

<p>Item 1.  <u>Introduction</u></p>	<p>WestEnd Advisors, LLC is registered with the Securities and Exchange Commission (SEC) 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 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>
<p>Item 2.  <u>Relationships and Services</u></p>	<p><b>What investment services and advice can you provide me?</b>        We offer investment advisory services to retail investors, including discretionary investment management to individuals, high net worth individuals, pension and profit-sharing plans; trusts or estates; charitable organizations; government entities; and, corporations or other businesses. The cornerstone of our investment philosophy is that the macroeconomic environment is a key driver of financial market returns.</p> <p><b>Monitoring</b>        The Chief Investment Officer (“CIO”) is responsible for determining general investment strategies for the firm. The CIO and/or other Portfolio Managers implement the investment strategy in specific Client portfolios. The CIO and/or any other Portfolio Managers ensure that Client assets are invested according to the strategy selected by the Client, and that investment decisions made on behalf of a Client do not violate any guidelines and restrictions imposed by the Client. Accounts are reviewed at least monthly, or more often if market conditions require, to identify any accounts materially different than the selected strategy.</p> <p><b>Investment Authority</b>        We manage client portfolios on a discretionary basis which gives us the authority to determine the securities to be bought or sold, the amount of securities to be bought or sold, the broker or dealer used to execute trades, and the commission rate paid by clients. Investment discretion is limited only by specific instructions, guidelines, and/or mandates provided by clients in writing and to which we agree.</p> <p><b>Limited Investment Offering</b>        In our Large-Cap Core Equity strategy, the investment universe is the S&amp;P 500 Index. In our ETF strategies, we select ETFs from leading U.S. providers to invest in favored areas of global equity and U.S. fixed income markets.</p> <p><b>Account Minimums and Other Requirements</b>        The minimum value of new accounts managed directly by us, is \$100,000 for the Large-Cap Core Equity strategy and \$50,000 for ETF strategies. The minimum value of new accounts managed through broker-sponsored wrap-fee programs is \$100,000 for the Large-Cap Core Equity strategy and \$50,000 for ETF strategies. In some circumstances, minimum account values may be negotiable.</p> <p><b>More information</b> about our services can be found on Part 2 of our Form ADV, which is available at <a href="https://adviserinfo.sec.gov/firm/summary/133279">https://adviserinfo.sec.gov/firm/summary/133279</a>.</p> <p><b>Conversation Starters.</b> Ask your financial professional—</p> <ul style="list-style-type: none"> <li>• <b>Given my financial situation, should I choose an investment advisory service? Why or why not?</b></li> <li>• <b>How will you choose investments to recommend to me?</b></li> <li>• <b>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</b></li> </ul>
<p>Item 3.A  <u>Fees, Costs, Conflicts, and Standard of Conduct</u></p>	<p><b>What fees will I pay?</b>        Our standard annual fee is charged quarterly in advance, and is generally between 0.50% and 1.00% based on the value of the assets in the account on the last day of the previous quarter. Fees may be negotiable depending on certain factors. More information about our firm’s fees are included in Part 2 of Form ADV: <a href="https://adviserinfo.sec.gov/firm/summary/133279">https://adviserinfo.sec.gov/firm/summary/133279</a>.</p> <p>In addition to our management fees, clients may incur certain charges imposed by custodians, brokers, and other third parties. Mutual funds and exchange traded funds also charge management fees, which are disclosed in a fund’s prospectus.</p> <p>We participate as a portfolio manager in several wrap-fee programs. In a wrap account, clients pay a single fee to a wrap sponsor based on assets under management, which generally includes execution, custodial,</p>

