

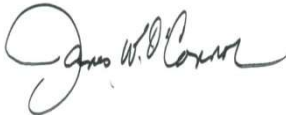
Annual Policy Disclosures

BESTVEST INVESTMENTS, LTD.

There are many different options open to you in the world of investing. To navigate those options, it takes teamwork between you and your financial service provider to determine your best course of action. The professionals at BestVest are here to help you make sound investment choices and keep you on the right course to financial success. This is our commitment to you.

We thank you for your trust and your business.

James W. O'Connor, President



PRIVACY POLICY

BestVest Investments, Ltd. (“BVI”, “we”, “us”, “our”) requires that you provide current and accurate financial and personal information. BVI will protect the information you have provided in a manner that is safe, secure, and professional. FINRA Rule 4512 requires firms to make a reasonable effort to obtain the name and contact information such as phone number of a Trusted Contact Person when opening a new non-institutional account or making account level changes to an existing non-institutional account. BVI and our employees are committed to protecting your privacy and to safeguarding that information. We collect non-public customer data in checklists, in forms, in written notations, and in documentation provided to us by our customers for evaluation, registration, licensing, or related consulting services. We also create internal lists of such data. During regular business hours access to customer records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the customer records will be locked. No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to personal and financial customer information shall share that information in any manner without the specific consent of a firm principal. Failure to observe BVI procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

Sharing Nonpublic Personal and Financial Information

BVI is committed to the protection and privacy of its customers’ and consumers’ personal and financial information. We may share such information with any affiliated or nonaffiliated third parties including:

When necessary to complete a transaction in a customer account, such as the clearing firm or account custodians; when required to maintain or service a customer account including third party banking and Credit Union services; or to resolve customer disputes or inquiries.

With persons acting in a fiduciary or representative capacity on behalf of the customer; such as financial planning, student loan financial aid, financial form filing for colleges and universities, and tax preparation. Or with rating agencies, persons assessing compliance with industry standards or to the attorneys, accountants, and auditors of the firm; In connection with a sale or merger;

To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims, or other liabilities;

To comply with federal, state, or local laws, rules, and other applicable legal requirements;

In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement.

Under any circumstances with the customer's instruction or consent or pursuant to any other exceptions enumerated in the customer file.

It is not our current policy to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Clients may not opt out of sharing information where it is necessary for us to service accounts or it is mandated by law. Clients may opt out of sharing for marketing purposes by sending written notification to the Main office located at:

600 North Jackson Street, Suite 305
Media, PA 19063
1-800-434-1776

Anti-Money Laundering Policy

BVI complies with the Anti-Money Laundering Law commonly known as the Patriot Act. The act provides for criminal penalties for anyone who aids or abets money laundering. To comply with the law, BVI screens all accounts for possible past violations and known terrorist lists. We may require additional information in the future to further document client identities. It is necessary for us to have new account forms filled out in their entirety to help fulfill our responsibility under the act and to comply with industry regulations for suitability and know your customer. BVI may close accounts which refuse to provide requested information.

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 for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

Best Execution and Order Flow Disclosure

All orders are executed at prices equal to, or better than, the displayed national best bid/offer prices. Market conditions determine speed and price of transactions. All transactions where executions are at multiple prices, due to lack of liquidity or price improvement, and the subsequent price is averaged may be identified by the abbreviation VWAP which stands for value weighted average price. Any client can determine the contra side of any transaction by writing to BVI. Our best execution information is available on-line at www.rbccorrespondentservices.com/cid-112218.html or <https://clearpoolgroup.com/annual-606-disclosure/> and also at our own website <http://www.bestvest.net/new/bestvestinvest/> or by writing

Members SIPC * FINRA * MSRB

1-800-434-1776

www.bestvest.net

to us. Our clearing firm and Clearpool both create and maintain their website and all information on the website. BVI does not guarantee that any or all information on either website is accurate. BVI may receive remuneration in the form of rebates for routing equity securities orders to designated broker dealers or third Markets for execution. Orders are routed to market centers including other broker dealers, where, based on experience, they combine price, speed, and size to provide you with what we believe are the best executions. Our primary objective is to obtain the best execution of transactions regardless of any compensation factor. Any remuneration received for directing orders will not accrue to your account but is considered a reduction of expenses.

The SEC requires that BVI disclose information regarding their order execution and order routing practices. To give our customers the utmost confidence in BVI and to comply with these requirements, the information regarding SEC rules 605 and 606 can be found at: RBC Correspondent Services, <https://www.rbcwm-usa.com/legal/rbc-cs/cid-360855.html> and Clearpool, <https://clearpoolgroup.com/annual-606-disclosure/>

Upon written request, a customer who places a “not held” order (e.g. an order in which the customer gives the firm price and time discretion) may receive a standardized set of individualized disclosures concerning the firm’s handling of the customer’s orders. Some restrictions apply.

Firm’s Relationship with RBC CS

Our firm has a contractual agreement with RBC Correspondent services (RBC CS) to serve as our clearing firm. The fully disclosed agreement states the responsibilities of each party. Prior to the agreement becoming effective, RBC CS is responsible for making all disclosures to our firm’s designated examining authority as required by NYSE Rule 382. Each client of our firm is notified of the relationship via a disclosure letter. The Disclosure letter details the responsibilities that our firm (the introducing broker-dealer) and RBC CS (the clearing firm) have to the client. Although client assets are held by RBC Capital Markets, LLC, neither RBC Capital Markets, LLC, nor RBC CS has responsibility for the financial condition or performance of our firm or our financial advisors.

Fee Disclosure & Securities Processing

Qualified retirement accounts are assessed an annual fee of \$35.00. There is a \$120.00 fee for closing your account or transferring your account to another securities dealer. An annual account fee will be charged in the amount of \$50 per year unless one of the following exemptions are met: Household assets over \$100,000, Retirement account, Advisory (managed) Accounts, or paperless account. Securities held in safekeeping are subject to a \$100.00 fee per security annually. Stocks held in street name may be subject to reorganization fees for name changes, mergers, reverse stock splits, and tenders. The reorganization fees are generally \$40.00 per item but vary according to the transfer agent. Legal fees for changing account name, converting old stock to new stock and processing estate death certificates are \$60.00 per item. Transfer on death creation is \$50.00 per account. There is a transaction fee charged by BestVest for purchasing and redeeming mutual fund shares that might be negated by dealing with the fund directly. Each fund has its own policies and fee schedules. There is a \$25.00 fee for DTC or DRS transfers of securities per item. A fee of \$2.00 per position, per month will be assessed for accounts holding DTC non-transferable securities. There is a \$25.00 fee for a bad address or returned mail where the client has not provided a valid change of address notification to the firm. Deposit of physical certificates that are not in good standing will result in a \$200 fee. The fee for trading through a restriction is \$500.00 Should your assets be abandoned and escheated to a state, the processing fee is \$200.00 Additional fees exist and changes to the fee structure may occur without prior notification. Security positions deemed worthless will be written off for the charge of \$1.00 without prior notification to the client A more detailed list of fees is available upon written request to BVI or on our website at www.bestvest.net.

Proceeds from the sale of physical securities will be held in your account for 30 days after settlement prior to release. This is to insure there are no restrictions or other problems with the physical securities. Mutual fund and options trades and some bond transactions settle the next day. Equities currently settle in two days. Cash must be in the account for trades that settle next day. Margin paperwork must be on file prior to trading on margin. Option paperwork must be approved by a firm principal 24 hour prior to trading.

FINRA Hotline

For review of your financial service representative, please visit the lower right hand order of www.bestvest.net or go directly to www.Brokercheck.Finra.Org. Customer complaints or inquiries may be directed to our primary regulatory authority: FINRA 1735 K Street, NW Washington DC 20006-1500, phone #1-800-483-9816 and WWW.FINRA.ORG.

SIPC and Insurance Coverage

SIPC is the Securities Investor Protection Corporation. Information may be obtained about SIPC, including a SIPC brochure, by contacting the SIPC directly at www.sipc.org, calling 202-371-8300 or writing to SIPC at 805 15th St. NW, Suite 800, Washington, DC 20005-2215. All customer accounts are insured through SIPC and through additional coverage provided by our clearing firms. SIPC covers each client for up to \$500,000 including \$250,000 for cash. Our clearing firm provides additional umbrella insurance coverage in security coverage. Cash balances swept into the RBC BDP in excess of \$1,500,000 (\$3,000,000 for joint accounts) will be automatically invested into the RBC U.S. Govt. Money Market Fund. This combines the benefits of FDIC insurance up to applicable limits with the relative safety of a U.S. Govt. Money Market Fund backed by both SIPC and Excess SIPC insurance. The FDIC coverage available through RBC Insured Deposits (RBC ID) is \$5 million. This coverage is \$10 million for accounts held jointly by two or more persons.

Miscellaneous

Phone calls may be recorded by BVI or our clearing firms. Formal notification is given that any recordings may be used to help with quality assurance. **Please review this disclosure and all written correspondence from BVI and RBC Correspondent Services carefully.**

Written materials such as confirmations and statements are deemed to be correct unless BestVest or RBC Correspondent Services receive notification of a discrepancy within five days of client's receipt of the material. The Laws of the State of New York will apply to any and all customer inquiries and/or complaints regardless of state of origin. In the event of unclaimed property, there is a possibility of escheatment pursuant to certain state laws.

Any client wishing to receive additional information on policies, fees, and or disclosure statements should contact us at 800-434-1776, e-mail us at compliance@bestvest.net or write to us in care of our Compliance department.

Clients are reminded about the risks of accessing and storing personal and financial data on their mobile devices, and about the risks of "jailbreaking" or "rooting" mobile devices to make them "open" for unauthorized applications, games and networking tools, which increase the risks of viruses, malicious code and unauthorized modifications to operating systems.

Business Continuity Plan

BestVest Investments maintains a Business Continuity Program. Our technology allows us to process our mission critical business of servicing and executing security transactions for our clients despite a widespread disruption. We have redundant services within our offices to provide service in the event of phone disruption, internet disruption and/or power disruption. We have tested these back-up procedures and find they work effectively. By having branch offices located throughout the country, we can execute orders even with an extreme local disruption. In the event of a disaster, we have back-up information that would enable us to recreate account activity for any account.

In the event that you are unable to contact us during an emergency using any of our listed main office and branch phone numbers, you may call 800-434-1776 or 610-891-2860 (Media, PA), 800-664-1876 (Narberth, PA), or 586-350-0551 (Harper Woods, MI). In the event that all of the above phone numbers are inoperable, please contact our clearing firm, RBC, at 612-607-8903. The fax number at the Media Office is 610-565-8819.

Our website: www.bestvest.net will be updated as soon as possible in the case of an emergency.

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this Business Continuity Plan annually to modify it for any changes to our operations, structure, business or location or to those of our clearing firms.

Investments are
Not Federally Insured * Involves Investment Risk
No Bank/Credit Union Guarantee * May Lose Value

January 2019