



## **ADV Part 2A**

Dated March 19, 2019

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ITEM 1 - COVER PAGE

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This brochure provides information about the qualification and business practices of Bridge City Capital, LLC. If you have any questions about the contents of this brochure, please contact us at (503) 265-8554, or by email at [info@bridgcitycap.com](mailto:info@bridgcitycap.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Bridge City Capital, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## ITEM 2 - MATERIAL CHANGES

Bridge City Capital, LLC (BCC) is providing this information as part of our annual updating amendment which contains changes from our last annual update. This section discusses only material changes since the last annual update which most recently occurred on March 19, 2018. There have been no material changes.

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## ITEM 4 - ADVISORY BUSINESS

### FIRM DESCRIPTION

Bridge City Capital, LLC (BCC) is a SEC registered investment advisory firm headquartered in Portland, Oregon. The firm was formed October 27, 2008 and began managing its small cap growth investment strategy on July 1, 2009.

### PRINCIPAL OWNERS

BCC's principal owner, Alexander Woodward, owns 37.57% of the firm. The remaining ownership of the firm is shared between eight other partners, are natural persons, with ownership ranging from less than 1% to 19.01%; 70.65% of BCC's ownership is internally held.

### TYPES OF ADVISORY SERVICES

BCC performs investment advisory services, focusing on managing discretionary portfolios invested in the firm's Small Cap Growth investment strategy; a diversified portfolio invested in small cap growth companies. BCC also advises on non-discretionary assets for one client account. The firm is a long-only active portfolio manager.

### TAILORED RELATIONSHIPS

BCC offers a Small Cap Growth investment strategy to its clients which may be modified from time to time based on individual client restrictions. Specific client restrictions and investment guidelines are established at the time of contract negotiation or upon written instruction from the client. The Small Cap Growth investment strategy is managed consistently with the firm's Bridge City Capital Small Cap Growth Composite, taking into consideration client needs, guidelines, restrictions or other limitations. Please refer to the Item 16 - Investment Discretion for additional information regarding portfolio restrictions and limitations.

### WRAP FEE PROGRAMS

BCC does not participate in Wrap Fee Programs.

### CLIENT ASSETS

As of December 31, 2018, BCC had \$ 158.91 million in client assets under management.

## ITEM 5 - FEES AND COMPENSATION

### FEE SCHEDULE

The standard fee schedule for BCC's investment advisory services is charged as a percentage of the fair market value of assets under management in accordance with the following schedule:

ASSETS UNDER MANAGEMENT	ANNUAL FEE
First \$10 million	0.85%
Greater than \$10 million	0.75%

Fees are paid quarterly in arrears. Fees may be negotiable. Factors considered when negotiating fees include total assets to be managed for the client over time, as well as operational and client service responsibilities.

BCC has one Advisor relationship where the firm acts as sub-advisor to a Unified Managed Account (UMA) program and manager to separate accounts on behalf of the Advisor. For this relationship, the Advisor pays fees in advance based on the aggregate market value of the Account on the last day of each calendar quarter.

#### BILLING

All clients are invoiced at the end of each billable period based upon the fair market value of each account's assets under management at the end of the period. BCC may deduct fees from client accounts if requested by the client. The billable period is the end of each calendar quarter, unless otherwise determined by client request.

#### OTHER FEES

BCC's fees are exclusive of custodian fees as well as brokerage commissions and other brokerage fees based upon trading activity. Please see the Item 12 - Brokerage Practices for additional information regarding BCC's brokerage practices.

#### ADDITIONAL COMPENSATION

Neither BCC nor any of our personnel receive compensation for the sale of securities or other product

### ITEM 6 - PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

BCC does not have any arrangements where it is paid a performance or incentive fee based on a share of capital gains or capital appreciation.

### ITEM 7 - TYPES OF CLIENTS

#### DESCRIPTION

BCC's Small Cap Growth investment strategy is designed for defined benefit plans, defined contribution plans, investment companies, foundations, endowments, mutual funds either as sub-advisor or advisor and qualified high net worth individuals. BCC has one non-discretionary investment advisor client.

#### ACCOUNT MINIMUMS

BCC's minimum account size is currently \$1,000,000. This may be negotiable.

### ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

#### METHODS OF ANALYSIS

The BCC Small Cap Growth investment strategy is based upon its investable universe which consists of all companies found within the Russell 2000 Growth Index or companies with similar characteristics. Companies are run through the analysis process outlined below, and those that have scored well are then reviewed and acted on by the investment team collectively. Since the firm's founding, over 700 companies have been run through BCC's analysis process.

Our investment strategy begins with our investment philosophy: a focus on quality small cap companies with proven track records, strong financial characteristics and above average growth prospects at attractive valuations will lead to strong relative returns over the long run. The method of analysis employed by the investment team follows a disciplined investment process which attempts to quantify the investment philosophy, and through internal research, generates a numeric score to measure the relative attractiveness of an investment. We believe this fundamental, bottom up investment process provides a disciplined and consistent framework for decision making and helps filter meaningful information.

Buy and sell decisions are guided by our investment process. BCC numerically ranks each company based upon four characteristics – Quality, Financial Strength, Profitability & Growth and Valuation. The score for each of the first three characteristics is arrived at based on how each company scores on a subset of questions. The Valuation score

is based upon earnings yield and uses an internally developed forward EPS projection to generate the final Valuation score.

The critical factors which help identify attractive securities include historical performance, future expected performance, returns on equity, assets and invested capital, margin trends, balance sheet strength and working capital metrics, cash flow generation, management team and employee base experience and stability, market share and expectations by other investors.

A company's total score is the sum of the four separate scores for Quality, Financial Strength, Profitability & Growth and Valuation. Each of the four scores is weighted equally, although the structured process limits the sum for each of the Quality, Financial Strength and Profitability to five or lower, while the Valuation score can be greater than five. In addition, the Quality, Financial Strength, and Profitability & Growth scores are summed and analyzed separately (generally known as the Growth Score) from the Valuation score. Our belief is that quality companies often trade at a premium valuation and that it is acceptable to own the best company in a sector even though its valuation score may be lower than its competitors.

Research is internally developed and employed in the decision-making process as previously described. We rely primarily on internal research but also use external research for idea generation and company and/or industry information. Regardless of where an investment idea comes from, it is run through our internal investment process to determine whether it is suitable for investment. The tools used in the investment process are internally developed and proprietary. Information used in the process is accessed through publicly available sources.

Investment decisions for a security; whether to add, increase, reduce or eliminate a holding from the portfolio, is a function of a company's Growth and Valuation Score in conjunction with our investment team's conviction level. As a company's score declines relative to others in the industry or sector it becomes relatively less attractive. As such it is a candidate to reduce or eliminate. A maximum position weight for any company is 3% of our Small Cap Growth portfolio. An investment position which becomes greater than the maximum position weight will be reduced.

#### INVESTMENT STRATEGIES

BCC's Small Cap Growth investment strategy is benchmarked against the Russell 2000 Growth Index. Risk reduction versus the benchmark is managed through the portfolio construction process. Our intention is to maintain the weighted average market cap of the Small Cap Growth investment strategy at or near that of the benchmark. The Small Cap Growth investment strategy aims to be largely sector neutral, generally within +/- 3% of the benchmark's sector weight), thereby eliminating asset allocation and sector "betting" risks.

We expect to own between 65 – 100 names and position sizes generally range from 0.5% to 3.0%. As of December 31, 2018, the portfolio held 89 names, the average position size is just over 1% and the top 10 names represent about 20.52% of the total portfolio.

We seek to be fully invested with cash balances less than 5% of the portfolio market value. The typical cash balance range is 2% to 3% of the portfolio market value.

The Small Cap Growth investment strategy inception was July 1, 2009. Portfolio turnover by calendar year is as follows.

Period	Turnover in Dollars	Turnover in Names
July 1 to December 31, 2009	28.9%	16.6%
2010	49.7%	28.7%
2011	25.7%	15.1%
2012	23.7%	18.7%
2013	24.4%	16.6%
2014	27.6%	23.9%

<b>2015</b>	23.6%	20.0%
<b>2016</b>	23.8%	17.1%
<b>2017</b>	23.2%	18.9%
<b>2018</b>	19.7%	15.2%

BCC does not believe our investment philosophy or process has led to excessive trading of securities; we do not believe brokerage and other transaction costs have materially affected our investment performance. BCC does not take tax ramifications into consideration when making investment decisions.

We believe our investment process guides us to small cap growth companies that generate free cash flow, maintain strong balance sheets, grow revenues and earnings and create attractive returns. A portfolio of equity investments in small cap companies with these qualities has consistently generated lower volatility than the benchmark through market environments since inception.

#### RISK OF LOSS

Investing in securities involves risk of loss that clients should be prepared to bear. Equity securities can be affected by macro-economic and other factors affecting the stock market including: changes in a company's financial condition; unfavorable or unanticipated poor performance of an issuer; and changes to investor sentiment, among other things.

Securities with smaller market capitalizations tend to be more volatile and less liquid than securities with larger market capitalizations.

The following environments could cause the Small Cap Growth investment strategy to outperform or underperform the benchmark.

- We may underperform in periods of very strong index performance. Conversely, in periods of very weak index performance, we tend to outperform the benchmark.
- We may underperform in periods when low quality companies perform well. We would expect that during periods when companies with low stock price, low or no earnings, low market capitalizations, low return on equity (ROE), etc. are performing well, we may underperform. Conversely, we would expect to outperform in periods when quality metrics are in favor.
- We would expect underperformance in periods when biotechnology industry stocks perform well. Given that the vast majority of these companies do not have earnings and may never have earnings, they do not score well in our process. As such, they tend to be underrepresented in our portfolios, but represent a significant portion of the benchmark. As of February 28, 2019, biotechnology stocks represented 14.72% of the benchmark.
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BCC expects that positive or negative performance, relative to our benchmark, will come primarily from security selection. BCC's stated investment objective is excess returns of 150-200 bps, gross of fees, per year on average, over a normal market cycle.

#### ITEM 9 - DISCIPLINARY INFORMATION

There have been no legal or disciplinary events material to the evaluation of BCC by any client or potential client since the inception of the firm, nor have there been any material legal or disciplinary events involving BCC's principals.



## ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

### BROKER-DEALER OR REGISTERED REPRESENTATIVE

BCC nor any of our personnel are registered, or have an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

### RECOMMEND OR SELECT OTHER INVESTMENT ADVISERS

BCC nor any of our personnel recommend or select other investment advisers for our clients. We do not receive compensation directly or indirectly from other advisers. BCC nor any of our personnel have other business relationships with investment advisers that create a material conflict of interest.

### CLIENT RELATIONSHIPS

In January 2015, BCC received a minority equity investment of \$1.2 million from an investor group led by Alexander J. Woodward, the firm's President. On November 15, 2017, BCC filed Form D with the SEC, notifying the Commission of a small capital raise to provide additional working capital for the timing of cash receipts/payments in current normal business operations. At current AUM and income/expense levels the firm is nearly cash flow breakeven. Bridge City raised \$137,500 in exchange for 3.75% of firm LLC units. All proceeds were received from existing members. No individual member's ownership increased or decreased by more than 0.75% post offering, and overall ownership by BCC personnel decreased by less than 1%, with internal ownership of 70.65% post offering. Current ownership is as follows:

- Alex Woodward, full-time LLC member (President, Co-PM); 37.57%;
- Internal ownership of 33.08% held by full-time LLC members.
- Outside investors, passive LLC investors - 29.35%; three of the outside investors are also clients invested in the BCC Small Cap Growth portfolio. BCC has established procedures to mitigate this potential conflict of interest.

## ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

### DESCRIPTION OF CODE OF ETHICS

BCC has adopted a Code of Ethics (the Code) in accordance with the requirements of Rule 204A-1 under the Investment Advisers Act of 1940 and Rule 17j-1 under the Investment Company Act of 1940, which impose an obligation to registered investment companies and investment advisers to adopt a written Code of Ethics covering the personal securities trading activities of certain of their officers and employees. The Code also sets forth other policies and procedures designed to aid BCC in complying with other federal securities laws including: meals, gifts and entertainment; insider trading; pay-to-play; and a whistleblower policy. It is the duty of all Access Persons (as defined in the Code) to place the interests of our clients first at all times.

### DUTY TO CLIENTS

BCC has a duty to exercise its authority and responsibility for the benefit of its clients, to place the interests of its clients first, and to refrain from having outside interests that conflict with the interests of its clients. BCC Access Persons must disclose any conflicts of interest between their personal accounts or BCC interests and the Client's accounts and interests to the CCO.

As a fiduciary, BCC complies with the following conduct standards:

- Provide prudent investment advice.
- Charge only reasonable compensation; and
- Avoid misleading statements.

#### RECOMMEND SECURITIES WITH MATERIAL FINANCIAL INTEREST

BCC does not own or recommend securities in which a partner has a material financial interest.

#### INVEST IN SAME SECURITIES RECOMMENDED TO CLIENTS

In general, Access Persons are discouraged from purchasing securities that are also held in client accounts. If an Access Person does own a security that is held in client accounts, the Access Person may not transact in the security in any manner that may disadvantage client accounts. Access Persons may not sell out of a security that is also held in client accounts until all client accounts have sold out of the position.

In general, the following restrictions are applicable to Reportable Securities that requires pre-clearance:

- Access Persons are prohibited from purchasing or selling a Reportable Security on a day when a client has a pending buy or sell order in that same security.
- Access Persons are prohibited from purchasing or selling a Reportable Security, which to their knowledge at the time of purchase or sale, is being considered for a purchase or sale by a client.
- Access Persons are prohibited from purchasing or selling Reportable Security within seven (7) calendar days before or after BCC trades in that Reportable Security on behalf of a client.

#### PERSONAL SECURITIES TRANSACTIONS

Pre-clearance and holdings policies have been established to protect client assets from transactions which could harm any client and to remove any appearance or suggestion of impropriety.

Access Persons must submit pre-clearance for Reportable Securities. If the security is within the market capitalization range of those securities BCC may purchase on behalf of its clients, the Access Person must include an explanation of why this security is not appropriate for our client accounts and is not a conflict of interest.

Automatic Investment Plans must be pre-cleared when they are initially established and again for any changes to the recurring pre-cleared amount. Any subsequent purchases or sales in a Reportable Security in accordance with an Automatic Investment Plan are not subject to pre-clearance or prohibited transaction rules.

Purchases of securities in Initial Public Offerings, private offerings, limited offerings, limited partnerships or hedge funds must be pre-cleared.

BCC prohibits employees from participating in investment clubs.

A copy of the Code is available upon request.

## ITEM 12 - BROKERAGE PRACTICES

#### SELECTING BROKERAGE FIRMS

The chief investment officer is responsible for identifying and approving broker-dealers used in executing trades for client accounts. Factors taken into consideration when selecting a broker would include: i) the ability to obtain best price; ii) knowledge of the industries and securities; iii) commission structure; iv) reputation and integrity; v) and financial condition.

#### RESEARCH AND SOFT DOLLARS

BCC uses research information provided by broker-dealers. BCC has not entered into any agreements to compensate broker-dealers for the receipt of research. BCC does not have any soft dollar arrangements.

## BROKERAGE FOR CLIENT REFERRALS

BCC does not pay for client referrals.

## DIRECTED BROKERAGE

BCC's investment management agreements with its clients grant BCC discretion to determine the broker or dealer to be used to execute a security transaction for each client's account and to determine the commission rate or compensation to be paid to the broker-dealer effecting each transaction, unless specifically directed otherwise by the client (see Client Directed Brokerage below). BCC has accounts under custody with Charles Schwab Institutional which requires trades to be directed to Charles Schwab Institutional. Trades executed by Charles Schwab Institutional are charged a flat ticket charge for each trade instead of the "cents-per-share" commission rate paid by other institutional clients that effect trades through other broker-dealers. To mitigate this potential conflict of interest, and to ensure equal treatment to all clients over time, the firm has implemented a trade rotation between the accounts under custody with Charles Schwab Institutional and its other institutional client accounts.

## CLIENT DIRECTED BROKERAGE

BCC may have accounts that provide written request to arrange for the execution of securities transactions for that client account through a specified broker-dealer. To the extent a client directs trading for its accounts, such as for one of the following reasons: (i) to participate in a commission recapture program, or (ii) to direct trading to a Minority, Female or Disability owned broker dealers. Clients should be aware that when directing trades: (a) client accounts may lose the benefit of aggregated trades and pay higher brokerage commissions because BCC may not be able to aggregate orders to reduce transaction costs; (b) client may receive less favorable prices; (c) client may not receive terms as favorable with respect to any particular transaction effected through the specified broker-dealer.

## BROKERAGE FOR NON-DISCRETIONARY ACCOUNT

BCC is an investment advisor to an account management program where the investment management agreement allows the sponsor to execute trades for the program based on the recommendations it receives from BCC periodically. Clients invested in the account management program should note that transactions executed by the sponsor and not BCC could result in the client's receipt of terms for those trades that are less favorable in some respects than BCC's clients whose trades are not executed through the sponsor.

## TRADE ORDER AGGREGATION AND ALLOCATION

BCC strives to treat all clients in a fair and equitable manner over time, and to seek to obtain best execution on each transaction for all client accounts. Trade orders will be aggregated (also referred to as bunched) unless restricted by client direction, type of account or other account restriction.

Allocations are determined prior to placing an order with a broker. Client trades are aggregated in a single block order in an effort to obtain best execution. If a block order is filled at several prices through multiple trades, an average price will be used for all trades executed and for all clients involved in the trade. If the block order is not filled by the end of the trading day, BCC will allocate the trades on a pro-rata basis using an average price for all accounts involved in the trade.

Not all trades may be done as a block trade with one broker. If multiple brokers are used in the same security on the same day for multiple accounts, then BCC will rotate such trades in a fair and equitable manner. Currently, BCC uses a simple rotation system.

## ITEM 13 - REVIEW OF ACCOUNTS

### PERIODIC REVIEWS

All accounts are invested in BCC's Small Cap Growth investment strategy, unless directed otherwise by the client, or client specific restrictions prohibit investment in certain securities. The Small Cap Growth investment strategy is reviewed daily by the investment team to ensure consistency with the strategy's stated internal investment parameters. BCC's chief compliance officer performs periodic reviews to review for adherence to client specific

investment guidelines and restrictions along with the Small Cap Growth investment strategy's stated internal investment parameters.

#### REGULAR REPORTS

BCC provides its clients with quarterly reports that provide, at a minimum, an accounting of their account performance on a gross and net of fee basis for the quarter and portfolio holdings as of the most recent quarter end. We also provide quarterly commentary on industry trends that occurred during the reporting period and analysis of those trends. Additional information may be provided upon request from the client.

### ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

#### ECONOMIC BENEFITS

BCC nor any of our personnel receive compensation from client referrals or other forms of compensation.

#### THIRD PARTY SOLICITORS

BCC does not use Third Party Solicitors.

### ITEM 15 – CUSTODY

All BCC client accounts funds and securities are maintained by a qualified custodian. BCC does not have custody of any client assets; however, the firm does have the authority to deduct its investment management fees from certain accounts. The firm has established procedures to ensure that the fees deducted from the client accounts are consistent with the stated calculation methodology in the investment management agreement and that the client has approved the fee prior to withdrawal from the custodian account. Further, all client accounts are reconciled monthly to ensure accuracy between BCC's portfolio accounting system and the qualified custodian's records. BCC encourages all clients to compare their custodian statements to the quarterly reports provided by BCC.

### ITEM 16 - INVESTMENT DISCRETION

#### DISCRETIONARY AUTHORITY FOR TRADING

Unless otherwise stated in the investment management agreement, BCC has discretionary investment authority for client assets. Clients can place limitations or restrictions on their account. Client limitations or restrictions are communicated to investment personnel and documented.

BCC requires an executed investment management agreement, which contains a limited power of attorney and defines any possible investment restrictions before beginning investment advisory services.

### ITEM 17 - VOTING CLIENT SECURITIES

#### PROXY VOTING

BCC has adopted a written proxy voting policy as required by Rule 206(4)-6 promulgated under the Investment Advisers Act of 1940, as amended. It is the policy of BCC to seek to: (a) vote proxies consistent with its contractual obligations and in the best interest of its clients; (b) identify, document and resolve potential conflicts of interest to the best of its ability; (c) promptly provide client with proxy voting results upon request; (d) provide a concise summary of its proxy voting process in its ADV Part 2A and to offer to provide its complete proxy voting policy and procedures to clients upon request; and (e) maintain records of proxy voting activities as required.

As a fiduciary, it is the intention of BCC to vote in the best interests of its clients.

BCC has established the following guidelines to help guide voting and will typically result in voting in line with management's recommendation when the firm believes management's recommendation is in the best interest of BCC's clients.

- 1) On occasion, a conflict of interest may exist between BCC and clients regarding the outcome of certain proxy votes. In such cases, BCC is committed to resolving the conflict in the best interest of our Funds, Portfolios and clients before we vote the proxy in question.
- 2) If the proxy proposal is a Routine Proxy Proposal, BCC will typically adhere to the standard procedure of referring to the principles and guidelines described herein in deciding how to vote. Alternatively, BCC may disclose the conflict to our clients and obtain their consent before voting or seek the recommendation of an independent third party in deciding how to vote.
- 3) If the proxy proposal is a Non-Routine Proxy Proposal, BCC will take any of the following courses of action to resolve the conflict:
  1. Disclose the conflict to our clients and obtain consent before voting;
  2. Suggest that our clients engage another party to determine how the proxy should be voted; or
  3. Vote according to the recommendation of an independent third party, such as a:
    - a. proxy consultant;
    - b. research analyst;
    - c. proxy voting department of a mutual fund or pension fund; or
    - d. compliance consultant.

Clients may obtain a copy of BCC's complete proxy voting policies and procedures by contacting the chief compliance officer. Clients who have elected to delegate their proxy voting authority to BCC may obtain written proxy voting reports upon request.

## ITEM 18 - FINANCIAL INFORMATION

### PREPAYMENT OF FEES

BCC does not require the prepayment of fees.

### FINANCIAL CONDITION

BCC does not have any financial commitment which is likely to impair its ability to meet contractual commitments to clients.

### BANKRUPTCY

BCC has not been subject to a prior bankruptcy.

## ADDITIONAL INFORMATION

### BUSINESS CONTINUITY

As part of its fiduciary duty to its clients and the requirements of Rule 206(4)-7 of the Investment Advisers Act, BCC has adopted policies and procedures to ensure business continuity in the event of a Significant Business Disruption (SBD). This policy is designed to allow BCC to resume providing service to its clients in as short a period of time as possible. This policy is, to the extent practicable, designed to address specific types of disasters and disruptions that BCC might reasonably face given its business and location.

### CONTINGENCY PLAN

Displacements or technology disruptions can be short-term or longer-term events, to ensure that critical functions can be performed the firm has established the following controls:

- Critical Personnel have remote access to firm documents using cloud-based network.
- Critical Personnel have internet access, phone and e-mail capabilities from an offsite location; and
- Critical Personnel maintain a list of applicable key contacts.

In the event of displacement or technology disruption the President and CCO will determine the severity of the event and the corresponding impact on the firm's business. The President and CCO will assess the duration/extent of the crisis and determine whether to activate the following disruption scenarios:

- Loss of network/technology at primary business location:  
If the network at the primary business location is not functioning within a reasonable period, Critical Personnel may be relocated to their homes to perform Critical Functions remotely.
- Loss of primary business location:  
If the loss of the primary business location occurs during business hours, Critical Personnel will immediately relocate to their homes to perform Business Critical Functions via remote connection. If the loss of the primary business location occurs during non-business hours, the Critical Personnel will remain at home to perform critical functions via remote connection.
- Loss of staff:  
Managing Partners will reallocate Critical Functions amongst remaining staff.

The Business Continuity Plan has been made available to all BCC Supervised Persons and is tested periodically. A copy of the firm's Business Continuity Policy is available upon request.

## PRIVACY NOTICE

Bridge City Capital, LLC (BCC) is a SEC registered investment advisor providing investment advisory services to institutional and high net worth clients (also referred to as consumer<sup>1</sup>) and may come into contact with Non- Public Personal Information<sup>2</sup>. BCC typically does not disclose holdings, transaction or other client and investor records (Client Records) to unaffiliated third parties unless such disclosures is permitted or required by law. BCC may share Client Records with third parties in the following situations:

- There is a legitimate business purpose for the disclosure and a written agreement that they third party will keep the information confidential. An example would include disclosure of information to a third party in order to gain or evaluate the services of that third party.
- Disclosure is permitted pursuant to a client contract. Examples would include disclosure to brokers, custodians, and a client's consultant.
- Disclosure is required by law. Examples would include responding to regulatory exams or litigations.

BCC has taken steps to address information sharing, physical security, and information technology safeguards to protect against the unauthorized access to or use of Client Records. A copy of BCC's Cybersecurity Policy for is available upon request.

BCC collects nonpublic information about clients and consumers. We will not share nonpublic personal information about clients or consumers with third parties not affiliated with Bridge City Capital, except as noted below. Specifically, BCC may share nonpublic personal information as necessary:

1. To complete transactions or account changes as directed by the client;
2. To maintain or service a client's account;
3. If requested or authorized to do so by a client;
4. With contracted service providers providing administrative or consulting functions for BCC;
5. If BCC is required or permitted by law or regulatory authorities with jurisdiction over the firm to do so.

A copy of BCC's Privacy Policy is available upon request.

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<sup>1</sup> According to 15 U.S. Code § 6809 (9) the term "consumer" means an individual who obtains, from a financial institution, financial products or services which are to be used primarily for personal, family, or household purposes, and also means the legal representative of such an individual.

<sup>2</sup> According to 15 U.S. Code § 6809 (4), the term "nonpublic personal information" means personally identifiable financial information: (i) provided by a consumer to a financial institution; (ii) resulting from any transaction with the consumer or any service performed for the consumer; or (iii) otherwise obtained by the financial institution.