

Advisory Services

Asset Management Consulting

- Financial Planning and Asset Allocation Services
 - Consulting Services
-

SunTrust Investment Services, Inc.

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SEC File Number 801-56443

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This brochure provides information about the qualifications and business practices of SunTrust Investment Services, Inc. If client has any questions about the contents of this brochure, please contact STIS at (800) 874-4770. The information in this brochure has not been approved or verified by the United State Securities and Exchange Commission or any state securities authority.

Website Addresses: www.suntrust.com/investmentservices and www.alexanderkey.com

Additional information about SunTrust Investment Services, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Securities and Insurance Products and Services:

•Are not FDIC or any other Government Agency Insured •Are not Bank Guaranteed •May Lose Value

Material Changes

The last update to the AMC Advisory Services Firm Brochure was September 27, 2011. There have been no material changes since the last update.

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Advisory Business

SunTrust Investment Services, Inc. (“STIS”) is a separate, wholly owned non-bank affiliate of SunTrust Banks, Inc. STIS became a registered broker-dealer under the Securities Exchange Act of 1934, in November of 1985 and an investment adviser under the Investment Advisers Act of 1940, as amended in May, 1999, and was a state registered investment adviser from April, 1996 to May, 1999. Registration does not imply a certain level of skill or training. STIS is a member of the Financial Industry Regulatory Authority (“FINRA”) and Securities Investor Protection Corporation (“SIPC”).

STIS offers the following advisory services: Financial Planning, Asset Allocation Services, Consulting Services and Retirement Income Navigator, powered by LifeYield ROI™ Analysis. Each is described below:

Financial Planning and Asset Allocation Services

For clients seeking financial advice involving analysis of a particular investment or financial situation, STIS provides consultation services designed to meet the client’s specific financial objectives and needs. The consulting services generally take the form of a financial plan or a report. In addition to general financial planning, consulting services may include but are not necessarily limited to such “modular” planning arrangements as Retirement Planning, Estate Planning, College Planning, Cash Flow Analysis, or analysis with regard to investment of lump sum distributions from employer pension and profit sharing plans, as well as asset allocation reports.

In preparing a financial plan or report for clients, information deemed relevant to the particular service is gathered through personal interviews with their Investment Advisory Representative (“IAR”) and through documents and/or other information supplied by the client. Each service includes an analysis of the clients’ information which may, but is not necessarily required, to include such things as their current assets and investments, liabilities, short and long-term capital and liquidity needs, risk tolerance, and short and long-term financial goals and objectives.

Should a client choose to implement the recommendations contained in the financial plan, STIS suggests that the client work closely with his or her attorney, accountant, insurance agent and/or securities broker. STIS’ IARs generally make recommendations with respect to products or services offered by STIS and its affiliates and STIS receives commissions and/or fees from these product recommendations which it shares with its IARs. The decision to implement any such decision, however, rests exclusively with the client, and the client has no obligation to implement any such recommendation through STIS or its affiliates.

Information Sharing – Financial Planning: SunTrust Bank and SunTrust Investment Services, Inc.

Affiliates of SunTrust Bank and STIS work together in teams to help find solutions for clients’ financial goals. Information gathered and reports created are shared among the team members of both entities.

Further, associates of SunTrust Bank may transfer to STIS during the course of their career. At the time of transferring to STIS, the disclosures noted for STIS apply to your relationship and to your accounts.

Consulting Services

STIS provides consulting services as described below:

Asset Allocation and Investment Policy. We provide assistance in the development and preparation of asset allocation studies and investment policy statements for sophisticated investors. These services typically involve analyzing your liquidity requirements, performance goals and risk tolerance levels as described to STIS by you. An investment policy statement characteristically includes your liquidity requirements, performance goals and risk tolerance levels and establishment of investment objectives and guidelines.

Investment Manager Searches and Selection. STIS identifies and presents investment managers (from among those included in various third-party databases), including Affiliated Investment Managers, that appear to be appropriate for

client based upon information provided by client and by the managers. We monitor a universe of investment managers that satisfy certain qualitative and quantitative criteria. Generally, but not uniformly, we will interview investment managers in the universe and conduct onsite visits. If descriptive profiles generated by the identified managers are available to clients, STIS does not independently verify or guarantee that the information is reliable.

Mutual Fund/Pooled Investments Evaluation and Searches. STIS identifies mutual funds and other pooled investment vehicles for clients from among those included in various third-party databases. Mutual fund or other investment vehicle recommendations for various asset classes are made on the basis of information provided by client and publicly available information regarding the various mutual funds or other vehicles.

Recommendations as to the Investment and Reinvestment of Assets: STIS provides recommended transactions (buy, sell, exchange), related to Assets in Client's accounts and include, but not limited to, common and preferred stocks, shares in mutual funds, closed-end funds, exchange traded funds, options, warrants, rights and corporate, municipal or government bonds, notes or bills.

Research of Services for Participant Directed Retirement Plans. In addition to the other mutual fund consulting services, we provide certain services specifically designed to meet the needs of participant directed plans. These services include assistance in determining the type and number of investment alternatives to be offered to plan participants; development of criteria to be used in selecting service providers; evaluation of the relative merits of bundled and unbundled record keeping/investment service providers; evaluation of proposal(s) received from prospective service providers; and investment education, which may include enrollment seminars and written educational materials.

Investment Adviser & Fund Performance Monitoring & Evaluation. STIS will provide performance reports on a periodic basis for mutual funds and/or managed accounts. These portfolio review reports provide you with a summary of assets at the beginning and the end of the period, including contributions and withdrawals, and industry standard time-weighted rates of return. The reports also include graphic and tabular presentations of performance including comparisons to appropriate capital market indices, inflation and stated client goals, performance attribution and risk/return analyses. We also create portfolio review reports based upon custody statements for client accounts and information obtained and analyzed from a wide variety of public and private sources. Although the information collected by us is believed to be reliable, we do not independently verify this information nor do we guarantee the accuracy or validity of such information.

Retirement Income Navigator Analysis.

STIS utilizes the Retirement Income Navigator™, powered by LifeYield ROI™ program to analyze client assets in multiple accounts, qualified and non-qualified, tax exempt, brokerage, advisory and insurance and generates liquidating transactions based on client's desired cash flow. The analysis seeks to minimize taxes while maximizing cash flow, or cash harvesting, but STIS does not guarantee such will be achieved.

The advice given is solely directed at funding the client's cash flow needs and does not include asset management. The tax information contained or provided in connection with the use of the Retirement Income Navigator application is general in nature, is provided for informational purposes only, and should not be construed as legal or tax advice. STIS, its employees, contractors and affiliates do not provide legal or tax advice. STIS cannot guarantee that such information is accurate, complete, or timely. Laws of a particular state or laws which may be applicable to a particular situation may have an impact on the applicability, accuracy, or completeness of such information. Federal and state laws and regulations are complex and are subject to change. Changes in such laws and regulations may have a material impact on pre- and/or after-tax investment results. STIS makes no warranties with regard to such information or results obtained by its use. STIS disclaims any liability arising out of your use of, or any tax position taken in reliance on, such information. Always consult an attorney or tax professional regarding your specific legal or tax situation.

Use of the Retirement Income Navigator application is provided as a convenience to help you manage cash flow from your investments. Reliance on it for any other purpose, including the calculation and preparation of income tax estimates or returns, is beyond the scope of the program. Access to Retirement Income Navigator is provided on an "as-is and as available" basis, and STIS and its employees, contractors, affiliates, successors and assigns make no warranty with regard to the accuracy of its tax calculations, tax effects or tax results. You should consult with your own tax professionals concerning specific tax circumstances.

STIS provides portfolio management for the AMC Fund Select Tactical program at the firm level and receives a portion of the management fee for that service. The firm does not manage any other client accounts, its IARs; however, do manage client accounts either on a discretionary or non-discretionary basis.

Assets Under Management as of November 30, 2011

| | |
|-------------------|------------------|
| Discretionary | \$ 1,180,318,344 |
| Non-Discretionary | \$ 4,098,088,395 |

Fees and Compensation

Financial Planning and Asset Allocation Services

Fees for financial plans prepared by either the STIS Financial Planning Group or by STIS IARs are negotiable and depend upon the scope and complexity of the financial plan or consulting service and generally range from \$500 to \$7,000 for plans prepared by the STIS Financial Planning Group and from \$0 to \$2,500 for plans prepared by STIS IARs and do not include any commissions or other transaction-related charges applicable to investment transactions directed by client. Considerations for establishing the fee include the number of modules in the financial plan, the complexity of said modules, the complexity of the clients' situation as well as the number and complexity of custom documents to review in order to complete the plan. In some instances, plans are provided without a fee. Fees are due upon presentation of the plan and may be deducted from a STIS account if client is listed as owner of the account.

Investment Consulting Services Fees

We offer clients several options for the payment of fees for our investment consulting services. These fees are negotiable. You may agree to pay a fixed fee, an asset-based fee or a reduced fee based on your use of STIS brokerage services. We will reduce our fees in whole or in part, at the option of the client and/or the client's manager, to reflect commissions at a specified conversion ratio on trades executed through us during the immediately preceding quarter. In our sole discretion, we also may reduce our fees to reflect commissions on trades executed through us during periods before the preceding quarter that have not previously been credited against our fees. Clients are billed quarterly, in arrears. Fees are pro-rated for accounts that are opened or closed during the quarter.

With the exception of the SunTrust Bank –Consulting Agreement, the fee structure for Investment Consulting Services is negotiable and can be a fixed dollar or a percentage of the Client's assets. The following fee schedule applies:

Fee Schedule

| | |
|------------------|-------|
| \$0 - \$500,000 | 2.25% |
| Next \$500,000 | 1.25% |
| Next \$4,000,000 | 1.00% |
| Over \$5,000,000 | 0.75% |

Retirement Income Navigator Fees

Retirement Income Navigator fees are negotiable and are based on a percentage of total client assets and are negotiable. The fee is calculated on all client assets including qualified and non-qualified, tax exempt, brokerage, advisory and insurance, identified by client and included in the analysis. Clients are billed quarterly, in advance. Fees are pro-rated for accounts that are opened or closed during the quarter.

In no event will a refund of fees paid under the Agreement be made if all or part of the intended tax consequences anticipated by the Retirement Income Navigator application are not sustained. It is our mutual intent that the transactions contemplated herein are not contractual protection transactions for purposes of Section 1.6011-4(b)(4) (or any successor provision) of the Treasury Regulations promulgated under Section 6011 of the Internal Revenue Code of 1986, as amended, and any comparable provision in the law of any other jurisdiction.

STIS may discount the any or all of the fees for employees of STIS and its affiliates.

Client assets may be invested in mutual funds or pooled investment vehicles, including ETFs, which, in addition to the Program Fee, incur the internal management and operating fees and expenses, mutual fund management fees, early termination fees (which may include fees on whole or partial liquidations of these assets) and other fees and expenses that may be assessed by the investment vehicle's sponsor, custodian, transfer agent, adviser, shareholder service provider or other service providers. Such fees are not included in the Program Fee. Further information regarding charges and fees assessed may be found in the appropriate prospectus, and/or annual report and/or custodial agreement.

Client assets may be invested in shares of a management investment company or mutual fund for which an affiliate of STIS, performs advisory or other services ("Affiliated Fund"), within certain limits, and receives management or other fees for such services ("Affiliated Fund Fees") that are separate and distinct from the fees that STIS receives that STIS receives pursuant to the investment advisory agreement. If, in the exercise of its investment management in accordance with the client Agreement or at your direction, STIS recommends investing a portion of your assets in shares of an Affiliated Fund, you hereby consent to and authorize such investments and STIS' receipt (to the fullest extent permitted by applicable law) of the Affiliated Fund Fees and the fees it receives pursuant to the client Agreement. In such a case, information about the Affiliated Fund Fees paid to STIS can be found in the prospectus and/or annual report for the Affiliated Fund and you may be provided with additional disclosures or asked to execute additional consents as, and to the extent, required by applicable law. You may terminate your consent and authorization at any time (i) by terminating the investment in the applicable Affiliated Fund, or (ii) by providing written notice to STIS of your intention that this consent and authorization be terminated.

If client is subject to the provisions of ERISA or Section 4975 of the Internal Revenue Code of 1986, the assets invested in an Affiliated Fund will not be included in the Fee calculation.

For purposes of determining the fee charged to a client, STIS uses the custodian's quarterly statement which includes the asset values.

For the duration of this Agreement, a portion of the fee may be paid to your IAR and other employees of STIS and its affiliates. Because of this, IARs may have a financial incentive to recommend one program over another program.

These services may cost clients more or less than purchasing investment advisory services separately. Factors that may bear upon the cost in relation to the cost of the same services purchased separately may include, among other things, the size and type of the account, the historical and expected size or number of trades for the account, and the number and range of supplemental services provided to the account.

Types of Clients

STIS offers advisory services to individuals, corporations and other business entities, pension and profit sharing plans, charitable organizations and not-for-profit organizations. STIS reserves the right to accept, reject or renew any client for advisory services. Our products and services are not guaranteed by SunTrust Banks, Inc., any other bank, or any subsidiary of SunTrust Banks, Inc. Products sold or recommended by STIS are not insured by the Federal Deposit Insurance Corporation.

Methods of Analysis, Investment Strategies and Risk of Loss

The main sources of information STIS IARs use include financial newspapers and magazines, inspections of corporate activities, research material prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission and company press releases.

Investment strategies used to implement investment advice given to clients include longer term purchases (securities held at least one year), short term purchases (securities sold within a year), trading (securities sold within 30 days), margin transactions and option writing, including covered options, uncovered options or spreading strategies.

Investing involves risks, including fluctuating returns and potential loss of principal, that clients should be prepared to bear.

Disciplinary Information

5/17/05 Securities and Exchange Commission File Number: 3-11924, Cease-and-Desist and Censure

The SEC alleged that between 2001 and 2002, STIS sold class A share mutual funds without providing certain customers with reductions on front-end loads or sales charges. Without admitting or denying the allegations, STIS consented to the findings, to the entry of a censure and cease-and-desist order and to refund break point discounts along with prejudgment interest to certain customers STIS identified in a self assessment and to make written notice to all customers who purchase class A mutual fund shares from STIS from 1/1/99-12/31/03.

6/29/05 NASD Case Number: 20042000229-01, Monetary Fine: \$15,000 and Censure

STIS submitted a Letter of Acceptance, Waiver and Consent ("AWC") in which the firm was censured, fined \$15,000 and required to revise its written supervisory procedures regarding compliance and applicable securities laws and regulations and rules relating to Trade Reporting and Compliance Engine ("TRACE") securities. TRACE facilitates the mandatory reporting of over the counter secondary market transactions in eligible fixed income securities. Without admitting or denying the allegations, STIS consented to the described sanctions and to the entry of findings that it failed to report transactions in TRACE-eligible securities in a timely fashion, that the firm's supervisory system did not provide for supervision reasonably designed to achieve compliance with respect to applicable securities laws and regulations, and NASD rules relating to TRACE reporting.

8/7/06 NASD Case Number: EAF0401290001, Monetary Fine: \$150,000 and Censure

STIS submitted a letter of AWC in which the firm was censured and fined \$150,000. Without admitting or denying the findings, STIS consented to the described sanctions and to the entry of findings that it failed to retain emails in compliance with the three-year retention requirement of Section 17(a) of the Securities Exchange Act of 1934 and SEC rule 17a-4.

7/30/07 Maryland Securities Commission Case Number: FA 2000-2028; 2006-043, Monetary Fine: \$4,500.

Maryland Securities Commission alleged that STIS investment advisory representatives were not properly registered with the State of Maryland. STIS refunded advisory fees equal to amount allocated to the investment advisory representative for the period of time that a STIS employee was not registered as an investment advisory representative in Maryland, agreed to follow compliance policies and procedures designed to prevent any future unregistered investment adviser representative activities and paid a fine of \$4,500.

10/15/08 FINRA Case Number: E072005012301, Monetary Fine: \$700,000 and Censure

FINRA alleged that STIS violated NASD Conduct Rules 2110, 2440, 3010, 3010(A) and (B) in that STIS failed to maintain an adequate supervisory system including written procedures, reasonably designed to review and monitor its fee-based brokerage business, and STIS failed to establish and maintain a supervisory system including written procedures reasonably designed to achieve compliance with FINRA's fair pricing rule. Without admitting or denying the findings, STIS consented to the findings and agreed to issue refunds plus interest in the aggregate amount of \$713,362 to identified customers who paid fees and/or commissions.

7/22/10 FINRA Case Number: 2006007105102, Monetary Fine: \$900,000 and Censure

FINRA alleged violations of NASD Conduct Rules 2110, 2310 and 3010. Specifically, FINRA alleged that STIS, through two former brokers, recommended unsuitable short-term unit investment trusts ("UIT"), closed end funds ("CEF") and mutual fund transactions and recommended unsuitable transactions on margin; that STIS failed to supervise two brokers, and that STIS failed to ensure that customers received the most favorable sales charge discounts on certain UIT purchases. In addition, FINRA alleged that STIS lacked adequate systems and procedures relating to UITs, CEFs and margin accounts. Without admitting or denying the allegations, STIS settled the matter by agreeing to the entry of FINRA's findings, to a censure and to a monetary fine of \$900,000, disgorgement of \$223,997 in commissions, and to the repayment of \$539,371.28 plus interest for applicable rollover or exchange discounts to 17 customers.

7/26/11 FINRA Case Number: 20080106036101, Monetary Fine: \$400,000 and Censure

FINRA alleged that STIS violated NASD Conduct Rules 2210, 2211 and 2110 and MSRB Rule G-21 by using materials with customers and prospective customers that were not fair and balanced and did not provide a sound basis for evaluating the facts in regard to purchases of auction rate securities (ARS), including the failure to adequately disclose the risks of investing in ARS such as the risk that ARS auctions could fail, that investments in ARS could become illiquid and that customers might be unable to obtain access to funds invested in ARS for substantial periods of time; and further alleged that STIS violated NASD Rules 2110 and 3010 and MSRB Rule G-27 by failing to establish and maintain procedures that were reasonably designed to ensure that it marketed and sold ARS in compliance with the federal securities laws and applicable NASD and MSRB rules, including, that it failed to maintain procedures reasonably designed to ensure that its registered representatives accurately described ARS to customers, that representatives failed to provide customers with adequate disclosure of the risks of ARS and failed to adequately train representatives about the characteristics of ARS and the differences between ARS and other investments. Without admitting or denying the findings, STIS consented to the described sanctions and findings; it completed a voluntary repurchase of ARS from certain customers and agreed to continue to make its best efforts to provide liquidity to all other customers who were not eligible for the voluntary repurchase and to arbitrate claims for consequential damages filed by eligible customers relating to the ARS through a Special Arbitration Program (SAP) in accordance with FINRA rules.

Other Financial Industry Activities and Affiliations

SunTrust Investment Services, Inc. ("STIS") is registered as a broker-dealer under the Securities Exchange Act of 1934. The principal business of STIS is that of a registered securities broker-dealer and the management personnel are all securities registered primarily for oversight of the securities business. Generally, management personnel are not actively selling investment products. STIS is also an insurance agency and there are members of management who are insurance licensed and appointed through STIS primarily for oversight of insurance business. Like brokerage, management personnel are generally not actively selling insurance products.

STIS has entered into a certificate of deposit selling group agreement with an affiliated broker-dealer, SunTrust Robinson Humphrey, Inc. (“STRH”). Under the agreement, STIS will offer to its clients individual time deposits, including deposit notes and certificates of deposit (collectively referred to as “CDs”) of federally insured depository institutions (“Issuers”), including SunTrust Bank, an affiliate of STIS. IARs may recommend fee-based CDs to their clients. STIS does not receive any compensation relating to the distribution of the CDs. SunTrust Robinson Humphrey, Inc., an affiliated broker-dealer, structures the CDs and is compensated by the Issuers, including SunTrust Bank, for their services. The Issuer receives the proceeds from the offerings.

STIS has entered into a solicitor agreement with an affiliated investment adviser, RidgeWorth Capital Management, Inc. (“RidgeWorth”). Under the agreement, STIS IARs solicit clients for RidgeWorth’s advisory services and STIS receives compensation for the solicitations. STIS also has a services agreement with RidgeWorth for various services that STIS provides to shareholders of RidgeWorth Funds which are advised by RidgeWorth. These services may include 1) shareholder record keeping and account services, 2) providing information to our clients regarding the funds, and 3) recommending shares of the funds for investment. STIS may also provide other services not listed here which are beneficial to the funds. These fees are paid from RidgeWorth’s corporate funds.

STIS has the following agreements with SunTrust Bank, an affiliate of STIS that routinely and primarily engages in offering deposit, lending and other services customarily associated with those of a commercial bank:

Networking Agreement: Under this agreement, STIS representatives are dually employed by STIS and the SunTrust Bank and offer investment products and services to SunTrust Bank clients.

Administration and Operational Services Agreement: Such items as business insurance, facilities management allocation, audit/internal control and human resources allocations, among other items are provided to STIS by SunTrust Bank at lower costs than could be provided by external vendors.

Solicitation Agreement: Under the agreement, STIS may refer clients to SunTrust Bank for investment advisory or asset management services.

Referral Incentive Plan: Under the plan, SunTrust Bank employees are paid a nominal referral fee by the SunTrust Bank for making general referrals of customers to STIS. Such referrals may result in a client opening an account and/or the purchase of other securities. However, the payment of the referral is not conditioned on the opening of any account. STIS reimburses the SunTrust Bank for the referral fees the Bank pays.

Investment Management and Due Diligence Agreement: **AMC Fund Select Advisor, AMC Fund Select Tactical AMC Premier and AMC Pinnacle Programs:** Under the agreement, SunTrust Bank will construct and maintain on a continuous basis one or more model portfolios (each, a “Model Portfolio”) meeting the investment objectives for the Model Portfolio, to be utilized by STIS in the investment of certain assets of clients for whom a SunTrust Bank Model Portfolio has been selected. SunTrust Bank will provide discretionary investment advisory services to STIS by providing STIS with investment recommendations for each Model Portfolio and/or Asset Allocation Model in accordance with the investment objectives and strategies and/or risk tolerance for each such Model Portfolio and/or Asset Allocation Model. SunTrust Bank will also provide initial and ongoing due diligence with respect to sub-advisers, Model Portfolio managers, and their models, mutual funds and ETFs in the AMC Fund Select Advisor, AMC Fund Select Tactical and AMC Pinnacle programs.

Neither STRH nor SunTrust Bank compensates STIS for placement of fee-based CDs purchases in applicable AMC advisory program accounts. However, due to STRH’s investment banking activities, STIS may have an incentive to recommend those securities in which either STRH brings to the market and/or acts as a market maker or SunTrust Bank issues, as in the case with the fee-based CDs. STIS has several product committees that review each new security offering, including initial public offerings and private placement offerings, whether from an affiliated or unaffiliated firm

to determine whether or not to allow the security in its investment program. STIS prohibits purchases of securities that have an upfront commission, concession or load in any AMC advisory program account.

Because we are affiliated with the investment adviser of the RidgeWorth Funds, we may have an incentive to recommend or purchase these funds over non-affiliated mutual fund shares in our applicable AMC advisory program accounts. STIS prohibits assessment of investment advisory fees on shares of RidgeWorth Funds in AMC advisory program accounts which are subject to ERISA or Section 4975 of the Internal Revenue Code of 1986. Further, the firm limits the percentage of a client's portfolio invested in these affiliated funds to 35% in the AMC Advise program accounts. STIS' senior management reviews and approves the fund companies, affiliated and non-affiliated, for the firm each year.

The compensation received from SunTrust Bank and/or RidgeWorth for soliciting advisory clients, which is disclosed to you in a disclosure statement, is typically equal to a percentage of the investment advisory fee charged by the affiliated adviser and may range up to sixty five percent of the advisory fee. Because we receive compensation from these affiliated advisers for referring clients and because such compensation may differ depending on the individual agreement with each affiliated adviser, we may have an incentive to recommend one of these investment advisers over a non-affiliated adviser with which we have a less favorable compensation arrangement. No client referred by us is charged any additional amount over the affiliated adviser's advisory fee as a result of the agreement between us and the affiliated adviser.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

STIS has adopted a Code of Ethics ("Code") for its advisory business which is intended to reinforce the fiduciary principles that govern the conduct of the firm and our personnel. This Code sets the standards of conduct expected of our advisory personnel, safeguards to material nonpublic information about client accounts and transactions and requires certain personnel to report their personal securities transactions. A copy of the STIS Code is available upon request from any STIS IAR.

Participation in Client Transactions

STIS and our investment personnel may recommend securities in which we or our investment personnel or employees have a financial interest or control relationship directly or indirectly, and we or our investment personnel may buy and sell securities that we or they recommend to advisory clients for purchase and sale. They may also give advice and take action in the performance of their duties to clients that differs from advice given, or the timing and nature of action taken, with respect to other clients' accounts. Personal trading by STIS employees must be conducted in compliance with all applicable laws and procedures adopted by STIS.

Personal Trading

Personal securities transactions by STIS employees or transactions for the firm's affiliates may raise potential conflicts of interest when a security is traded that is 1) owned by you or 2) considered for purchase or sale for you. STIS has, as part of its internal compliance program, adopted policies and procedures which impose certain rules and restrictions as to transactions for the firm's account and for the accounts of employees and affiliates. Such policies and procedures are designed to prevent improper or unethical conduct whenever a potential conflict of interest may arise. Personal trading by our employees must be conducted in compliance with all applicable laws and procedures.

As a broker-dealer, STIS maintains an investment account to meet its net capital requirement. This account is invested in U.S. Treasuries and a high quality money market fund in which clients may also invest; however, due to the nature of these investments, and the fact that none of our affiliated entities are involved in their underwritings, there are no conflicts of interest.

SunTrust Bank, its affiliates and their employees may make political and charitable contributions to various persons and organizations. The ensuing goodwill may result in added business to STIS

Brokerage Practices

Generally, financial planning, asset allocation and consulting services clients do not have a STIS brokerage account; however, due to anti-money laundering aspects, clients must open a STIS brokerage account upon signing an advisory services agreement.

Upon opening a brokerage account it is important that client understands that in order to help the government fight the funding of terrorism and money-laundering activities, to meet Federal law and contractual obligations to NFS, STIS is required to verify client's identity by obtaining client name, date of birth, address, and a government-issued identification number before opening a brokerage account. In certain circumstances, STIS may obtain and verify this information with respect to any person(s) authorized to effect transactions in an account. For certain entities, such as trusts, estates, corporations, partnerships or other organizations, identifying documentation is also required. Client account may be restricted and/or closed if STIS cannot verify this information. Neither STIS nor NFS will be responsible for any losses or damages (including, but not limited to, lost opportunities) resulting from any failure to provide this information, or from any restriction placed upon, or closing of, the client's brokerage account. Further, if client is a foreign financial institution, client agrees that in establishing a brokerage account with STIS that client will not open or maintain your brokerage account for or on behalf of any third party and that client will not allow any third party to use or access any brokerage account that client opens at STIS.

STIS does not have any soft-dollar arrangements.

Information Sharing – Financial Planning:

SunTrust Bank and SunTrust Investment Services, Inc.

It is necessary that SunTrust receive your permission before sharing your information among its affiliates. By providing personal information to your SunTrust representative, you give SunTrust permission to share this information with our affiliates for the purpose of developing your Report.

STB and STIS employees work together in teams to help find solutions for each client's financial goals. Information gathered and Reports created are shared among the team members from both entities. Associates of STB may transfer to STIS during the course of their career and may serve as a registered representative and/or an investment adviser representative of STIS.

SunTrust has a number of affiliated companies that provide various products and services such as securities, insurance, mortgage loans, trust and banking services. The financial planning analysis process may involve sharing the information you provide and other information SunTrust maintains about you among these affiliates in order to provide a recommendation of appropriate products and services.

Review of Accounts

Supervisory reviews are conducted by the firm's Central Supervision Group, which consists of a Group Supervisory Specialist Manager, three Group Supervisory Specialist ("GSS") Team Leads and 20 to 22 Group Supervisory Specialists who report to their respective GSS Team Leads.

Each GSS Team Lead and their GSS Team are responsible for reviewing advisory services account opening documentation, recommendations made and the annual review process, among other items for their designated areas.

An IAR's Principal Manager is responsible for reviewing financial planning and asset allocation report information as part of their regular correspondence review. The Central Supervision Group reviews transactions resulting from clients implementing the recommendations/proposals from the financial plan or allocation reports.

Client Referrals and Other Compensation

SunTrust Bank employees are paid a nominal referral fee for making general referrals of customers to STIS. See **Other Financial Industry Activities and Affiliations**, Referral Incentive Plan, above for details.

Custody

For Retirement Income Navigator Analysis consulting services, where client has an established brokerage account, clients receive monthly and/or quarterly statements from NFS and clients should review these carefully.

Other advisory service client assets subject to these advisory services are generally held away from STIS at another financial institution. Clients should review these custodian statements carefully due to the STIS fee being calculated on these figures.

Voting Client Securities

STIS has no authority or obligation to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities in which assets may be invested from time to time. Client (or the plan fiduciary in the case of an account subject to ERISA) expressly retains the authority and responsibility for the voting of such proxies.

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