

# **EDWARD JONES GUIDED SOLUTIONS®**

## **Flex Account Brochure**

### **as of March 30, 2020**

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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**

Our “Summary of Material Changes” describes material changes that have been made to this brochure since our last annual update filed March 28, 2019. We mail the summary to existing clients within 120 days of the end of our fiscal year, and it is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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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 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. You should read 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 us, 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.L.P. (“JFC”), a holding company registered as a partnership with the State of Missouri. Edward Jones registered with the SEC as a broker-dealer in 1941 and as an investment adviser in 1993. Edward Jones became a member of the National Association of Securities Dealers (“NASD”) (now known as the Financial Industry Regulatory Authority (“FINRA”)) in 1939.

As of December 31, 2019, we managed \$213,656,983,626 in discretionary assets and \$209,579,596,280 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 or investments may be more appropriate

for your investment goals or needs. If you decide to invest in Guided Solutions Flex, we will not begin providing you advisory services until (a) our acceptance and approval of a written Client Services Agreement between you and Edward Jones, and (b) funding of the account at the initial minimum investment as determined by 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 aligned with Edward Jones’ guidance; and
- are comfortable paying monthly, asset-based (percentage) fees for investments and advice rather than individual, transaction-based commissions or sales charges.

In evaluating fee-based advisory programs, you should consider a number of factors. You may be able to obtain some or all of the same or similar investments and/or services available through this and other fee-based advisory programs separately through Edward Jones or another broker-dealer or investment adviser. You should consider that, depending on the circumstances, the aggregate fees you will pay for investing in Guided Solutions may be lower or higher than if you purchased the investments or services separately or through another broker-dealer or investment adviser. An important factor to consider is the amount of trading activity you have in your accounts and the corresponding brokerage commissions that would be charged if you bought

and sold individual securities in a brokerage account. You also may experience different performance results or tax consequences from what you would by purchasing the investments separately or through another broker-dealer or investment adviser.

## **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 “Account Portfolio Objective”).

**Account 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 Account 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 an Account Portfolio Objective.

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 Account Portfolio Objective if you are willing to take more or less risk than the recommended Account Portfolio Objective. An

alternative Account Portfolio Objective is not always available. You ultimately decide whether you want to select a recommended Account Portfolio Objective or an alternative Account Portfolio Objective, if available.

Edward Jones will have no authority to change your Account Portfolio Objective without your instruction.

Based on your risk tolerance, time horizon and other financial information, your Account Portfolio Objective determines the recommended asset allocation, investment category ranges (“Target Ranges”) and Investment Diagnostics (defined below). Edward Jones’ guidelines 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.

Account Portfolio Objectives in Guided Solutions Flex currently include:

**All-Equity Focus:** This portfolio objective 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 objective seeks long-term capital appreciation and provides very little or no current income.

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

**Balanced toward Income:** This portfolio objective 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 objective 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 Account 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 an Account Portfolio Objective. If we change the Target Ranges for your Account 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 Account Portfolio Objective, you may choose from among the investment options available for Guided Solutions Flex (“Eligible Investments”) to implement your Account 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 with your Account 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 Account Portfolio Objective.

You are 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. Please note that Eligible Investments for Guided Solutions Flex may not be offered in Edward Jones Guided Solutions® Fund Accounts or our other advisory programs.

The Edward Jones Money Market Fund, an Eligible Investment for Guided Solutions Flex, is affiliated with Edward Jones. Cash balances awaiting investment or reinvestment in your account will be automatically swept into the Edward Jones Money Market Fund, where they will be held until invested in another Eligible Investment. Dividends and capital gains received may be reinvested or transferred into the Edward Jones Money Market Fund, as directed by you. The portion of your Guided Solutions Flex

account that is invested in the Edward Jones Money Market Fund will be included in the calculation of your Program Fee (defined below). 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, in its sole discretion.

Until the Ineligible Investment is replaced, there is a possibility that 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 with your Account Portfolio Objective’s Target Ranges and/or Investment Diagnostics.

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, investment restrictions may prevent or limit you from purchasing or continuing to purchase certain Eligible Investments. Situations include, but are not limited to, restrictions that prevent purchases of an Eligible Investment and restrictions that only permit current holders of the Eligible Investment to continue making purchases, subject to parameters set forth by Edward Jones.

**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 Account Portfolio Objective or with your Investment Diagnostics. 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 realigning your account within the time frame established for Guided Solutions Flex as determined by Edward Jones. To realign your account, 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 you do not provide instructions to Edward Jones to realign your account 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 execute trades only 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.

**Trade Allocation.** Some Guided Solutions Flex trades may be combined with trades for other client accounts and executed in aggregated block trades. 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. In order 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 exceed the standard settlement period 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 reinvestment of the assets.

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.

**Trade Errors.** In certain circumstances, trade errors may occur in your account. When a trade error occurs that is caused by the actions of Edward Jones, we will work to promptly correct the error while ensuring your account is not disadvantaged.

It is Edward Jones' policy to use an Edward Jones error account to correct trades. This may result in trades between your account and an Edward Jones error account. If trade errors are caused by your actions and the process of correcting the errors results in a net loss in the error account, your account will be debited for the amount of such loss. If the process of resolving trade errors results in a net gain in the error account, as accrued and calculated on a periodic basis, we will donate the amount of such gain to charities chosen by Edward Jones.

**Principal Trading.** Edward Jones may execute trades for Guided Solutions Flex accounts as principal by selling a security from our inventory to you or purchasing a security from you for our inventory. Principal transactions include certain transactions that you have directed Edward Jones to execute in a principal capacity, fractional share liquidations and corrections of trades originally executed in an agency capacity.

Principal transactions cause a conflict between Edward Jones' and your interests, including when Edward Jones generates additional revenue due to market movement, resulting in gains on our inventory positions. Edward Jones also has an incentive to recommend the purchase of a security held in its inventory that is difficult to sell, a conflict addressed by Edward Jones' policies and procedures. In certain principal transactions, Edward Jones will provide required disclosures and obtain your verbal consent prior to the trade.

**Margin Loans.** Eligible non-retirement account clients may obtain margin loans collateralized by marginable securities held in their accounts. Margin loans for Guided Solutions Flex accounts may be used for "Personal Line of Credit Loans" or "Overdraft Coverage," but may not be used for the purpose of purchasing securities on credit. When Edward Jones extends a margin loan to you, it is not acting as an investment adviser but solely as a broker-dealer. In making the decision to take out a margin loan, it is important you understand the risks associated with using margin, the costs of margin loans, and how the performance of your account may be negatively affected. Please see the Edward Jones Margin Disclosure Statement and the Statement of Credit Terms (the "Margin Disclosure") for a discussion of the risks as well as "Margin Risk" below before taking out a margin loan. The Margin Disclosure also includes a discussion of the costs of margin loans. As discussed below, you will pay interest charges on your margin loans in addition to the Program Fee (defined below). Before taking out a margin loan in your Guided Solutions Flex account, first evaluate the intended duration of the loan and your other options, including alternative loan options or liquidating securities. It is our view that margin loans are most appropriate when short in duration. To the extent that a margin call is triggered in connection with your account and we are forced to sell any securities or other assets to satisfy the margin call, we will act solely in our capacity as a broker-dealer and lender (and not as an investment adviser). Moreover, if selling such

securities in order to satisfy a margin call, we will prioritize our interest over your interests.

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

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 any advisory termination fee. While oral instructions to terminate your participation in Guided Solutions Flex are generally 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 a



third-party account. Some mutual funds and/or fund share classes may not be held outside of your Guided Solutions Flex 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 typically occurs two (2) 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 will cause a taxable event and 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

Every Guided Solutions Flex account pays asset-based fees (referred to as your “Program Fee”). In addition to your Program Fee, mutual funds and ETFs that you purchase or that are held in your account have internal fees and expenses that are described in the prospectus of each fund. These internal fees and expenses vary depending on the mutual fund or ETF.

The following section explains:

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

## The Program Fee

Each Guided Solutions Flex account is charged a Program Fee for certain investment advisory services, including initial and ongoing analysis of your investment needs and objectives; periodic consultations; ongoing evaluation and selection of investments for this program; Edward Jones’ ongoing investment policy guidance and services to keep your account aligned with such guidance; periodic performance reporting; custody and transaction execution services and other related services as described in this Brochure.

## Program Fee Schedule

VALUE OF ASSETS IN ACCOUNT		ANNUAL FEE RATE
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%

## How the Program Fee Is Calculated

The Program Fee is based on the market value of all assets held in your account, including cash, cash equivalents, shares of third-party money market funds and shares of the Edward Jones Money Market Fund. Margin loan balances, if any, do not reduce the market value of your account for the purposes of calculating the Program Fee. 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 above), payable monthly in arrears. As the value of the assets in your account increases or decreases, you are charged according to the tiered fee schedule set forth above.

The fees assessed by Edward Jones will reduce your account's overall returns and performance.

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.

All Guided Solutions Flex accounts are subject to a \$10 minimum monthly Program Fee.

## Pricing Groups

To determine your Program Fee rate, 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 in 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: (a) the same last name, (b) the

same Social Security number, or (c) 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 that 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 schedule 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; or
- You are a member of an active or retired associate's Pricing Group.

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

## Potential Fee Reductions or Offsets to the Program Fee

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

### 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, timing of trade activity for the security, or other characteristics of the account activity in the previous Edward Jones account. 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 will not receive a fee reduction.

### Fee Offsets

**Rule 12b-1 Fees:** Some mutual fund companies or their affiliates pay Edward Jones Rule 12b-1 fees for distribution and marketing expenses. This creates a conflict of interest. In order to eliminate this conflict of interest, if we receive Rule 12b-1 fees for the shares in your account, we will credit the amount received to your account.

**Shareholder Accounting Revenue:** Some mutual fund companies pay Edward Jones for account

recordkeeping and administrative services provided by Edward Jones for the mutual fund companies. This creates a conflict of interest. In order to eliminate this conflict of interest, if we receive shareholder accounting fees for the shares in your account, we will credit the amount received to 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 Fund (collectively, “Money Market Revenue”). Appendix A includes a detailed discussion of our 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.

### How the Program Fee Is Paid

The Program Fee is 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 is not sufficient cash or assets invested in the Edward Jones Money Market Fund, we are authorized to sell a sufficient amount of assets held in your account to pay the Program Fee. Edward Jones will first 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 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 the Target Ranges for your Account Portfolio Objective or with the Investment Diagnostics for your account. Such transactions will be effected without regard to tax consequences. You may

have to pay redemption fees to a fund company if those shares were held only for a short time. (See below for more information on redemption fees.) Trades as a result of a liquidation of a mutual fund or ETF in a taxable account may result in a taxable event. 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.

### **Internal Fees and Expenses of Mutual Funds and ETFs, Including Redemption Fees**

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 below 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 less than thirty (30) days to twelve (12) months). The prospectus and SAI will describe whether the mutual fund has a redemption fee and whether there are instances when the redemption fees will be waived.

Any internal fees and expenses charged by a mutual fund or ETF will reduce your account’s overall returns and investment performance.

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

In addition to the Program Fee described above, clients will pay Edward Jones interest on margin loans, if applicable, as set forth in the Margin Disclosure. A client may pay for other services including, but not limited to, debit and check-writing fees, estate service fees and fees to distribute an account pursuant to a transfer on death agreement.

Also, the Program Fee does not cover the following (if applicable to your account): transfer taxes; electronic fund, wire and other account transfer fees; internal fees and expenses incurred by mutual funds or ETFs purchased for your account; 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. Edward Jones 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, London Interbank Offered Rates and Secured Overnight Financing Rate. Under these arrangements, banks may pay interest based on a spread to one of these rates or may pay a fixed interest rate.

## **Financial Advisor Compensation**

Your financial advisor receives a portion of the 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 Account Portfolio Objective you select. As a result, your financial advisor does not have a financial incentive to recommend one Account Portfolio Objective over another.

Similarly, the fee rate paid to your financial advisor will be the same regardless of the investment advisory program in which you invest. However, your financial advisor also may receive compensation in connection with margin loans in Guided Solutions Flex as described below. As a result, your financial advisor may have a financial incentive to recommend Guided Solutions Flex over another investment advisory program.

The amount of your financial advisor's compensation may be more or less than what he or she would receive if you paid separately for investment advice, brokerage services and administrative services. See "Comparing Costs and Expenses" below.

If you use margin in your account, Edward Jones will receive revenue as a result of charging interest on your margin loan. As a result, there is a material conflict of interest between you and us in connection with margin loans, which we address through disclosure in this Brochure. For example, if you take out or maintain a margin loan rather than withdraw money from your Guided Solutions Flex account, we retain the Program Fee that such assets are otherwise generating and charge you interest on any outstanding margin loan balances. Depending on your specific circumstances, including the intended duration of the margin loan and the return on your account, over the long term it may cost you more to take out the margin loan

than if you had pursued an alternative loan option or liquidated securities and withdrawn the sale proceeds from your account. You are encouraged to carefully consider the total cost of taking out any margin loan, and any additional compensation to us or your financial advisor, when determining to take out and/or maintain a margin loan.

The Program Fee, as well as assets under care and client margin loan balances, 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 the Travel Award Program is based upon the amount of new and existing assets under care of a financial advisor.

## **Comparing Costs and Expenses**

The Program Fee is a fee for investment advisory, brokerage and custody services as described above under "The Program Fee." Guided Solutions Flex may cost you more or less than purchasing these services separately, depending on the costs of the services if provided separately, the size of your account, the amount of cash in your account, and the trading activity in your account and the corresponding brokerage commissions that would be charged if you bought and sold individual securities in a brokerage account.

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 (although you would not receive the benefits of the program described in this Brochure).

If you purchased these investments through Edward Jones as a broker-dealer, you would 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 for your financial advisor to recommend Guided Solutions Flex instead of brokerage services.

## **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.

The total value of your account is monitored by Edward Jones. If the value of your account falls significantly (for example, a balance of \$10,000 or below), we may, in our discretion, remove your account from Guided Solutions Flex.

Edward Jones offers clients a wide range of financial services. Guided Solutions Flex may not be appropriate for every client or every account type. Generally, Guided Solutions Flex is available only to residents or entities of the United States and certain U.S. territories with the following types of accounts: individual; joint; 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 any person or entity from investing or remaining in Guided Solutions Flex for any reason, including if we do not believe it is an appropriate investment strategy for that person or entity. As a general rule, you should intend to invest in Guided Solutions Flex for a minimum of three (3) years.

You will not be able to purchase certain fixed-income securities if your account value is below \$50,000. We can change the minimum in our discretion. You will be able to hold eligible fixed-income securities in your account regardless of account value. For example, if you purchased a bond when your account value exceeded \$50,000, you can continue to hold that bond even if your account value declines. However, holding fixed-income securities in an account with a value less than \$50,000 may result in your account being out of alignment with the Target Ranges, your Account Portfolio Objective or with the Investment Diagnostics for your account.

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 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 Guided Solutions Flex. Assets in your Guided Solutions Flex account 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 or 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 may result in higher fees and expenses and negatively affect investment performance.

## **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 or Edward Jones-supervised persons serve as portfolio managers in Guided Solutions Flex. In consultation with your Edward Jones financial advisor, you will select your Account 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:

- inconsistency with Edward Jones' investment philosophy;
- complexity of the investment;
- regulatory concerns;
- termination of an agreement with a mutual fund company;
- lack of ongoing financial information; and
- a decision by Edward Jones to reduce the overall ownership level of a fund.

The appropriate Target Ranges for each Account 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 Account 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, you should monitor and realign your account if the asset allocations have deviated significantly from the Target Ranges for your Account 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 Account Portfolio Objective will be achieved.

Each Eligible Investment will fluctuate in value and, when sold, may be worth more or less than the original cost to purchase. Diversification does not guarantee a profit or protect against loss. You should consider the investment objectives (as applicable), risks, fees and expenses, and past performance of each Eligible Investment before deciding to invest in Guided Solutions Flex. Information about each Eligible Investment can be obtained from your financial advisor.

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

**Concentration Risk.** An account with a limited number of Eligible Investments may experience more volatility than a more diversified account with a larger number of Eligible Investments.

**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 NAV 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.

*Share Classes.* Mutual fund investments in Guided Solutions Flex can have different share classes. While each share class invests in the same pool of investments and has the same investment objective, each has different internal fees and expenses. 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 it believes the fee structure of 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 they will be invested in the share class with the lowest expense ratio.

Edward Jones generally attempts to select institutional and/or advisory share classes for Guided Solutions Flex, when available. Institutional and/or advisory 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 or advisory 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 fees. 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 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.

*Redemptions.* Edward Jones' clients collectively own a large percentage of certain mutual funds that are Eligible Investments. Due to the 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 company can also decide to redeem shares "in-kind" instead of in cash. In that event, you may receive the actual underlying securities of the fund. The underlying securities could lose value before they are sold. Brokerage and other transaction costs will apply to the sale of the underlying securities. We 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.

**ETFs Risk.** ETFs are typically registered investment companies whose shares are listed on a securities exchange. 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, gaining or losing value throughout the day. ETF performance may vary from that of its benchmark or its peers. Like mutual funds, ETFs are subject to investment advisory, transactional, operating and other expenses. Unlike mutual funds, shares

of ETFs cannot be directly purchased from and redeemed by the fund.

**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 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 NAV of \$1 per share, the value of the fund may fluctuate, and you could lose money.

**Foreign Investing Risk.** Investments in foreign markets or foreign companies may be achieved through investments in securities of foreign issuers; ETFs or mutual funds that hold securities of foreign issuers; or ADRs, which are receipts typically issued by a U.S. bank or trust company evidencing ownership of the underlying securities of a foreign company. Investments in foreign markets or foreign companies carry a number of economic, financial and political considerations that are not associated with the U.S. markets and that could unfavorably affect your account's performance. Among those risks are greater price volatility; weak supervision and regulation of

securities exchanges, brokers and issuers; higher brokerage costs; fluctuations in foreign currency exchange rates and related conversion costs; adverse tax consequences; and settlement delays.

**Margin Risk.** Our financial advisors provide information and education regarding the availability of margin loans. However, you decide whether to borrow money from us and you decide when and how to pay back any loans. There are certain risks and conflicts of interest that arise when we make margin loans in our role as lender and broker-dealer rather than investment adviser, including (i) the interest rate charged in connection with your loan may be higher than those charged by other lenders and is in addition to the Program Fee; (ii) we may require additional collateral if there is a decline in the market value of the securities that secure your margin loan; (iii) we can sell any securities in your account to satisfy a margin call without notice to you; (iv) we may be required to liquidate securities we would otherwise not recommend you sell, and which may not otherwise be in your best interests to sell, to satisfy a margin call; (v) you are not entitled to select which securities are liquidated to satisfy a margin call and we can sell securities that you wish to retain or that have a low tax basis without regard to your wishes or any adverse tax consequences of a sale; (vi) depending on market conditions, the prices obtained for the securities may be less than favorable and may be less than the value that we or you believe the securities are worth; (vii) the timing of securities sales in connection with a margin call will be different than if those securities were not used as collateral in connection with a margin loan, and may negatively impact the performance of your account and interrupt your investment strategy; (viii) a situation could arise where the value of your account is zero and you still owe money on a loan; and (ix) with respect to the margin loan and collateral, we will act in the capacity of a lender and may take the actions described above, which may be in conflict with your best interest and our role as an investment adviser to your Guided

Solutions Flex account. Any action taken by us against the securities in your Guided Solutions Flex account pursuant to the use of margin will not constitute a breach of our fiduciary duties as an investment adviser.

**Cybersecurity Risk.** The computer systems, networks and devices used by Edward Jones and its service providers employ a variety of protections designed to protect against damage or interruption from computer viruses, network and computer failures and cyber-attacks. Despite such protections, systems, networks and devices potentially can be breached. Cyber-attacks include, but are not limited to, gaining unauthorized access to digital systems for purposes of corrupting data, or causing operational disruption, as well as denial-of-service attacks on websites. Cyber incidents may cause disruptions and impact business operations, potentially resulting in financial losses, the inability of Edward Jones or service providers to trade, violations of privacy and other laws, regulatory fines, reputational damage, reimbursement costs and additional compliance costs, as well as the inadvertent release of confidential information.

## **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 or ETF sponsor, and you will be responsible for voting proxies.

## **Legal Notices**

Edward Jones will not take any action or render any advice regarding any legal action on your behalf relating to any Eligible Investments or other assets held in your account (including shares

of the Edward Jones Money Market Fund) 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 1 of its Form ADV, which is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), as well as on FINRA's website at [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

**FINRA – ETFs.** In violation of FINRA Rule 2010 and 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 solicitation 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 MSRB Rules G-17, G-11(b) and (d), G-27 and G-30(a). Edward Jones was censured and 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-27 and G-30. The settlement required 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 MSRB 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 had 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 of 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 principal transactions and certain underwritings and other investment advisory services. Edward Jones and its affiliates receive compensation, including fees and commissions, associated with these services. We have a financial interest in our clients’ transactions and the recommendations we make to clients to buy or sell securities or investment products.

A 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 payments from certain unaffiliated mutual fund families on client assets held outside of Edward Jones’ advisory programs. “Revenue sharing” generally means a mutual fund family shares with another company, like Edward Jones, a portion of the revenue it earns through managing mutual fund assets. Edward Jones’ receipt of revenue sharing outside of advisory programs creates a conflict of interest in the form of additional financial benefits to us, our financial advisors and equity owners. We believe that this conflict of interest is mitigated through internal policies designed 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.

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 does not receive revenue sharing on assets held in Guided Solutions Flex accounts. Edward Jones and its financial advisors 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, is dually registered with the SEC as an investment adviser and broker-dealer, and is 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 affiliated mutual funds that are Ineligible Investments in Guided Solutions Flex. Certain current or former associates of Edward Jones serve as officers or directors/trustees of the affiliated investment adviser and/or the affiliated 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 insurance-related 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 conduct general 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., 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:

- act with integrity and in an ethical manner with you and all of our clients;

- place your and all of our clients' interests first;
- 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;
- comply with all applicable rules, regulations and laws; and
- do not use any material nonpublic information they may receive as a result of their employment with Edward Jones.

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. Under our Code of Ethics, access persons must receive prior approval before acquiring a beneficial ownership interest in any security in an initial public offering, limited offering or hedge fund transaction. Additionally, 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 when 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. There are times when we act as principal, which means we participate in client transactions by buying securities for our own inventory and selling those securities to our clients. To the extent conflicts arise under such transactions, Edward Jones is nevertheless obligated to execute

any such transaction in the manner it believes is in the client's best interest.

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 do 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, we prohibit 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 Account 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 review your account monthly to determine whether your account moves out of alignment with the Target Ranges for your Account Portfolio Objective or with the Investment Diagnostics for your account and will

notify you if your account is not in alignment. 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 into 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 Account Portfolio Objective.

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

You will receive a written account statement at least quarterly (monthly for months when there is activity in your account) containing a description of all activity in your account during the period, including all transactions, contributions, withdrawals, fees and the value of your account at the beginning and end of the period.

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.

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 receives 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 pay certain expenses on behalf of financial advisors, including training and educational expenses, and in some instances make payments directly to Edward Jones to subsidize training and educational costs for financial advisors. These companies also participate in conferences or other marketing activities with Edward Jones and generally share in the cost of those 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.

### **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 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 “Money Market Fund”), which is advised by Passport Research, Ltd. (“Passport Research”). Edward Jones is the direct or indirect owner of 100% of Passport Research. As such, the Money Market Fund is advised by an affiliate of Edward Jones. Passport Research receives a management fee of 0.20% of average net assets of the Money Market Fund, less any fees paid to its sub-adviser(s).

The Money Market 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 Money Market 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 Money Market Fund and the accounts that its clients maintain in the Money Market Fund. For any Guided Solutions Flex account investing in the Money Market 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 summary prospectus for the Money Market Fund. The summary prospectus describes the investment characteristics of the Money Market Fund and the fees paid to Passport Research or its affiliates by the Money Market Fund. The prospectus also describes certain revenue received by Edward Jones in connection with the Money Market Fund.

[To be filed with SEC as appendix to Form ADV brochure.]

## **ANNUAL SUMMARY OF MATERIAL BROCHURE CHANGES**

### **EDWARD JONES GUIDED SOLUTIONS® FLEX ACCOUNT**

Below is a summary of material changes that have been made to this brochure since our last annual update filed March 28, 2019.

- In our June 28, 2019 interim amendment, we notified you of the following change:

Effective November 22, 2019, we began offering margin loans in eligible non-retirement Guided Solutions Flex accounts. We added information about margin loans, including related characteristics, limitations, costs and risks described in Item 4: Services, Fees and Compensation and Item 6: Guided Solutions Flex Investment Selection and Evaluation.

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