



HIGHLAND ASSOCIATES, INC. IS AN INVESTMENT ADVISER REGISTERED WITH THE SECURITIES AND EXCHANGE COMMISSION

Brokerage and investment advisory services and fees differ, and it is important for retail investors to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We provide investment advisory services rather than brokerage services to retail investors. Our investment advisory services include Investment Services, Reporting Services, and Business Services. These services are offered in three formats: 1) Implemented Consulting, 2) Discretionary Services, and 3) Designated Investment Services.

We are held to a fiduciary standard that covers our entire investment advisory relationship with you. We will offer you advice on a regular basis. We will discuss your investment goals and design with you a strategy to achieve your investment goals. We will monitor your portfolio, investment strategy, and investments on an ongoing basis as part of our standard services.

You can choose an investment advisory service that allows us to buy and sell investments in your account without asking you in advance (a “discretionary account”) or we may give you advice and you decide what investments to buy and sell (a “non-discretionary account”).

Given my financial situation, should I choose an investment advisory service, Why or why not?

How will you choose investments to recommend to me?

What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What fees will I pay?

If you establish an investment advisory relationship, you will either pay an on-going asset-based fee based on the value of the cash and investments in your advisory portfolio or a fixed fee at the end of each month. Our fees are negotiated on a per-client basis and vary based on the type of advisory services and the size of the client portfolio.

The more assets you have in an investment advisory portfolio means more fees, thus incentive for us to encourage you to increase assets in a portfolio.

Some investments (such as mutual funds) impose additional fees that will reduce the value of your investment over time. Also, with certain investments, you may have to pay fees to sell the investment.

You will bear the economic liability associated with employing the services of fund managers and custodians and shall pay all fund managers and custodian fees, as well as brokerage and other transaction costs associated with investing in securities.

YOU WILL PAY FEES AND COSTS WHETHER YOU MAKE OR LOSE MONEY ON YOUR INVESTMENTS. FEES AND COSTS WILL REDUCE ANY AMOUNT OF MONEY YOU MAKE ON YOUR INVESTMENTS OVER TIME. PLEASE MAKE SURE YOU UNDERSTAND WHAT FEES AND COSTS YOU ARE PAYING.

Help me understand how these fees or costs might affect my investment. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

Regions Financial Corporation (“RFC”) is the parent company of Regions Bank and RFC Financial Services Holding, LLC. We are owned by Regions Bank.

Regions Securities, LLC, (“RSL”), is wholly owned by RFC Financial Services Holding, LLC, which is a wholly owned subsidiary of Regions Financial Corporation and is a registered broker-dealer with the various federal regulators and self-regulatory organizations (“SRO”), including but not limited to the SEC and FINRA.

RFC Financial Services Holding, LLC, also wholly owns BlackArch Partners, an investment bank, which is a direct owner of BlackArch Securities, LLC, a broker-dealer registered with the SEC and FINRA.

While these companies are affiliated with us and/or our parent company, this affiliation does not present a conflict of interest to our clients. We do not engage in transactions for client accounts with Regions Securities, LLC or BlackArch Securities, LLC.

How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

We provide our financial professionals with competitive base salaries as well as annual incentives. Annual incentives may include short-term incentives and long-term incentives based on the professional’s position and title. Short-term incentives include cash bonuses and are based on how well the professional completes an agreed upon set of tasks. Long-term incentives include stock grants that vest over time.

Do you or your financial professionals have legal or disciplinary history?

Yes. One or more of our advisory affiliates have legal or disciplinary history. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Ask a financial professional, do you have any disciplinary history? For what type of conduct?

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker dealer? Who can I talk to if I have concerns about how this person is treating me?