

Stirling Bridge Wealth Partners, LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Stirling Bridge Wealth Partners, LLC. If you have any questions about the contents of this brochure, please contact us at (419) 832-1111 or by email at: Jason@stirlingbridgewealthpartners.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Stirling Bridge Wealth Partners, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Stirling Bridge Wealth Partners, LLC's CRD number is: 174122.

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Registration does not imply a certain level of skill or training.

Version Date: 01/11/2024

Item 2: Material Changes

There are the following material changes in this brochure from the last annual updating amendment on 01/11/2023 of Stirling Bridge Wealth Partners. Material changes relate to Stirling Bridge Wealth Partners policies, practices or conflicts of interests only.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Stirling Bridge Wealth Partners, LLC (hereinafter "Stirling Bridge") is a Limited Liability Company organized in the State of Ohio.

The firm was formed in November 2014, and the principal owner is Jason David Born.

B. Types of Advisory Services

Portfolio Management Services

Stirling Bridge offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Stirling Bridge creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Stirling Bridge evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Stirling Bridge will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Stirling Bridge seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Stirling Bridge's economic, investment or other financial interests. To meet its fiduciary obligations, Stirling Bridge attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Stirling Bridge's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Stirling Bridge's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Material Conflicts of Interest

A material conflict of interest is when the interests of Stirling Bridge and its employees may in any way interfere with those of our clients. Oftentimes, even the appearance of such interference may be considered a conflict of interest.

Stirling Bridge has organized its firm structure, operations, policies, and fee methods in a manner to minimize as many potential conflicts of interest as possible. However, as in any arrangement when one party pays a fee to another for a service, especially when the service provider is a fiduciary as in this case, conflicts of interest may arise.

As Stirling Bridge receives revenue from only one source, a level fee expressed as a percentage of our clients' assets under management, the potential for conflicts of interest is reduced when compared to other firms with broader compensation structures.

We do, however, acknowledge that whenever a client chooses to do business with us, we receive revenue by way of monthly fees. Some might consider our compensation a conflict that may encourage Stirling Bridge to promote business relationships with clients that are better served elsewhere or with other types of investments. In order to mitigate or eliminate this inherent conflict of interest, we have policies and procedures in place.

Before onboarding clients, including those with retirement assets that fall under ERISA, extensive in-person or electronic interviews take place. A detailed investor questionnaire is completed as a part of an in-depth discussion to ensure that the investment allocation, vehicles, and accounts employed on behalf of the client are appropriate for his or her needs. An Investment Policy Statement (IPS) is constructed for every client, covering every account. This IPS delineates the goals and constraints of the relationship from the broader client level down to the account level. Risk, taxes, fees, expected returns, and other factors are considered. The IPS is reviewed with and signed by the client, ensuring a thorough understanding is had by both the service provider as well as the investor. All attempts are made to update the IPS whenever material changes occur.

Lastly, Stirling Bridge receives no other compensation from any other source apart from the level fee charged clients. We have no proprietary products. We receive no payments from any third party. The compensation of our staff is based solely on the continued, fruitful management of our clients' assets in efficient, low-cost investments.

FIDUCIARY ACKNOWLEDGEMENT

When we provide investment advice to you regarding your current or future retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

C. Client Tailored Services and Client Imposed Restrictions

Stirling Bridge offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client’s current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent Stirling Bridge from properly servicing the client account, or if the restrictions would require Stirling Bridge to deviate from its standard suite of services, Stirling Bridge reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Stirling Bridge does not participate in any wrap fee programs.

E. Assets Under Management

Stirling Bridge has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$45,611,499.00	\$2,342,576.00	December 2023

Item 5: Fees and Compensation

A. Fee Schedule

Asset-Based Fees for Portfolio Management

Total Assets Under Management	Annual Fee
\$0 - \$2,000,000	1.00%
\$2,000,000 - \$4,000,000	0.80%
\$4,000,000 - And Up	0.60%

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of Stirling Bridge's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Financial Planning Services are available to ongoing Portfolio Management Clients. The fee for this service is included in the Portfolio Management fee.

Stirling Bridge bills based on the balance on the first day of the billing period.

B. Payment of Fees

Payment of Asset-Based Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in advance.

For clients who have approved Stirling Bridge's management of their held away accounts as detailed in Items 12 and 16 in this document, fees are calculated based upon the value of the assets in those same accounts using the identical fee schedule for the client's assets managed by Stirling Bridge and held at Schwab Institutional. However, the fees based on these held away accounts are allocated to accounts held at Schwab which are under our management.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and

distinct from the fees and expenses charged by Stirling Bridge. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Stirling Bridge collects fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

E. Outside Compensation For the Sale of Securities to Clients

Neither Stirling Bridge nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Stirling Bridge does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

Stirling Bridge generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

Minimum Account Size for Portfolio Management

There is an account minimum of \$400,000, which may be waived by Stirling Bridge in its discretion.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Stirling Bridge's methods of analysis include fundamental analysis, cyclical analysis, quantitative analysis and modern portfolio theory.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

Stirling Bridge uses long term trading, short term trading and options trading (including covered options, uncovered options, or spreading strategies).

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors

begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Quantitative Model Risk: Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Stirling Bridge's use of options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Stirling Bridge's use of options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate

risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Stirling Bridge nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Stirling Bridge nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool

Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither Stirling Bridge nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Stirling Bridge does not utilize nor select third-party investment advisers. All assets are managed by Stirling Bridge management.

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

A. Code of Ethics

Stirling Bridge has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Stirling Bridge's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Stirling Bridge does not recommend that clients buy or sell any security in which a related person to Stirling Bridge or Stirling Bridge has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Stirling Bridge may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Stirling Bridge to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Stirling Bridge will always document any transactions that could be construed as

conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Stirling Bridge may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Stirling Bridge to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Stirling Bridge will never engage in trading that operates to the client's disadvantage if representatives of Stirling Bridge buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Stirling Bridge's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Stirling Bridge may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Stirling Bridge's research efforts. Stirling Bridge will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Stirling Bridge will require clients to use Schwab Institutional, a division of Charles Schwab & Co., Inc.

1. Research and Other Soft-Dollar Benefits

While Stirling Bridge has no formal soft dollars program in which soft dollars are used to pay for third party services, Stirling Bridge may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). Stirling Bridge may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and Stirling Bridge does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Stirling Bridge benefits by not having to produce or pay for the research, products or services, and Stirling Bridge will have an incentive to recommend a broker-dealer

based on receiving research or services. Clients should be aware that Stirling Bridge's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

Stirling Bridge receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. *Clients Directing Which Broker/Dealer/Custodian to Use*

Stirling Bridge will require clients to use a specific broker-dealer to execute transactions. There is no conflict of interest, as the broker-dealer is not an affiliate or related person of Stirling Bridge. By directing brokerage, Stirling Bridge may be unable to achieve most favorable execution of client transactions which could cost clients money in trade execution. Not all advisers require or allow their clients to direct brokerage.

4. *Trade Away/Delivery Versus Payment (DVP) Relationships*

From time to time Stirling Bridge may direct client brokerage to JPMorgan Securities, LLC. If such a service is deemed appropriate, clients are made aware of the possibility of the trading relationship in advance. Clients then approve of and sign an authorization before any trades are ever made away from Schwab Institutional. In the course of such trading, Stirling Bridge maintains its aforementioned obligation to seek "best execution."

The decision to trade at JPM Securities, LLC and settle at Schwab Institutional is made on a case-by-case basis. Some factors which aid in the determination include availability, liquidity, and pricing of the instrument (e.g. stock or bond) in question. Stirling Bridge also considers services provided, ease of use, fees or commissions charged, among other criteria. JPM Securities, LLC provides Stirling Bridge access to written research reports and oral communication with a broker.

5. *Management of "Held-Away" Accounts*

To all clients with existing assets held at Schwab Institutional under our management, we offer additional investment management service for accounts held elsewhere. Specifically, these accounts include 401(k), 403(b), and other defined contribution plan accounts that are incapable of being consolidated into the client's existing Schwab relationship. In the course of executing this service we utilize an Order Management System provided by Pontera to implement holistic, tax-efficient asset location, asset class diversification, and opportunistic rebalancing strategies on behalf of the client. Clients approve this service ahead of time in writing.

Stirling Bridge in no way takes custody of these held away assets. Clients enter their own password credentials, never sharing them with any personnel at Stirling Bridge. The Order Management System permits only the management of the assets and grants no ability to facilitate loans or distributions of any kind from client accounts.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Stirling Bridge buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Stirling Bridge would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Stirling Bridge would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for Stirling Bridge's advisory services provided on an ongoing basis are reviewed at least monthly by Jason D Born, Portfolio Manager with regard to clients' respective investment policies and risk tolerance levels. All accounts at Stirling Bridge are assigned to this reviewer.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client of Stirling Bridge's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Stirling Bridge does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Stirling Bridge's clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

Stirling Bridge does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, Stirling Bridge will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

Stirling Bridge provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Stirling Bridge generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

In those instances where a client has signed a Prime Broker Agreement, granting Stirling Bridge permission to place trades away from the custodian, Stirling Bridge uses discretion when determining which broker to use when placing trades. The decision is made on a case-by-case basis while considering multiple factors of best execution as highlighted in Item 12 of this document.

In those instances where a client has granted Stirling Bridge permission to utilize an Order Management System to holistically manage their held away defined contribution plan account as detailed in Item 12 of this document, the investment choices available to Stirling Bridge are

limited to those permitted by the client's plan. Since each client with a defined contribution plan account may have different options available, the decision of which specific vehicles to employ will be based upon multiple factors including, but not limited to, cost, client goals, client risk tolerance, expected returns, and time horizon.

Item 17: Voting Client Securities (Proxy Voting)

Stirling Bridge acknowledges its fiduciary obligation to vote proxies on behalf of those clients that have delegated to it, or for which it is deemed to have, proxy voting authority. Stirling Bridge will vote proxies on behalf of a client solely in the best interest of the relevant client and has established general guidelines for voting proxies. Stirling Bridge may also abstain from voting if, based on factors such as expense or difficulty of exercise, it determines that a client's interests are better served by abstaining. Further, because proxy proposals and individual company facts and circumstances may vary, Stirling Bridge may vote in a manner that is contrary to the general guidelines if it believes that doing so would be in a client's best interest to do so. If a proxy proposal presents a material conflict of interest between Stirling Bridge and a client, then Stirling Bridge will determine how to vote that proxy and whether the conflict of interest will be disclosed to the client.

Clients may obtain a complete copy of the proxy voting policies and procedures by contacting Stirling Bridge in writing and requesting such information. Each client may also request, by contacting Stirling Bridge in writing, information concerning the manner in which proxy votes have been cast with respect to portfolio securities held by the relevant client during the prior annual period.

Item 18: Financial Information

A. Balance Sheet

Stirling Bridge neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Stirling Bridge nor its management has any financial condition that is likely to reasonably impair Stirling Bridge's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Stirling Bridge has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

Stirling Bridge currently has only one management person: Jason David Born. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

Stirling Bridge does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.