

2024 ANNUAL NOTICE TO CLIENTS

1. Margin Disclosure Statement: Securities purchased on margin or carried in your margin account are collateral for margin loans made to you. If the securities in your account decline in value, so does the value of the collateral supporting your loan and, as a result, Davenport & Company LLC and/or Pershing can take actions, such as issue a margin call and/or sell securities or other assets in any of your accounts introduced by Davenport to Pershing in order to maintain the required equity in the account.

It is important that you fully understand the risks involved in trading securities on margin. These risks can include the following:

- You can lose more funds than you deposit in the margin account.
- Davenport and/or Pershing can force the sale of securities or other assets in your account(s).
- Davenport and/or Pershing can sell your securities or other assets without contacting you.
- You are not entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.
- Davenport and/or Pershing can increase its “house” maintenance margin requirements at any time and is not required to provide you advance written notice.
- You are not entitled to receive an extension of time to pay a margin call.

2. Availability of Statement of Financial Condition: Davenport provides you with periodic reports of its Statement of Financial Condition, as well as its Annual Report, by making them available on its website. Full financials from 12/31/2022 and unaudited financials from 6/30/2023 are available on the web. Audited financials for 12/31/2023 will be posted in March in accordance with the SEC Regulations. Davenport asks that you visit www.investdavenport.com to obtain a current Statement of Financial Condition. Printed copies may be obtained by calling your Financial Advisor or (800) 846-6666.

3. Net Capital Requirement: Davenport is required by the SEC and FINRA to maintain minimum net capital equal to \$250,000. As of December 31, 2023, Davenport’s net capital of \$30,952,907 was \$30,702,907 in excess of the minimum net capital required.

4. Important Information When Opening a New Account: The USA PATRIOT Act is designed to detect, deter, and punish terrorists in the United States and abroad. The Act imposes anti-money laundering requirements on brokerage firms and requires us to have a comprehensive anti-money laundering program, which includes a customer identification component. As part of our required program, we may ask you to provide various identification documents or other information to verify your identity. These documents may include government issued IDs and, if applicable, corporate paperwork. If you decline to provide such documents, Davenport may not be able to conduct securities business with you and may be forced to close such accounts or refuse to transact securities business. To aid in our identification process, Davenport has contracted with a third party vendor. If applicable, certain relevant information regarding your account may be passed to such third party to verify your identity and help Davenport comply with the USA PATRIOT ACT.

5. Privacy Pledge to Customers: We respect your privacy and value the relationship we have with you. Our Privacy Pledge applies to only current or former individual customers who obtain financial products or services from Davenport primarily for personal, family or household purposes. It does not apply to partnerships, corporations, trusts or other non-individual customers, clients, or account holders. Davenport and its

affiliates do not disclose any nonpublic personal information about current or former individual customers as defined above to anyone, except as permitted or required by law. We may disclose all of the information we collect, as described below, within the affiliated Davenport companies, which include a securities broker-dealer and registered investment adviser, trust company, and investment banking company.

These companies include Davenport & Company LLC and Davenport Financial Advisors. To appropriately service your account(s) Davenport and its affiliates collect nonpublic personal information about you from affiliates, applications or forms you complete, and other information provided by you, whether in writing, in person, by telephone, electronically, or by any other means, such as your name, address, social security number, assets, income and debt. Additionally, we collect information about your transactions with Davenport and its affiliates, such as your account balance, trading activity, payment history, and parties to transactions.

We may disclose the information we collect to companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements. We have agreements in place with these companies that prohibit them from disclosing or using the information except as necessary for carrying out the purposes for which we disclosed the information. We may also disclose nonpublic personal information about you to non-affiliated third parties that assist us in servicing your account(s); to securities regulators as required by laws, rules and other applicable requirements; to others pursuant to subpoena; pursuant to your written request, or as otherwise permitted or required by law. We restrict access to your nonpublic personal information to those employees and agents who need to know that information to provide products or services to you. In addition, we maintain physical, electronic, and procedural safeguards to protect your nonpublic personal information. As with any business policy, we must respond to changes in the law or in our business needs. Accordingly, we reserve the right to modify our Privacy Pledge as permitted or required by law.

6. California Consumer Privacy Notice: Maintaining the privacy and security of your personal information is Davenport’s highest priority. In doing so, we want to provide transparency regarding how and why your data is collected, how it is used, and with whom it may be shared. The Davenport Privacy Notice, Third Party Relationship Policy, and Website – Disclosures and Terms of Use Policy, set forth how we use your personal information.

7. Cybersecurity: We maintain a comprehensive Privacy and Information Security Program of which Information Security is an integral part. We review, assess and update our security practices at reasonable intervals and in light of emerging risks and developments.

Davenport is committed to protecting your Information. Where possible, Davenport makes an effort to redact all or part of identifying information, such as your account number.

It is necessary for Davenport to share certain client information with affiliates and/or trusted service providers in order to provide our products and services, and to comply with legal and contractual obligations. Davenport ensures that our partners will maintain the information accordance with our privacy and security standards.

We may disclose the information we collect, as described above, to companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements. We have agreements in place with the companies that prohibit them from disclosing or using the information except as necessary for carrying out the purposes for which we disclosed the information.

8. Stop Orders in Fast Moving Markets: A stop order is an order to buy or sell a stock once the price of the stock reaches a specified price, known as the stop price. When the specified price is reached, the order becomes a market order. Buy stop orders are used when buying stock to limit a loss or protect a profit on short sales. The order is entered at a price that is always above the current market price. Sell stop orders are used to help avoid further losses or protect a profit that exists if a stock price continues to drop. A stop order to sell is always entered below the current market price. There are risks associated with stop orders. Investors should be aware that the stop price could be activated by a very short term fluctuation in a fast moving market and could result in an execution that is far away from the desired stop price.

9. Compensation for Order Flow and Order Routing Information: As an introducing broker, Davenport routes orders to Pershing LLC for execution, and does not receive compensation for directing order flow in equity securities. Pershing receives compensation for directing order flow in certain equity securities and listed options. The source and nature of the compensation, if any, received in connection with this trade will be furnished upon written request.

Davenport is committed to seeking the best possible executions for its customers' orders, and regularly reviews transactions for quality of execution. Upon request, Davenport will identify where a particular customer order was routed for execution during the past six months along with the execution time and whether the order was directed or non-directed. In addition, quarterly reports are prepared pursuant to Rule 606 that identify where customers' non-directed orders in covered securities are sent for execution, along with the nature of Davenport's relationship with the market center(s) that received those orders. The most recent quarterly report that details this order routing information is available at www.investdavenport.com, and a written copy will be furnished upon request.

On November 2, 2018, the Securities and Exchange Commission ("SEC") or (the "Commission") adopted amendments to Rules 600, 605, and 606 of Regulation NMS under the Securities Exchange Act (the "Exchange Act"). The recently adopted amendments to Rule 606(b) added a new disclosure requirement, set forth in new paragraph (b)(3), that requires a broker-dealer, upon request of its customer, to provide specific disclosures related to the routing and execution of the customer's NMS orders submitted on a not held basis for the prior six months, subject to two de minimis exceptions. The Commission also amended the existing disclosure requirement in paragraph (b)(1) of Rule 606 to cover customer disclosure requests that are not covered by new paragraph (b)(3). To obtain more information about the rule, you may access the following website addresses: <https://www.sec.gov/rules/final/2019/34-85714.pdf> <https://www.sec.gov/rules/final/2018/34-84528.pdf>

10. Extended Trading Hours: There are numerous risks when trading during extended trading hours, among them:

Risk of Lower Liquidity: Liquidity refers to the ability of market participants to buy and sell securities. Generally, liquidity is determined by the number of orders available in a market. There may be lower liquidity in extended hours trading as compared to regular market hours. This may impact the price of the security.

Risk of Higher Volatility: Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be greater volatility in extended hours trading than in regular market hours.

Risk of Changing Prices: The prices of securities traded in extended hours trading may not reflect the prices either at the end of regular market hours, or upon the opening the next morning.

Risk of Unlinked Markets: Depending on the extended hours trading system or the time of day, the prices displayed on a particular extended hours trading system may not reflect the prices in other concurrently operating extended hours trading systems dealing with the same securities.

Risk of News Announcements: Normally, issuers make news announcements that may affect the price of their securities after regular market hours. Similarly, important financial information is frequently announced outside of regular market hours. In extended hours trading, these announcements may occur during trading, and if combined with lower liquidity and higher volatility, may cause an exaggerated and unsustainable effect on the price of the security.

Risk of Wider Spreads: The spread refers to the difference in price between what you can buy a security for and what you can sell it for. Lower liquidity and higher volatility in extended hours trading may result in wider than normal spreads for a particular security.

As a result of these and other risks, orders may be only partially executed, or not at all, or you may receive an inferior price in extended hours trading versus prices during regular market hours.

11. Information on Your Financial Advisor: BrokerCheck is a free tool to help investors research the professional backgrounds of current and former FINRA-registered brokerage firms and brokers. To obtain information or a brochure visit www.finra.org or call toll-free (800) 289-9999. SEC Investment Adviser Public Disclosure (IAPD) is a free tool to help investors research information on Investment Adviser firms as well as individual Investment Adviser Representatives and is available at: www.adviserinfo.sec.gov.

12. FINRA Securities Helpline for Seniors: FINRA provides a toll-free helpline for seniors available from 9 a.m. to 5 p.m. ET, Monday through Friday. The helpline number is 844-57-HELPS or 844-574-3577.

13. Trusted Contact Information: Davenport may request and document trusted contact information. If you provide a trusted contact person or persons, Davenport or an associated person is authorized to contact the trusted contact person and disclose information about your account(s) to address possible financial exploitation; to confirm specifics regarding your current contact information, health status, or identity of any legal guardian, executor, trustee, or holder of a power of attorney; or as otherwise permitted by FINRA Rule 2165 (Financial Exploitation of Specified Adults).

14. Customer Account and Certain Fee Information: It is important that we have current information on file regarding your investment objectives, risk tolerance, time horizon and financial situation to properly service your account. Please notify your Financial Advisor promptly of any material changes in your account information so that we may update our records. Davenport maintains a fee schedule for account services and features, such as account transfers, security deposits, wire transfers, stop payments, annual account fees, etc. Davenport's fee schedule is available at www.investdavenport.com/client-disclosures or upon request from your Investment Professional.

Davenport will notify you of applicable fees at the time of account opening. Changes to fees will be communicated in writing by mail to the last known address of record or through other notification methods. If notification is by a method other than a letter (e.g., statement stuffers, newsletters, etc.), notification of a fee increase will be clear, conspicuous and in plain English. In addition, fee information will be available at www.investdavenport.com. In the event of an extensive change to fees, a letter may be mailed alerting you to visit our website where complete information may be obtained.

The Transaction Fee reported on certain trade confirmations reflects the fee charged by the national securities exchange or association on which your transaction was executed, or through which it clears. The amount is based on a formula proscribed

by Section 31 of the Securities Exchange Act of 1934; or in the case of options trades, it is set by the CBOE.

15. Investment Advisory Services and Disclosure of Fees and Commissions: In accordance with SEC requirements, Davenport has prepared a written disclosure document (or brochure) that describes its investment advisory programs and discloses potential conflicts of interest that may exist between Davenport and its clients. This document is updated periodically to reflect changes in the details of our advisory programs. If you would like a current copy of the disclosure document, please contact your Financial Advisor or our Compliance Department at (800) 846-6666. For more information, visit www.investdavenport.com/client-disclosures and click on "ADV Part 2A" and "ADV Part 2A - Appendix 1".

Davenport offers several types of investment advisory accounts with varied fee structures and features. Davenport also offers brokerage accounts on which customers pay commissions and other transaction-based compensation. The cost of participating in an investment advisory program subject to an asset-based fee arrangement may be higher than a traditional brokerage account where you would pay Davenport compensation on a trade-by-trade basis. For accounts that trade actively, fee-based accounts may be more economical. When determining which type of account to use, you should consider your past and anticipated transaction activity, use and benefits of the products and services available with each type of account, whether you self-direct your transaction activity or rely on your Davenport Financial Advisor for advice, and personal preferences considering various payment alternatives. In a retail brokerage account, you pay us transaction-based fees for the products and services you receive, such as buying and selling stocks, bonds, mutual funds, annuity contracts and other investment products.

These fees apply whether you make or lose money on your investments. Fees and expenses reduce the return on your investments over time. Please review all supplied information to ensure you fully understand the fees and expenses that apply to your account.

16. Managed Account Trading: Davenport is a dually registered Broker/Dealer and Investment Adviser. Pershing LLC is the clearing firm for our securities business. We do not recommend Broker/Dealers other than Pershing LLC for client transactions for our managed accounts. We do permit you to direct brokerage to another Broker/Dealer of your choice. Directing brokerage to a Broker/Dealer other than Pershing LLC may cost you more money in transaction costs and may result in less favorable execution prices. The investment advisory division of Davenport & Company LLC relies upon Pershing LLC's broker/dealer services for best execution. If a client has directed brokerage to another firm, he/she will not participate in aggregated orders placed by Davenport. Therefore, the execution price will most likely be different for those clients and may be more or less than the price obtained by the aggregated order.

17. Account Inquiries: All inquiries or concerns regarding your account or its activity should be directed to the branch manager of the office servicing your account. You may also contact our Compliance Department:

Davenport & Company LLC
Attn: Compliance Department
P.O. Box 85678 Richmond VA 23285-5678 T: (804) 780-2000
TF: (800) 846-6666

18. Relationships with Third Parties: Like many securities firms, Davenport receives payments from third parties whose products we distribute, including mutual fund companies, cash sweep products and insurance companies. Payments from mutual funds, cash sweep products, and insurance companies may include commissions, trails, sales loads, rule 12b-1 fees, sub-transfer agent fees or other shareholder servicing fees for maintaining customer account information, providing other administrative services, shareholder accounting fees,

networking fees, reimbursements for education, marketing support and training-related expenses.

Davenport receives various benefits from our relationship with our clearing and custodial firm, Pershing LLC. Some examples include revenues from uninvested cash balances you authorize us to move into money market funds and FDIC insured bank deposit products and a portion of certain brokerage account services and custodial fees that exceed the amount we are charged for these services Davenport believes that all payments are in accordance with industry rules and regulations as currently in effect. The minimum and maximum aggregate payment that Davenport can be paid ranges from .02 - .725%, respectively, and can be zero at times.. Please contact your Financial Advisor if you have any questions regarding such relationships, payments, or the extent to which your Financial Advisor benefits from these arrangements. You should also refer to the prospectuses and Statements of Additional Information of the mutual funds, cash sweep products, and insurance products in which you invest for further information.

19. Account Protection: All accounts are protected by the Securities Investor Protection Corporation (SIPC) up to \$500,000 per eligible account, subject to a \$250,000 limit on cash balances pending investment. SIPC account protection is designed to protect the investor from failure of the brokerage firm, not from poor performance or failed investments. SIPC does not cover fluctuations of market value of an investor's securities. You may obtain information about SIPC, including the SIPC Brochure, by calling the SIPC Membership Department at (202) 371-8300, or visiting them on the web at www.sipc.org. In addition to SIPC protection, Pershing provides coverage in excess of SIPC limits from certain underwriters in Lloyd's insurance market and other commercial insurers.

Davenport maintains blanket fidelity bond coverage in excess of the minimum requirements imposed by the Financial Industry Regulatory Authority (FINRA). Davenport's coverage is \$50 million in total and \$25 million per incident. Our fidelity bond coverage provides that the insurance company will pay the insured business or individual for money or other property lost because of dishonest acts of its bonded employees. The bond covers all dishonest acts, such as larceny, theft, embezzlement, forgery, misappropriation, wrongful abstraction, or willful misapplication, whether employees act alone or as a team.

Davenport is fully committed to protecting the securities our clients entrust to us. Rigorous adherence to regulatory procedures, checks and balances, SIPC insurance coverage, blanket fidelity bond coverage, and a conservative, well-capitalized balance sheet all work together to ensure the utmost protection of our clients' assets. Should you have any questions or comments, please contact your Financial Advisor.

20. Business Continuity Plan: Davenport maintains a Business Continuity Plan ("BCP"), which documents procedures to assess and respond to a business disruption. The BCP accounts for a variety of interruptions including those that could solely affect Davenport, or a building, business district, city or region in which Davenport conducts business. The BCP provides that the Business Continuity Committee ("BCC") assess the severity of any disruption and activate the necessary procedures. Davenport maintains a back-up data and communications facility that is geographically separated from our primary facility. Should there be a disruption to our primary facility or business district, Davenport can relocate critical personnel to maintain communication with clients and provide access to cash and securities.

Modifications to the BCP are made as warranted based on changing circumstances and needs. Any resulting revisions to this disclosure will be available at www.investdavenport.com. Alternatively, clients may request a copy of the most recent disclosure by mail.

21. What is EMMA? EMMA, the Electronic Municipal Market Access system, www.emma.msrb.org provides free public access to information about individual municipal securities,

including official statements, continuing disclosures and real-time trade data. Investors can access and download for free all documents and data on EMMA, and also obtain educational information geared toward retail investors. EMMA is operated by the Municipal Securities Rulemaking Board, the regulatory agency that protects investors and ensures a fair and efficient municipal bond market.

Information Available on EMMA

- Official statements and advance refunding documents
- Continuing disclosures, including annual financial statements and notices of material events
- Real-time and historical trade data
- Interest rates and auction results for municipal auction rate securities
- Interest rates for variable rate demand obligations
- Daily market statistics and educational material about municipal bonds

22. MSRB Rule G-10 - Investor Education and Protection:

Davenport is registered with the U.S. Securities and Exchange Commission (“SEC”), the Financial Industry Regulatory Authority (“FINRA”) and the Municipal Securities Rulemaking Board (“MSRB”). As such, Davenport is subject to the regulations and rules on municipal securities activities established by the SEC, FINRA and MSRB. The website for the SEC is www.sec.gov; the website for FINRA is www.finra.org and the website for the MSRB is www.msrb.org. Note that in addition to having educational material about the municipal securities market, the MSRB website has an investor brochure that describes the protections that may be provided by the MSRB rules and how to file a complaint against Davenport or its representatives with the FINRA Investor Complaint Center.

23. Systematic Mutual Fund Transactions: Customers who have established Systematic Reinvestment Services (SRS) for their mutual fund transactions will receive written information describing the details of each transaction effected pursuant to the SRS on their monthly and/or quarterly account statements in lieu of receiving immediate trade confirmations. Specific information regarding individual transactions processed pursuant to the SRS will be furnished at any time upon written request. Please visit www.investdavenport.com/client-disclosures to access the Mutual Fund Guide or request a copy from your Financial Advisor.

Stay Involved and Be Proactive: Determining which share class is most suitable for you is an ongoing process. We encourage you to work with your Financial Advisor and review the following:

- Review a copy of the fund’s prospectus.
- Carefully consider your investment time horizon.
- Understand how breakpoints work and how your Financial Advisor is compensated.
- Communicate with your Financial Advisor about changes in your objectives and holdings.

To learn more about mutual funds and their costs, visit the following websites: US Securities and Exchange Commission at www.sec.gov, FINRA at www.finra.org, the Securities Industries and Financial Markets Association at www.sifma.org or the Investment Company Institute at www.ici.org.

24. Regulation Best Interest: Davenport offers a range of wealth management and financial advisory services. Davenport is registered with the U.S. Securities and Exchange Commission (SEC) as a broker dealer that provides brokerage services. Davenport is a registered investment advisor that provides investment advisory services and is a member of the Financial Industry Regulatory Authority (FINRA). It is important to understand that brokerage and advisory services are separate, and each is governed by different rules and regulations. Please visit our website at www.investdavenport.com/client-disclosures for a copy of Davenport’s Form CRS and Regulation Best Interest Disclosure.

25. Fractional Shares: Reinvesting mutual fund or stock cash dividends into additional shares of the same security, or purchasing fractional shares, may result in an investment position that contains both whole and fractional shares. Please note that Davenport may elect to send a monthly statement, in lieu of an immediate confirmation, for transactions executed to liquidate orphaned fractional share positions. Liquidations of these positions are conducted as a sell order and the proceeds are credited to your account. No transaction fee or commission is charged.

For more information on any of the subjects discussed above, please contact your Financial Advisor.



Davenport & Company LLC Member: NYSE | FINRA | SIPC
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