

FLIPPIN, BRUCE AND PORTER, INC.

CLIENT PRIVACY POLICY NOTICE

When you employ Flippin, Bruce & Porter as your investment adviser, you entrust us not only with your assets, but also with your personal financial data. We consider all information to be private and confidential, and we will hold ourselves to the highest standard of trust and fiduciary duty in its safekeeping.

Protecting your privacy is important to us. We want our clients to understand what information we collect and how we use it.

We collect only information that is needed to serve you and administer our business.

In the process of serving you, we become stewards of certain “nonpublic personal information” – information about you that is not available publicly. The client information we collect and store generally consists of the following:

- Information you provide directly or indirectly to us on applications or other forms, correspondence or through conversations (such as your name, social security number, address, phone number, assets, income, date of birth, occupation, etc.).
- Information related to your transactions with us (such as your account numbers, account balances, transaction details and other financial information).
- Information we receive from third parties including your broker, consultant, custodian, financial planner or other intermediary retained by you (such as broker statements, custodial statements and trade confirmations).

We limit the collection and use of information about our clients to that which is necessary to administer our business and serve our clients.

We carefully limit and control the sharing of your information.

In order to protect client privacy, we carefully control the way in which any information about clients is shared. We do not disclose information about our clients or former clients to anyone, except as necessary in the management of your account and as permitted or required by law.

We are permitted by law to disclose some or all of the information we collect as described above to other advisers, custodians, brokers, administrators or any firms that assist us in maintaining and supporting the financial products and services provided to you. For example, custodians and brokers need information to process security transactions for your account.

We are committed to the privacy of your nonpublic personal information and will use strict security standards to safeguard it.

We are committed to the security of your nonpublic personal information. Our employees and others hired to work for us are held accountable for adhering to strict policies and procedures to prevent any misuse of your nonpublic personal information. Employees are bound by this privacy policy and are educated on implementing our security principles and practices. Our strict policies for protecting client information apply equally to current and former clients.

We have established physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information. Our operational and data processing systems are maintained in a secure environment that protects nonpublic personal information from being accessed inappropriately by third parties.

If you have any questions about the confidentiality of your information, contact the Chief Compliance Officer at (434) 845-4900.