

Item 1 – Cover Page

Form ADV Part 2A: *Firm Brochure*

Retirement Financial Solutions, LLC d/b/a

Blue Ridge Wealth Planners

9725 Cogdill Road, Suite 101

Knoxville, Tennessee 37932

865-392-4260

www.blueridgewealth.com

Date of Disclosure Brochure: March 20, 2026

This disclosure brochure provides information about the qualifications and business practices of Retirement Financial Solutions, LLC doing business under the name Blue Ridge Wealth Planners (also referred to as we and us throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact Bradley Fugate at 865-392-4260. The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Blue Ridge Wealth Planners is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for Retirement Financial Solutions, LLC, Blue Ridge Wealth Planners or our firm's CRD number 285347.

*Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

Since our last annual amendment update dated March 31, 2025, we have:

- **Cover Page / Firm Management**

We updated our disclosure to reflect that Christopher Payne now serves as the firm's Interim Chief Compliance Officer, effective October 2025.

- **Item 4 – Advisory Business**

We clarified that we generally manage client accounts internally using our proprietary Great Valley model strategies and, in some cases, use an unaffiliated sub-advisory platform and unaffiliated third-party investment advisers to help implement and/or manage all or a portion of client accounts. We also expanded our description of the Great Valley Strategies and clarified that comprehensive financial planning is typically provided as part of our wealth management services and included in our asset-based advisory fee.

- **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

We expanded our discussion of the Great Valley Strategies, including how they are implemented and when third-party strategies may be used. We also updated the related risk disclosures, including additional information about strategy-specific risks and the risks of interval funds and other alternative or real-asset exposures.

- **Client Assets Managed by Blue Ridge Wealth Planners**

We updated our assets under management information as of December 31, 2025

We will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after our firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time, we will also offer or provide a copy of the current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Introduction.....	4
Description of Advisory Services	4
Retirement Plan Rollover Recommendations	5
Types of Investment.....	6
Tailor Advisory Services to Individual Needs of Clients.....	7
Client Assets Managed by Blue Ridge Wealth Planners	7
Item 5 – Fees and Compensation	7
Item 6 – Performance-Based Fees and Side-By-Side Management.....	8
Item 7 – Types of Clients	9
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	9
Methods of Analysis	9
Investment Strategies	10
Risk of Loss.....	12
Item 9 – Disciplinary Information.....	13
Item 10 – Other Financial Industry Activities and Affiliations	13
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading	15
Code of Ethics Summary	15
Affiliate and Employee Personal Securities Transactions Disclosure	15
Item 12 – Brokerage Practices.....	16
Directed Brokerage	17
Block Trading Policy.....	17
Item 13 – Review of Accounts.....	17
Account Reviews and Reviewers.....	17
Statements and Reports	17
Item 14 – Client Referrals and Other Compensation	18
Item 15 – Custody	19
Item 16 – Investment Discretion	19
Item 17 – Voting Client Securities	19
Item 18 – Financial Information.....	20
Customer Privacy Policy Notice	21

Item 4 – Advisory Business

Blue Ridge Wealth Planners is an SEC-registered investment adviser located in Knoxville, Tennessee and organized as a limited liability company (LLC) under the laws of the State of Tennessee. Robert Fugate is the Founder of Blue Ridge Wealth Planners, and Bradley Fugate has served as the controlling Managing Member of the firm since January 2017. Blue Ridge Wealth Planners filed its initial application to become registered as an investment adviser in October 2016. Additional information regarding the education and business background of Robert and Bradley Fugate is available in their respective Form ADV Part 2B Brochure Supplements.

Introduction

The investment advisory services of Blue Ridge Wealth Planners are provided to you through an appropriately licensed and qualified individual who is an investment adviser representative of Blue Ridge Wealth Planners (referred to as your investment adviser representative throughout this brochure).

As part of our wealth management relationships, we typically provide ongoing financial planning and retirement-planning advice as an integrated component of our asset management services, rather than as a separate stand-alone service.

Description of Advisory Services

The following are descriptions of the primary advisory services of Blue Ridge Wealth Planners. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and Blue Ridge Wealth Planners before we can provide you with the services described below.

Asset Management Services

We offer discretionary asset management services. Our investment advice is tailored to your individual needs and investment objectives. If you retain our firm for asset management services, we will meet with you to determine your investment objectives, risk tolerance, time horizon, cash flow needs, and other relevant information at the beginning of our advisory relationship. We use this information to develop an overall strategy and to select an appropriate combination of our internally managed model strategies and, where appropriate, strategies managed by unaffiliated third-party investment advisers for your account.

We implement most client portfolios through a sub-advisory platform offered by an unaffiliated SEC-registered investment adviser (the "Sub-Adviser"). In many cases, Blue Ridge Wealth Planners serves as portfolio manager and is responsible for designing and managing the investment strategies used in your account (including our proprietary Great Valley Strategies). In those accounts, the Sub-Adviser acts in an implementation role as our sub-adviser by providing trading, rebalancing, and related technology and administrative services and by executing trades in your account on our behalf in accordance with the investment models and instructions we provide.

In other cases, we may recommend and select strategies or model portfolios managed directly by the Sub-Adviser or by other unaffiliated third-party investment advisers available on the sub-advisory platform (collectively, "Third-Party Advisers"). When we do so, the applicable Third-Party Adviser has discretionary authority to make day-to-day investment decisions for your account or for a portion of your account, subject to your stated investment objectives and any reasonable restrictions you impose. We retain responsibility for recommending the use of Third-Party Advisers, selecting and monitoring them, and determining whether their continued use is appropriate for your situation.

If you participate in our discretionary asset management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authority allows us (and any Third-Party Advisers we engage, acting in their capacity as sub-advisers) to determine the specific securities to be bought or sold and the amounts of those securities, consistent with your investment guidelines, without obtaining your prior approval for each transaction. Discretionary authority is typically granted in our Investment Advisory Agreement and the applicable account and trading authorization forms. You may impose reasonable restrictions on this authority by providing us with your instructions in writing.

Financial Planning Services

As part of our discretionary asset management services, we provide ongoing, goals-based financial planning at no additional charge. This planning can address areas such as retirement income planning, cash flow and budgeting, education funding, insurance and risk management, tax-aware investment strategies, and estate-planning considerations. Financial planning is generally not offered as a standalone service and is included in our asset-based advisory fee rather than charged separately.

Wrap Fee Programs

A wrap fee program is a program under which the client pays a single fee that covers both receipt of investment advice and the execution of securities transactions. We serve as portfolio manager in a wrap fee program sponsored by the unaffiliated Sub-Adviser that provides the sub-advisory platform described in Item 4. In this program, the advisory fee you pay generally includes custody, trading, portfolio management, and reporting services in a bundled format. Your total cost for obtaining these services through the wrap fee program may be higher or lower than the cost of obtaining the services separately from other providers.

Within the wrap fee program, your account may be managed directly by Blue Ridge Wealth Planners (using our proprietary strategies), by the Sub-Adviser, by another Third-Party Adviser available on the platform, or by a combination of these, depending on the strategy or strategies we recommend and select for you.

When considering whether a wrap fee program is appropriate, you should take into account the value and type of services you will receive, your expected trading activity, and the total wrap fee. If your account is not expected to trade frequently or you qualify for reduced transaction charges, the wrap fee program may be more expensive than other fee arrangements. In other cases, a wrap fee program may be less expensive than paying for advisory, custodial, and transaction services separately.

If you participate in a wrap fee program, your account will generally be managed on a discretionary basis by us and/or by one or more Third-Party Advisers, based on your individual investment objectives. If we recommend that you participate in a wrap fee program available through the sub-advisory platform, you will receive a separate wrap fee program brochure from the Sub-Adviser describing the program and the costs associated with it.

Retirement Plan Rollover Recommendations - To the extent we recommend you roll over your account from a current retirement plan to an individual retirement account ("Rollover IRA"), managed by Blue Ridge Wealth Planners please know that Blue Ridge Wealth Planners and our investment adviser representatives have a conflict of interest.

We can earn increased investment advisory fees by recommending that you roll over your account at the retirement plan to a Rollover IRA managed by Blue Ridge Wealth Planners. We will earn fewer investment advisory fees if you do not roll over the funds in the retirement plan to a Rollover IRA managed by Blue Ridge Wealth Planners.

Thus, our investment adviser representatives have an economic incentive to recommend a rollover of funds from a retirement plan to a Rollover IRA which is a conflict of interest because our recommendation that you open an IRA account to be managed by our firm can be based on our economic incentive and not based exclusively on whether or not moving the IRA to our management program is in your overall best interest.

We have taken steps to manage this conflict of interest. We have adopted an impartial conduct standard whereby our investment adviser representatives will (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in Blue Ridge Wealth Planners receiving unreasonable compensation related to the rollover of funds from the retirement plan to a Rollover IRA, and (iii) fully disclose compensation received by Blue Ridge Wealth Planners and our supervised persons and any material conflicts of interest related to recommending the rollover of funds from the retirement plan to a Rollover IRA and refrain from making any materially misleading statements regarding such rollover.

To the extent we provide you investment advice as a participant in a retirement plan regarding whether to maintain investments and/or proceeds in the retirement plan, roll over such investment/proceeds from the retirement plan to a Rollover IRA or make a distribution from the retirement plan, Blue Ridge Wealth Planners hereby acknowledges our fiduciary obligations to you with regard to our investment advice about whether to maintain, roll over or distribute proceeds from the retirement plan, and as such a fiduciary with respect to its investment advice to you about whether to maintain, roll over or distribute proceeds from the retirement plan.

Our investment advisor representatives shall act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk, tolerance, financial circumstances, and a client's needs, without regard to the financial or other interests of Blue Ridge Wealth Planners or our affiliated personnel.

Newsletters

Blue Ridge Wealth Planners occasionally prepares general, educational and informational newsletters. Newsletters are always offered on an impersonal basis and do not focus on the needs of a specific individual. Newsletters are provided to clients and prospective clients free of charge.

Seminars

Blue Ridge Wealth Planners provides dinner seminars throughout the year. Seminar topics focus on retirement planning issues but can also include other general financial planning topics. Seminars are always offered on an impersonal basis and do not focus on the individual needs of participants. Seminars are offered to clients and prospects free of charge.

Workshops

Blue Ridge Wealth Planners offers educational workshops throughout the year covering retirement planning and financial planning topics. Attendees may receive a course workbook which further details the topic of discussion. See *Item 5 – Fees and Compensation* for the costs associated with the workshops.

Types of Investments

Our investment advice focuses primarily on equities, mutual funds, exchange-traded funds (ETFs), interval funds, and our proprietary model strategies that invest in these types of securities. We generally use diversified ETFs and mutual funds as the main building blocks in client portfolios and may use interval funds in limited circumstances to provide exposure to certain alternative or real-asset strategies.

Although we generally provide advice only on these types of investments, we reserve the right to offer advice on any investment product that we determine is suitable in light of your specific circumstances, needs, goals, and objectives. In certain situations—for example, where you hold individual stocks, employer stock, or other legacy holdings—we may recommend holding, gradually diversifying, or otherwise integrating those positions into your overall portfolio and financial plan. Where your tax situation or individual stock positions call for it, we may recommend strategies designed to manage concentration or capital gains risk (such as continuing to hold a position with significant unrealized capital gains, implementing a gradual sales plan, or in appropriate cases using covered call strategies to generate income or reduce the need to sell shares).

It is not our typical investment strategy to attempt to “time the market,” but we may increase cash holdings modestly when we believe this is appropriate based on your risk tolerance, liquidity needs, and our expectations of market behavior. We may also modify our investment strategy to accommodate special situations such as low-basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax considerations. The use of any such strategies, including options strategies such as covered calls, involves additional risks and may not be appropriate for every client or account. Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.

Tailor Advisory Services to Individual Needs of Clients

Blue Ridge Wealth Planners advisory services are always provided based on your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose restrictions on the Accounts we manage for you, including specific investment selections and sectors. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

When managing client Accounts through our firm's Asset Management Services program, we can manage a client's Account in accordance with one or more investment models. When client Accounts are managed using models, investment selections are based on the underlying model, and we do not develop customized (or individualized) portfolio holdings for each client. However, the determination to use a particular model or models is always based on each client's individual investment goals, objectives and mandates.

In practice, we generally tailor your portfolio by selecting and combining one or more of our proprietary Great Valley Strategies—such as Great Valley Reservoir, Great Valley Irrigator, Great Valley Rainmaker, Great Valley Thundercloud, and Great Valley Wellspring—in proportions that reflect your risk tolerance, time horizon, income needs, and overall financial situation. As part of our wealth management services, we also incorporate financial planning (for example, retirement income planning, tax-aware withdrawal strategies, and estate-planning considerations) into our ongoing advice. We generally do not offer financial planning as a stand-alone service for a separate fee; instead, it is included within our asset-based advisory relationship.

Client Assets Managed by Blue Ridge Wealth Planners

As of December 31, 2025, Blue Ridge Wealth Planners had \$361,659,979 in discretionary assets under management and \$0 in non-discretionary assets under management.

Item 5 – Fees and Compensation

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service can be available from other sources. The exact fees and other terms will be outlined in the agreement between you and Blue Ridge Wealth Planners.

Fees for Asset Management Services

The total annual advisory fee due to us for asset management services ("Advisory Fee") is negotiable at the sole discretion of our firm and will be outlined in the Investment Advisory Agreement signed by you and our firm. Our maximum annual Advisory Fee for these services is up to 2% of the total assets under management.

Advisory Fees are typically billed monthly in arrears based on each account's average daily balance during the prior calendar month. The first monthly fee will be prorated based on the portion of the month remaining after your account is opened. Advisory Fees are generally deducted from your account(s) by the qualified custodian at our instruction or at the instruction of the Sub-Adviser acting in its implementation capacity. In rare cases, we may agree to direct bill clients.

For accounts implemented through the sub-advisory platform, you pay an ongoing asset-based "wrap" fee instead of separate transaction-based commissions to us. The wrap fee generally includes most trading costs and custodial fees that would otherwise be charged separately. As a result, the total wrap fee may be higher than the advisory fee you would pay in a non-wrap arrangement where you pay transaction costs separately.

When we use the Sub-Adviser or other Third-Party Advisers to manage all or part of your account, a portion of the Advisory Fee you pay may be retained by those firms as compensation for their services. The portion retained by us and the portion retained by any Third-Party Adviser may vary depending on the specific strategy or program you use. This creates a conflict of interest because we have a financial incentive to recommend certain strategies, programs, or Third-Party Advisers over others, or over managing the account ourselves, based on the portion of the Advisory Fee we retain rather than solely on your needs. We seek to address this conflict by basing our recommendations on your investment objectives, risk tolerance, and overall circumstances, by supervising our advisory activities, and by disclosing these arrangements to you.

Our Advisory Fee reduces the value of your account over time. The more assets (including cash) you have in your advisory account, the more you will pay in fees. This creates a conflict of interest because we have an incentive to encourage you to increase the assets we manage for you. We address this conflict of interest by seeking to ensure that our recommendations regarding contributions, transfers, and rollovers are in your best interest.

Our Advisory Fee schedules may vary by investment type. For example, we may charge a lower Advisory Fee on certain real estate-based interval funds held in your advisory account than on other assets we manage.

In addition to our Advisory Fee, you will bear the internal fees and expenses of mutual funds, exchange-traded funds (ETFs), interval funds, and other pooled investment vehicles held in your account (such as management fees and other operating expenses). These internal expenses are paid at the fund or product level and are in addition to the Advisory Fee you pay to us.

Fees for Workshops

From time to time, Blue Ridge Wealth Planners will charge a minimal fee, as needed, due to costs associated with the content of the workshop and/or course workbook, without notice.

Other Fee Terms

You should notify Blue Ridge Wealth Planners within ten (10) days of receipt of an invoice if you have questions about or dispute any billing entry.

To the extent Blue Ridge Wealth Planners engages an outside professional (i.e., attorney, independent investment adviser or Accountant) while providing advisory services to you, Blue Ridge Wealth Planners will be responsible for the payment of the fees for the services of such an outside professional, and you will not be required to reimburse Blue Ridge Wealth Planners for such payments. To the extent that you personally engage such an outside professional, you will be responsible for the payment of the fees for the services of such an outside professional, and Blue Ridge Wealth Planners will not be required to reimburse Client for such payments. Fees for the services of an outside professional (i.e., attorney, independent investment adviser or Accountant) will be in addition to and separate from the fees charged by Blue Ridge Wealth Planners, and you will be responsible for the payment of the fees for the services of such an outside professional. In no event will the services of an outside professional be engaged without your express approval.

Item 6 – Performance-Based Fees and Side-By-Side Management

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's Account. *Item 6* is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

Item 7 – Types of Clients

Blue Ridge Wealth Planners generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals

You are required to execute a written agreement with Blue Ridge Wealth Planners specifying the particular advisory services in order to establish a client arrangement with Blue Ridge Wealth Planners.

We provide investment advisory services primarily to individuals, families, and their related entities. We do not have a firm minimum account size to become a client. For our standard asset management services, we generally look for at least \$250,000 in investable assets. We may, in our discretion, accept clients with a lower amount and may aggregate accounts held by members of the same household to meet this level.

The Sub-Adviser that sponsors the sub-advisory platform may have its own minimum account size and minimum fee requirements for accounts that participate in its programs. The Sub-Adviser will disclose its minimum account size and fees in its Form ADV Part 2A Disclosure Brochure and any wrap fee program brochure it provides to you.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Blue Ridge Wealth Planners uses the following methods of analysis in formulating investment advice:

Charting - This is a set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends.

Charting is likely the most subjective analysis of all investment methods since it relies on proper interpretation of chart patterns. The risk of reliance upon chart patterns is that the next day's data can always negate the conclusions reached from prior days' patterns. Also, reliance upon chart patterns bears the risk of a certain pattern being negated by a larger, more encompassing pattern that has not shown itself yet.

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong and could therefore lead to an unfavorable investment decision.

Technical – This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity.

Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

Investment Strategies

Blue Ridge Wealth Planners may employ the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Value Investing. Value Investing can be described as a strategy of selecting stocks that trade for less than their intrinsic values. Value investors typically seek stocks of companies that they believe the market has undervalued. They believe the market overreacts to good and bad news, resulting in stock price movements that do not correspond with the company's long-term fundamentals. The result is an opportunity for value investors to profit by buying when the price is deflated. Often, value investors select stocks with lower-than-average price-to-book or price-to-earnings ratios and/or high dividend yields. The risks associated with value-investing include incorrectly analyzing and overestimating the intrinsic value of a business, concentration risk, under performance relative to major benchmarks, macro-economic risks, investing in value traps i.e., businesses that remain perpetually undervalued, and lost purchasing power on cash holdings in the case of inflation.

Tactical asset allocation. Allows for a range of percentages in each asset class (such as Stocks = 40-50%). The ranges establish minimum and maximum acceptable percentages that permit the investor to take advantage of market conditions within these parameters. Thus, a minor form of market timing is possible, since the investor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

Strategic asset allocation. Calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a "buy and hold" strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client's goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

Investment Model Strategies. Blue Ridge Wealth Planners has created proprietary model strategies (the "Great Valley Strategies") that we use to manage most client portfolios. These strategies are designed for different combinations of growth, income, and risk tolerance and are implemented primarily using diversified mutual funds, exchange-traded funds (ETFs), and, where appropriate, interval funds and other exchange-listed securities. Based on the information you provide us, we consider your time horizon, risk tolerance, income needs, and financial goals when determining which Great Valley Strategies, or combination of strategies, are appropriate for your situation.

In most cases, we manage your portfolio directly using one or more of the Great Valley Strategies. In other cases, we may recommend and select strategies or model portfolios managed by the Sub-Adviser or by other unaffiliated Third-Party Advisers available on the sub-advisory platform. When we select a strategy managed by a Third-Party Adviser, that firm has discretionary authority to manage the assets allocated to that strategy, subject to your stated investment objectives and any reasonable restrictions you impose. We retain responsibility for recommending, selecting, and monitoring the use of Third-Party Advisers and their strategies in your account.

We implement the Great Valley Strategies and any Third-Party Adviser strategies through the sub-advisory platform described in Item 4. In this arrangement, we or the applicable Third-Party Adviser are responsible for designing and managing the strategies and for deciding how your account is allocated among them, while the Sub-Adviser provides trading, rebalancing, and related technology and administrative services and executes trades in your account in accordance with the models and instructions we or the applicable Third-Party Adviser provide.

In the development and management of our own model strategies, we use techniques that may include technical analysis, fundamental analysis, and charting. We may employ various execution tactics, such as long-term and short-term buys, value investing, and strategic or tactical asset allocation, in an effort to achieve each model's objectives. Each strategy uses its own mix of techniques, execution tactics, and research tools to manage its assets in line with its stated philosophy, and we actively manage each strategy's investment objective over time.

Great Valley Reservoir. Great Valley Reservoir is a more conservative strategy that emphasizes capital preservation and current income. It typically invests primarily in fixed income ETFs and other income-oriented securities, with limited equity exposure. This strategy may be appropriate for investors with lower risk tolerance, shorter time horizons, or a greater need for income and stability, and it is expected to experience less volatility than strategies with higher equity allocations.

- **Great Valley Irrigator.** Great Valley Irrigator is a balanced strategy that blends equity and fixed income exposure, generally through diversified ETFs and mutual funds. It seeks a combination of income and capital appreciation and may be appropriate for investors with a moderate risk tolerance and intermediate time horizon who are willing to accept some volatility in pursuit of longer-term growth.
- **Great Valley Rainmaker.** Great Valley Rainmaker is a growth-oriented strategy that invests primarily in equity ETFs and other equity securities. It is designed for investors with a higher risk tolerance and longer time horizon who are willing to accept greater short-term volatility and the risk of significant market declines in pursuit of higher long-term growth potential.
- **Great Valley Thundercloud.** Great Valley Thundercloud is a strategy that invests largely in large-capitalization equities, typically through ETFs and, in some cases, individual stocks. It is expected to experience volatility similar to, or greater than, broad equity markets and may be appropriate for investors who are comfortable with substantial fluctuations in account value and have a long investment time horizon.
- **Great Valley Wellspring.** Great Valley Wellspring is a diversified alternative strategy that primarily uses ETFs and, where appropriate, interval funds and other vehicles to obtain exposure to asset classes such as commodities, real estate investment trusts (REITs), infrastructure, and other non-traditional investments. It is intended to complement a traditional stock-and-bond portfolio and may behave differently from traditional markets, which can help diversify risk but can also introduce additional risks, including liquidity risk, sector concentration risk, and greater sensitivity to changes in economic or regulatory conditions.

Primarily Recommend One Type of Security

We do not primarily recommend one type of security to clients. Instead, we recommend any product that may be suitable for each client relative to that client's specific circumstances and needs.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that the future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- **Market Risk** – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Equity (stock) market risk** – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- **Company Risk**. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as an unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- **Fixed Income Risk**. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- **Options Risk**. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- **ETF and Mutual Fund Risk** – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- **Management Risk** – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.
- **Interval Fund Risk** – Interval funds are closed-end funds that do not trade on an exchange and generally offer to repurchase shares only at stated intervals. Between repurchase dates, you may not be able to sell your shares, and the fund's repurchase offers may be oversubscribed, meaning you may be able to sell only part of your holdings in a given period. Interval funds may invest in less liquid or more complex assets, which can increase valuation risk and volatility.

- **Strategy-Specific Risks** – The Great Valley Strategies described above involve differing levels and types of risk. Strategies with higher allocations to equities—such as Great Valley Rainmaker and Great Valley Thundercloud—will generally experience greater volatility and a higher risk of significant short-term losses than strategies with greater allocations to fixed income. Strategies with higher fixed income exposure—such as Great Valley Reservoir—are subject to interest rate risk, credit risk, and inflation risk, and may not keep pace with equity markets over time. Great Valley Irrigator combines equity and fixed income exposure and, as a result, combines the risks of both asset classes. Great Valley Wellspring seeks exposure to alternative asset classes (including commodities, REITs, REIT-like vehicles, MLPs, and other non-traditional assets) and may behave differently from traditional stock and bond portfolios; these exposures can increase volatility, may be less liquid, and may involve additional risks such as commodity price risk, sector concentration risk, and changes in tax or regulatory treatment of certain structures. There is no assurance that any strategy will achieve its objectives or that any specific combination of strategies will be appropriate for every client.
- **Third-Party Adviser Risk** - When we use the Sub-Adviser or other unaffiliated Third-Party Advisers to manage all or part of your account, the performance of your portfolio will depend in part on their investment decisions and the quality of their management. There is a risk that a Third-Party Adviser’s strategy, investment decisions, or business operations may not perform as expected, which could negatively affect your account.

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client’s or prospective client’s evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

Blue Ridge Wealth Planners is not, and does not have a related person that is, a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” or offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or insurance agency, a pension consultant, a real estate broker or dealer, or a sponsor or syndicator of limited partnerships.

Sales of Insurance Products

Our representatives can sell other products or provide services outside of their role as investment adviser representatives with us. Due to the firm’s financial planning philosophy, it is common for our financial professionals to recommend that clients utilize insurance products (for example, a fixed index annuity (“FIA”)) as part of the client’s overall financial plan in lieu of separately managed accounts (specifically, in lieu of cash and fixed income asset classes). You should be aware that there are a number of conflicts of interest that are present due to our planning philosophy and recommendations to utilize insurance products in this nature.

As an estimate, our financial professionals that are registered as investment adviser representatives spend approximately 30% of their time on insurance sales and services and 70% of their time on investment advisory services. Please refer to Item 5 – Fees and Compensation and Item 14 – Client Referrals and Other Compensation for more details.

You may therefore work with your financial professional in both their capacity as an investment adviser representative of Blue Ridge Wealth Planners, as well as in their capacity as an insurance agent. As such, your Blue Ridge Wealth Planners financial professional, in their dual capacity as an IAR and insurance agent, may advise you to purchase insurance products (general disability insurance, life

insurance, annuities, and other insurance products), and then assist you in implementing the recommendations by selling you those same products.

When acting as an insurance agent, in exchange for selling you those products, the financial professional will typically be paid a commission. This recommendation that a client purchase an insurance product through them as an insurance agent presents a conflict of interest, as the receipt of commissions is an incentive to recommend products that could potentially be based on commissions rather than your personal needs and objectives.

Furthermore, commissions may vary by product, and each individual product may have different commission rates, encouraging the financial professional to recommend products that may pay higher commissions over the products that make the most sense for you.

In addition, insurance products may also have different payment schedules depending on the nature of the product, and the timing of the payments likely differ from that of the advisory options offered by Blue Ridge Wealth Planners. This timing difference has the potential to create a conflict of interest since some financial professionals may have the incentive to recommend a product that pays commissions now, over an advisory product that pays fees over a relatively longer period. As an example, all other variables held equal, a 5% commission paid by an insurance company upon sale of a \$100,000 annuity product may be more attractive to a financial professional than a one percent (1%) advisory fee charged on a \$100,000 account paid over a period of five (5) years, despite the overall pre-tax compensation paid to the financial professional being equal.

There are other conflicts present as well. Blue Ridge Wealth Planners utilizes the services of an unaffiliated insurance marketing organization (the "Insurance Marketing Organization" or "IMO") to assist in identifying and selecting insurance products for our clients. The IMO is under common ownership with an unaffiliated SEC-registered investment adviser that sponsors the sub-advisory platform we use to implement many client accounts (the "Sub-Adviser"). The IMO and insurance carriers may offer special bonus or incentive compensation to our firm and our investment adviser representatives, when they act in their separate capacities as insurance agents, based in part on overall sales of annuities and/or other insurance products placed through the IMO. This creates a conflict of interest for Blue Ridge and our financial professionals to utilize products available through the IMO and its partner carriers.

In addition, certain insurance carriers and companies under common ownership with the IMO may separately provide incentive-based bonuses or awards in exchange for sales-related production over specific periods of time. They may also provide indirect compensation by providing marketing assistance, business development tools, technology, back-office and operations support, business succession planning, business conferences, and incentive trips. These incentive programs do not directly affect fees paid by the client. Although some of these services can benefit a client, other services obtained by our investment adviser representatives, such as marketing assistance, business development, and incentive trips, will not benefit an existing client and create conflicts of interest because they give us and our financial professionals an incentive to favor the IMO, companies under common ownership with the IMO, and their partner carriers.

At times, our financial professionals receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are the result of informal expense sharing arrangements in which product sponsors will underwrite costs incurred for marketing, such as client appreciation events, advertising, publishing, and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are made by those sponsors for which sales have been made or for which it is anticipated sales will be made. This creates a conflict of interest in that there is an incentive to recommend certain products and investments based on the receipt of this compensation instead of what is in the best interest of clients.

We have taken a number of steps to manage these types of conflicts of interest. We attempt to control for these sales-related conflicts by always basing investment decisions on the individual needs of clients. As a fiduciary, we expect and require that each investment adviser representative only recommend insurance and annuities when in the best interest of the client. The sale of commission-based products is

supervised by the firm's Chief Operating Officer, and the firm makes periodic reviews of its insurance recommendations to ensure that our financial professionals act in accordance with our fiduciary duty. If you have any questions or concerns about annuity recommendations made during the financial planning process, we encourage you to immediately bring it to the attention of the Managing Director or the Chief Compliance Officer.

Finally, you should be aware that there are other insurance products that are offered by other insurance agents other than those recommended by our financial professionals. You are under no obligation to implement any insurance or annuity transaction through Blue Ridge Wealth Planners.

Real Estate Ownership

Robert Fugate, Bradley Fugate, and John Vandergriff are also affiliated with Cogdill One, LLC, which owns real estate including a commercial building located at 9725 Cogdill Road, Knoxville, TN 37932. Each of them has an ownership interest in this real estate. Blue Ridge Wealth Planners leases office space in this building. This arrangement presents a potential conflict of interest because these individuals benefit indirectly from the lease payments made by the firm. We believe the lease terms are fair and reasonable and comparable to those that could be obtained from an unrelated landlord.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

An investment adviser is considered a fiduciary and has a fiduciary duty to all clients. Blue Ridge Wealth Planners has established a Code of Ethics to comply with the requirements of the securities laws and regulations that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. Blue Ridge Wealth Planners' Code of Ethics covers all individuals that are classified as "supervised persons". All employees, officers, directors and investment adviser representatives are classified as supervised persons. Blue Ridge Wealth Planners requires its supervised persons to consistently act in your best interest in all advisory activities. Blue Ridge Wealth Planners imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm's fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of Blue Ridge Wealth Planners. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

Affiliate and Employee Personal Securities Transactions Disclosure

Blue Ridge Wealth Planners or supervised persons of the firm can buy or sell for their personal accounts investments identical to those recommended to clients. This creates a conflict of interest. It is the express policy of Blue Ridge Wealth Planners that all persons supervised in any manner by our firm must place clients' interests ahead of their own when implementing personal investments. As is required by our internal procedures manual, Blue Ridge Wealth Planners and its supervised persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations. To prevent conflicts of interest, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, supervised persons). Any supervised person not observing our policies is subject to sanctions up to and including termination.

Item 12 – Brokerage Practices

Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back-office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back-office services, technology and pricing of services offered.

At least annually, we will review alternative custodians in the marketplace for comparison to the currently used custodian, evaluating criteria such as overall expertise, cost competitiveness, and financial condition. Quality of execution for custodians will be reviewed through trade journal evaluations.

Currently, we require the use of Fidelity as your qualified custodian. This decision is based on the Sub-Adviser's participation in the Fidelity Institutional Wealth Services program. For accounts implemented through the sub-advisory platform, Fidelity will also be used as the qualified custodian. Fidelity provides Blue Ridge Wealth Planners with access to their institutional trading and custody services, typically not available to retail investors. The services from Fidelity include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Fidelity and the Sub-Adviser also make available to Blue Ridge Wealth Planners other products and services that we benefit from but may not benefit your Accounts. Some of these other products and services assist us in managing and administering client Accounts. These include software and other technology that:

- Provide access to client Account data (such as trade confirmation and Account statements)
- Facilitate trade execution (and allocation of aggregated trade orders for multiple client Accounts)
- Provide research, pricing information and other market data
- Facilitate payment of our fees from client Accounts
- Assist with back-office functions, recordkeeping and client reporting.

Many of these services generally may be used to service all or a substantial number of our Accounts. Fidelity also makes available other services intended to help us manage and further develop our business. These services can include:

- Consulting, publications and conferences on practice management
- Information technology
- Business succession
- Regulatory compliance
- Marketing.

In addition, Fidelity will make available, arrange and/or pay for these types of services rendered to Blue Ridge Wealth Planners by independent third parties providing these services to us. As a fiduciary, we endeavor to act in your best interest. Our requirement that you maintain your assets in Accounts at Fidelity may be based in part on the benefit to us of the availability of some of the foregoing products and

services and not solely on the nature, cost or quality of custody and brokerage services provided by Fidelity. This creates a conflict of interest.

You are under no obligation to act on our recommendations. You may select a broker/dealer or Account custodian other than Fidelity, although in this case we cannot assist you with asset management services.

Directed Brokerage

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular broker/dealer, Blue Ridge Wealth Planners may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/dealers can cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, Blue Ridge Wealth Planners has decided to require our clients to use broker/dealers and other qualified custodians determined by Blue Ridge Wealth Planners.

Block Trading Policy

We may elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when Blue Ridge Wealth Planners believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities among client Accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

Blue Ridge Wealth Planners uses the pro rata allocation method for transaction allocation.

Under this procedure, pro rata trade allocation means an allocation of the trade at issue among applicable advisory clients in amounts that are proportional to the participating advisory client's intended investable assets. Blue Ridge Wealth Planners will calculate the pro rata share of each transaction included in a block order and assign the appropriate number of shares of each allocated transaction executed for the client's Account.

If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which Blue Ridge Wealth Planners or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* Neither we nor our associated persons receive any additional compensation as a result of block trades.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Managed Accounts are reviewed at least quarterly. While the calendar is the main triggering factor, reviews can also be conducted at your request. Account reviews will include investment strategy and objectives review and making a change if strategy and objectives have changed. Reviews are conducted by your Advisor on record, with reviews performed in accordance with your investment goals and objectives.

Statements and Reports

For our asset management services, you are provided with transaction confirmation notices and regular quarterly Account statements in writing directly from the qualified custodian. Additionally, Blue Ridge Wealth Planners may provide position or performance reports to you quarterly and upon request.

You are encouraged to always compare any reports or statements provided by us, the Sub-Adviser, or any Third-Party Adviser that manages a portion of your account against the Account statements delivered

from the qualified custodian. When you have questions about your Account statement, you should contact our firm and the qualified custodian preparing the statement.

Item 14 – Client Referrals and Other Compensation

Blue Ridge Wealth Planners does not directly or indirectly compensate any person for client referrals. We do not have formal solicitor arrangements under which we pay referral fees to third parties for recommending our advisory services.

As disclosed under the “Fees and Compensation” and “Other Financial Industry Activities and Affiliations” sections of this Brochure, our financial professionals providing investment advice on behalf of our firm are often licensed insurance agents and earn commission-based compensation for selling insurance products. In addition, these persons may receive certain benefits from the Insurance Marketing Organization described in Item 10, from the Sub-Adviser that sponsors the sub-advisory platform, from Third-Party Advisers available on that platform, and from insurance carriers and other product sponsors, including marketing support, training, conferences, business consulting, technology tools, educational meetings, and, in some cases, incentive trips or other recognition based in part on the overall level and type of business placed through them. Our representatives who are licensed insurance agents may also receive certain benefits from insurance carriers, including non-cash items such as meals, small gifts, or marketing support.

These practices present conflicts of interest because our representatives have an incentive to recommend insurance products, as well as products and strategies available through the IMO, the Sub-Advisory Platform, and specific Third-Party Advisers and carriers, based on the compensation and other benefits they receive, rather than solely on your needs and objectives. The availability of additional support and benefits from these firms can also create an incentive for us and our financial professionals to favor them over others that do not provide comparable support. We seek to manage these conflicts by requiring that recommendations be made in your best interest, supervising our financial professionals’ activities, and disclosing these arrangements to you.

From time to time, our financial professionals may receive expense reimbursements or other non-cash compensation from product sponsors (including insurance companies or asset managers) that may cover all or a portion of the costs of attending educational meetings, conferences, due diligence events, training sessions, or client and prospect seminars. Product sponsors may also provide informal expense sharing for marketing activities such as seminars, client events, or other promotional efforts. While these benefits do not directly increase the fees or premiums you pay, they present conflicts of interest because they create an incentive for our financial professionals to recommend the products or services of these sponsors over others that do not provide similar support. We seek to manage these conflicts by requiring that recommendations be made in your best interest, supervising our financial professionals’ activities, and disclosing these arrangements to you.

Blue Ridge Wealth Planners maintains a YouTube page and other social media or online platforms for advertising and educational purposes. The firm pays to produce and publish its content on these platforms and, in some cases, receive a small amount of compensation from the platform (for example, based on viewer counts or subscribers) after achieving certain thresholds of viewers or subscribers. Any such compensation is incidental to our advertising activities and does not present a material conflict of interest to our clients. Blue Ridge Wealth Planners does not pay viewers for watching its videos or subscribing to its page.

We periodically review our compensation practices and relationships with product sponsors, the Insurance Marketing Organization, the Sub-Adviser, Third-Party Advisers, and other service providers to evaluate and manage the conflicts of interest they present.

If you have any questions about the compensation received by your financial professional or by our firm in connection with the products or services we recommend, you should contact our Managing Member or Chief Compliance Officer.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access to or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

For all of our managed accounts, we have established procedures to ensure all client funds and securities are held by a qualified custodian in a separate account for each client under that client's name. Clients will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Blue Ridge Wealth Planners, the Sub-Adviser, or any Third-Party Adviser that provides reports about your account. When clients have questions about their account statements, they should contact Blue Ridge Wealth Planners or the qualified custodian preparing the statement.

Item 16 – Investment Discretion

When you engage us for asset management services, you generally grant Blue Ridge Wealth Planners discretionary authority over your advisory accounts. This means we have the authority, without obtaining your prior approval for each transaction, to determine:

- Which securities to buy or sell;
- The amount of each security to buy or sell; and
- The timing of transactions

all in a manner consistent with your investment objectives, risk tolerance, and any reasonable written restrictions you provide.

Discretionary authority is granted in our Investment Advisory Agreement and in the applicable account and trading authorization forms. You may request reasonable limitations on our discretionary authority (for example, by restricting certain securities or sectors), and we will not implement such restrictions unless we agree to them in writing. If you impose restrictions that we determine are inconsistent with our investment approach, we may be unable to accept or continue the advisory relationship.

We implement our discretionary investment decisions through the sub-advisory platform described in Item 4. In many cases, we exercise investment discretion directly, and the Sub-Adviser provides trading, rebalancing, and related implementation services. In other cases, we exercise our discretion by selecting one or more Third-Party Advisers available on the platform to manage all or part of your account. When we select a Third-Party Adviser, that firm has discretionary authority to make day-to-day investment decisions for the assets allocated to its strategy, subject to your stated investment objectives and any reasonable restrictions you impose. We retain responsibility for recommending, selecting, and monitoring the use of Third-Party Advisers in your account.

In rare, exceptional circumstances, we may agree to manage an account on a non-discretionary basis, which would mean that we provide recommendations but obtain your approval before executing transactions. Any such arrangement would be documented in a written addendum to our Investment Advisory Agreement describing the scope and limitations of our authority.

Item 17 – Voting Client Securities

Blue Ridge Wealth Planners does not vote proxies on behalf of Clients. We have determined that taking on the responsibility for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

Item 18 – Financial Information

This *Item 18* is not applicable to this brochure. Blue Ridge Wealth Planners does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, Blue Ridge Wealth Planners has not been the subject of a bankruptcy petition at any time.

Customer Privacy Policy Notice

Commitment to Your Private Information: Blue Ridge Wealth Planners has developed a policy of protecting the confidentiality and security information we collect about our clients. We do not, and will not, share nonpublic personal information about you (“Information”) with outside third parties without your consent, except for the specific purposes described below. This notice has been provided to you to describe the Information we may gather and the situations under which we may need to share it.

Why We Collect and How We Use Information. We limit the collection and use of Information within our firm to only those individuals associated or employed with us that must have Information to provide financial services to you. Such services include maintaining your accounts, processing transaction requests, providing financial planning, financial advisory, and other services described in our Form ADV.

How We Gather Information. We get most Information directly from you when you provide us with information from any of the following sources:

- Applications or forms (for example: name, address, social security number, birth date, assets, income, financial history)
- Transactional activity in your account (for example: trading history and account balances)
- Information services and consumer reporting sources (for example: to verify your identity or to assess your credit history)
- Other sources with your consent (for example: your insurance professional, attorney, or accountant)

How We Protect Information. Our employees and affiliated persons are required to protect the confidentiality of Information and to comply with our stated policies. They may access Information only when there is an acceptable reason to do so, such as to service your account or provide you with financial services. Employees who violate our Privacy Policy are subject to disciplinary action, up to and including termination from employment with us. We also maintain physical, electronic, and procedural safeguards to protect information, which comply with applicable SEC, state, and federal laws.

Sharing Information with Other Companies Permitted Under Law. We do not disclose Information obtained in the course of our practice except as required or permitted under law. Permitted disclosures include, for instance, providing information to unrelated third parties who need to know such Information in order to assist us with providing services to you. Unrelated third parties may include broker/dealers, mutual fund companies, insurance companies, and the custodian with whom your assets are held. In such situations, we stress the confidential nature of information being shared.

Former Customers. Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.