100 S. Brentwood Blvd., Suite 110
St. Louis, Missouri 63105
314-725-6000
www.argentcapital.com
March 27, 2020

DISCLOSURE BROCHURE
INSTITUTIONAL ACCOUNTS

This disclosure brochure provides information about the qualifications and business practices of Argent Capital Management, LLC. If you have any questions about the contents of this brochure, please contact us at (314) 725-6000. 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.

Argent is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an investment adviser provide you with information about which you determine to hire or retain an investment adviser.

Additional information about Argent also is available on the SEC's website at www.adviserinfo.sec.gov.

Argent Capital Management LLC

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Material Changes

This section discusses any material changes to this brochure since the date of our 2019 annual update. This brochure dated March 27, 2020 does not contain any materially different information from our previous brochure dated March 28, 2019.

A copy of our current brochure may be requested by contacting Laurie Hayek, Chief Compliance Officer, at (314) 725-6000 or lhayek@argentcapital.com. Our brochure is also available free of charge on our website at www.argentcapital.com.

Additional information about Argent Capital Management, LLC ("Argent") is also available via the SEC's website at www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with Argent who are registered, or are required to be registered, as investment adviser representatives of Argent.

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Advisory Business

Argent Capital Management, LLC was founded in 1998 and is a registered investment adviser. We are a Missouri limited liability company that is substantially owned by current employees and board members, of which Steven L. Finerty and John F. Meara are principal owners.

Our Mission

Argent's mission is to provide superior investment management in conjunction with a level of personal service and communication that is unique in the investment management community. We provide investment advice to endowments, foundations, pension funds, investment companies and high net worth individuals.

We managed approximately $3 billion in assets under management as of December 31, 2019. We manage all client assets on a discretionary basis, although accounts may be customized to achieve specific client objectives and clients may impose reasonable restrictions on particular securities.

In addition to advising on publicly-traded equity securities, we may provide advice with respect to a client's investments in mutual funds, exchange-traded funds, investment grade corporate bonds, government bonds, commercial paper, certificates of deposit, warrants, limited partnerships and real estate investment trusts. Investing in securities involves risk of loss that clients should be prepared to bear.

Investment Philosophy

Argent provides investment management services for domestic equity portfolios. We have built all of our strategies upon a similar investment philosophy: *We believe that change in companies, driven either by internal or external factors, frequently results in stock mispricing.* Argent's Change-Based Investing℠ approach results in high conviction portfolios designed to maximize opportunities to benefit our clients.

Argent employs a team approach to portfolio management. Our best decisions are typically based on collaborations between a small team of investment professionals who also share in the investment research process. This team approach allows us to make prompt investment decisions while avoiding the burden of a large bureaucratic structure. Our Large Capitalization Strategy Investment Committee is comprised of John F. Meara, Kenneth H. Crawford, Scott A. Harrison, Ying Ko, Kirk F. McDonald, Peter L. Montelbano, Joseph I. Schulz, and Bill Weeks. Our Mid-Capitalization Strategy Investment Committee is comprised of John F. Meara and Kirk F. McDonald. Our Small Capitalization Strategy Investment Committee is comprised of Eduardo J. Vigil, Peter A. Roy, Edward L. Brown, Ithiel Turrado, and M. Jed Ellerbroek Jr.

Argent uses fundamental methods of analyzing securities based mainly on information we gather from a wide range of publicly available information, including financial periodicals, corporate rating services, Securities and Exchange Commission filings, quantitative databases, company press releases and personal inspections. However, our best source of data, in terms of both objectivity and expertise comes from what we at Argent call "Main Street" contacts. These are unpaid individuals from the private and public sectors who provide non-confidential, unique experiential insight into the industries and companies we are researching.

Large Capitalization Strategy

The goal of the Large Cap Strategy is to outperform our benchmark, the Russell 1000® Growth Index over the long term. Our review begins with a universe of all U.S. companies with a market capitalization of $3 billion or more. The investment team uses a bottom-up, fundamental approach when selecting stocks and we invest in those companies with superior earnings growth and attractive valuations.

Argent Capital's® Large Cap Strategy consists of a portfolio of 30-35 stocks. Each of these stocks must demonstrate the characteristics consistent with our Change-Based Investing℠ approach. When reviewing a stock, we need to be able to identify a change in the company or industry, quantify, evaluate and verify the change. In particular, we are looking for those companies undergoing a positive fundamental change (identify change). Additionally, this change must accelerate growth for the company (quantify change) and the upside potential of the stocks needs to be greater than the downside risk (evaluate change). Another important step in our process is to verify the validity of the change by speaking with individuals from public or private companies that can confirm the changes we identified (verify change).

It is rare that a company stands up to each of the four aspects of change, and as a result, we are left with a highly selective portfolio of 30-35 names. When a name displays all four of the above aspects of change, we believe it has strong potential to generate superior returns over the long term. Our process results in a low turnover portfolio whose high active share represents our commitment to stand apart from our benchmark.

Investing in equities involves the risk of loss due to, among other things, adverse developments in company-specific, industry-specific or broader economic fundamentals.

Small Capitalization Strategy

The goal of the Small Cap Strategy is to outperform our benchmark, the Russell 2000® Index on a long term basis. It is a bottom-up fundamental strategy consisting of 60-80 U.S. stocks with market capitalizations of less than $3 billion each.

Our process allows us to identify pricing inefficiencies in smaller capitalization companies due to lack of effective research, a stock's trading liquidity and lower institutional ownership. The Small Cap Core Strategy is comprised of two distinct styles: growth and value.

Our strategy is a fundamental, bottom-up process that searches for incremental changes through our proprietary earnings screens that identify misunderstood and under-appreciated small cap companies. Each of the stocks in the Small Cap portfolio must demonstrate the characteristics consistent with our Change-Based Investing℠ approach. When reviewing a stock, we need to be able to identify a change in the company or industry, quantify, evaluate and verify the change. In particular, we are looking for those companies undergoing a positive fundamental change (identify change). Additionally, this change must accelerate growth for the company (quantify change) and the upside potential of the stocks needs to be greater than the downside risk (evaluate change). Another important step in our process is to verify the validity of the change by speaking with individuals from public or private companies that can confirm the changes we identified (verify change).

It is rare that a company stands up to each of the four aspects of change, and as a result, we are left with a highly selective portfolio of 60-80 names. When a name displays all four of the above aspects of change, we believe it has strong potential to generate superior returns over the long term.

Investing in equities involves the risk of loss due to, among other things, adverse developments in company-specific, industry-specific or broader economic fundamentals.

Advisor to Mutual Fund – Argent Small Cap Fund

The Argent Small Cap Fund utilizes the same Small Cap Strategy as noted above which is to outperform our benchmark, the Russell 2000® Index on a long-term basis. It is a bottom-up fundamental strategy consisting of 60-80 U.S. stocks with market capitalizations of less than $3 billion each.

You should consider the Fund’s investment objectives, risks, charges and expenses carefully before investing. For a prospectus that contains this and other information about the fund, call 888-898-5288 or visit the fund website at www.argentcapitalfunds.com. Please read the prospectus carefully before investing. Mutual fund investing involves risk including the possible loss of principal. The primary risks of investing in the Fund are:

- *Management Risk.* The Advisor’s investment strategies for the Fund may not result in an increase in the value of your investment or in overall performance equal to other investments.
- *New Fund Risk.* As a new fund, there can be no assurance that the Fund will grow or maintain an economically viable size.
- *General Market Risk.* The value of the Fund’s shares will fluctuate based on the performance of the Fund’s investments and other factors affecting the securities markets generally.

- *Common Stock Risk.* Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change.
- *Small-Cap Company Risk.* Small-cap companies often have less predictable earnings, more limited product lines, markets, distribution channels and financial resources, and the management of such companies may be dependent upon one or few key people. The market movements of equity securities of these companies may be more abrupt and volatile than the market movements of equity securities of larger, more established companies, or the stock market in general. Because of these movements, and because small-cap companies tend to be bought and sold less often and smaller amounts, they are generally less liquid than the equity securities of larger companies.
- *Growth-Style Investing Risk.* Growth stocks are typically priced higher than other stocks, in relation to earnings and other measures, because investors believe they have more growth potential. Growth prices tend to fluctuate more dramatically than the overall stock market, and may not achieve the earnings growth expected.
- *Value-Style Investing Risk.* Value stocks can perform differently from the market as a whole and from other types of stocks. Value investments are subject to the risk that their intrinsic value may not be recognized by the broad market.
- *Cybersecurity Risk*. With the increased use of technologies such as the Internet to conduct business, the Fund is susceptible to operational, information security, and related risks. Cyber incidents affecting the Fund or its service providers may cause disruptions and impact business operations, potentially resulting in financial losses, interference with the Fund's ability to calculate its net asset value ("NAV"), impediments to trading, the inability of shareholders to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs.

Argent Capital Management LLC is advisor to the Argent Small Cap Fund which is distributed by Quasar Distributors, LLC. The Custodian for the Fund is U. S. Bank N. A. with the Fund Administrator being U. S. Bank Global Fund Services, LLC. The institutional class ticker for the Fund is ACMSX.

The Argent Small Cap Fund commenced operations on September 28, 2018.

Mid-Capitalization Strategy

The goal of the Mid Cap strategy is to outperform the Russell MidCap® Index over the long term. The Mid Cap Strategy was designed to give investors an opportunity to invest in stocks of the roughly 1,000 companies that are too large for a small cap strategy and not yet big enough for a large-cap portfolio. As such, we hold companies with a market capitalization between $1.5 billion- $20 billion. Argent's Mid Cap strategy uses an integrated blend of quantitative and fundamental research to identify opportunities to purchase ownership stakes in good businesses undergoing positive internal or external change.

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Each of these stocks must demonstrate the characteristics consistent with our Change-Based Investing℠ approach. When reviewing a stock, we need to be able to identify a change in the company or industry, quantify, evaluate and verify the change. In particular, we are looking for those companies undergoing a positive fundamental change (identify change). Additionally, this change must accelerate growth for the company (quantify change) and the upside potential of the stocks needs to be greater than the downside risk (evaluate change). Another important step in our process is to verify the validity of the change by speaking with individuals from public or private companies that can confirm the changes we identified (verify change).

It is rare that a company stands up to each of the four aspects of change, and as a result, we are left with a highly selective portfolio of 40-50 names. When a name displays all four of the above aspects of change, we believe it has strong potential to generate superior returns over the long term.

Investing in equities involves the risk of loss due to, among other things, adverse developments in company-specific, industry-specific or broader economic fundamentals.

Sell Discipline

In implementing our strategies, we generally purchase a security with the intent of holding it for either the long-term or for the short-term. If a company's execution deteriorates and/or valuation becomes excessive relative to our investment thesis, we sell and direct the assets to a more attractive opportunity.

Specifically, we may sell a security for any reason, including but not limited to: excessive valuation; poor execution; permanent impairment of the company; an individual stock holding representing greater than a predetermined percentage of the total portfolio; or a source of cash for a better opportunity.

Wrap Fee Portfolio Manager

Argent serves as portfolio manager for wrap fee programs sponsored by Cleary Gull Advisors (Johnson Wealth, Inc.) and Commerce Trust Company. In general, wrap fee accounts are managed the same as our discretionary accounts, and we receive a portion of the sponsor's wrap fee for our services. For more information on these services, please see the wrap fee brochure prepared by the program's sponsor.

Fees and Compensation

Separate Account Fees

Argent's fees are established in a written Investment Advisory Agreement, and are typically calculated as a percentage of assets under management according to the following schedule:

Large and Mid-Capitalization Strategy Standard Fee Schedule

0.75% on first $10,000,000

0.55 % on next $15,000,000

0.50% on balance

Small Capitalization Strategy Fee Schedule

0.80% on first $25,000,000

0.75% on next $25,000,000

0.70% on next $50,000,000

0.65% on balance

We typically bill fees quarterly in advance, based on the market value of each client account as of the last day of the prior quarter. We may negotiate or waive fees in certain circumstances. We pro-rate fees for accounts that have been funded less than a calendar quarter at the time of billing.

Argent's fees do not include custodian fees, brokerage commissions or securities transaction fees charged by a client's custodian and/or broker/dealer. Our fees also do not include any fees that may be charged by mutual fund companies for accounts that hold mutual fund shares. Such charges, fees and commissions are incurred by the client are in addition to our fee, and we shall not receive any portion of these charges, fees and commissions. Please see "Brokerage Practices" on page 9 for the factors that we consider in selecting broker-dealers for client transactions and determining the reasonableness of their commissions.

Argent will assist clients in establishing a custodial account at the client's request. Clients typically grant us authority to deduct its fees directly from the client's custodial account, although we may send an invoice direct to clients upon their request. We will send the client's custodian communication reflecting the fees billed and the custodian will send the client a statement, at least quarterly, reflecting all fees deducted from the account. The client is responsible for verifying the accuracy of the fee calculation, as the client's custodian will not determine if the fee was properly calculated. Clients retain ownership of all funds and securities in their accounts.

Clients may terminate an Investment Advisory Agreement upon written notice to Argent, or as otherwise noted in their Investment Advisory Agreement with Argent. Clients will receive a pro-rata refund of any advisory fees paid, but not yet earned, as of the date of termination.

Mutual Fund Fees

Argent's annual advisory fee is 0.65% of the average daily net assets for the Argent Small Cap Fund. The net expense ratio is 0.86% and 1.21% of the average daily net assets attributable to the Institutional Share Class and the Retail Share Class, respectively. The net expense ratio represents what investors have paid as of the prospectus dated 04/30/2019.

Fees waived and expenses paid by the Advisor may be recouped by the Adviser for a period of three fiscal years following the fiscal year during which such waiver and payment was made, if such recoupment can be achieved without exceeding the expense limit in effect at the time the waiver and payment occurred and at the time of recoupment.

Please refer to the current prospectus for more information regarding the fee waiver agreements.

Performance-Based Fees and Side-By-Side Management

Argent does not offer performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Types of Clients

Argent provides investment advice to endowments, foundations, pension funds, investment companies and high net worth individuals. For new institutional accounts, we have established minimum initial account values of $5,000,000 for both the large capitalization strategy and the small capitalization strategy, which may be waived or lowered in our discretion. Accounts maintained at levels below the stated initial account values will be periodically reviewed with the client.

Methods of Analysis, Investment Strategies and Risk of Loss

Argent's primary activity is advising on publicly-traded equity securities. In addition, we may provide advice with respect to a client's investments in other securities such as mutual funds, exchange-traded funds, investment grade corporate bonds, government bonds, commercial paper, certificates of deposit, warrants, limited partnerships and real estate investment trusts. Investing in securities involves risk of loss that clients should be prepared to bear.

Argent provides investment management services for domestic equity portfolios which are comprised primarily of large capitalization, mid-capitalization or small capitalization companies.

For more information on our Investment Strategies and Methods of Analysis, please refer to "Advisory Business" on page 1.

Disciplinary Information
A registered investment adviser is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the adviser or the integrity of the adviser's management. Argent has no information applicable to this item.

Other Financial Industry Activities and Affiliations
Steven L. Finerty, chairman of Argent, and other individual owners of Argent, are principals of Moneta Group Investment Advisors, LLC ("Moneta"), a registered investment adviser that offers comprehensive financial planning services. Moneta principals may refer to Argent those clients requesting individual equity management services. Argent charges an advisory fee as described in "Fees and Compensation" on page 6. Moneta and its principals may also receive fees from clients for managing client portfolios, including the assets that are managed by Argent. No client is obligated to use Argent for equity management services as a result of a referral by Moneta principals.

Argent provides equity management services to some clients of Enterprise Trust, a division of Enterprise Bank & Trust, pursuant to a subadvisory agreement. Argent receives a subadvisory fee based on a percentage of assets under management from Enterprise Trust for providing portfolio management services to trust clients. Enterprise Trust charges its own advisory and/or trustee fees. In addition, Argent may recommend that its clients select Enterprise Trust as custodian for their assets managed by Argent. Argent typically pays, out of its advisory fee, any custodial fees charged by Enterprise Trust to Argent's advisory clients.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading
Argent has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to personal trading procedures, the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, among other things. The Code of Ethics also requires all covered persons to comply with federal securities laws and avoid activities, interests, and relationships that might interfere with making decisions in the best interest of client portfolios. All Argent supervised persons certify their knowledge of and obligations under the Code of Ethics annually.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with making decisions in the best interest of Argent's advisory clients. Subject to satisfying the Code of Ethics and applicable laws, officers, directors and employees of Argent may trade for their own accounts in securities which are recommended to and/or purchased for our clients. In addition, the Code of Ethics requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity.

Employee trading is monitored under the Code of Ethics to reasonably prevent conflicts of interest between Argent and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Argent's obligation of best execution. In such circumstances, the affiliated and client accounts will receive the average price paid or received for the entire aggregated trade. We will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

We will not affect any principal transactions for client accounts and cross trades between client accounts are allowed in limited circumstances when in the best interest of the client and properly documented with all parties.

You may obtain a copy of Argent's Code of Ethics by sending a written request to: *Code of Ethics Information Request, Argent Capital Management, LLC, 100 South Brentwood Boulevard, Suite 110, St. Louis, Missouri 63105.*

Brokerage Practices

Argent typically has the discretion to select the broker/dealer that will provide the best execution of a portfolio transaction at the best price for client accounts. When we select a broker/dealer, we are responsible for exercising discretion regarding commissions paid by client accounts. For each specific transaction, we use our best judgment to select the broker/dealer most capable of providing the necessary services to obtain the best available price and the most favorable execution. Best available price and most favorable execution generally describe a policy of executing portfolio transactions at prices which provide the most favorable total cost or net proceeds that are reasonably obtainable under the circumstances.

In addition to price, we may consider additional broker/dealer services when selecting a broker/dealer for transactions including among others: trading ability, capital strength, communications, settlement processing, automation, knowledge of other buyers or sellers, administrative ability, underwriting, and provision of information on the particular security or market. The specific criteria used vary depending upon the nature of the transaction, the market, and number of broker/dealers capable of effecting the transaction.

In recognition of the value of these factors, transactions will not always be executed at the lowest available commission rate. Negotiated rates will be based upon our judgment of the rates, which generally reflect the execution requirements of the transaction regardless of whether the broker provides research services to Argent. We may also consider utilizing brokers who supply research or brokerage services to us. Client accounts may pay commission rates in excess of those that another broker/dealer would have charged for effecting the same transaction if we determine, in good faith, that the commission paid is reasonable in relation to the value of the research or brokerage services provided as permitted by Section 28(e) of the Securities Exchange Act of 1934.

Argent receives both research services that are proprietary to broker/dealers effecting transactions, and third party research and brokerage services provided by broker/dealers through "soft dollars." We receive a benefit because we do not have to produce or pay for the services. We may use research and brokerage services furnished by broker/dealers to service any or all of our clients, including accounts other than those that pay commissions to the broker/dealer providing the services. We may allocate brokerage for research and brokerage services that are also available for cash, where appropriate and permitted by law and may pay cash for certain research services received from external sources.

Research services provided may include, among other things, economic or company information, accounting and tax law/interpretations, political and legal developments, technical market action, quotes, pricing systems, market index information, appraisal services, or analysis. Research services may be in the form of computer-generated data, software, support and related maintenance costs. Research services may also be provided by meetings with corporate and industry spokespersons, economists, academicians and government representatives. Brokerage services may include, among other things, our order management system and messaging database utilized to execute trades.

In all circumstances where research or brokerage services are provided by broker/dealers with "soft dollars," and such research or brokerage services are also used by us for administrative purposes (such as the preparation of client account valuations), a reasonable allocation is made by us so that the value of the service for making investment and brokerage decisions is borne by client accounts, and the value attributable to administrative functions is borne by Argent (and paid in cash by us.)

Clients should be aware that they have brokerage options. Argent will execute transactions through a particular brokerage firm as a result of a client's direction or as a result of a client's decision to participate in a 'wrap fee' arrangement. In these situations, the client will be responsible for negotiating the commission rates paid by the client for the execution of transactions. In directed broker arrangements, the client should be aware of Argent's inability to negotiate commissions, obtain volume discounts and that best execution may not be achieved for transaction in the client's account(s). As a result, transactions in accounts directed by a client to a particular brokerage firm may result in higher commissions, greater spreads or less favorable net prices than would be the case if Argent were authorized to choose the brokerage firm through which to execute transaction for the client's account(s).

Argent frequently aggregates client orders for execution, which generally results in lower commission rates. When the aggregate order is executed at various prices on a given day, each participating client's proportionate share of such order reflects the average price paid or received with respect to the total order. In limited circumstances, due to low liquidity, orders may be executed over multiple days with the average price paid or received applied to accounts participating on that day. For trades taking multiple days to complete, the order in which accounts participate is rotated so as not to give advantage to any particular group of accounts. In managing accounts, Argent attempts to allocate securities fairly among client accounts based on each account's investment style, applicable restrictions, other holdings and availability of cash and securities, but cannot ensure that all accounts will participate equally, or even at all, in every investment. Personal trades for employees of Argent will from time to time be included in aggregated orders with trades in client accounts.

If Argent makes an error in submitting a trade order on a client's behalf, Argent will follow its formal trade error policy. In general, this policy states that if an erroneous trade cannot be broken, then Argent will place a correcting trade with the broker-dealer (the "correcting trade"). If the correcting trade results in a loss to the broker-dealer, Argent will issue a check to cover the loss from company funds and the client account will not be affected in any way. If the correcting trade results in a gain, Argent will review the circumstances and, if appropriate, will apply the gain to the client's account; if, however, the correcting trade affects several client accounts or is not appropriate, then the gain will be retained by the broker-dealer or directed to a charitable organization. In all cases, any correcting entries will be made in the best interest of the client.

Review of Accounts
Argent's investment policy committees review portfolios to confirm that each is being managed consistent with the client's stated goals and objectives and Argent's investment strategies. Small Capitalization portfolios are reviewed at least annually by the Small Capitalization Investment Policy Committee, of which Eduardo J. Vigil, John F. Meara, Meghan S. James and Laurie A. Hayek are members. All other portfolios are reviewed at least annually by the Investment Policy Committee, of which John F. Meara, Kenneth H. Crawford, Meghan S. James, Kirk McDonald and Laurie A. Hayek are members.

In addition to reviews by the Investment Policy Committee, clients may receive regular written reports from Argent regarding their account. The nature and frequency of these reports are determined primarily by the particular needs of each client. Generally, large capitalization strategy clients receive monthly reports of all trades for that period, unless they opt out. Generally, small capitalization strategy clients receive quarterly reports that include summary information on holdings, returns, characteristics and sector weights. We may conduct a special review of any client account upon request, or in unusual market circumstances. In addition, through telephone calls and in-person meetings, our portfolio managers will keep clients informed of the investment policies and strategies employed to achieve clients' investment objectives.

Clients will receive an annual written notice from Argent that requests updated information regarding changes to their financial situation, investment objective and account restrictions. A member of our Investment Committees who is knowledgeable about the management of the client's portfolio will be available on a reasonable basis to meet with the client at the client's request.

Clients will retain ownership of all funds and securities in their accounts. Additionally, clients will receive monthly or quarterly reports from the client's broker/dealer and/or custodian that include confirmation of all securities transactions in their account during that month. Please see "Custody" on page 12 for further information.

Client Referrals and Other Compensation
Argent may enter into written agreements with certain individuals and entities who will act as solicitors of client accounts for us in compliance with the requirements of Rule 206(4)-3 of the Advisers Act. The individual or entity who solicits the client account may receive a portion of the total fee paid to Argent for managing that account. Unless the solicitor is an officer, director, or employee of Argent, he or she will provide each client with certain disclosure documents including a "Solicitor's Disclosure Statement," which sets forth the amount of the fee paid by Argent in connection with the client referral.

Custody
Clients retain ownership of all funds and securities in their accounts. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge clients to carefully review such statements and compare such official custodial records to any account statements or reports that we may provide. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Clients typically grant Argent authority to deduct their fees directly from the client's custodial account, although we may send an invoice directly to clients at their request. We will send the client's custodian communication reflecting the fees billed and the custodian will send the client a statement, at least quarterly, reflecting all fees deducted from the account. We urge clients to verify the accuracy of the fee calculation, as the client's custodian will not determine if the fee was properly calculated.

Investment Discretion
Argent typically manages discretionary accounts. Accordingly, we usually receive discretionary authority from the client at the outset of an advisory relationship to determine which securities are bought and sold for each client's account and the amount of such securities bought or sold. We exercise such discretion in a manner consistent with the stated investment objectives for the particular client account, and clients may impose reasonable restrictions on particular securities. We record investment guidelines and restrictions in writing.

Voting Client Securities

Argent has adopted policies and procedures governing the voting of client proxies (the "Proxy Voting Policy"), which are designed to meet the requirements of the Unites States Securities and Exchange Commission and to fulfill the fiduciary duties owed to clients. The Proxy Voting Policy is intended to provide Argent employees with principles to guide their voting of proxies in an informed and responsible manner in the best interests of our clients by using a defined process for evaluating proxy issues. We have retained Institutional Shareholder Services, Inc. ("ISS") to provide proxy-related services to us which include research, analysis and voting recommendations on selected companies as well as reporting assistance. We generally intend to follow the recommendations of ISS in a manner consistent with our Proxy Voting Policy.

The guidelines in the Proxy Voting Policy address a broad range of topics, including, but not limited to, those related to corporate governance, changes to corporate structure, the board of directors, and compensation. The individual responsible for managing your account will make proxy voting decisions on your behalf. This individual shall make a reasonable effort to monitor corporate actions and obtain sufficient information to make an informed voting decision in your best long-term interests. While we believe this process will result in most voting decisions being made in accordance with the Policy, each vote will be determined based upon a number of relevant factors. As a result, votes occasionally may deviate from the guidelines set forth in the Proxy Voting Policy. Argent's Investment Committee will make the voting decision in the case where an individual responsible for making proxy voting decisions on your behalf proposes to make a voting decision that constitutes a deviation from the Policy, or when the decision involves a conflict of interest.

Clients may retain their rights to vote any or all proxies for their account. Clients must provide specific voting instructions to Argent in writing and prior to the voting deadline.

You may obtain a copy of Argent's Proxy Voting Policy or information regarding how we vote with respect to your securities by sending a written request to: *Proxy Voting Information Request*, *Argent Capital Management, LLC, 100 South Brentwood Boulevard, Suite 110, St. Louis, Missouri 63105.*

Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients.

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Cover Page

This brochure supplement provides information about Argent's Investment Team personnel that supplements the Argent brochure. You should have received a copy of that brochure. Please contact Laurie Hayek, Chief Compliance Officer, at (314) 725-6000 if you did not receive Argent's brochure or if you have any questions about the contents of this supplement.

Additional information about Argent's Investment Team personnel is available on the SEC's website at www.adviserinfo.sec.gov

Argent Capital Management LLC Investment Team

Portfolio Managers

John Meara
President, CIO
Senior Portfolio Manager
Large Cap

Ken Crawford
Senior Portfolio Manager
Large Cap

Scott Harrison
Portfolio Manager
Large Cap

Kirk McDonald
Mid-Cap Portfolio Manager
Large Cap Research Analyst-Quantitative

Eddie Vigil
Portfolio Manager
Small Cap

Peter Roy
Portfolio Manager
Small Cap

Analysts

Ithiel Turrado
Research Analyst
Small Cap

Ward Brown
Research Analyst
Trader
Small Cap

Jed Ellerbroek, Jr.
Senior Research Analyst
Small Cap

Ying Ko
Senior Research Analyst
Large Cap

Peter Montelbano
Research Analyst
Large Cap

Joe Schulz
Research Analyst
Large Cap

Bill Weeks
Quantitative Research Analyst

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PROFESSIONAL CERTIFICATIONS

Select employees have earned certifications which are explained in detail below.

CHARTERED FINANCIAL ANALYST

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute. In order to earn the CFA designation candidates must complete a series of three exams, possess a bachelor's degree from an accredited institution or have equivalent education or work experience as well as 48 months of qualified, professional work experience. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

CERTIFIED FINANCIAL PLANNER ™

The Certified Financial Planner (CFP®) designation is a professional certification mark for financial planners imparted by the Certified Financial Planner Board of Standards, Inc. in the United States, the Financial Planners Standards Council in Canada, or the Financial Planning Standards Board, the international owner of the CFP mark.

In order to earn the CFP designation, candidates are required to meet specific education, examination, experience and ethics requirements, as well as pay an ongoing certification fee. All candidates are required to have a bachelor's degree or higher from an accredited U.S. college or university. In addition, candidates must master a list of approximately 100 topics regarding integrated financial planning on which they are then tested. After passing the examination, the candidate must demonstrate to have exempt and extensive experience in the financial planning field. Finally, students and certificants are required to adhere to the CFP Board Code of Ethics and Professional Responsibility and to the Financial Planning Practice Standards. Registered investment advisors have a fiduciary duty to care for investments.

ACCREDITED ASSET MANAGEMENT SPECIALIST ℠

This designation (AAMS℠) is awarded by the College for Financial Planning to investment professionals who have completed a course of study encompassing investments, insurance, tax, retirement, and estate planning issues. Candidates must pass an examination, commit to a code of ethics and agree to pursue continuing education. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Argent Capital Management LLC

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March 27, 2020

Educational Background and Business Experience

John F. Meara, CFA
President, CIO

As President and Chief Investment Officer, Meara oversees Argent's day-to-day investment operations, manages client portfolios, and plays a key role in investment decisions. His focus is on the consumer staples, industrials, technology and telecommunications sectors. Meara co-founded Argent in 1998.

Meara, a Chartered Financial Analyst, has over 30 years industry experience. Immediately prior to co-founding Argent, he worked as a portfolio manager with Commerce Bank. His background also includes serving as a senior analyst at American Express Financial Advisors and as an equity analyst for Waddell & Reed. Meara earned his B.S. in Finance from the University of Missouri–Columbia. Mr. Meara was born in 1966.

Active in the community, Meara serves as a member for several corporate and non-profit boards including the St. Louis Zoo Association, Boys and Girls Clubs of Greater St. Louis, the SSM Health Foundation and is also member of the Young Presidents Organization. Meara is on the Investment Committee for Ronald McDonald House where he is a previous board member. Professional affiliations include the CFA Institute and St. Louis Financial Analysts Society. Additionally, Meara is a three-time winner of the Wall Street Journal's Dart Board Contest.

Meara's investment insights have frequently been quoted in publications such as the *Wall Street Journal,* the *St. Louis Post-Dispatch* and the *St. Louis Business Journal,* as well as on *Bloomberg* and other national broadcast outlets.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation to report.

Item 6 – Supervision
Meara and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

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Educational Background and Business Experience

Kenneth H. Crawford
Senior Portfolio Manager – Large Cap Strategy

Crawford performs market research and is actively involved in the portfolio management activities. His focus is on the consumer discretionary, energy, financial, health care, materials and utilities sectors.

Crawford has over 29 years' experience in the industry. Prior to joining Argent in September 2002, Crawford was a portfolio manager for American Century Investment Management where he oversaw the American Century Select Fund. Additionally, he worked as an analyst for Texas Commerce Bank. Crawford received a B.A. in Economics and also a Master's of Science in Finance from the prestigious Applied Securities Analysis program at the University of Wisconsin–Madison. Mr. Crawford was born in 1960.

Crawford serves on the Corporate Givers Committee for the Missouri Botanical Garden.

Crawford's acute commentary on individual stocks and general market conditions are sought out by reporters representing the *Wall Street Journal, CNBC,* the *Associated Press, Bloomberg,* the *St. Louis Post-Dispatch* and the *St. Louis Business Journal*.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation to report.

Item 6 – Supervision
Crawford and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

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Educational Background and Business Experience

Scott A. Harrison, CFA
Portfolio Manager – Large Cap Strategy

Harrison, a Chartered Financial Analyst, manages client portfolios and performs primary market research focusing his analysis on the consumer discretionary, consumer staples and health care sectors. As one of Argent's first employees, Harrison is trained in many roles within the firm, from operations to investment analysis. Promoted to portfolio manager in 2014, Harrison provides guidance and shares his expertise with other members of the investment team. Mr. Harrison was born in 1976.

Harrison joined Argent in January 2000 and has 23 years industry experience. He received his B.S. in Finance from the University of Missouri–St. Louis.

Harrison is a member of the CFA Institute and the St. Louis Financial Analysts Society.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation to report.

Item 6 – Supervision
Harrison and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

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Educational Background and Business Experience

Kirk McDonald, CFA
Portfolio Manager – Mid Cap Strategy
Senior Research Analyst - Quantitative – Large Cap Strategy

McDonald, a Chartered Financial Analyst, focuses his analysis on materials for the Large Cap Growth Strategy. Additionally, he leverages his expertise in quantitative research to lead Argent's quantitative screening and risk management efforts.

McDonald has 18 years' experience in the industry. Immediately prior to joining Argent in February 2011, McDonald was a portfolio manager for Fiduciary Asset Management (FAMCO). His background also includes serving as a senior consultant for Arthur Andersen and as a pilot in the United States Air Force. McDonald earned a B.S. from the United States Air Force Academy and a Masters of Business Administration from the University of Oklahoma. Mr. McDonald was born in 1967.

McDonald is a member of the Chicago Quantitative Alliance and co-founder and president of the St. Louis Chapter of the United States Air Force Academy Association of Graduates. In addition, he is active in the community, volunteering as a committee member for the annual Memorial Day Remembrance at Jefferson Barracks National Cemetery and he is also a member of the CQA Investment Challenge, serving as a mentor to a team of students at Webster University.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation to report.

Item 6 – Supervision
McDonald and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

Educational Background and Business Experience

Ying Ko, CFA
Senior Research Analyst – Large Cap Strategy

Ko, a Chartered Financial Analyst, focuses her analysis on the financials, technology and telecommunications sectors.

Ko has over 20 years of experience in the industry. Prior to joining Argent in July 2006, she was a research associate for RBC Dain Rauscher and she also worked as an equity analyst for Edward Jones. Ko received her B.S. in Chemistry from the University of California–Davis and her MBA with a focus in Finance from the University of Minnesota. Ms. Ko was born in 1969.

Ko is a member of the CFA Institute and the St. Louis Chartered Financial Analysts Association. She is fluent in English, Chinese, Mandarin, Cantonese and Shanghainese.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation to report.

Item 6 – Supervision
Ko and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

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Educational Background and Business Experience

Peter Montelbano, CFA
Research Analyst – Large Cap Strategy

Montelbano, a Chartered Financial Analyst, is a member of the Large Cap Growth team and focuses his analysis on the technology and consumer discretionary sectors.

Montelbano has 6 years of experience in the industry. Prior to joining Argent in July 2016, he was a Mid & Small Cap Equity Analyst Intern at Invesco. His background also includes serving as an Associate Portfolio Manager at BMO Harris and as an Analyst at Stark Investments. Montelbano received his B.S. in Finance and a M.B.A. in Finance from the prestigious Investment Analysis program at the University of Wisconsin–Madison. Mr. Montelbano was born in 1985.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation to report.

Item 6 – Supervision
Montelbano and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

Educational Background and Business Experience

Joseph Schulz
Research Analyst – Large Cap Strategy

Schulz, a Chartered Financial Analyst, is a member of the Large Cap Growth team and performs primary market research across the large cap universe and provides support to other members of the large cap investment team.

Schulz has 5 years of experience in the industry. Prior to joining Argent in December 2018, he was an Investment Research Analyst at 40/86 Advisors in Indianapolis, Indiana. His background also includes serving as an Equity Research Analyst at Hovde Capital Advisors and as an Intern at Heartland Advisors. Schulz received his B.A. in Finance, Investments and Banking and a M.S. from the prestigious Investment Analysis program at the University of Wisconsin–Madison. Mr. Schulz was born in 1993.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation to report.

Item 6 – Supervision
Schulz and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

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Educational Background and Business Experience

Bill Weeks
Quantitative Research Analyst

Weeks, a Chartered Financial Analyst, uses his experience in artificial intelligence to build applied machine-learning algorithms to improve equity models for Argent.

He has more than 13 years of experience in the investment industry in quantitative investment modeling. Prior to joining Argent in 2020, Bill was with American Century Investments where he was a senior quantitative analyst. Before American Century Investments, Bill worked as a director of quantitative research at the Kauffman Foundation where he created multifactor quantitative investment models.

He has dual degrees in Physics and Electrical Engineering from Washington University as well as a M.S. and Ph.D. in Electrical Engineering from the University of Illinois at Urbana-Champaign. Mr. Weeks was born in 1972.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation to report.

Item 6 – Supervision
Weeks and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

Educational Background and Business Experience

Eduardo J. Vigil, CFP®, AAMS℠
Portfolio Manager – Small Cap Strategy

As Portfolio Manager of the Small Cap Equity strategy, Vigil manages client portfolios and plays a key role in investment decisions. Vigil has been with the Small Cap strategy since its inception. Vigil also performs primary market research focusing his analysis across the universe of small capitalization stocks.

Vigil, a Certified Financial Planner™ and Accredited Asset Management Specialist℠, has over 20 years' experience in the industry. Prior to joining Argent in June 2008, Vigil was a Financial Consultant with Charles Schwab & Co. where he oversaw a portfolio of over $440 million. Vigil has also previously operated a personal financial planning practice through American Express Financial Advisors. Vigil received his B.S. in Business Administration from the University of Missouri – St. Louis. Mr. Vigil was born in 1976.

Vigil is fluent in Spanish.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation to report.

Item 6 – Supervision
Vigil and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

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Educational Background and Business Experience

Peter Roy, CFA
Portfolio Manager – Small Cap Strategy

As Portfolio Manager of the Small Cap Equity strategy, Peter plays an important role in investment decisions and managing portfolio risk.

Peter has over 20 years of experience in the industry. Prior to joining Argent in 2019, he was with PNC Capital Advisors in St. Louis for 16 years and Nuveen Investments in Chicago. At PNC he held various roles, most recently as a Managing Director and Senior Portfolio Manager on the select equity small-cap strategy.

He received his B.A. in English from the University of Dayton and his M.B.A, with a concentration in Finance, from Washington University's Olin School of Business. Peter is a member of the CFA Institute and CFA Society of St. Louis.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation to report.

Item 6 – Supervision
Roy and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

Educational Background and Business Experience

Edward (Ward) L. Brown
Research Analyst and Trader – Small Cap Strategy

Brown oversees all small cap equity trading at Argent. Additionally, as a Research Analyst for the Argent Small Cap Strategy, Brown performs primary market research focusing his analysis across the universe of small capitalization stocks.

Brown has 24 years industry experience. Prior to joining Argent in June 2013, he served as an Equity Execution Consultant at Instinet LLC where he managed a book of commission based institutional business. Brown began his career with Bridge Trading Company where he held several positions, the most recent as Co-Head of Institutional Trading. While at Bridge, Brown served in the company's UK office, developing its international brokerage arm. Brown earned a B. A. in Human and Organizational Development from Vanderbilt University. Mr. Brown was born in 1973.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation.

Item 6 – Supervision
Brown and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

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Educational Background and Business Experience

Ithiel Turrado
Research Analyst – Small Cap Strategy

As a Research Analyst for the Argent Small Cap strategy, Turrado performs primary market research across the small cap universe and provides support to other members of the investment team.

Turrado, a former Argent intern, is a Chartered Financial Analyst (CFA) Level 3 candidate and has 6 years of industry experience. Turrado holds a Master's of Science in Finance and graduated Cum Laude with a B.A. in Finance and minor in Accounting from Lindenwood University. Mr. Turrado was born in 1990.

Ithiel is fluent in Spanish.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation.

Item 6 – Supervision
Turrado and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

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Educational Background and Business Experience

M. Jed Ellerbroek, Jr.
Senior Research Analyst – Small Cap Strategy

As a Senior Research Analyst for the Argent Small Cap strategy, Ellerbroek performs primary market research across the small cap universe and provides support to other members of the investment team.

Jed, has 15 years of industry experience. Prior to joining Argent in 2020, he worked with PNC Capital Advisors in St. Louis from 2008-2019 progressing from an analyst role to an associate portfolio manager on the select small cap strategy. He also served as an associate analyst at Wachovia Capital Markets in St. Louis and as an analyst for consulting firm Jeffrey Slocum & Associates in Minneapolis.

Jed holds dual degrees in Economics and Finance from the University of Northern Iowa. He is also a Chartered Financial Analyst and a member of the CFA Institute and CFA Society of St. Louis.

Item 3 – Disciplinary Information
There are no legal or disciplinary events that would be material to your evaluation of this supervised person providing investment advice.

Item 4- Other Business Activities
There are no outside business activities to report.

Item 5 – Additional Compensation
There is no additional compensation.

Item 6 – Supervision
Ellerbroek and all Argent Investment Team professionals are supervised by policies and procedures relating to the provision of investment advice. These policies include preauthorization of all marketing materials, permanently recording all trading activity, reconciling accounts to custodians' records daily, and monitoring personal trading activities. For additional information regarding Argent's supervisory activities, please call Laurie Hayek, Chief Compliance Officer, at (314) 725-6000.

Argent Capital Management LLC

Privacy Notice

Argent Capital Management, LLC is committed to maintaining the confidentiality and security of the personal information collected from our potential, current and former clients. The proper handling of personal information is one of our highest priorities and we feel it is important for you to understand the measures taken to protect your privacy. The following outlines how we use information collected from you and the measures taken to safeguard that information. It is our policy that we will never sell your information to any outside parties.

Your Information

We collect and keep only information that is necessary for us to provide services as requested by you and to administer your business with us. The following nonpublic personal information may be collected:

- Information we receive from you on investment advisory agreements, client information forms and written or electronic correspondences – including, but not limited to, your name, address, phone number, tax ID number, assets, income and date of birth; and
- Custodian account statements, which may include transactions with independent broker/dealers – including account numbers, account balances, cost basis information and similar records.

Disclosure of Your Information

We will not disclose any nonpublic personal information about you to anyone unless it is necessary to implement your transactions with us, at your direction or required by law. If you decide to close your account(s) or become an inactive client, we will continue to adhere to the privacy policies and practices as described in this notice.

Sharing Your Information

We may use information collected from you to administer your accounts, funds and records. For example, we and our service providers may use the information collected to evaluate your financial needs, carry out your instructions or to comply with U.S. Securities and Exchange Commission laws and regulations. Such service providers have a legitimate business need to see your personal information in order for us to provide our services to you. We require these providers to strictly maintain the confidentiality of your information and to abide by all applicable laws. As permitted by law, we may disclose nonpublic personal information about you to:

- Companies with whom you enter into an agreement to provide financial advice and planning;
- Non-affiliated third-parties, such as outside providers that perform services for us including, but not limited to, recordkeeping, custodial administration and proxy voting services; and
- Good faith disclosures to regulators with regulatory authority over Argent.

Safeguarding Your Information

Your personal account information is restricted to those employees who need access to such information in order to provide investment advisory services to you. Argent also maintains physical, electronic and procedural safeguards to protect your personal financial information. If Argent shares your information with a third-party service provider, we direct each provider to adhere to our privacy policy.

Annual Notices

We provide our *Privacy Notice* to each client at least once per year, as federal and state laws require. We reserve the right to modify this policy at any time. If you have additional questions regarding Argent's *Privacy Notice,* questions regarding other written disclosures, or would like to request a copy of our ADV II (Disclosure Brochure), please contact our Chief Compliance Officer, Laurie Hayek, at Argent Capital Management, LLC, 100 South Brentwood Blvd., Suite 110, Clayton, MO 63105 or at (314) 725-6000.