

<b>Introduction</b>	<p>Holderness Investments Co. (“Holderness”) is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to you to research firms and financial professionals at <a href="https://investor.gov/CRS">Investor.gov/CRS</a>, which also provides educational materials about broker-dealers, investment advisers, and investing.</p>
<b>Relationships and Services</b>	<p><b>What investment services and advice can you provide me?</b>        We offer investment advisory services to retail investors, including portfolio management, to individuals, trusts, estates, pension and profit-sharing plans, charitable organizations, and corporations. Our advice is customized and based on a client’s risk profile and objectives. Our investment recommendations most often include stocks, exchange traded funds, mutual funds, and bonds.</p> <p><b>Monitoring</b>        As part of our services, we monitor and advise on clients’ investment portfolios on an ongoing basis.</p> <p><b>Investment Authority</b>        A majority of our clients grant us ongoing discretionary authority to manage their accounts, which means that we can buy and sell investments on behalf of our clients without seeking permission on a trade -by- trade basis. For clients with whom we provide non-discretionary services, clients make the ultimate decision regarding the purchase or sale of investments.</p> <p><b>Limited Investment Offering</b>        We do not currently make available or offer advice only with respect to proprietary products, or a limited menu of products or types of investments.</p> <p><b>Account Minimums and Other Requirements</b>        We generally only accept clients with a minimum of \$1,000,000 of investible assets. Accounts below this minimum may be accepted on an individual basis at our discretion. Assets of family member accounts are aggregated for purposes of meeting this minimum.</p> <p><b>More detailed information about our services is available on Part 2 of our Form ADV, which is available at <a href="https://adviserinfo.sec.gov/firm/summary/106530">https://adviserinfo.sec.gov/firm/summary/106530</a>.</b></p> <p style="text-align: center;"><b><i>Conversation Starter to ask our Financial Professionals</i></b></p> <ul style="list-style-type: none"> <li>• <i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i></li> <li>• <i>How will you choose investments to recommend to me?</i></li> <li>• <i>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</i></li> </ul>
<b>Fees, Costs, Conflicts, and Standard of Conduct</b>	<p><b>What fees will I pay?</b>        Holderness charges clients an investment management fee that is based on the value of each client’s assets under management.</p> <p>Our fee schedule ranges between .4% and 1% annually, depending on the size and complexity of each client’s account. Fees are negotiable. Fees are charged quarterly in arrears, based on the account’s average daily balance during the quarter. Our firm’s fees generally increase as client accounts grow, so we have an incentive to encourage our clients to increase the amount of assets in the accounts that are under our management.</p> <p>Additional information about our firm’s fees are included in Item 5 of Part 2 of Form ADV, available at <a href="https://adviserinfo.sec.gov/firm/summary/106530">https://adviserinfo.sec.gov/firm/summary/106530</a>.</p> <p>In addition to our investment management fee, clients may bear transaction fees when we buy or sell investments. When our firm recommends a transaction in mutual funds and exchange traded funds for a portion of clients’ portfolios, such investment vehicles pay their own management, transaction, and administrative fees and expenses. These fees and expenses are indirectly borne by the clients in those vehicles.</p>

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 make sure you understand what fees and costs you are paying.

**Conversation Starter to ask our Financial Professionals**

- *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 acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

**When we act as your investment adviser**, we act in your best interest and do not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. Here is an example to help you understand what this means.

- Our financial professionals may be licensed as insurance agents with Holderness Asset Solutions, LLC, which is an insurance agency and an affiliate of Holderness. In their capacity of effecting transactions in insurance products for clients, our financial professionals can earn commissions and therefore have an incentive to recommend insurance products to generate commissions.

**Conversation Starter to ask our Financial Professionals**

- *How might your conflicts of interest affect me, and how will you address them?*

**More detailed information** about conflicts of interest between Holderness and its clients is available on Part 2 of Form ADV, which is available at <https://adviserinfo.sec.gov/firm/summary/106530>.

**How do your financial professionals make money?**

- Certain of our financial professionals receive a fixed percentage of firm revenue generated by their advisory services, and other financial professionals receive a salary and are eligible to receive discretionary bonuses. Compensation is set with the intention of attracting and retaining highly qualified professionals. Compensation is based on a variety of factors, including the number, value and complexity of accounts under management, the performance of those accounts, and client satisfaction and retention. These arrangements present a conflict of interest in that we are incentivized to encourage you to increase the amount of assets in your account(s) managed by us in order to increase the fees you pay and therefore increase our firm's revenue.
- Some of our financial professionals are licensed as representatives with a broker-dealer or insurance agency. In their capacity of effecting transactions in investment or insurance products, our financial professionals can earn commissions. This creates an incentive to recommend insurance or investment products for the purpose of generating commissions.

**Disciplinary History**

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

No, Holderness and its financial professionals have not been subject to any legal or disciplinary events. You can research Holderness and our financial professionals using the free and simple search tool available at [www.Investor.gov/CRS](http://www.Investor.gov/CRS).

**Conversation Starter to ask our Financial Professionals**

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

**Additional Information**

**Updated copies of this form, and additional information about Holderness**, can be found at <https://adviserinfo.sec.gov/firm/summary/106530>. You can also request an up-to-date version of the Relationship Summary, or the more detailed Part 2 of Form ADV, by calling Kim Cummings Eder at 336-574-1400.

**Conversation Starter to ask our Financial Professionals**

- *Who is the primary contact person for my account? Is he or she a representative of an investment-adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*