



Harrell Investment Partners, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 18, 2024

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Harrell Investment Partners, LLC (“HIP” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (512) 759-8000 or by email at dee@harrellpartners.com.

HIP is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about HIP to assist you in determining whether to retain the Advisor.

Additional information about HIP and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 299166.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of HIP.

HIP believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. HIP encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

There has been a material change to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor has named Dilda Dalvi as Chief Compliance Officer of the firm, effective May 8, 2023.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 299166. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (512) 759-8000 or by email at dee@harrellpartners.com.

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Item 4 – Advisory Services

A. Firm Information

Harrell Investment Partners, LLC (“HIP” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (LLC) under the laws of the State of Texas. HIP was founded in September 2018 and is owned by Robert K. Harrell II (Principal). The Chief Compliance Officer of HIP is Dilda Dalvi. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by HIP.

B. Advisory Services Offered

HIP offers investment advisory services to individuals, high net worth individuals, and charitable organizations (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. HIP’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

HIP provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and continuous financial planning services. HIP utilizes a four-step approach to help ensure it fully understands and addresses client needs while providing flexibility to its clients with respect to their investment needs.

- **Discover:** HIP will first spend time with the client, asking questions, discussing the Client’s financial situation and investment experience, and broadly identifying major goals of the Client.
- **Design:** HIP will review and analyze the information provided by the Client. Based on its reviews, HIP generally develops with each Client:
 - a financial outline for the Client based on the Client’s financial situation and goals, and the client’s risk tolerance level (the “Financial Profile”); and
 - the Client’s investment objectives and guidelines (the “Investment Plan”).

The Financial Profile is a reflection of the Client’s current financial picture and a look to the future goals of the Client. The Investment Plan outlines the types of investments HIP will make or recommend on behalf of the Client based on HIP’s own research and analysis in order to meet those goals. The elements of the Financial Profile and the Investment Plan are discussed periodically with each Client, but are not necessarily written documents. The Investment Plan will be updated from time to time when requested by the Client, or when determined to be necessary or advisable by HIP based on updates to the Client’s financial or other circumstances.

- **Implement:** To execute the Client’s Investment Plan, HIP will manage the Client’s investment portfolio on a discretionary or a non-discretionary basis pursuant to an investment advisory agreement with the Client. As a discretionary investment adviser, HIP will have the authority to supervise and direct the portfolio without prior consultation with the Client.

Clients who choose a non-discretionary arrangement must be contacted prior to the execution of any trade in the account(s) under management. This may result in a delay in executing recommended trades, which could adversely affect the performance of the portfolio. This delay also normally means the affected account(s) will not be able to participate in block trades, a practice designed to enhance the execution quality, timing and/or cost for all accounts included in the block. In a non-discretionary arrangement, the Client retains the responsibility for the final decision on all actions taken with respect to the portfolio.

Manage: HIP will monitor the investment performance of Client accounts relative to their Financial Profiles on an ongoing basis.

Notwithstanding the foregoing, Clients may impose certain written restrictions on HIP in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each Client should note, however, that restrictions imposed by a Client may adversely affect the composition and performance of the Client's investment portfolio. Each Client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the Client's account. For these and other reasons, performance of Client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ and Clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar Clients of HIP.

Retirement Accounts – When deemed to be in the Client's best interest, the Advisor will recommend that a Client take a distribution from an ERISA sponsored plan or to roll over the assets to an Individual Retirement Accounts ("IRAs"), or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). In such instances, the Advisor will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

At no time will HIP accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

Financial Planning Services - HIP will typically provide a variety of continuous financial planning services. Such services may be included in the overall advisory services or contracted separately, based on the Client's needs and complexity of the services to be provided. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs and other areas of a Client's financial situation. Depending on a Client's particular situation, financial planning services may include some or all of the following:

- Gathering factual information concerning the Client's personal and financial situation;
- Assisting the Client in establishing financial goals and objectives;
- Analyzing the Client's present situation and anticipated future activities in light of the Client's financial goals and objectives;
- Identifying problems foreseen in the accomplishment of these financial goals and objectives and offering alternative solutions to the problems;
- Making recommendations to help achieve retirement plan goals and objectives;
- Designing an investment portfolio to help meet the goals and objectives of the Client;
- Providing estate planning;
- Assessing risk and reviewing basic health, life and disability insurance needs; or
- Reviewing goals and objectives and measuring progress toward these goals.

HIP may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

Separate Account Managers - HIP may select one or more Separate Account Managers (each, a “Manager”) through a wrap program sponsored by Raymond James & Associates member New York Stock Exchange/SIPC (the “Raymond James Wrap Program”) to act as a sub-advisor for Client accounts. HIP’s access to various Managers allows HIP to offer a wide variety of manager styles, and provides the opportunity to utilize more than one Manager. Factors that HIP considers in recommending/selecting a Manager for a client account generally include the client’s stated investment objective(s), management style, performance, risk level, reputation, financial strength, reporting, pricing, and research.

The Manager(s) generally will be granted discretionary trading authority to provide investment supervisory services for the portfolio. In most cases, HIP retains the authority to terminate the Manager’s relationship or to add new Managers without specific client consent. HIP will monitor the investment approach and performance of the Manager(s).

C. Client Account Management

Prior to engaging HIP to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – HIP, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – HIP will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – HIP will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – HIP will provide investment management and ongoing oversight of the Client’s investment portfolio.

D. Wrap Fee Programs

HIP does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by HIP.

E. Assets Under Management

As of December 31, 2023, HIP manages \$502,784,870 in Client assets, \$485,498,032 of which are managed on a discretionary basis and \$17,286,838 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one more written agreements with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid in advance of each calendar quarter pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees range from up to 1.25% annually based on several factors, including: the scope and complexity of the services to be provided; the level of assets to be managed; and the overall relationship with the Advisor. The minimum annual fee for any account is \$10,000. The Advisor may, in its discretion, make exceptions to the foregoing or negotiate special fee arrangements where HIP deem it appropriate under the circumstances. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by HIP will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuations.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Financial Planning Services

HIP offers stand-alone financial planning services either on an hourly or fixed fee basis. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

Separate Account Manager Fees

For Clients referred by the Advisor to a Manager[s], the Client's fee may be separately billed or deducted from the Client's account[s] by the Manager[s].

HIP will have an apparent or actual conflict of interest to select Managers with lower fees than other Managers, because HIP retains the portion of its fee not paid to Managers. However, HIP will select Managers in the best interest of its Clients. With respect to the Raymond James Wrap Program, HIP generally pays a fixed portion of its fee to the Managers in the Raymond James Wrap Program and retains the remainder of the investment advisory fees charged, which is subject to a maximum of 1.25%.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with HIP at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients are urged to also review and compare the statement provided by the Advisor to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by HIP to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s].

Separate Account Manager Fees

For Clients referred by the Advisor to a Manager[s], the Client's fee may be separately billed or deducted from the Client's account[s] with the respective manager and a portion of the investment advisory fee may be provided to HIP.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than HIP, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by HIP are separate and distinct from these custody and execution fees.

In addition, all fees paid to HIP for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in Client accounts, but typically charges for mutual funds and other types of investments. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of HIP, but would not receive the services provided by HIP which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by HIP to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

HIP may be compensated for its investment management services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Financial Planning Services

HIP requires an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engagement, the percentage of the engagement scope completed by the Advisor. Upon termination, the Advisor will refund any unearned, prepaid planning fees from the effective date of termination to the end of the quarter. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

Separate Account Manager Fees

In the event that a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. HIP will assist the Client with the termination and transition as appropriate.

E. Compensation for Sales of Securities

HIP does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Certain Advisory Persons are licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of the Advisor who are insurance agents have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Advisor. Please see item 10 – Other Financial Industry Activities and Affiliations.

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

HIP does not charge performance-based fees for its investment advisory services. The fees charged by HIP are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

HIP does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

HIP offers investment advisory services to individuals, high net worth individuals and charitable organizations. The amount of each type of Client is available on HIP's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. HIP generally does not impose a minimum relationship size.

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

A. Methods of Analysis

HIP employs fundamental, technical, cyclical, charting and quantitative analysis methods in developing investment strategies for its Clients. Research and analysis from HIP are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that HIP will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the

health of the particular company that HIP is recommending. The risks with cyclical analysis are similar to those of technical analysis.

Charting analysis utilizes various market indicators as investment selection criteria. These criteria are generally pricing trends that may indicate movement in the markets. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the technical and charting analysis may lose value and may have negative investment performance. The Advisor monitors these market indicators to determine if adjustments to strategic allocations are appropriate.

Qualitative analysis involves analysis that uses subjective judgment based on unquantifiable information, such as management expertise, industry cycles, strength of research and development. Qualitative analysis contrasts with quantitative analysis, which focuses on numbers such as the firm's financials and prospectus or offering memorandums. Both techniques are often used together in order to examine a company's operations and evaluate its potential as an investment opportunity.

As noted above, HIP generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. HIP will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, HIP may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. HIP will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. Please see Item 8.B. for risks associated with the Advisor's investment strategies as well as general risks of investing.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment strategies:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving HIP or its management person[s]. HIP values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 299166.

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agency Affiliations

As noted in Item 5, Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with HIP. As an insurance professional, an Advisory Person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

Separate Account Managers

As noted in Item 4, the Advisor may select Manager[s] to assist with the implementation of a Client's investment strategy. In such arrangements, the Advisor will receive a portion of the investment advisory fees collected by the Manager[s] from the Client. The Advisor will not charge its own investment advisory fee for assets referred to an Manager[s].

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

A. Code of Ethics

HIP has implemented a Code of Ethics (the “Code”) that defines the Advisor’s fiduciary commitment to each Client. This Code applies to all persons associated with HIP (“Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor’s duties to each Client. HIP and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of HIP’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (512) 759-8000 or via email at dee@harrellpartners.com.

B. Personal Trading with Material Interest

HIP allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. HIP does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. HIP does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

HIP allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by HIP requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer (“CCO”) or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While HIP allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will HIP, or any Supervised Person of HIP, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

HIP does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize HIP to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, HIP does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis. Under certain instances, the Client may grant the Advisor limited authority to place trades away from the Custodian. Please see Prime Brokerage Authorization below.

Where HIP does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by HIP. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. HIP may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian’s offices.

HIP will generally recommend that Clients establish their account[s] at Raymond James & Associates, Inc. ("Raymond James"), a FINRA-registered broker-dealer and member New York Stock Exchange/SIPC. Raymond James will serve as the Client's "qualified custodian". HIP maintains an institutional relationship with Raymond James, whereby the Advisor receives economic benefits from Raymond James. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **HIP does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - HIP does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where HIP will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). HIP will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

4. Prime Brokerage - The Advisor may execute securities transactions either through the Custodian or through another unaffiliated broker-dealer in connection with a prime brokerage relationship established with the Custodian. Should a Client's account[s] make use of prime brokerage, the Client is required to execute additional agreement[s] with the Custodian authorizing the Advisor to trade-away from and settle to the Client's established account[s] at the Custodian. The Custodian may charge an additional trade-away fee for these transactions in addition to the normal securities transaction costs.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. HIP will execute its transactions through the Custodian as authorized by the Client. HIP may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Dilda Dalvi, Chief Compliance Officer of HIP. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify HIP if changes occur in the Client's

personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by HIP

HIP may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, HIP may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform

HIP has established an institutional relationship with Raymond James to assist the Advisor in managing Client account[s]. Access to the Raymond James platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Raymond James. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor has the following benefits from Raymond James: financial support, financing services, receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

Use of Independent Managers

The Advisor may be indirectly compensated by a Manager[s] as described in Item 5 above and does not receive any other forms of compensation with such arrangements.

B. Client Referrals from Promoters

The Advisor does not compensate, either directly or indirectly, any affiliated or unaffiliated parties ("Promoters") for Client referrals.

Item 15 – Custody

HIP does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct HIP to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by HIP to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have

adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

HIP generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by HIP. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by HIP will be in accordance with each Client's investment objectives and goals.

In certain circumstances, HIP does not have discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior approval from the Client. The Advisor will contact the Client and obtain approval prior to executing trades or allocating investment assets.

Item 17 – Voting Client Securities

HIP does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither HIP, nor its management, have any adverse financial situations that would reasonably impair the ability of HIP to meet all obligations to its Clients. Neither HIP, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. HIP is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.



Form ADV Part 2B – Brochure Supplement

for

**Robert K. Harrell
Founder**

Effective: March 18, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Robert K. Harrell (CRD# 2282318) in addition to the information contained in the Harrell Investment Partners, LLC (“HIP” or the “Advisor”, CRD# 299166) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the HIP Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (512) 759-8000 or by email at dee@harrellpartners.com.

Additional information about Mr. Harrell is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2282318.

Item 2 – Educational Background and Business Experience

Robert K. Harrell, born in 1965, is dedicated to advising Clients of HIP as Founder. Mr. Harrell earned a BA, Economics from University of Texas in 1987. Additional information regarding Mr. Harrell's employment history is included below.

Employment History:

Founder, Harrell Investment Partners, LLC	01/2019 to Present
Managing Director, Raymond James & Associates, Inc	05/1989 to 12/2018

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Harrell. Mr. Harrell has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Harrell.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Harrell.***

However, we do encourage you to independently view the background of Mr. Harrell on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2282318.

Item 4 – Other Business Activities

Mr. Harrell is dedicated to the investment advisory activities of HIP's Clients. Mr. Harrell does not have any other business activities.

Item 5 – Additional Compensation

Mr. Harrell is dedicated to the investment advisory activities of HIP's Clients. Mr. Harrell does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Harrell serves as the Founder of HIP and is supervised by Dilda Dalvi, the Chief Compliance Officer. Ms. Dalvi can be reached at (512) 759-8000.

HIP has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of HIP. Further, HIP is subject to regulatory oversight by various agencies. These agencies require registration by HIP and its Supervised Persons. As a registered entity, HIP is subject to examinations by regulators, which may be announced or unannounced. HIP is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

Anna V. Bodine
Chief Operating Officer/Partner

Effective: March 18, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Anna V. Bodine (CRD# 5217850) in addition to the information contained in the Harrell Investment Partners, LLC (“HIP” or the “Advisor”, CRD# 299166) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the HIP Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (512) 759-8000 or by email at dee@harrellpartners.com.

Additional information about Mrs. Bodine is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 5217850.

Harrell Investment Partners, LLC
3814 Medical Parkway, Austin, TX 78756
Phone: (512) 759-8000 * Fax: (512) 759-8100

Item 2 – Educational Background and Business Experience

Anna V. Bodine, born in 1974, is dedicated to advising Clients of HIP as the Chief Operating Officer/Partner. Mrs. Bodine earned a Bachelor of Arts in Organizational Leadership from St. Edward's University in 2016. Additionally, Mrs. Bodine was a candidate for a Bachelor of Nursing Degree from the University of Texas. Additional information regarding Mrs. Bodine's employment history is included below.

Employment History:

Chief Operating Officer/Partner, Harrell Investment Partners, LLC	03/2024 to Present
Chief Operating Officer/Senior Advisor, Harrell Investment Partners, LLC	01/2019 to 03/2024
Branch Manager, Raymond James & Associates, Inc.	10/2010 to 01/2019

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mrs. Bodine. Mrs. Bodine has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mrs. Bodine.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mrs. Bodine.***

However, we do encourage you to independently view the background of Mrs. Bodine on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 5217850.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mrs. Bodine is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mrs. Bodine's role with HIP. As an insurance professional, Mrs. Bodine will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mrs. Bodine is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mrs. Bodine or the Advisor. Mrs. Bodine spends approximately 1% of her time per month in this capacity.

Item 5 – Additional Compensation

Mrs. Bodine has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mrs. Bodine serves as the Chief Operating Officer/Partner of HIP and is supervised by Dilda Dalvi, the Chief Compliance Officer. Ms. Dalvi can be reached at (512) 759-8000.

HIP has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of HIP. Further, HIP is subject to regulatory oversight by various agencies. These agencies require registration by HIP and its Supervised Persons. As a registered entity, HIP is subject to examinations by regulators, which may be announced or unannounced. HIP is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement
for

Dilda D. Dalvi
Chief Compliance Officer
Senior Vice President of Operations

Effective: March 18, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Dilda D. Dalvi (CRD# 4850130) in addition to the information contained in the Harrell Investment Partners, LLC (“HIP” or the “Advisor”, CRD# 299166) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the HIP Disclosure Brochure or this Brochure Supplement, please contact us at (512) 759-8007.

Additional information about Ms. Dalvi is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4850130.

Harrell Investment Partners, LLC
3814 Medical Parkway, Austin, TX 78756
Phone: (512) 759-8000 * Fax: (512) 759-8100

Item 2 – Educational Background and Business Experience

Dilda D. Dalvi, born in 1972, is dedicated to advising Clients of HIP as the Chief Compliance Officer and Senior Vice President of Operations. Ms. Dalvi earned a Bachelor's Degree in Economics and Accounting from Karnataka University in 1994. Additional information regarding Ms. Dalvi's employment history is included below.

Employment History:

Chief Compliance Officer and Senior Vice President of Operations, Harrell Investment Partners, LLC	11/2020 to Present
Investment Advisor Representative, Live Oak Investment Partners, LLC	08/2021 to 11/2021
Branch Administrator, Raymond James Financial Services - Ciani Thomas Financial	03/2020 to 07/2021
Senior Registered CSA, Raymond James & Associates	03/2017 to 12/2019
Branch Liaison, Wells Fargo Advisors LLC	06/2013 to 05/2015

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Dalvi. Ms. Dalvi has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Dalvi.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Dalvi.***

However, we do encourage you to independently view the background of Ms. Dalvi on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4850130.

Item 4 – Other Business Activities

Position / Dispute Resolution Arbitrator

Ms. Dalvi serves as a Position / Dispute Resolution Arbitrator for FINRA. Ms. Dalvi spends approximately 10 hours per month in her capacity as a Position / Dispute Resolution Arbitrator.

Item 5 – Additional Compensation

Ms. Dalvi has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Ms. Dalvi serves as Chief Compliance Officer and Vice President of Operations of HIP. Ms. Dalvi can be reached at (512) 759-8000.

HIP has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of HIP. Further, HIP is subject to regulatory oversight by various agencies. These agencies require registration by HIP and its Supervised Persons. As a registered entity, HIP is subject to examinations by regulators, which may be announced or unannounced. HIP is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: March 18, 2024

Our Commitment to You

Harrell Investment Partners, LLC ("HIP" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. HIP (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

HIP does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes HIP does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where HIP or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients HIP does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (512) 759-8000 or via email at dee@harrellpartners.com.