

# Edward Jones Guided Solutions<sup>®</sup> Flex Account Brochure as of August 11, 2017

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## Item 1: Cover Page

**This wrap fee program brochure provides information about the qualifications and business practices of Edward D. Jones & Co., L.P. (“Edward Jones,” “we” or “us”). If you have any questions about the contents of this brochure, please contact us at 800-803-3333. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.**

**Additional information about Edward Jones is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2: Material Changes**

Not all changes included in this updated brochure have been deemed material by Edward Jones. This section describes material changes that have been made to the brochure since it was filed on July 1, 2017.

- Item 9A: Disciplinary Information and Other Financial Industry Activities and Affiliations. We have provided information regarding a recent settlement agreement with FINRA (as defined herein).

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#### Item 4: Services, Fees and Compensation

Edward Jones is a registered broker-dealer and investment adviser. As an investment adviser, Edward Jones offers several advisory programs. This program brochure (“Brochure”) provides clients (“client,” “you” or “your”) with information about Edward Jones, Edward Jones Guided Solutions® Flex Account (“Guided Solutions Flex”), the fees charged for our services, and our business practices. Please review this Brochure carefully and consult with your tax professional before you decide to invest in Guided Solutions Flex.

Other advisory programs offered through Edward Jones are not described in this Brochure. These programs offer different services and investments and have different fees and minimum investment requirements. To learn more about other advisory programs offered by Edward Jones, please ask your financial advisor or go to [www.edwardjones.com/advisorybrochures](http://www.edwardjones.com/advisorybrochures) to review the brochures for the available advisory programs.

Edward Jones is the primary operating subsidiary of The Jones Financial Companies, L.L.P. (“JFC”), a holding company registered as a partnership with the State of Missouri. Edward Jones registered as a broker-dealer in 1941 and as an investment adviser in 1993.

As a dually registered broker-dealer and investment adviser, Edward Jones offers a variety of financial services. You can purchase many of the same or similar investments as those available in an advisory program for a lower fee through Edward Jones as a broker-dealer, although you will not receive the additional services available through an advisory program or the protections afforded by the Investment Advisers Act of 1940, as amended. It is important for you to consider the additional costs associated with an advisory program before investing.

As of December 31, 2016, we managed \$141,871,683,805 in discretionary assets and \$62,334,014,864 in non-discretionary assets across all of our advisory programs.

The decision to invest in Guided Solutions Flex is yours. Before making this decision, you and your financial advisor should discuss whether other programs and investments may be more appropriate for your investment goals or needs. If you decide to invest in Guided Solutions Flex, our advisory relationship begins when Edward Jones accepts a written Client Services Agreement between you and Edward Jones.

Before investing in Guided Solutions Flex, you should decide if you are comfortable assuming responsibility for the day-to-day management of your account. Investors in Guided Solutions Flex typically:

- want to be involved in the investment process and approve final trade decisions;
- value the receipt of ongoing advice from Edward Jones when making investment decisions;
- desire a disciplined approach to long-term investing and are willing to adhere to an asset allocation strategy; and
- are comfortable paying monthly, asset-based (percentage) fees for investments and advice rather than individual commissions or sales charges.

#### Guided Solutions Flex Overview

Guided Solutions Flex is a client-directed advisory program sponsored by Edward Jones designed to provide the client with ongoing investment advice, guidance and services for an asset-based fee. The Guided Solutions Flex experience is rooted in the working relationship between you and your Edward Jones financial advisor. In consultation with your Edward Jones financial advisor, you will select an appropriate portfolio objective (your “Portfolio Objective”).

**Portfolio Objective.** In order to invest in Guided Solutions Flex, you will complete a Client Profile that contains important information about your account, which generally includes your time horizon, risk tolerance and selected Portfolio Objective. Your time horizon will reflect the time frame over which you will be accumulating and/or distributing your investments. Time horizon is expressed as either your life stage or the number of years accumulating and/or distributing.

Based upon the level of investment risk you are willing to take (your risk tolerance or comfort with risk) and the expected time horizon for your financial goals, we will recommend a Portfolio Objective for your account.

Depending on several factors, which may include your risk tolerance, time horizon, account size compared to net worth and other investments associated with your applicable goal(s) established at Edward Jones, you may be able to choose an alternative Portfolio Objective if you are willing to take more or less risk than the recommended Portfolio Objective. An alternative Portfolio Objective is not always available. You ultimately decide whether you want to invest in a recommended Portfolio Objective or an alternative Portfolio Objective, if available. Edward Jones will have no authority to change your Portfolio Objective without your instruction.

Based on your risk tolerance, time horizon and other financial information, your Portfolio Objective determines the recommended asset allocation, investment category ranges and Investment Diagnostics (defined below) ranges (collectively, the "Target Ranges"). Edward Jones' guidance regarding certain factors including, but not limited to, security overconcentration, bond diversification, fixed-income laddering and sector overconcentration are collectively referred to as "Investment Diagnostics." The recommended Target Ranges are determined solely by Edward Jones and can

be modified by Edward Jones without prior notice.

Portfolio Objectives in Guided Solutions Flex include:

**All Equity Focus:** This portfolio offers the highest growth potential. The majority of investments in the portfolio are equity-based, which are likely to carry the highest level of risk. This portfolio seeks long-term capital appreciation and provides very little or no current income.

**Growth Focus:** This portfolio emphasizes higher growth potential while providing modest current income. Over the long term, it should have higher risk than portfolios with a more income-oriented objective.

**Balanced toward Growth:** This portfolio emphasizes growth potential with a secondary goal of current income. Over the long term, it should have moderate to higher risk.

**Balanced Growth & Income:** This portfolio blends current income with long-term growth potential. Over the long term, it should have moderate risk.

**Balanced toward Income:** This portfolio emphasizes current income with a secondary goal of growth potential. Over the long term, it should have lower to moderate risk.

**Income Focus:** This portfolio emphasizes current income with little growth potential or inflation protection. Over the long term, it should have lower risk than portfolios with a more growth-oriented objective.

Edward Jones constructs and periodically reviews the recommended Target Ranges for each Portfolio Objective in Guided Solutions Flex. Due to various influences such as changing market conditions or a reclassification of an Eligible Investment (defined below) to a different

asset class, we may change the Target Ranges of a Portfolio Objective. If we change the Target Ranges for your Portfolio Objective, we will notify you to restore the alignment of your investments with your Target Ranges, if necessary. For more information see “Account Alignment” below.

After you have selected your Portfolio Objective, you may choose from among the investment options available for Guided Solutions Flex (“Eligible Investments”) to implement your Portfolio Objective.

When analyzing investments and developing recommendations that may be appropriate for your account, we rely on a variety of different sources of information. Such sources may include research developed by Edward Jones that covers a wide range of Eligible Investments and investment research reports issued by firms that are not affiliated with us.

In addition, we may use certain Edward Jones’ investment tools as a preliminary basis for recommending certain Eligible Investments that align to your Portfolio Objective. The use of such investment tools does not guarantee the performance of your account or any investments therein or protect against potential investment losses.

You decide how much to invest in each Eligible Investment within the Target Ranges. You are also responsible for directing the buying and selling of Eligible Investments in your account as necessary to bring your account into alignment with the Target Ranges for your Portfolio Objective.

You will be responsible for all trading and investment decisions in your account and should not rely solely on the recommendations of Edward Jones or your financial advisor in choosing among Eligible Investments. Neither Edward Jones nor your financial advisor will have discretionary authority for any trading or

investment decisions in your account, except as otherwise described in this brochure.

**Eligible Investments.** Through Guided Solutions Flex, clients can choose from an extensive list of Eligible Investments selected by Edward Jones that primarily includes stocks, bonds, mutual funds and exchange-traded funds (“ETFs”) across a variety of asset classes.

The Edward Jones Money Market Fund, an Eligible Investment for Guided Solutions Flex, is affiliated with Edward Jones. Cash balances in your account will be automatically invested in the Edward Jones Money Market Fund. Dividends and capital gains received may be reinvested or transferred into the Edward Jones Money Market Fund, as directed by you. Please refer to Appendix A for more information about the Edward Jones Money Market Fund.

There is no guarantee that an Eligible Investment will perform in any particular manner. Past performance is not a guarantee of future results. It is important that you read the prospectus of any mutual fund, ETF or applicable security investment that is an Eligible Investment before investing. Further details about a mutual fund or ETF investment can also be found in its statement of additional information (“SAI”) and shareholder reports.

You will not be able to hold any investment in your account that Edward Jones has deemed ineligible for Guided Solutions Flex (“Ineligible Investments”). In the event that Edward Jones re-categorizes an investment from an Eligible Investment to an Ineligible Investment, Edward Jones will notify you, and you must instruct Edward Jones to remove the investment from your account within the time frame established for Guided Solutions Flex, as determined by Edward Jones from time to time.

Until the Ineligible Investment is replaced, there is a possibility additional shares of the Ineligible Investment may be purchased. Such purchase(s)

may occur in certain instances including, but not limited to, when dividend reinvestments occur. The purchase of additional shares of an Ineligible Investment and the eventual mandatory removal of such shares may result in a taxable event.

If you have a tax-qualified retirement account and do not provide instructions to remove an Ineligible Investment within the time frame established by Edward Jones, we will sell the Ineligible Investment and proceeds will be held as a cash balance awaiting reinvestment in your account, which will be swept into the Edward Jones Money Market Fund. Such sale may cause your account to go out of alignment.

However, if you have a taxable account and do not provide instructions to Edward Jones to remove an Ineligible Investment within the time frame established by Edward Jones, your account will be removed from Guided Solutions Flex.

While all Eligible Investments can be held in your Guided Solutions Flex account, not all Eligible Investments can be purchased in the account. You will not be able to purchase Eligible Investments in your account that Edward Jones has deemed restricted from purchase in Guided Solutions Flex.

**Account Alignment.** Edward Jones will review your account periodically and notify you when your account is out of alignment with the Target Ranges for your Portfolio Objective through your account statements or other communications. If your account is out of alignment for any reason, including, but not limited to, market volatility, an investment becoming an Ineligible Investment for Guided Solutions Flex and/or the purchase or sale of an investment, you will be responsible for restoring your account's alignment within the time frame established for Guided Solutions Flex, as determined by Edward Jones. To restore your account's alignment you must provide instructions to Edward Jones to buy one or more investments in your account, to sell one or more

investments and reinvest the proceeds in your account, to sell an investment and transfer the proceeds to another account, to transfer an investment to another account, or to deposit additional assets in your account. Such transactions may result in tax consequences as well as additional fees and expenses.

Your Guided Solutions Flex account does not offer an automatic rebalancing feature. In the event that you do not provide instructions to Edward Jones to restore your account's alignment within the required time frame, your account will be removed from Guided Solutions Flex.

**Brokerage Services.** You are solely responsible for all trading decisions in your account, and Edward Jones will only execute trades at your direction, except as otherwise described in this Brochure. When Edward Jones executes trades for your account, we are not acting as an investment adviser, but solely as a broker-dealer. Trading in your account will be subject to our trading policies and practices. You will not be charged trade commissions or mark-ups for Guided Solutions Flex trades. However, Guided Solutions Flex may cost you more or less than purchasing advisory services and brokerage services separately, depending on certain factors, such as the frequency of your trading. You cannot request that your orders be executed through another broker-dealer. Not all investment advisers require their clients to execute their trades through a certain broker-dealer as we do.

Guided Solutions Flex trades are not aggregated (i.e., trades for your account are not combined with trades for other client accounts and executed in a single block trade) since each trade requires your approval and is directed by you.

From time to time, the volume and/or number of trades that are directed by clients to be executed for Guided Solutions Flex accounts may exceed Edward Jones' operational and technological capacities if these trades are directed on a single

day. For example, this may occur if Edward Jones is re-categorizing an investment from an Eligible Investment to an Ineligible Investment. To maintain the orderly processing of trades and to minimize the incidence of errors, Edward Jones may allocate trades based on the time of order entry. In certain circumstances this process may take several days or weeks. Although designed to be fair and equitable over time, this may result in clients receiving different prices. In addition, if the volume or size of redemptions required to be effected as a result of re-categorizing a mutual fund from an Eligible Investment to an Ineligible Investment exceeds the limits set forth in the mutual fund's trading policies and procedures, the mutual fund may take up to seven days to process redemptions or may redeem positions in-kind. In such circumstances, client assets may not be fully invested and may be subject to market risk between the redemption date and the date the assets are reinvested. Alternatively, Edward Jones may rely on a random allocation process to effect the redemptions over time in a manner consistent with the limits set forth in the mutual fund's trading policies and procedures.

In certain circumstances, a trade error may occur in your account. It is Edward Jones' policy to use an error account to correct trades. The correction process may result in trades between your account and an Edward Jones error account. If a trade error is caused by your activity and the process of correcting the error results in a net loss in the error account, your account will be debited for the amount of such loss. If the trade error is caused by our activity, it is Edward Jones' policy to restore your account to the position it would have been in had the trade error not occurred. However, in those instances in which we cannot restore your account to the position it would have been in had the trade error not occurred, Edward Jones will work with you to ensure that your account is otherwise made whole. If the process of resolving a trade error results in a net gain in the error account, we will donate the amount of such gain to charities chosen by Edward Jones.

**Custody Services.** Assets in your account are typically held at Edward Jones, as a broker-dealer. However, if you have entered into an IRA Custodial Agreement with Edward Jones Trust Company ("EJTC"), assets in your account will be held at EJTC. EJTC has delegated its duties and responsibilities as a custodian to Edward Jones, as a broker-dealer.

As custodians, Edward Jones and EJTC are responsible for:

- safekeeping your funds and securities;
- collecting dividends, interest and proceeds from any sales; and
- disbursing funds from your account.

Edward Jones (as broker-dealer) will provide all accounts with written trade confirmations of securities transactions and account statements for each month there is activity in the account. If EJTC is the custodian, the account statement will be sent by Edward Jones on behalf of EJTC. **Please review your account statements carefully and notify us immediately if you detect an error or a discrepancy.**

**Termination of Your Account.** You or Edward Jones may terminate your participation in Guided Solutions Flex at any time without an advisory termination fee. While oral instructions to terminate your participation in Guided Solutions Flex are acceptable, Edward Jones in its sole discretion may require written notice in order to terminate Guided Solutions Flex advisory services for your account.

Upon notice of termination of your Guided Solutions Flex account, Edward Jones will not be obligated to recommend any action with regard to the assets in your account, but you may instruct Edward Jones to sell the securities or transfer the securities to another Edward Jones account or third-party account. Some mutual funds and/or fund share classes may not be held in a non-advisory account. In these cases, Edward Jones is authorized to redeem those

shares for you or to convert the mutual fund share class into a different share class.

If you sell the assets in your account, your proceeds will be available upon settlement of the trades generated to complete the liquidation. Settlement is typically three business days following the trades. Because bond markets may be less liquid, these investments may be more difficult to liquidate, especially during periods of extreme market volatility. Therefore, you may experience delays or adverse price fluctuations when liquidating these securities. Account liquidation may cause a taxable event as well as additional fees and expenses.

If you have a tax-qualified retirement account and, upon notice of termination, fail to instruct Edward Jones as to the disposition of assets in your account within a time period determined by Edward Jones, Edward Jones may liquidate and distribute the assets in your account. Such distribution may be subject to tax withholdings and penalties.

If you have a taxable account and, upon notice of termination, fail to instruct Edward Jones as to the disposition of assets in your account, your account will revert to a brokerage account and any transactions will be subject to commissions and sales charges.

## **Fees**

When you obtain services through Guided Solutions Flex, you pay fees to Edward Jones. You also incur internal fees and expenses in the mutual funds and ETFs that you purchase or that are held in your account. The following section explains:

- who receives the fees and expenses;
- when you pay the fees and expenses;
- how the fees and expenses are calculated and paid; and
- potential fee offsets or reductions you may receive from Edward Jones.

## **Program Fee Paid to Edward Jones**

Every Guided Solutions Flex account is charged an asset-based fee for investment advisory services, execution of transactions through Edward Jones and related services (the “Program Fee”). Mutual funds and ETFs have internal fees and expenses (as discussed more fully below), which are in addition to the Program Fee. Such fees and expenses will reduce the account’s overall returns and performance.

## **How the Program Fee Is Calculated**

The Program Fee is based on the market value of the assets held in your account. However, for taxable accounts the value of any fixed-income syndicate offerings acquired and held in your account will be excluded from the Program Fee calculation for a period of time as determined by Edward Jones. The Program Fee is assessed at an annual fee rate (shown below), payable monthly in arrears. As the value of the assets in your account increases or decreases, you are charged according to the tiered fee schedules set forth below. Accounts are subject to a \$10 minimum monthly fee.

## **Program Fee Schedule**

	<b><u>Value of Assets in Account</u></b>	<b><u>Annual Fee Rate</u></b>
First	\$250,000	1.35%
Next	\$250,000	1.30%
Next	\$500,000	1.25%
Next	\$1,500,000	1.00%
Next	\$2,500,000	0.80%
Next	\$5,000,000	0.60%
Over	\$10,000,000	0.50%

To determine your Program Fee, your account may be grouped with your other Edward Jones advisory accounts or the Edward Jones advisory accounts of people related to or close to you who meet the criteria below that are held in the same Edward Jones branch into what we refer to as a Pricing Group. Each account can only be in one



Pricing Group and we will disclose to you the accounts making up your Pricing Group upon request. Other members of the Pricing Group will receive the same disclosure upon request.

Your Pricing Group is based on the following criteria:

1. Your single, joint, custodial, owner-only 401(k) plan and IRA accounts are grouped together if they are registered at the same address and share one or more of the following: (i) the same last name, (ii) the same Social Security number, or (iii) the same Edward Jones Relationship Group (If you have worked with your financial advisor to group your account with other accounts for the purpose of planning and establishing financial goals, that is a Relationship Group. Your Relationship Group may be the same as your Pricing Group. Please contact your financial advisor if you have any questions about your Relationship Group.)
2. Your revocable trust accounts are grouped with your single, joint, custodial, owner-only 401(k) plan, IRA, or other revocable trust accounts if they are registered at the same address and use the same tax ID number for tax reporting.
3. Your association, church, corporation, estate, irrevocable trust, LLC, partnership, and sole proprietorship accounts are grouped with other accounts of the same type if they are registered at the same address and use the same tax ID number for tax reporting. These types of accounts will be grouped with each other, but not with other account types.

Additionally, accounts that do not meet the above criteria with your account, but which meet the above criteria with another person's account in your Pricing Group, will be added to your Pricing Group. Please contact your financial advisor if you have questions about your Pricing Group.

In addition, the Program Fee may be lower than the above schedules in the following circumstances:

- Either Edward Jones or your financial advisor negotiates a lower Program Fee.
- You are an active or retired associate of Edward Jones.

Reducing the Program Fee is at the sole discretion of Edward Jones.

### **Potential Fee Offsets or Reductions to the Program Fee**

Depending on certain factors, you may be eligible to receive fee offsets or reductions to your Program Fee, as described below.

#### **(i) Fee Offsets**

Rule 12b-1 Fees: Mutual fund companies or their affiliates may pay Edward Jones Rule 12b-1 fees for distribution and marketing expenses. If we receive Rule 12b-1 fees for the shares in your account, we will credit the amount received to your account as a fee offset.

Shareholder Accounting Revenue: Mutual fund companies may pay Edward Jones for account record keeping and administrative services provided by Edward Jones for the mutual fund companies. We will apply a fee offset to your account equal to the amount received by Edward Jones for these services with respect to the actual mutual funds held in your account.

Edward Jones Money Market Fund: Edward Jones is the direct or indirect owner of 100% of the adviser of the Edward Jones Money Market Fund, and Edward Jones receives various revenues related to assets in the money market fund (collectively, "Money Market Revenue"). For any account investing in the Edward Jones Money Market Fund, we will apply a fee offset equal to the amount of the Money Market

Revenue received by Edward Jones with respect to such account.

## (ii) Fee Reductions

If your Guided Solutions Flex account is funded from an Edward Jones account that incurred commissions or redemption fees within a preceding period, as established by Edward Jones, the Program Fee may be reduced for up to twenty-four (24) full months in which the account is active in Guided Solutions Flex. The amount of the fee reduction will depend on the type of security held and timing of trade activity for such security. Ask your financial advisor for additional information about potential fee reductions. Any fee reductions will be applied in accordance with policies established by Edward Jones, which may be amended from time to time. If you close your account in Guided Solutions Flex before receiving the entire fee reduction, you will not receive any of the remaining fee reduction that may have been available for your account.

If you are selling securities to invest in Guided Solutions Flex but did not purchase them through Edward Jones, you may not receive a fee reduction.

## Payment of Program Fee

The Program Fee is charged to your account each month in arrears. If your Guided Solutions Flex account is open for part of a month, then you will pay a fee based on the number of days your account was open and invested in Guided Solutions Flex. The amount you pay is determined by the average daily market value of the assets held in your account for the previous month.

The Program Fee will be deducted directly from your Guided Solutions Flex account and paid using the cash portion of your account, which may be cash or assets invested in the Edward Jones Money Market Fund. If there are not

sufficient cash or assets invested in the Edward Jones Money Market Fund, Edward Jones is authorized to liquidate securities to cover any remaining Program Fee. Edward Jones will sell a sufficient amount of shares of mutual funds held in your account to pay the Program Fee. If there are not sufficient assets in the mutual funds held in your account, Edward Jones will first sell a sufficient amount of shares of ETFs or equity securities, and then a sufficient amount of fixed-income securities necessary to pay the Program Fee. If Edward Jones sells mutual funds, ETFs, equity securities, or fixed-income securities, this may result in your account being out of alignment with your Portfolio Objective or Investment Diagnostics. Such transactions will be effected without regard to tax consequences. You may have to pay redemption fees to a mutual fund company if those mutual fund shares were held for only a short time. (See below for more information on redemption fees.) Securities transactions effected to pay the Program Fee may necessitate odd-lot sales. Odd-lot sales may result in less favorable pricing conditions. At the sole discretion of Edward Jones, you may be allowed to pay your Program Fee from an alternate Edward Jones account.

***Please note:*** For U.S. federal tax purposes, you may be able to deduct the Program Fee depending on your financial situation and tax bracket. Edward Jones does not give tax advice, nor can we tell you whether your Program Fee can be deducted. You should talk to your attorney or qualified tax professional about whether your Program Fee can be deducted.

## Internal Fees and Expenses of Mutual Funds and ETFs

Mutual funds and ETFs have internal management fees and ongoing expenses for operating the funds (internal fees and expenses) that are deducted from the fund's assets, which has the effect of reducing the fund's net asset value ("NAV"). Many mutual funds that are Eligible Investments in Guided Solutions Flex

have different share classes with different fees and expenses for each share class. The prospectus for each mutual fund and ETF will describe the internal fees and expenses. Please refer to Item 6 for more information regarding the selection of mutual funds and ETFs as Eligible Investments for Guided Solutions Flex.

Internal fees and expenses are in addition to the Program Fee described above and vary depending on the particular mutual fund or ETF. You will not see a separate entry on your account statement showing these fees and expenses.

Certain mutual funds may also impose redemption fees if shares of the mutual fund are held for only a short time (typically anywhere from 30 days to 12 months). The prospectus and SAI will describe whether the mutual fund has a redemption charge and whether there are instances when the redemption fees will be waived.

Any internal fees and expenses charged by a mutual fund or ETF, as well as the fees you pay for Guided Solutions Flex, will reduce your account's investment performance.

### **Comparing Costs and Expenses**

You can choose to forgo the services of Guided Solutions Flex and buy and sell securities through Edward Jones as a broker-dealer or through other brokers or agents not affiliated with Edward Jones. If you purchase these investments through Edward Jones as a broker-dealer, you generally pay sales charges or commissions, a portion of which would be paid to your financial advisor. A financial advisor will typically earn more in upfront fees and commissions when you use brokerage services. In the alternative, a financial advisor will typically earn more over time if you invest in Guided Solutions Flex. This creates a financial incentive and potential conflict of interest to the financial advisor when recommending Guided Solutions Flex instead of brokerage services.

Several factors could affect the benefits you would receive if you purchase the same services separately or participate in Guided Solutions Flex. An important factor to consider is the amount of trading activity in which you engage in your account and the corresponding brokerage commissions that would be charged if you bought and sold individual securities in a brokerage account.

### **Other Fees and Expenses Not Included in the Program Fee**

In addition to the Program Fee described above, clients may incur other fees and expenses. A client may pay for other services including, but not limited to, debit and check-writing fees, ATM fees, estate service fees, bill payment fees and fees to distribute an account pursuant to a transfer on death agreement.

Also, the Program Fee does not cover transfer taxes; electronic fund, wire and other account transfer fees; fees and expenses incurred by mutual funds or ETFs purchased for your account (described previously); mutual fund redemption fees and contingent deferred sales charges; and any other charges imposed by law or otherwise agreed to by Edward Jones and you with regard to your account.

Deposits, including interest and dividends, received into your account but not yet invested in Eligible Investments may earn interest that will be retained by Edward Jones. We may also earn and retain interest on distributions requested from your account until the time the check is cashed or another payment method is completed.

The average overnight interest rate on these deposits may fluctuate daily and is tied to changes in widely referenced interbank lending rates, such as Fed Funds Effective Rate, Fed Funds Target Rate and London Interbank Offered Rates. Under these arrangements, banks may pay interest based on a spread to one of these rates or may pay a fixed interest rate.

## Item 5: Account Requirements and Types of Clients

Your initial investment in a Guided Solutions Flex account must generally be at least \$25,000. You can fund your Guided Solutions Flex account with cash and/or securities. If you establish your Guided Solutions Flex account and/or later add to your account with Ineligible Investments, you shall give instructions to Edward Jones to liquidate or redeem those Ineligible Investments without regard to tax consequences or redemption fees that may be assessed on the liquidation or redemption of those securities. Edward Jones will act in its capacity as a broker-dealer, not as a fiduciary or investment adviser, in connection with such transactions and will sell those securities at no commission. Edward Jones will not provide advice and/or guidance regarding the securities being sold to fund the Guided Solutions Flex account. Trades that occur in a taxable account may cause a taxable event as well as additional fees and expenses.

Generally, Guided Solutions Flex is available only to residents or entities of the United States with the following types of accounts: individuals; trusts; charitable organizations; corporations and other business entities; traditional IRAs and Roth IRAs; and Benefit Plans. Benefit Plans include an owner-only 401(k) plan, a Savings Incentive Match Plan for Employees ("SIMPLE") IRA, a Simplified Employee Pension ("SEP") IRA, a traditional IRA linked to an Edward Jones SEP IRA, and other eligible plans.

Edward Jones can prohibit anyone or any account type from investing or remaining in Guided Solutions Flex for any reason, including if we believe it is not an appropriate investment strategy for you. As a general rule, you should intend to invest in Guided Solutions Flex for a minimum of three years.

You will be able to hold eligible fixed-income securities in your account regardless of account

value; however, you will not be able to purchase certain fixed-income securities if your account value is below \$50,000. Holding fixed-income securities in an account with a value less than \$50,000 may result in your account being out of alignment with your Portfolio Objective or Investment Diagnostics.

If, at any time, you transfer mutual funds into a Guided Solutions Flex account and those mutual funds are current Eligible Investments but in a different share class from those held for Guided Solutions Flex, Edward Jones is authorized to convert those shares into a different share class eligible to be held in Guided Solutions Flex.

Mutual fund shares held in your Guided Solutions Flex account(s) may accumulate and be used to satisfy a letter of intent ("LOI") associated with multiple Edward Jones brokerage accounts. However, if a brokerage account transferring into Guided Solutions Flex is the only account where the LOI can be met, Edward Jones can terminate your LOI and sell a portion of your position to adjust the commission paid in your brokerage account before the transfer of your assets into your Guided Solutions Flex account(s). Assets in your Guided Solutions Flex account(s) will not be used to pay any adjustment(s) that apply in the event you fail to satisfy the LOI.

If you terminate your Guided Solutions Flex account and transfer mutual funds into a brokerage account in which the current mutual fund share class is not available, Edward Jones is authorized to liquidate or convert those funds into a different share class.

Any share class conversion could result in higher or lower fees and expenses and may negatively affect investment performance.

The total value of your account is monitored by Edward Jones. If your account value falls significantly (for example, a balance of \$10,000

or below), we may, in our discretion, remove your account from Guided Solutions Flex.

### **Item 6: Guided Solutions Flex Investment Selection and Evaluation**

Guided Solutions Flex is a client-directed wrap fee program sponsored by Edward Jones. No third-party investment advisers, no related persons nor Edward Jones supervised persons serve as portfolio managers in Guided Solutions Flex. In consultation with your Edward Jones financial advisor, you will select your Portfolio Objective and Eligible Investments for your account. For more information see Item 4.

### **Performance-Based Fees and Side-by-Side Management.**

This section does not apply to Edward Jones.

### **Methods of Analysis, Investment Strategies and Risk of Loss.**

Edward Jones selects the Eligible Investments available in Guided Solutions Flex based on numerous quantitative and qualitative factors, each of which may be given different weight in the decision-making process, and generally no one factor determines the outcome of any selection.

Eligible Investments undergo periodic review by Edward Jones to determine if they remain suitable for Guided Solutions Flex. An Eligible Investment can be re-categorized from an Eligible Investment to an Ineligible Investment for a variety of reasons, including, but not limited to, the following:

- inconsistent with Edward Jones' investment philosophy;
- complexity of the investment;
- regulatory concerns;
- termination of an agreement with a mutual fund company; and
- lack of ongoing financial information.

The appropriate Target Ranges for each Portfolio Objective are based on the Edward Jones investment categories. Depending on market volatility, the asset allocations in your account will sometimes depart from the Target Ranges for your Portfolio Objective. Different asset classes will perform better than others, resulting in an asset allocation that may have more or less risk than you may want. In order to keep your account in alignment with your Portfolio Objective, you should monitor this and realign your account if the asset allocations have deviated significantly from the Target Ranges for your Portfolio Objective.

The objective of investing in a variety of Eligible Investments in various types of asset classes allocated in the Target Ranges is to construct a portfolio designed to experience less volatility and show more consistent performance over time. There is no guarantee that this goal will be achieved.

*Risk of Loss.* All investment strategies and investments involve risk, and the value of your account will fluctuate. As a result, your account may be worth more or less than the amount of money you invested. Past performance does not guarantee future results, and there is no guarantee that your Portfolio Objective will be achieved.

Depending on the Eligible Investments you select, your account may also be subject to the following risks:

*Mutual Funds Risk.* Mutual funds are diversified, professionally managed portfolios of securities that pool the assets of individuals and organizations to invest toward a common objective such as current income or long-term growth. Mutual funds are subject to investment advisory, transactional, operating and other expenses. Each mutual fund is subject to specific risks, depending on its investments. The value of mutual funds' investments and the net asset value of the funds' shares will fluctuate in response to changes in market and economic conditions, as

well as the financial condition and prospects of companies and other investments in which the funds invest. The performance of a mutual fund will depend on whether the fund's investment adviser is successful in pursuing the fund's investment strategy.

Mutual fund investments in Guided Solutions Flex may consist of different share classes. While each share class invests in the same pool of investments and has the same investment objective, they have different internal fees and expenses depending on how they are sold. Mutual funds often permit the conversion of shares from one class to another, subject to certain conditions as determined by the mutual fund. Edward Jones may convert your shares to another available share class when we believe the new class of shares will be more beneficial to you.

Edward Jones considers several factors when selecting a mutual fund share class for Guided Solutions Flex, including, but not limited to, the eligibility criteria set by mutual fund companies and the overall cost structure of the share class. Clients should not assume that they will be invested in the share class with the lowest expense ratio.

Edward Jones generally attempts to select institutional, advisory, and/or fee-based share classes for Guided Solutions Flex, when available. Institutional, advisory, and/or fee-based shares generally do not impose a sales charge or ongoing Rule 12b-1 fees, and as a result, are usually less expensive than Class A shares.

Other share classes, including Class A, may be utilized when no institutional, advisory or fee-based share classes are available. Class A shares are typically purchased in brokerage accounts and usually carry an up-front sales charge and ongoing Rule 12b-1 fees. If Class A shares are selected in Guided Solutions Flex, the up-front sales charges are generally waived but the Class

A shares are still charged the ongoing Rule 12b-1 fee. As described in Item 4 above, if we receive Rule 12b-1 fees for shares held in your account, we will credit the amount received to your account as a fee offset.

Please refer to the appropriate prospectus and the SAI for more information regarding the available share classes of mutual funds used in Guided Solutions Flex. In its sole discretion, Edward Jones can change the share class of any mutual fund at any time without prior notice to you.

Edward Jones clients collectively own a large percentage of certain mutual funds which are Eligible Investments. Due to this significant ownership, there may be adverse consequences in the event that Edward Jones, as the investment adviser, re-categorizes a mutual fund from an Eligible Investment to an Ineligible Investment. If the resulting volume or size of redemptions directed by accounts in Guided Solutions Flex as a result of the re-categorization exceeds the limits set forth in the mutual fund's policies and procedures, the resulting delay in effecting redemptions may result in accounts experiencing increased risk of loss. A mutual fund can also decide to redeem shares "in-kind" instead of cash. In that event, accounts may receive the actual underlying securities of the fund. The underlying securities could lose value before they are sold. In addition, brokerage and other transaction costs apply to the sale of the underlying securities. Edward Jones will work with the mutual fund company to minimize any potential adverse impact to accounts in Guided Solutions Flex, but there is no assurance that you will be able to avoid the risk of loss and other adverse consequences. As always, you should read the fund's prospectus to understand its investment objectives, strategies, principal risks, fees and expenses, and past performance when deciding whether to invest in a mutual fund.

*ETFs Risk.* ETFs are typically registered investment companies whose shares track an index, a commodity or a basket of assets such as

an index fund, but trade like stocks on an exchange. ETFs experience price changes throughout the day as they are bought and sold. An investment in an ETF generally presents the same primary risks as an investment in a conventional mutual fund (i.e., one that is not exchange traded) that has the same investment objective, strategies and policies. The price of an ETF can fluctuate within a wide range, and an ETF will lose value if the prices of the underlying investments owned by the ETF go down. Like mutual funds, ETFs are subject to investment advisory, transactional, operating and other expenses. ETF performance may vary from that of its benchmark or its peers.

*Equity Securities Risk.* Common stocks and other equity securities generally increase or decrease in value based on the earnings of a company and on general industry and market conditions. The value of a company's share price may decline as a result of poor decisions made by management, lower demand for the company's services or products or if the company's revenues fall short of expectations. There are also risks associated with the stock market overall. The stock market may experience periods of turbulence and instability.

*Preferred Stock Risk.* Preferred stock is a class of a capital stock that typically pays dividends at a specified rate. Preferred stock is generally senior to common stock, but subordinate to debt securities, with respect to the payment of dividends and on liquidation of the issuer. While subject to the same risks affecting equity securities generally, the market value of preferred stock also generally decreases when interest rates rise (interest rate risk) and is also affected by the issuer's ability to make payments on the preferred stock (credit risk).

*Fixed-income Securities Risk.* Fixed-income securities, such as bonds, are subject to credit risk and interest rate risk. Credit risk is the possibility that an issuer of an instrument will be unable to make interest payments or repay principal when

due. Changes in the financial strength of an issuer or changes in the credit rating of a security may affect its value. Interest rate risk is the risk that interest rates may increase, which tends to reduce the resale value of certain fixed-income securities.

*Municipal Securities Risk.* Municipal securities are subject to various risks based on factors such as economic and regulatory developments, changes or proposed changes in the federal and state tax structure, deregulation, court rulings and other factors. Repayment of municipal securities depends on the ability of the issuer or project backing such securities to generate taxes or revenues. There is a risk that the interest on an otherwise tax-exempt municipal security may be subject to federal income tax.

*Government Securities Risk.* U.S. government securities are subject to interest rate and inflation risks. Not all U.S. government securities are backed by the full faith and credit of the U.S. government. Certain securities issued by agencies and instrumentalities of the U.S. government are only insured or guaranteed by the issuing agency or instrumentality, which must rely on its own resources to repay the debt. As a result, there is risk that these entities will default on a financial obligation.

*Money Market Funds Risk.* Money market funds are a type of mutual fund that invests in high-quality, short-term debt securities, pays dividends that generally reflect short-term interest rates and seeks to maintain a stable NAV per share (typically \$1). An investment in a money market fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. Although a money market fund is managed to maintain a stable net asset value of \$1 per share, the value of the fund may fluctuate, and you could lose money.

## Voting Proxies.

When you invest in Guided Solutions Flex, you are solely responsible for voting proxies arising from any securities held in your account. Edward Jones will not take any action and will not render any advice regarding how to vote proxies arising from any securities held in your account. You may receive proxy-related materials and notices from Edward Jones or the applicable securities issuer or mutual fund, and you will be responsible for voting proxies.

**Legal Notices.** Edward Jones will not take any action and will not render any advice regarding any legal action on your behalf relating to any Eligible Investments (including shares of the Edward Jones Money Market Fund) or other assets held in your account that may become subject to any legal action, regulatory action, administrative action, class action lawsuit and/or bankruptcy. However, Edward Jones will promptly forward any such documents to you.

## Item 7: Client Information Provided to Edward Jones

Client information provided to Edward Jones will be maintained in accordance with our privacy policies.

Over time, your financial goals and objectives may change. Accordingly, you and your financial advisor must perform an annual review, as set forth in Item 9B below.

## Item 8: Client Contact with Edward Jones

You may contact your Edward Jones financial advisor during normal business hours with questions regarding your account.

## Item 9: Additional Information

### A. Disciplinary Information and Other Financial Industry Activities and Affiliations

#### Disciplinary Information

Edward Jones is a registered broker-dealer and investment adviser. This section contains information about certain legal and regulatory matters that Edward Jones believes are material to a client's evaluation of its advisory business or the integrity of its management. Edward Jones has also been subject to various legal and regulatory proceedings relating to its brokerage business that are disclosed in Part 1A of its Form ADV.

State of California – Revenue Sharing. In the early 1990s, Edward Jones negotiated revenue sharing plans with seven fund families, which had been designated as “preferred funds.” On December 20, 2004, the State of California alleged that Edward Jones violated Corporations Code Section 25401 by failing to adequately disclose its revenue sharing arrangements with these certain designated preferred funds, and Section 25216(a) by omitting to disclose a material fact or facts with respect to its revenue sharing arrangements with these certain designated preferred funds, which may have been misleading. On September 2, 2008, Edward Jones reached an agreement with the California Attorney General in which the case was dismissed with prejudice. Without admitting or denying the allegations, Edward Jones agreed to pay \$2.7 million to the Attorney General as fees and costs and \$4.8 million to the State of California as civil penalties.

Financial Industry Regulatory Authority (“FINRA”) – Official Statements Delivery. On November 2, 2006, FINRA alleged Edward Jones violated MSRB Rule G-32 by failing to timely deliver official statements to certain clients in various transactions when Edward Jones was not



an underwriter or member of the syndicate and violated MSRB Rules G-8, G-27, and G-17 regarding certain record-keeping requirements. Without admitting or denying the findings, on April 9, 2009, Edward Jones consented to the described sanctions and entry of findings, and was censured and fined \$900,000. Edward Jones adopted and implemented systems and procedures reasonably designed to ensure compliance with MSRB Rules G-32 and G-8.

FINRA – Exchange-traded Funds (“ETFs”). In violation of FINRA Rule 2010 and National Association of Securities Dealers (“NASD”) Rules 2110, 2310 and 3010, FINRA alleged that Edward Jones (1) failed to establish and maintain a supervisory system, including written supervisory procedures, reasonably designed to achieve compliance with applicable NASD or FINRA rules in connection with the sale of non-traditional ETFs; (2) failed to establish and maintain an adequate supervisory system to monitor transactions in non-traditional ETFs involving retail clients; (3) did not exercise due diligence in investigating non-traditional ETFs; (4) did not ensure that its registered representatives obtained adequate information and instruction regarding traditional ETFs before recommending those products to clients; and (5) did not provide such information directly to registered representatives or require that they obtain it from other sources. FINRA also alleged that Edward Jones’ supervisory system was inadequate with respect to its oversight of non-traditional ETF transactions and until the time when FINRA issued Regulatory Notice 09-31, relied on its general supervisory procedures to oversee transactions in non-traditional ETFs. FINRA alleged that those procedures did not address the products’ unique features and risks, e.g., Edward Jones’ sales exception reports and other supervisory tools did not differentiate between exchange-traded equity securities, traditional ETFs and non-traditional ETFs. FINRA alleged that Edward Jones’ general supervisory procedures did not require it to monitor either the length of time clients held

open positions in non-traditional ETFs or the effect of long holding periods on those positions. On January 9, 2014, without admitting or denying the findings, Edward Jones entered into a letter of acceptance, waiver and consent in which Edward Jones was censured, fined \$200,000, and ordered to pay \$51,581.25 in restitution to clients.

State of New Hampshire – Solicitation Calls. In April 2013, the State of New Hampshire brought an action against Edward Jones, in which the allegations included solicitations calls being made in violation of applicable telephone solicitation rules, failure to properly train and supervise registered representatives in the area of telephone solicitation, and failure to establish a system and procedures reasonably designed to ensure compliance with applicable telephone solicitation rules. On February 25, 2014, Edward Jones and the State of New Hampshire entered into a Consent Agreement in which Edward Jones agreed to pay the State \$175,000 in costs, \$175,000 in contribution to New Hampshire investor education, and \$400,000 in an administrative fine, without any admission of fault or wrongdoing.

SEC – Municipal Bond Pricing. On August 13, 2015, Edward Jones, without admitting or denying the findings, entered into a settlement in public administrative and cease-and-desist proceedings with the SEC regarding certain of the firm’s municipal securities activities. Pursuant to the settlement, the SEC alleged that Edward Jones violated Sections 17(a)(2) and (3) of the Securities Act of 1933 (“Securities Act”), Sections 15B(c)(1) and 15(b)(4)(E) of the Securities Exchange Act of 1934 (“Exchange Act”), and Municipal Securities Rulemaking Board (“MSRB”) Rules G-17, G-11(b) and (d), G-27 and G-30(a), was censured and was ordered to cease and desist from violating or causing any current and future violations of Sections 17(a)(2) and (3) of the Securities Act, Section 15B(c)(1) of the Exchange Act and MSRB Rules G-17, G-11, G-30 and G-27. The settlement requires

Edward Jones to pay \$5,194,401.37 to current and former customers of Edward Jones and to pay a civil money penalty in the amount of \$15,000,000. In entering into the settlement, the SEC considered remedial acts undertaken by Edward Jones related to this matter.

#### FINRA – Mutual Fund Sales Charge Waivers.

On May 5, 2015, FINRA's Enforcement Division advised Edward Jones that it was investigating whether any violations of the federal securities laws or rules had occurred with respect to mutual fund purchases and sales charge waivers for certain retirement plan and charitable organization accounts. Prior to being advised of the investigation, Edward Jones had commenced a review of this issue and self-reported to FINRA. On October 26, 2015, Edward Jones, without admitting or denying the findings, entered into a settlement agreement with FINRA to resolve this matter. Pursuant to the settlement, Edward Jones agreed to provide remediation to certain customers, estimated at the time of the settlement agreement to be approximately \$13.5 million. A monetary penalty was not imposed by FINRA. In reaching the settlement, FINRA recognized the extraordinary cooperation of Edward Jones, including its self-reporting of the issue to FINRA.

FINRA – Municipal Securities Transactions Below Minimum Denominations. On June 2, 2017, Edward Jones, without admitting or denying the findings, entered into a settlement agreement with FINRA's Department of Market Regulation in connection with its investigation of possible violations of Municipal Securities Rulemaking Board rules regarding transactions in certain municipal securities in amounts lower than the applicable minimum denominations. As part of the settlement, Edward Jones agreed to pay a monetary fine of \$210,000.

FINRA – Supervision of Tools-Generated Reports. On July 13, 2017, Edward Jones, without admitting or denying the findings, entered into a settlement agreement with FINRA

in connection with its investigation of the supervision of the use and dissemination of reports generated through Edward Jones' systems by financial advisors. FINRA expressly stated that its review of 65,000 reports did not reveal any instances of reports that were misleading. FINRA also stated that Edward Jones has made changes to enhance its supervisory processes. As part of the settlement, Edward Jones agreed to pay a monetary fine of \$725,000.

### **Other Financial Industry Activities and Affiliations**

You should be aware that Edward Jones, its affiliates and its financial advisors perform services for you and other clients outside Guided Solutions Flex, including the execution of brokerage transactions (e.g., the purchase or sale of securities or insurance products), research, the retail distribution of securities (e.g., mutual funds), the participation in certain underwritings and other investment advisory services. Edward Jones and its affiliates may receive compensation, including fees and commissions, associated with these services. Edward Jones has a financial interest in our clients' transactions and the recommendations we make to clients to buy or sell securities or investment products.

A potential conflict of interest exists where Edward Jones has an existing business relationship with the mutual fund families that are available as Eligible Investments through Guided Solutions Flex. Edward Jones receives revenue sharing from certain unaffiliated mutual fund families outside of advisory programs. Edward Jones' receipt of revenue sharing creates a potential conflict of interest in the form of additional financial incentives. We believe that this potential conflict of interest is addressed through internal policies to prevent Edward Jones, in its capacity as investment adviser, and any affiliated investment adviser, from considering revenue sharing from existing business relationships when selecting Eligible Investments for Guided Solutions Flex.

Edward Jones has additional policies and procedures, including client disclosures, to address this conflict. For more information regarding revenue sharing, please visit [www.edwardjones.com/disclosures](http://www.edwardjones.com/disclosures) or request a revenue sharing disclosure document from your Edward Jones financial advisor. Edward Jones and its financial advisors may also receive compensation for services and recommendations that may differ from advice given to you while participating in Guided Solutions Flex.

In its capacity as a broker-dealer, Edward Jones performs research and distributes recommendations to buy, sell or hold the equity securities of asset management companies or financial institutions with asset management affiliates that manage mutual funds designated as Eligible Investments in Guided Solutions Flex. In order to preserve the independence of this process and to address any conflicts of interest, we have adopted a policy under which we do not consider our opinion on equity securities of asset management companies or financial institutions in selecting mutual funds designated as Eligible Investments in Guided Solutions Flex.

The following summarizes Edward Jones' material relationships or arrangements with other entities that participate in the financial industry.

Edward Jones is the primary operating subsidiary of JFC, and is dually registered as an investment adviser and broker-dealer with the SEC and a member of FINRA.

Olive Street Investment Advisers, LLC, a subsidiary of JFC, is registered as an investment adviser with the SEC and serves as the investment adviser of proprietary mutual funds that are Ineligible Investments in Guided Solutions Flex. Certain current or former associates of Edward Jones may serve as officers or directors of the affiliated investment adviser or the proprietary mutual funds.

Edward Jones' Canadian operating subsidiary, an Ontario, Canada, limited partnership (Edward Jones in Canada), is a broker-dealer registered with the Investment Industry Regulatory Organization of Canada.

EJTC, a wholly owned subsidiary of JFC, is a federally chartered savings and loan association that offers personal trust and investment management services. EJTC also acts as custodian for certain Traditional IRAs and Roth IRAs that are participating, or have participated, in Guided Solutions Flex and other Edward Jones programs. For additional information about this arrangement, please see Item 4.

Edward Jones owns directly or indirectly 100% of three insurance agencies that conduct general insurance producing activities in the U.S.: Edward Jones Insurance Agency of New Mexico, L.L.C., a New Mexico limited liability company; Edward Jones Insurance Agency of Massachusetts, L.L.C., a Massachusetts limited liability company, and Edward Jones Insurance Agency of California, L.L.C., a California limited liability company.

Edward Jones indirectly owns 100% of two insurance agencies that perform insurance-related activities in Canada: Edward Jones Insurance Agency (Quebec) Inc., a Canadian corporation, and Edward Jones Insurance Agency, an Ontario Canada limited partnership.

Edward Jones owns 7% of Customer Account Protection Company Holdings, Inc. (CAPCO), a captive insurance group.

Edward Jones is the direct or indirect owner of 100% of Passport Research, Ltd. ("Passport Research"), a Pennsylvania limited partnership that acts as the investment adviser to the Edward Jones Money Market Fund. Appendix A contains a detailed discussion of our affiliation with the Edward Jones Money Market Fund.

**B. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading; Review of Accounts; Client Referrals and Other Compensation; and Financial Information.**

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

Edward Jones has established a Code of Ethics to ensure that our associates:

- (1) Act with integrity and in an ethical manner with you and all of our clients;
- (2) Place your and all of our clients' interests first;
- (3) Conduct personal trading in compliance with our Code of Ethics, avoid potential conflicts of interest and make sure they do not abuse the faith and trust you have placed in them;
- (4) Comply with all applicable rules, regulations and laws; and
- (5) Do not use any material nonpublic information they may receive as a result of their employment with Edward Jones.

Under our Code of Ethics, Edward Jones' associates: (1) are prohibited from buying securities during an initial public offering; (2) are prohibited from buying securities in a private placement unless they have prior approval from Edward Jones; and (3) may be restricted from making trades in securities immediately before or after trades in the same securities are made for advisory clients.

Some Edward Jones associates are deemed "access persons" under our Code of Ethics because they may have access to nonpublic information regarding either the securities in a client's accounts or changes to Eligible Investments, including asset allocations. Access persons are required to submit to the chief compliance officer, or his or her delegate, a list of any securities they own and securities transactions they made for any account they

control at Edward Jones or another financial institution. You may request a copy of the Edward Jones Code of Ethics from your financial advisor.

As a broker-dealer, there may be times where Edward Jones will buy, sell or recommend that our brokerage clients who are not participating in Guided Solutions Flex buy securities that are also Eligible Investments in Guided Solutions Flex. These brokerage activities are done in the regular course of our business as a broker-dealer and are separate from our investment advisory services.

You should know that financial advisors, Edward Jones associates (including those directly involved with Guided Solutions Flex) and/or their family members are permitted to and may invest in Guided Solutions Flex. This practice could create a conflict of interest if associates placing trades for their own accounts were to place a trade before our clients and receive a better price on a security.

Edward Jones has internal supervisory reviews and procedures to review accounts held by our associates and certain family members and their personal trading practices. The reviews look for improper trading activities, including trading that may be in conflict with the best interests of a client. In addition to the Code of Ethics and the supervisory reviews, Edward Jones prohibits financial advisors from placing trades for their personal accounts before trades for our clients in the same security. In the event a financial advisor's personal order fills at a better price than a client's order placed close in time, we will adjust the trade so the client receives the better price.

**Review of Accounts**

At the time your Guided Solutions Flex account is opened, Edward Jones' supervisory associates will review your selected Portfolio Objective and the funding of your account. If you have sold investments purchased at Edward Jones in order

to fund the account, the holding period of those investments will be reviewed for appropriateness. Supervisory personnel may also call you directly to discuss your understanding of Guided Solutions Flex, including the fees and expenses you are or will be paying.

While you are invested in Guided Solutions Flex, Edward Jones will notify you if your account moves out of alignment with your Portfolio Objective and/or Investment Diagnostics. If this happens, you should work with your financial advisor to determine what adjustments are needed to bring your account back into alignment. In the event that you do not provide instructions to bring your account back in alignment within a time period determined by Edward Jones, your account will be removed from Guided Solutions Flex. For more information on account alignment, see Item 4.

In addition, you and your financial advisor must annually review whether there have been any changes to your financial circumstances including, but not limited to, your risk tolerance and Portfolio Objective.

If you decide to invest in a different Portfolio Objective, you will need to complete a new questionnaire and we may make recommendations to realign your account to match your new Portfolio Objective.

Our review does not substitute for your own continued review and monitoring of your account and performance of your investments. You should review trade confirmations (as applicable), account statements and other information we send to you. Current and timely information about your account will be available in Edward Jones' online client access system. If you have any questions, please discuss them with your financial advisor.

## **Client Referrals and Other Compensation**

Edward Jones does not enter into arrangements with unaffiliated third parties to refer or solicit clients to any advisory program offered by Edward Jones.

Your financial advisor receives a portion of the monthly Program Fee. As a result, your financial advisor has a financial incentive not to negotiate the Program Fee. The portion of the Program Fee paid to your financial advisor is at the discretion of Edward Jones. The fee rate paid to your financial advisor will be the same regardless of the Portfolio Objective you select. As a result, your financial advisor does not have a financial incentive to recommend one Portfolio Objective over another.

Edward Jones has contracted with Broadridge Investor Communications Solutions, Inc. ("Broadridge"), an unaffiliated third-party vendor, to distribute proxies, periodic reports and voting instruction information to our clients. Pursuant to the agreement between Edward Jones and Broadridge, and in accordance with regulations, Broadridge charges the issuing company on behalf of Edward Jones for these services. Edward Jones may receive from Broadridge a portion of the fees paid by the issuing company.

Certain unaffiliated mutual fund companies and/or ETF sponsors (or their investment advisers) with mutual funds and/or ETFs on the list of Eligible Investments may pay certain expenses on behalf of financial advisors, including training and educational expenses, and in some instances may make payments directly to Edward Jones to subsidize training and educational costs for financial advisors. They may also participate in conferences or other marketing activities with Edward Jones and may be asked to share in the cost of these activities. Edward Jones has not entered into any agreement with any ETF, mutual fund, or its investment adviser or its distributors or affiliates providing

for payment of such expenses as a condition of inclusion on the list of Eligible Investments. Our financial advisors are not allowed to consider an advisory product partner's sponsorship of a marketing activity when choosing which Eligible Investments to suggest to you.

The Program Fee, as well as assets under care, will impact your financial advisor's eligibility for a bonus and bonus amount.

Financial advisors are eligible to participate in the Edward Jones Travel Award Program ("Travel Award Program"), which includes domestic and international travel, or a cash award

in lieu of a trip. Eligibility for a Travel Award Program is based upon the amount of new and existing assets under care for a financial advisor.

### **Financial Information**

This section does not apply to Edward Jones.

### **Item 10: Requirements for State-Registered Advisers**

This section does not apply to Edward Jones.

## **Appendix A**

### **Disclosures Regarding Proprietary/Affiliated Money Market Fund**

Your Guided Solutions Flex account may from time to time be invested in shares of the Edward Jones Money Market Fund (the "Fund"), which is advised by Passport Research (the "Adviser"). Edward Jones is the direct or indirect owner of 100% of the Adviser. As such, the Fund is advised by an affiliate of Edward Jones. The Adviser receives a management fee of 0.20% of average net assets of the Fund, less any fees paid to its sub-adviser(s).

The Fund pays a Rule 12b-1 fee of 0.25% of average net assets to Edward Jones for the sale, distribution, administration and customer servicing of the Fund's Investment Shares and Retirement Shares, and a Service Fee up to 0.15% of average net assets to Edward Jones for providing services to shareholders and maintaining shareholder accounts. Edward Jones provides shareholder services, transfer agent services and marketing services to the Fund and the accounts that its clients maintain in the Fund. For any Guided Solutions Flex account investing in the Fund, Edward Jones will apply a fee offset equal to the amount of the Money Market Revenue received by Edward Jones with respect to such account.

Edward Jones has provided you with the current prospectus for the Fund. The prospectus describes the investment characteristics of the Fund, the schedule of fees paid to the Adviser or its affiliates by the Fund, and the schedule of fees paid to the Adviser or its affiliates for any additional services provided by them to the Fund. The prospectus also describes certain revenue received by Edward Jones in connection with the Fund.