

Trustmont Financial Group, Inc. is registered with the SEC as a Broker-Dealer
Trustmont Advisory Group, Inc. is registered with the SEC as an Investment Advisor

Client Relationship Summary (Form CRS) as of January 30, 2023

Item 1: Introduction

Brokerage and advisory service fees differ and it is important for you to understand the differences. Free and simple tools are available to help you research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

What investment services and advice can you provide me?

Depending on your needs and investment objectives, we can provide you with services in a brokerage account, investment advisory account, or both at the same time. You should carefully consider which types of accounts and services are right for you.

| Broker-Dealer Services Brokerage Accounts | Investment Adviser Services Advisory Accounts |
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| <ul style="list-style-type: none"> • If you open a brokerage account, you will pay us a transaction-based fee, generally referred to as a commission, every time you buy or sell an investment. • You may select investments or we may recommend investments for your account, but the ultimate investment decision for your investment strategy and the purchase or sale of investments will be yours. All Trustmont Financial Group brokerage accounts are non-discretionary which means we must obtain your consent prior to placing any trade in your account. • Once a brokerage transaction is complete, we have no further duty to monitor your account or any position in your account. You may always contact your Trustmont Financial Group representative to discuss any security of interest to you, and your Trustmont Financial Group representative may contact you to discuss or recommend a security, but these conversations do not create an obligation to monitor any position in your account. • We offer securities traded on the major stock exchanges, as well as bonds, variable annuities, and mutual funds. We occasionally offer less common investments intended for specialized client needs. Please ask us for more information on investments you'd like to know more about. • Please see our Regulation Best Interest Disclosure Document located at TrustmontGroup.com | <ul style="list-style-type: none"> • If you open an advisory account, you will pay an on-going asset-based fee for our services. • We will offer you advice on a regular basis. We will discuss your investment goals, design with you a strategy to achieve your investment goals, and regularly monitor your account. We will perform a full review of your account at least annually and contact you to discuss your portfolio. • A Trustmont Advisory account relationship grants discretionary authority to your advisor to buy and sell securities in your account when your advisor determines it necessary, without being required to obtain your advance consent for any trade. • We offer securities traded on the major stock exchanges, as well as bonds, options and mutual funds. • Please see our Form ADV, Part 2A located at TrustmontGroup.com for additional information on our advisory services. |

Conversation Starters: *Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

Item 3: Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please ask your financial professional to give you personalized information on the fees and costs that you will pay.

| <p>Broker-Dealer Services Brokerage Accounts</p> | <p>Investment Adviser Services Advisory Accounts</p> |
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| <ul style="list-style-type: none"> • You will pay us a fee every time you buy or sell an investment. This fee, commonly referred to as a commission, is based on the specific transaction and not the value of your account. <p>With stocks or exchange-traded funds, this fee is usually a separate commission. With other investments, such as bonds, this fee might be part of the price you pay for the investment (called a “mark-up” or mark-down”). With mutual funds, this fee (typically called a “load”) reduces the value of your investment.</p> <ul style="list-style-type: none"> • Some investments (such as mutual funds and variable annuities) impose additional fees that will reduce the value of your investment over time. Also, with certain investments such as variable annuities, you may have to pay fees such as “surrender charges” to sell the investment. • Our fees vary and are negotiable. The amount you pay will depend, for example, on how much you buy or sell, what type of investment you buy or sell, and what kind of account you have with us. • Depending on the type of account, you will pay additional fees, such as custodian fees, account maintenance fees, small account fees, account inactivity fees, termination fees, and/or account transfer fees. • Brokerage representatives receive a portion of commissions in your account as compensation. Depending on your account, more transactions in your account may result in more fees we charge you. We may, therefore, have an incentive to encourage you to engage in transactions. • A transaction-based fee brokerage account may cost less if you do not trade | <ul style="list-style-type: none"> • A Trustmont Advisory Group advisory relationship may charge you fees based on one of the following methods: 1. A percentage of assets under management; 2. Hourly fees; 3. Flat-rate fees. <p>The amount paid to our firm and your financial professional generally does not vary based on the type of investments we select on your behalf. Fees are deducted from your account, thereby, reducing the value of your account. For fees charged on an hourly basis or flat rate, you may also have the option to pay your fees by invoice instead of having the fee deducted from your account.</p> <ul style="list-style-type: none"> • Some investments such as mutual funds impose additional fees that will reduce the value of your investment over time. • Our fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account. Please ask your Trustmont Advisory Group advisor about which type of advisory relationship is best for you. • Trades in an advisory account do not impose a commission, but advisory trades may carry a ticket charge imposed by the custodian of your assets. Trustmont Advisory Group receives no portion of the ticket charge. • Advisors receive a percentage of your advisory fees as compensation. Advisory fees are charged against your entire account, whether or not you purchase or sell a security. In certain circumstances, Trustmont Advisory Group may exempt a holding in an advisory account from being subject to advisory fees. • Advisors may have an incentive to place you in an advisory account to generate advisory fees which could be more expensive than brokerage commissions. • An asset-based fee advisory account may cost more than a transaction-based fee account, but you may prefer an advisory account if you want |

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| <p>often or if you plan to buy and hold investments for longer periods of time.</p> <ul style="list-style-type: none"> For more information on our fees and costs, please see our Regulation Best Interest Disclosure Document located at TrustmontGroup.com. | <p>continuing and ongoing advice or want someone to make investment decisions for you.</p> <ul style="list-style-type: none"> For more information on fees and costs, please see our Form ADV, Part 2A located at TrustmontGroup.com. |
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Conversation Starters: *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflict of interest do you have?

Standards and Conflicts

We must abide by certain laws and regulations in our interactions with you.

| <p>Broker-Dealer Services Brokerage Accounts</p> | <p>Investment Adviser Services Advisory Accounts</p> |
|---|---|
| <ul style="list-style-type: none"> We must act in your best interest and not place our interest ahead of yours when we recommend an investment or an investment strategy involving securities. When we provide any service to you, we must treat you fairly and comply with a number of specific obligations. Our interests can conflict with your interests. When we provide recommendations, we must eliminate these conflicts or tell you about them and in some cases reduce them. <p>Our Conflicts:</p> <ul style="list-style-type: none"> When we provide you with a recommendation as your broker-dealer, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts of interest. You should understand and ask us about these conflicts because they can affect the recommendation we provide to you. Here are some examples to help you understand what this means: Your financial professional acting in multiple capacities may create conflicts of interest. Capacities may include a registered representative of a broker-dealer, investment advisor representative and/or as insurance agent of various insurance companies. Recommendations may be limited to products offered through these companies. Certain product providers may pay us directly when you invest in their products. Your | <ul style="list-style-type: none"> We are held to a fiduciary standard that covers our entire investment advisory relationship with you. For example, we are required to monitor your portfolio, investment strategy and investments on an ongoing basis. The fiduciary standard, which is the highest legal standard, involves a duty of care and a duty of loyalty. Our interests can conflict with your interests. We must eliminate these conflicts or tell you about them in a way you can understand, so that you can decide whether or not to agree to them. <p>Our Conflicts:</p> <ul style="list-style-type: none"> When we act as your investment advisor, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts of interest. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. Here are some examples to help you understand what this means: Your financial professional acting in multiple capacities may create conflicts of interest. Capacities may include, a registered representative of a broker-dealer, investment advisor representatives, and/or as insurance agents of various insurance companies. Advisory recommendations may be limited to products offered through these companies. We do not have extra bonuses or different |

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| <p>financial professional may receive more money if you buy these investments. Therefore, your financial professional may have an incentive to offer or recommend certain investments.</p> <ul style="list-style-type: none"> Your financial professional may be an owner of the firm; employees that are owners of our firm may receive additional ownership compensation as a result of the profitability of the firm. For more information on our Conflicts please see our Regulation Best Interest Disclosure Document located on our website at TrustmontGroup.com. | <p>revenue payouts based on services or products sold to you. We do not have sales contests.</p> <ul style="list-style-type: none"> Your financial professional may be an owner of the firm; employees that are owners of our firm may receive additional ownership compensation as a result of the profitability of the firm. Please see our Form ADV Part 2A for additional information located on our website at TrustmontGroup.com |
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Conversation Starters: *How might your conflicts of interest affect me, and how will you address them?*

How do your financial professionals make money?

| <i>Broker-Dealer Services Brokerage Accounts</i> | <i>Investment Adviser Services Advisory Accounts</i> |
|---|--|
| <ul style="list-style-type: none"> You will pay your financial professional a fee every time you buy or sell an investment. This fee is commonly referred to as a commission. The more transactions in your account, the more fees we charge you. Therefore, your financial professional may have an incentive to encourage you to trade often. | <ul style="list-style-type: none"> Your financial professional shares in the revenue the firm earns from advisory services. The more assets you have in the advisory account, the more you may pay us. Therefore, your financial professional may have an incentive to encourage you to increase the assets in your account in order to increase fees. |

Item 4: Disciplinary History

Do you or your financial professionals have legal or disciplinary history? YES

Please visit Investor.gov/CRS for a free and simple search tool to research the firm and our financial professionals.

Conversation Starters: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Additional Information:

- You can find additional information about our brokerage and investment advisory services by visiting our website at trustmontgroup.com. To request a copy of our Form ADV, brochure supplement for your financial professional, Regulation Best Interest Disclosure Document, or an up-to-date copy of the relationship summary, please call us at 724-468-5665.
- To report a problem to the SEC, visit Investor.gov or call the SEC's toll-free investor assistance line at (800) 732-0330. To report a problem to FINRA, visit FINRA.org or call 301-590-6500. If you have a problem with your investments, account or financial professional, contact us in writing at Trustmont Group, 200 Brush Run Road, Greensburg, PA 15601 or call 724-468-5665.

Conversation Starters: *Who is my primary contact person? Is he/she a representative of an investment advisor or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*



Part 2A of Form ADV: Firm Brochure

March 20, 2026

Trustmont Advisory Group, Inc. is registered as a Registered Investment Adviser with the United States Securities and Exchange Commission and is located at 200 Brush Run Road, Suite A, Greensburg, PA 15601. Our Telephone number is (724) 468-5665 and our website is www.trustmontgroup.com.

This brochure provides information about the qualifications and business practices of Trustmont Advisory Group, Inc. If you have questions about the contents of this brochure, please call us at 724-468-5665.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. The use of the term "Registered" does not imply any level of skill or training.

Additional information about Trustmont Advisory Group, Inc. is available on the SEC's website www.adviserinfo.sec.gov.

Item 2 Material Changes--There are no material changes.

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Item 2 Material Changes

Item 3 Table of Contents

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Item 4 - Advisory Business

The following pages describe Trustmont Advisory Group's services, fee arrangements, and business practices.

Peter D. Dochinez owns approximately 80% of Trustmont Advisory Group. We have been in business since 1997.

We advise customers in several ways. One or more of the following options can be chosen.

1. We write Financial Plans after speaking with the customer. A questionnaire may also be utilized to collect your pertinent information.
2. We give financial advice to customers. This is done by analyzing your current investments and discussing your willingness to accept risk. We may also consider the amount of tax you pay each year. Then, we may suggest other investments and may explain why the proposed changes should be made. Since we are also registered representatives licensed to make trades, we may offer to place trades for you. We may earn a commission on these trades. How we are paid is outlined in Item 10.
3. We help to manage our customers' investments for a fee. Before we can make any adjustments to your investments, you must first grant us the authority to do so. You may have to pay a commission for the recommended trades. If you grant us permission to do the trade for you, we may earn the commission. You can tell us what kinds of investments to use; you can also tell us what we should not invest in. All changes to your account will be reported on your regular statements.

4. As of December 31, 2025, we manage approximately 6348 accounts worth approximately \$1.3 billion. All of these assets are managed on a discretionary basis.
5. We conduct seminars for groups of customers and/or potential customers. We will talk in general terms about investments and give attendees some ideas of what we offer our customers.
6. We do not have our own wrap fee programs.
7. We may suggest you use a wrap fee program from a company with which we have a working relationship. We may be compensated if you choose to work with one of these wrap fee programs.

Item 5 - Fees and Compensation

1. If you choose to receive a written Financial Plan, we may negotiate our charges with you. We determine our costs by looking at several things. First, we decide how much information we must evaluate. Second, we determine how much research must be done, and third, how long it will take us to write the report. We will never charge you more than \$5,000 for the plan, and payment can be made in two installments. The first installment is due when you sign an agreement for us to write the plan. The second installment is due when we meet with you, give you a copy of the plan, and discuss it with you.
2. We may agree to do a Financial Plan for you at no charge. This may occur if you are an established customer currently paying for other services, or we may waive the fee if we have earned commissions by doing trades for you.
3. We may also charge you if you want us to review and update a plan we wrote for you in the past. We cannot charge you more than 33% of the cost of the original financial plan unless the information used to prepare the original written financial plan has changed.
4. When we provide you specific advice on your investments, we may charge you no more than \$500 per hour. This fee can be negotiated, and must be paid at the end of the meeting. The advice we give you may also cover any or all of the following areas:
 - a. Business Planning
 - b. Children's Education
 - c. Retirement Planning
 - d. Estate Planning
 - e. Conserving your money and other valuable assets
 - f. Tax planning
5. When we manage your investments for you, we are typically paid a percentage of the value of the assets we manage. This fee can be no more than 2% a year. We will bill the amount of fee to you either on a monthly basis or a quarterly basis. You may pay this bill one of two ways:
 - a. You pay the invoice that may be sent to you.

b. This fee is deducted from the funds you have in your account(s).

If you start the plan in the middle of a period, you may only have to pay for the number of days remaining in that period. You may have to pay for a full period when you transfer your funds from another manager. This amount will be a part of the agreement that you sign.

You may be charged a different fee and receive different services depending on which Trustmont Advisory Group, Inc. advisor you choose to work with.

If you find an error in your billing statement, please call us at 724-468-5665. After review, if we agree that an error has occurred, we will correct the error by making either a credit or debit to your account. We will send you a letter to explain what we did. You must inform us or your adviser of the error no later than April 15 of the year following the year in which the error occurred. If you notify us or your advisor after the above date, the error will not be corrected.

We will charge your account immediately if we discover that your account was under billed. We will send you a letter to explain the mistake. We must do this within 60 days of the date in which the original charge was assessed.

6. We can charge a customer up to \$100 to attend a seminar.

7. Some of us are Registered Representatives. We may earn a commission by selling you investments and other products. This is discussed in detail in Item 10.

8. You may be charged a commission to purchase a mutual fund, ETF, variable annuity or other product. Your representative will tell you how much the commission will be. He or she will also detail the amount the mutual fund, variable annuity, ETF or other product charges for other expenses.

9. We may charge you a set-up fee to establish an account with Trustmont Advisory Group, Inc. This fee may be as high as \$100 per account with a maximum fee of \$200 per household.

10. Trading, brokerage and custodial fees charged by the client's third party broker-dealer and custodian are separate and distinct from management fees charged by Trustmont Advisory Group, Inc. In addition, clients will incur certain charges imposed by third parties other than Trustmont Advisory Group in connection with investments made through a Trustmont Advisory Group account, including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, IRA and qualified retirement plan fees.

Investment Advisory Fees charged by Trustmont Advisory Group are separate and distinct from the fees and expenses charged by investment company securities that are recommended to clients. A description of these fees and expenses are available in each investment company security's prospectus. Some fund fees include 12b-1 fees, which are internal distribution fees assessed by the Fund, all or a portion of which are paid to the distributor(s) of the Funds. Trustmont Advisory Group, Inc., and your Advisory Representative do not retain 12b-1 fees paid by Funds.

In most cases, mutual fund companies offer multiple share classes of the same mutual fund. Some share classes of a fund charge higher internal expenses, whereas other share classes of a fund charge lower internal expenses. Institutional and advisory share classes typically have lower expense ratios and are less costly for a client to hold than Class A shares or other share classes that are eligible for purchase in an advisory account. Mutual funds that offer institutional share classes, advisory share classes, and other share classes with lower expense ratios are available to investors who meet specific eligibility requirements that are described in the mutual fund's prospectus or its statement of additional information. When determining the appropriateness of a particular fund or other investment that will be purchased or held in an advisory account, your advisor will consider the expected holding period, investment objective, risk tolerance, time horizon, financial condition, and amount invested. Based upon these factors, your advisor may recommend, select, or continue to hold a fund share class that charges higher internal expenses than other available share classes for the same fund.

11. Trustmont Advisory representatives have the ability to utilize annuities in their client portfolios.

12. You should call us at 724-468-5665 if you have questions.

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

Trustmont does not collect Performance-Based Fees.

Item 7 - Types of Clients

We work with the following kinds of clients:

- ◆ Individuals,
- ◆ Pension and Profit Sharing Plans,
- ◆ Trusts,
- ◆ Estates,
- ◆ Charitable Organizations,
- ◆ Corporations, and
- ◆ Other Business Entities.

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

When we work with you, we use a long-term outlook. The fundamental risk in all investments is that it is possible that when you need to use the funds, they will be worth less than your original investment. Based on history, the longer your money is invested, the less chance there is that you will lose money.

Our analysis of your current investments and our ongoing analysis of your investments uses information that we learn from the following sources:

- a. Financial Newspapers and Magazines
- b. Research reports from economists and other financial industry experts

- c. Services that rate investments and Bonds
- d. Company annual reports
- e. Corporate filings with the U.S. Securities and Exchange Commission
- f. Company Press Releases
- g. Financial Industry Newsletters
- h. Handouts from Professional Seminars
- i. Discussions with product wholesalers
- j. Marketing Material from Product Sponsors
- k. Industry meetings
- m. Other Resources

Investing in securities involved risk of loss that you should be prepared to bear.

We do not use a specific investment strategy or method of analysis. Rather, we use all of the information sources plus our own experience and our discussions with you to make our recommendations.

Some of our advisors may use a form of technical analysis to advise you when to make changes in your investments. They may use mathematical formulas and computerized analysis. They will explain how the program works and why they suggest you should use it.

We may recommend you use a particular investment program from a vendor. The vendor may use a particular strategy. In that case, we will give you a prospectus and other literature that describes what that strategy is. We will also help you to understand how this strategy works and why it may good for you to use.

Item 9 - Disciplinary Information

There have been no disciplinary events in the past 10 years of either our managers or the Company.

Item 10 - Other Financial Industry Activities and Affiliations

Many of our advisers are also registered representatives of Trustmont Financial Group, Inc. This allows us to place trades to purchase and sell other financial products on behalf of our customers. This usually requires that you pay a commission. We will always tell you when we will be earning a commission from Trustmont Financial Group, Inc. We will also advise you of the amount of the commission—it can vary depending on what you are transacting. Some of us also may recommend that you do your purchases and sales through the online services of a custodial firm.

We also have attorneys and other specialists who we may recommend to you. They can help you to set up a Trust, establish a new business, or settle an estate. We may also recommend that you use an accountant or other tax specialist and may give you several recommendations.

Many of the advisers are also licensed to sell insurance products. The insurance product may generate a commission to the insurance agent who is also an adviser. Insurance products offered can be but are not limited to: life insurance, annuities, indexed annuities, health insurance, automobile insurance, disability insurance, long term care insurance, other property and causality insurance.

Some of the advisers are also professionals of other businesses. These businesses could be but are not limited to: Certified Public Accountant (CPA), attorney, Certified Financial Planner (CFP®), Chartered Life Underwriter (CLU®), Chartered Financial Consultant (ChFC®), Personal Financial Specialist (PFS®), tax advisor/tax preparation, real estate agent, paralegal, teacher/professor, mortgage related services, notary, trust related services, Investment Advisor Representative (IAR) of a Registered Investment Advisor (RIA) not related to or affiliated with Trustmont Advisory Group, Inc.

Trustmont advisor representatives may suggest that you use an "allocation program," wrap program, or some other service that offers to manage your money. Usually, these programs charge you for this service. The charge is typically a percentage of the money you have under management in their program. For instance, if you give them \$100,000 and the fee they charge is 1.5% per year, then the charge would be \$1,500 per year to manage your money. This charge is usually taken once each quarter, though it could be monthly, from the money that you have given them. In the example above, the manager would take \$375 out of your account four times a year. The quarterly fee is determined by the value of your account either at the beginning, the end or a time weighed calculation that the manager is charging you. The money manager pays a portion of these fees, as a solicitor, to Trustmont Advisory Group, Inc. Trustmont Advisory Group, Inc. and your advisor share in what is paid.

You are not required to use any of the investment programs or services that we recommend.

Item 11 - Code of Ethics

We have a Code of Ethics that holds us to certain standards when we recommend stocks and other investments to you. It is our policy to conduct our business in full compliance with securities law and other relevant regulations. Our representative will tell you if he or she owns the investment that he or she is recommending to you. He or she will also tell you if they have any other financial interest or incentive to recommend the investment. A copy of the Code of Ethics will be provided to you at account opening and may be requested at any time thereafter.

Item 12 - Brokerage Practices

Trustmont Advisory Group, Inc. does not provide any proprietary research to any of its customers. Trustmont Advisory Group, Inc. is not connected with any soft dollar arrangements, meaning that our representatives do their own independent analysis using public information that anyone can find or purchase. The same is true when an advisor may suggest that you use a specific custodian.

It is our policy to make all trades in the same investment together to reduce the overall costs to our customers. This is called aggregating trades. Occasionally a trade will not be aggregated. This does not result in an increased cost to our customer.

Persons associated with Trustmont Advisory Group, Inc. may also be registered representatives of Trustmont Financial Group, Inc., a broker/dealer registered with the SEC, FINRA and various state regulatory agencies. A registered representative of Trustmont Financial Group, Inc. may receive a commission in mutual funds, equities, bonds, variable annuities and other investment products on behalf of clients, who may or may not have an advisory fee agreement with Trustmont Advisory Group, Inc. This relationship may create a conflict of interest as an investment advisor representative may also receive commissions as a registered representative of

Trustmont Financial Group, Inc.

Trustmont Advisory Group, Inc. and Trustmont Financial Group, Inc. participate in no intercompany arrangements, such as marketing or revenue sharing agreements.

Item 13 - Review of Accounts

Your adviser will offer at least once a year, or more often if you request, a review of your accounts, financial plan or any other services you have chosen to engage with your advisor. He or she will discuss with you the fee for this service before making the appointment to meet with you.

Item 14 - Client Referrals and other compensation

Trustmont has many referral sources such as current clients, outside professionals, including attorneys and accountants, personal friends, and family members. We do not provide cash compensation for client referrals; however, we may provide non-cash compensation in the form of a complimentary meal at a restaurant or client appreciation event, for example. Non-cash compensation creates a conflict of interest so the referral could be biased.

Trustmont does not accept referral fees or any form of cash compensation from other professionals when we refer a prospect or client to them.

Item 15 - Custody

Trustmont does not hold any of your funds or investments. Rather, these funds and investments are held by qualified custodians. These other companies will send you regular statements showing the activity with the funds and investments that they are holding for you. We usually also get a copy of the same statement. You should review the statement when you receive it, and call us if something does not appear to be correct.

Item 16 - Investment Discretion

All of our customer accounts are managed on a discretionary basis. That means that you give us the authority to purchase and sell investments in your account without your approval. You must sign an agreement allowing us to do this. We do not have authority to sign any documents for our customers. We also do not take possession of any of your money or investments. You can decide the type and amount of investments made for your account.

Item 17 - Voting Client Securities

We do not vote customer securities. You will receive proxies and related material directly from the custodian or transfer agent. You may contact us to discuss this material.

Item 18 - Financial Information

We are not required to provide our financial information to our clients because we do not:

- Require the prepayment of more than \$1,200 in fees and six or more months in advance, or
- Take custody of client funds or securities, or
- Have a financial condition that is likely to impair our ability to meet our commitments to you.

HORIZON

FINANCIAL ADVISORS INC.

PRIVACY DISCLOSURE

Protecting your privacy is very important to Horizon Financial Advisors. We want you to understand what information we collect and how it is used. We collect and use "nonpublic personal information" in order to provide our customers with a broad range of financial products and services as effectively and conveniently as possible. We treat nonpublic personal information in accordance with our Privacy Policy.

Information We Collect and From Whom We Collect It

We may collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates, or others;
- Information we receive from you voluntarily, such as your e-mail address and any information contained in your e-mail messages.

"Nonpublic personal information" is nonpublic information about you that we obtain in connection with providing a financial product or service to you. This information may be collected in person, by mail, fax, or by other electronic means as permitted by law or in accordance with express authorization from you.

What Information We Disclose and to Whom We Disclose It

We do not disclose any nonpublic personal information about you to anyone without your express consent, except as permitted or required by law. We may disclose the nonpublic personal information we collect, as described above, to persons or companies that perform services on our behalf.

Your Right to Verify Accuracy of Information We Collect

Keeping your information accurate and up to date is very important to us. You may access and correct nonpublic personal information about you that we collect except for information relating to or in anticipation of a claim or a criminal or civil proceeding.


Our Security Procedures

We restrict access to the nonpublic personal information about you and allow disclosure only to those employees or persons and companies as permitted by law to assist in providing products or services to you. We maintain physical, electronic, and procedural safeguards to protect the nonpublic personal information about you. Should your relationship with us end, we will maintain and only disclose nonpublic personal information that we have about you in accordance with this Privacy Policy.

BUSINESS CONTINUITY PLANNING DISCLOSURE

Horizon Financial Advisors has developed a Business Continuity Plan on how we would respond to events that might significantly disrupt our business. This plan has been developed to provide continuity of service that we provide to you as our valued client. Since the timing and impact of disasters and disruptions is unpredictable, we would have to be flexible in responding to actual events as they occurred. With that in mind, we are providing you with this information as to how we would respond to a business disruption and how you could reach us or obtain service regarding your investment accounts.

[Rev. 07-11]

Jonnet Building, Suite 303 • 4099 William Penn Highway • Monroeville, PA 15146-2513
(412) 856-7300 • (800) 852-7182 • Fax (412) 856-3677 

*Securities Offered Through TRUSTMONT® FINANCIAL GROUP Member FINRA/SIPC
Registered Investment Advisory Services Offered Through TRUSTMONT® ADVISORY GROUP
200 Brush Run Road, Greensburg, PA 15601 • (724) 468-5665*

Horizon Financial Advisors, Inc. is not an affiliate of Trustmont Financial Group, Inc.

Business Continuity Planning Disclosure – cont.

Contacting Us

If after a significant business disruption you cannot contact us as you usually do by phone at (412) 856-7300/(800) 852-7182 or in person at our office, call our emergency contact numbers at (412) 389-5732 or (412) 780-2379. You could also contact the company with whom you have an investment directly. Their phone number can be found on your most recent statement. Via the internet, you should visit our website at www.horizonfinancialadvisors.com to find any emergency instructions for you to follow in order to access information regarding your account(s). You could attempt to reach us via e-mail at info@horizonfinancialadvisors.com. Lastly, for securities-related accounts such as those held at TD Ameritrade, a mutual fund company or variable annuity company, you could also call our Broker-Dealer firm, Trustmont Financial Group/Trustmont Advisory Group, located in Greensburg, at (724) 468-5665.

Our Business Continuity Plan

We have implemented a system to recover and resume business operations after a significant business disruption. All employees of our firm are aware of the procedures to follow in the event of a business disruption. The plan involves safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. Our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of a significant business disruption.

Our plan involves having a backup of client and firm records, for both electronic and paper-based data, that is stored in a secure location outside the business office. This location would be a temporary one, using a different phone carrier and internet provider than the one located at our normal operations in the Jonnet Building in Monroeville. Additionally, we are currently contracted with a web and e-mail hosting service that is located in another geographical region. We have, therefore, made alternative arrangements to allow for communication between employees and clients. Our Broker-Dealer firm, clearing firm, mutual fund companies, and annuity companies that hold client's accounts also back up important records in a geographically separate area.

They, too, will restore their operations within a reasonable time. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, your orders and requests for funds or service could also be delayed during this period.

Varying Disruptions

Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimum to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a nearby site, mentioned above, when needed and expect to recover and resume business within a few hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within a reasonable time. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our website, www.horizonfinancialadvisors.com how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities by contacting the investment company directly, as mentioned above.

For More Information

If you have questions about our business continuity planning, you can contact us at (412) 856-7300/(800) 852-7182.



200 Brush Run Road, Suite A
Greensburg, Pennsylvania 15601

Privacy Disclosure Document

Protecting your privacy is very important to the Trustmont companies. We want you to understand what information we collect and how it is used. We collect and use "nonpublic personal information" in order to provide our customers with a broad range of financial products and services as effectively and conveniently as possible. We treat nonpublic personal information in accordance with our Privacy Policy.

Information We Collect and From Whom We Collect It

We may collect nonpublic personal information about you from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates, or others;
- Information we receive from you voluntarily, such as your email address and any information contained in your email messages.

"Nonpublic personal information" is nonpublic information about you that we obtain in connection with providing a financial product or service to you. This information may be collected in person, by mail, fax, or by other electronic means as permitted by law or in accordance with express authorization from you. FINRA rules declare that any and all customer information including statements, confirms, new account documents, and correspondence are the property of Trustmont. It is Trustmont's position that this information also belongs to the registered representative or advisor who introduces the customer to Trustmont. Therefore, should a registered representative or advisor leave Trustmont, he/she will be permitted to take with them their copies of customer information. If you do not agree to this provision as a customer, you are required to notify Trustmont in writing. Your private information will be permitted to go with the registered representative or advisor upon their departure from Trustmont unless your written notice is on file.

What Information We Disclose and to Whom We Disclose It

We do not disclose any nonpublic personal information about you to anyone without your express consent, except as permitted or required by law. We may disclose the nonpublic personal information we collect, as described above, to persons or companies that perform services on our behalf.

Your Right to Verify Accuracy of Information We Collect

Keeping your information accurate and up to date is very important to us. You may access and correct nonpublic personal information about you that we collect except for information relating to or in anticipation of a claim or a criminal or civil proceeding.

Our Security Procedures

We restrict access to the nonpublic personal information about you and allow disclosure only to those employees or persons and companies as permitted by law to assist in providing products or services to you. We maintain physical, electronic, and procedural safeguards to protect the nonpublic personal information about you. Should your relationship with us end, we will maintain and only disclose nonpublic personal information that we have about you in accordance with this Privacy Policy.

Customer Identification Program Notice

Important Information You Need to Know About Opening a New Account

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account. This Notice answers some questions about Trustmont Group's Customer Identification Program.

What types of information will I need to provide?

When you open an account, Trustmont Group is required to collect information such as the following from you:

- Your name
- Date of birth
- Address
- Identification number:
- U.S. Citizen: taxpayer identification number (social security number or employer identification number)
- Non-U.S. Citizen: taxpayer identification number, passport number, and country of issuance, alien identification card number, or government-issued identification showing nationality, residence, and a photograph of you.

You will also need to show your driver's license or other identifying documents. A corporation, partnership, trust, or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement, or a trust agreement. U.S. Department of the Treasury, Securities and Exchange Commission, and FINRA rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance.

What happens if I don't provide the information requested or my identity can't be verified?

Trustmont Group may not be able to open an account or carry out transactions for you. If you have already opened an account, they may have to close it.

We thank you for your patience, and hope that you will support the financial industry's efforts to deny terrorists and money launderers access to America's financial system.

Securities Investor Protection Corporation (SIPC)

You may obtain information about SIPC, including the SIPC brochure, by contacting SIPC at (202) 371-8300 or by visiting the SIPC web site at www.sipc.org.

Proxy Voting

Trustmont Advisory Group, Inc. does not vote proxies on behalf of its clients.



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BUSINESS CONTINUITY PLANNING

Trustmont Financial Group, Inc. has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – Your first line of contact should be with your registered representative. In the event that you are unable to contact him/her, you may contact us at our main numbers of 724-468-5665 or toll free at 1-800-618-3666. If you cannot access us through either of those numbers, you may go to our web site at www.TrustmontGroup.com to find any emergency instructions for you to follow in order to access information regarding your account(s).

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firms back up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firms that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within a reasonable time. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within a few hours. In a disruption affecting our business district, city, or region, we will transfer our operation to a site outside of the affected area, and recover and resume business within a reasonable time. In either situation, we plan to continue in business, transfer operations to another branch or our clearing firms if necessary, and notify you through our web site. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customers prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you may contact us at 724-468-5665.



200 Brush Run Road, Suite A
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Trustmont Financial Group, Inc. / Trustmont Advisory Group, Inc.

Ethics Policy

This Ethics Policy is for all employees, registered representatives and advisors of Trustmont Financial Group, Inc. (TFG) and Trustmont Advisory Group, Inc. (TAG). This policy is a guide to ethical practices in working with clients, the public, correspondents, Mutual Fund and Insurance Companies.

It is TFG's and TAG's policy to conduct its business in full compliance with both the letter and the spirit of the securities and other laws and regulations. This policy includes dealing fairly and honestly with all customers, making full disclosures of all material facts in connection with securities transactions, and obtaining sufficient customer information to determine that all securities transactions are suitable for the customer. Each registered representative and advisor has both a legal and business obligation to comply with all applicable laws and regulations. To meet these objectives, each registered representative and advisor should be fully informed and knowledgeable about the securities laws and regulations and must certify his or her understanding of those matters prior to any sales activity, and periodically thereafter, as part of an ongoing compliance program. TFG and TAG fully expect its registered representatives and advisors to exercise the highest degree of professional ethics in all actions they undertake on behalf of the firm(s). In furtherance of that objective, TFG and TAG expect its registered representatives and advisors to act in accordance with the policies set forth herein at all times.

1. No registered representative, advisor, officer or director shall, directly or indirectly, knowingly make or cause to be made a material false or misleading statement or omit to state or cause another person to omit to state any material fact to a customer, correspondent or regulatory official.
2. Neither TFG or TAG, nor any of its registered representatives or advisors, for their own accounts or others, shall purchase or sell securities while in the possession of information which might be considered "insider" (material, non-public) information, or discuss the information with a third party, unless a written opinion has been furnished by the firms Compliance Department stating that in his or her opinion the proposed transaction or discussion would not violate the anti-fraud provisions of federal or state securities laws. Information is material if there is a substantial likelihood that its public disclosure would affect either a reasonable investor's decision to buy, sell or

hold securities. Information is “non-public” if it is not made generally available by the means best calculated to make it publicly available. The SEC has opined that appropriate public disclosure is required.

3. TFG, TAG, its registered representatives and advisors shall comply with all applicable legal requirements of the United States and each state. Specifically, all registered representatives and advisors must abide by the laws and regulations of the Securities and Exchange Commission, FINRA, and state regulators where they are licensed.
4. The use of assets of TFG or TAG for any unlawful or improper purpose is prohibited.
5. No confidential information concerning TFG or TAG shall be used or revealed without proper authorization.

Confidential Information of TFG and TAG

Registered representatives and advisors often learn confidential information about TFG and TAG. As such, company information is confidential and not to be shared with the general public unless specifically approved, in writing, by an officer of the company or the Compliance Department.

Confidential Information of Customers

Unauthorized use of customer information, whether within or outside TFG or TAG, is a very serious violation and may result in immediate termination. Customer information may not be disclosed to third parties except as authorized for processing customer transactions or implementing customer requests. Registered representatives and advisors may not disclose customer information to anyone outside TFG or TAG unless

1. The outside firm needs to know the information in order to perform services for TFG or TAG and is bound to maintain its confidentiality.
2. The client has consented, in writing, or been given an opportunity to request that the information be shared.
3. As required by law or self-regulatory organizations.
4. Authorized by the Compliance Department.

Registered representatives and advisors should be mindful of these obligations when using the telephone or electronic mail, especially when using these forms of communications in the public where the conversation may be overheard or read. All documentation containing personal or confidential customer information should be shredded and disposed of properly when no longer needed.

Conflicts of Interest

A list of conflicts can not be exhaustive, thus when there is the slightest possibility for conflict, the registered representative or advisor must discuss the situation with an officer or Compliance Department of TFG or TAG and receive written approval prior to proceeding. Also, a registered representative or advisor, without written approval of an officer or Compliance Department;

1. May not give or receive gifts of more than a token value (currently \$100.00) that are in any way connected with business relationships.
2. Must comply with all provisions of federal, state and self regulatory agency securities laws as well as all company policies.

Outside Business Activities

Outside business activities must be disclosed, in writing, to the Compliance Department. These include, but are not limited to, being appointed an officer or director of a public or private company, any activity where compensation is received, or the making of a private investment.

Outside Brokerage Accounts

Brokerage accounts may be opened with other broker/dealers but must be disclosed to the Compliance Department. Duplicate copies of confirms and statements are to be issued to the company, attention Compliance Department.

No employee shall conduct a transaction in a security while in possession of inside material non-public information concerning that security or entity.

No employee shall enter into a transaction intended to raise, lower, or maintain the price of any security or to create a false appearance of active trading.

“Access Persons” Subject To the Reporting Requirements

The SEC makes reference to “access persons”. An access person is a supervised person who has access to non-public information regarding client’s purchase or sale of securities, is involved in making securities recommendations to clients or who has access to such recommendations. Thus, any registered representative or advisor, and any of their office staff, working within their office or outside, are determined to be an access person. TFG and TAG require certain access persons to submit personal securities transaction reports. The required persons would be all registered representatives and advisors licensed with TFG and TAG.

Annual Holdings Report

SEC Rule 204A-1(b)(i) requires a complete report of each access person's securities holdings at the time the person becomes an access person and at least once annually. The Rule requires new advisors to submit their report no later than 10 days after the person becomes an access person, and information must be current as of the date no more than 45 days prior to date the person became an access person. At least once annually the advisor must submit the report to the compliance department and the information must be current up to 45 days prior to the report being submitted.

Quarterly Transactions Reports

Additionally, the SEC requires reports of all personal securities transactions by access persons, and the adviser to review those reports, which are due no later than 30 days after the close of the calendar quarter. (SEC Rule 204A-1(b)(2) Two exceptions are permitted under this rule. No reports are required:

1. With respect to transactions effected pursuant to an automatic investment plan.
2. With respect to securities held in accounts over which the access person had no direct or indirect influence or control.

Every Registered Representative/Advisor must provide the Compliance Department copies of all statements from the broker/dealer, mutual fund company, insurance company or any other investment company. The copies must be accompanied with a signed statement attesting to the fact that these copies represent all reportable transactions made for that quarter. Each of those accounts should direct duplicate confirms at the time of the transaction(s) to the Compliance Department.

Reportable Securities

SEC Rule 204A-1 treats all securities as reportable, with the following exceptions;

1. Transactions and holdings in direct obligations of the US Government.
2. Money market instruments (banker's acceptances, bank certificates of deposit, commercial paper, re-purchase agreements and other high quality short-term debt instruments.
3. Shares of money markets.
4. Transactions and holdings in shares of other types of mutual funds.
5. Transactions in units of a unit investment trust if the unit investment trust is invested exclusively in unaffiliated mutual funds.

Initial Public Offerings (IPO's)

TFG and TAG do not participate in IPO's.

Reporting of Violations

It will be the responsibility of the Compliance Department to report any violations of the Ethics Policy as required by SEC Rule 204A-1 to the president of TFG and TAG.

Receipt of the Code of Ethics

All employees will receive a Code of Ethics upon initial employment with Trustmont. Each Registered representative/Advisor must acknowledge annually that they are in receipt of the Code and will comply with the provisions.