply to transactions in new issues, mutual funds, or insurance products, Delivery-Versus-Payment (DVP) accounts, automatic investment plans, or fee-based accounts (with the exception of trades involving ineligible assets). The transaction fee is charged to all other transactions, including but not limited to equities, bonds, UITs and options.

⁴ Option exercises and assignments will incur full commission. Options involve risks and are not suitable for all investors.

⁵ Investors should consider carefully information contained in the prospectus, including investments objectives, risks, charges and expenses.

5/22/20