

SmartALPHA® Defensive Equity Strategy Indexes

Executive Summary

- Reflecting the academic research on the low volatility effect, currently available low volatility products are mainly driven by statistical volatility – the standard deviation of stock price change over a defined period.
- However, price volatility is just a reflection of fundamental risk, which in turn has two main components, macro risk and company-specific risk.
 It is only by defining and quantifying these risks that a truly defensive equity strategy can be designed.
- Alpha Quant Models (AQM) developed defensive equity strategy indexes which combine top-down and bottom-up dimensions, providing greater opportunity in both risk management and potential excess returns relative to currently available low volatility products.
- The SmartALPHA® Defensive Indexes target contemporaneously high returns and low volatility through a systematic process that selects defensive stocks with high expected alpha.
- The approach is unique to statistical low volatility products. It is intuitive, rooted in fundamental analysis and economic theory, and generates an asymmetrical return pattern with strong downside protection while maintaining remarkable upside participation.
- Further, the SmartALPHA® indexes remain fully invested in liquid stocks at all times and do not employ any derivatives or other less-liquid instruments to achieve these goals.



Massimo Santicchia Managing Partner massimo@alphaquantmodels.com www.alphaquantmodels.com

Introduction

In the aftermath of the 2008 financial crisis, scarred by huge portfolio losses, investors increasingly demanded investment vehicles that could offer protection in falling, volatile markets.

At the same time, numerous academic studies were published on the so-called "low volatility anomaly": contrary to finance theory, over the long term, stocks with lower price volatility have out-performed stocks with high price volatility.

The low volatility effect is not new. Researchers Robert Haugen and James Heins in the 1970s wrote about this effect in a seminal paper.¹

As an outgrowth of the 2008 financial crisis, this anomaly was "rediscovered" and "productized." A number of investment firms and ETF providers saw the opportunity to commercially exploit the low volatility anomaly and jumped onto the academic debate with papers and articles touting their own products. Since then, a number of "low vol" products have flooded the industry and raised several billion dollars in assets; investors have embraced the concept and low equity volatility is now a new asset class.

Reflecting the academic research, the existing low volatility strategies available today are mainly driven by statistical volatility – the standard deviation of stock price change over a defined period.

But, what's the actual merit of these strategies? Is it sound to invest money in strategies that in essence select stocks based merely on their past price fluctuations?

Is there a more purposeful way to build low volatility, defensive strategies? AQM will review the current low volatility methodologies and products and propose a more logical and more effective approach: the SmartALPHA® Defensive Strategy Indexes.

Types of Low Volatility Strategies

Current low volatility strategies follow one of two methodologies: minimum variance optimization strategy or non-optimized low volatility strategy.

Figure 1 describes two representative low volatility index methodologies, the S&P Low Volatility Index and the MSCI Minimum Volatility Index.

Optimization-based Indexes are calculated by optimizing an existing equity index (such as the MSCI USA Index or the Russell 1000) using an estimated covariance matrix to produce a portfolio that has the lowest expected volatility for a given set of constraints. Thus, in optimized models, it is assumed that stocks have the same expected return and volatility and correlations are estimated using a risk model. These indexes lack transparency and, in an attempt to reduce tracking error, have significant exposures to non-defensive sectors and consequently, they may not provide strong downside protection.

FIGURE 1. Selected Low Volatility Methodologies

	S&P 500 Low Volatility Index	MSCI USA Min Volatility Index
Definition of Risk	Standard deviation of the daily price returns over the prior 12 months	Barra Covariance Model (variance and correlations)
Methodology	The 100 least volatile stocks in the S&P 500 are weighted inversely proportional to their volatility	Forecast volatility using minimum variance optimization
Constraints	None	Sector and risk- factor. Max holding size 1.5%
Assessment	Simple and transparent; good cushion in down markets, but limited upside	"Black Boxy", benchmark sensitive; sector constraints limit downside protection

¹ Robert A. Haugen and A. James Heins, "Risk and the Rate of Return on Financial Assets: Some Old Wine in New Bottles." Journal of Financial and Quantitative Analysis, Vol. 10, No. 5, December 1975.

Non-optimized models simply sort stocks on their past price volatility and select the least volatile ones. Each stock in the index is then weighted by the inverse of its volatility, so that the stocks with lower volatility receive the higher weights. These indexes are transparent and provide good downside protection, but they can become very concentrated in certain sectors, such as utilities, and may lack attractive participation in up markets.

Both methodologies are mainly driven by volatility of stock prices and do not target or maximize returns. As illustrated in the performance analysis section, these low volatility strategies have not proven to keep up with a rising market typically associated with economic rebounds and expansions. This lack of upside participation represents an investment risk as it may impair the investor's portfolio growth over the long run.

As we discuss later, at the end of the day, the real risk for an investor is not the short-term stock price fluctuations, but the inability to preserve and grow wealth over the investment horizon. This requires a strategy that provides downside protection without renouncing to long term growth.

The following will first highlight the difference between statistical and fundamental risk. Fundamental risk is then defined and separated into macro and firmspecific risks. Finally, the construction process employed by the SmartALPHA® Defensive Indexes is depicted followed by review their performance versus the overall market and other low volatility strategies.

A Myopic Definition of Risk

Low volatility strategies define risk merely as price volatility. Standard deviation is a measure of absolute volatility that shows how much an investment's return varies from its average return over time.

To understand the flaws of measuring risk with price volatility consider this example: suppose the price of a stock goes up 20 percent in one month, 10 percent the next, and 5 percent in the third month. The standard deviation would be 7.6 with a return of 38.6 percent. Compare this to a stock that declines 10 percent three months in a row. The standard deviation would be zero with a loss of 27 percent. An investor holding the falling stock might find consolation knowing that the loss was incurred completely "risk-free."²

In addition, protracted periods of low volatility in an individual security or entire asset class, do not portend continuous future stability.

Actually, the evidence tends to show that the opposite is true: extended periods of low volatility are followed by high volatility. One only needs to remember that the 2008 financial meltdown was preceded by one of the lowest market volatility readings in history but, as we all know, it ended up in tears.

Thus, a low standard deviation of returns over the measurement period may give investors in low volatility strategies only a false sense of security.

AQM believes that focusing only on statistical volatility is superficial as it confuses the cause (fundamental risk) with the effect (price volatility).

In fact, the true limitation of low volatility strategies is that they select stocks with no consideration to their economic characteristics despite extensive evidence that company-specific fundamentals (i.e., valuation, earnings persistence) are related to future stock risk and returns.

The price fluctuation of a company's stock- and therefore its volatility - is determined by the trading activity of investors who buy and sell shares according to their views and emotions.

But stocks are not just price charts or quotes on a monitor that change every second. Equity shares represent ownership in a company's business. Therefore, to understand the risks of a company's stock, analysis of the sector and industry the company operates in, its business model, its earnings persistence, its capacity to generate cash flows, and last but probably most important, its valuation should be integrated.

It is the interaction between the fundamentals and the market valuation that determines the future returns and risk of a stock, not its past price volatility.

Ultimately, if we accept that risk is not the same as volatility, we must also question any portfolio strategy that relies on this view.

The SmartALPHA® Defensive Strategy Indexes

Defining Risk

AQM believes that a low volatility, defensive equity strategy should not be governed by a mechanical application of statistical parameters like price volatility and correlations.

The starting point of a defensive strategy - like any equity strategy - should be the investor's standpoint and goals. From the investor point of view there are three distinct yet interrelated risks:

- 1.Prolonged drawdowns (a bear market, typically related to the business cycle);
- 2.Sharp market drops (unexpected market events, shocks, black swans);
- 3. Inability to preserve and grow capital over the investment horizon. Over time, sudden losses and deep drawdowns may impair the ability to preserve and grow wealth.

It follows logically that a defensive equity strategy should aim to provide protection in down markets, while at the same time offering adequate upside participation. A defensive strategy that follows this approach may assist investors in reaching their ultimate goal of preserving and growing wealth over their investment horizon.

The second step is to define and quantify equity risk from a portfolio management standpoint with the objective of mitigating that risk. From a portfolio manager's standpoint, stock price volatility (risk) is a manifestation of fundamental risk. In turn, fundamental risk has two main components: macro and company-specific risk.

Macro Risk

Macro risk is related to the overall economy and the business cycle, impacting all stocks. Specifically: a)The largest capital losses and drawdowns are typical associated with economic contractions and recessions. b)Unexpected and unpredictable events that affect the economy such as geopolitical events or a shock in the supply of basic commodities like oil.

Company-Specific Risk

This risk is inherent to individual stocks and has three components:

- 1. Earnings Persistence: a decline in earnings power reduces the equity value;
- 2.Distress: high debt leverage constrains growth and may result in bankruptcy;
- 3. Valuation: stocks trading at high multiples are riskier and tend to underperform.

Sector Risk

The largest non-company specific determinant of equity volatility and returns is the sector in which a company operates. This makes intuitive sense as stocks belonging to the same sector will tend to be affected by the same economic, regulatory and technology forces. In addition, some sectors have similar sensitivity to the economic environment. For example, consumer staples and health care firms—two defensive sectors— are less dependent on the rate of economic growth than cyclical sectors such as industrials and consumer cyclicals. Defensive sectors display consistently low volatility and historically offered cushion during down markets (see Figure 2).

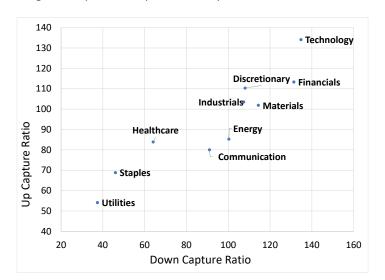


Figure 2. Up/Down Capture Ratio by Sector 1990-2020

Source: FactSet, Alpha Quant Models. As of 12/31/2020.



Business Cycle and Sectors Performance

Historically, non-cyclical, defensive sectors have consistently provided protection in down markets. This makes sense, as there is an economically intuitive link between the business cycle and the performance of cyclical and defensive sectors. During periods of economic expansion, cyclical stocks tend to perform best as their growth is leveraged to the economy. However, as the business cycle peaks and the economy starts to contract, defensive stocks offer downside protection due to their resilience and lower sensitivity to the business cycle. This relationship between the business cycle and the performance of cyclical and defensive sectors has been very consistent over the last several decades. Figure 3 reports the average monthly returns for each sector and for the Cyclical and Defensive equal-weighted groups for four distinct regimes based on the ISM.

Figure 3. Sector Returns by PMI Regime

DECIME	BELOW 50 &	BELOW 50 &	ABOVE 50 &	ABOVE 50 &
REGIME	DECREASING	INCREASING	INCREASING	DECREASING
count	67	37	141	125
%	18.1%	10.0%	38.1%	33.8%
Technology	1.232	1.161	1.470	1.050
Financials	0.395	0.439	1.302	0.673
Discretionary	0.876	1.146	1.331	0.697
Materials	0.423	1.248	0.856	0.793
Industrials	0.650	0.487	1.047	0.950
Energy	0.218	-0.044	0.596	1.152
Healthcare	1.686	0.466	0.925	0.913
Staples	1.549	0.688	0.838	0.714
Utilities	0.472	-0.225	0.810	1.145
Communication	1.104	-0.028	0.688	0.547
Cyclicals	0.633	0.740	1.100	0.886
Defensive	1.236	0.310	0.858	0.924

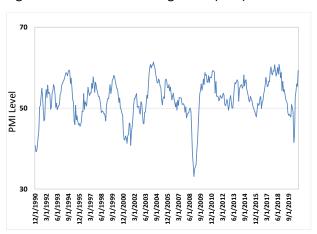
Source: FactSet, Alpha Quant Models. As of 12/31/2020.

The ISM measures manufacturing activity based on a monthly survey at purchasing managers at more than 300 manufacturing firms. An index of more than 50 indicates the economy is in expansion. A reading of 50 indicates no change and a reading below 50 suggests a contraction of the manufacturing sector. Four distinct regimes are created based on both the level and the directional change of the index to capture the typical phases of the business cycle: expansion (above 50 and increasing), contraction (above 50 and decreasing), recession (below 50 and decreasing), and recovery (below 50 and increasing). We then calculated the average sector returns by phase.

Figure 3 highlights the correlation between the business cycle's strength and direction and the performance of cyclically sensitive and defensive sectors. For example, cyclical sectors such as Technology, Financials and Discretionary out-perform significantly during expansions (ISM above 50 and increasing). However, during contractions and recessions defensive sectors (particularly Healthcare and Staples) offer significant downside cushioning benefits.

It turns out that available low volatility products can be deconstructed as unintentional defensive sector strategies as their sector composition is dominated by utilities, staples and health care sectors. Supported by empirical evidence, AQM advocates an approach that selects stocks exclusively from defensive sectors as a more deliberate and economically sensible method to build a defensive strategy more resilient to economic recessions and less exposed to downside volatility.

Figure 4. ISM Manufacturing Index (PMI)



Source: FactSet Economic Data. As of 12/31/2020.



Bottom-Up Dimension: Firm-Level Risk

From a bottom-up standpoint, the SmartALPHA® stock selection process is designed to manage company-specific risks. AQM research shows that stocks with specific fundamental attributes such as low earnings quality, high debt leverage, and high valuation multiples historically have significantly underperformed the market averages.

Figure 5 illustrates this evidence over the 1990-2020 period. The charts report the compound returns of the top and bottom portfolio deciles. For example, the stocks in the bottom decile by free cash flow-to-debt ratio (companies with high level of debt and low liquidity) significantly underperformed companies with ample liquidity and low debt. Similarly, stocks in the top decile by sector-relative price-to-sales ratio underperformed significantly the cheapest portfolio decile. Analogous patterns are observable for high vs. low profitability (ROIC) and high vs. conservative investment spending policy (capex growth). The charts depict the economic and statistical significance of these factor returns and the consistency and magnitude of their top-bottom quintile return spreads.

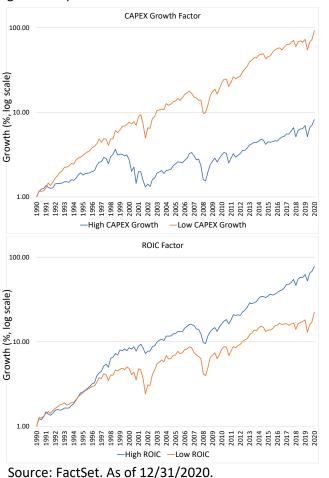
This empirical evidence and fundamental insight is leveraged into the construction process by selecting stocks based on fundamental and valuation factors that AQM's research has found to be predictive of returns and risk.

The flow chart on the next page depicts the construction process of the SmartALPHA® Defensive Growth and Defensive Value Indexes. Starting from a universe of liquid, large- and mid-cap U.S. equities, the indexes are constructed exclusively from non-cyclical sectors (staples, health care, telecom and utilities).

Thirty stocks are then selected for each index based on quality and value factors that have displayed strong performance over several cycles and market conditions.

The methodology favors sectors with greater opportunity for higher returns (high factor dispersion). Each index includes 30 equal-weighted stocks. Indexes are reconstituted quarterly and rebalanced annually to equal-weighted. Portfolio constraints are a maximum of six stocks per industry and a maximum of 8% per constituent.

Figure 5. Top and Bottom Portfolio Deciles for Selected Alpha Factors (Growth Index – log scale)





A

2uant

Engineered for Alpha

Figure 6. Investment Process

Investment Universe

Investable U.S. Equity Universe

Investment Universe

Investable U.S. Equity Universe

U.S. listed Large- to midcap stocks Min price of \$5



Macro Risk Selection

Defensive Sectors Consumer Non-Cyclical Healthcare | Telecom | Utilities



Macro Risk Selection

Defensive Sectors Consumer Non-Cyclical Healthcare | Telecom | Utilities

Macro risk is mitigated by selecting only from non-cyclical, defensive sectors



Fundamental Factor Screens

Earnings Growth & Quality



Fundamental Factor Screens

Valuation | Leverage

Company-specific risks are mitigated and expected returns enhanced through bottom-up stock selection



Sector Adjusted Ranking

Adjust rankings for dispersion within sectors



Defensive Growth Strategy Index



Sector Adjusted Ranking

Adjust rankings for dispersion within sectors

Methodology favors sectors with greater opportunities.



Defensive Value Strategy Index 30 stocks per index **Equal-weighted Rebalanced annually** Re-constituted quarterly Max. Stocks per Industry: 6 Max. per Constituent: 8%



Risk and Return Analysis Live Performance

This section reports the performance of the SmartALPHA® Defensive Indexes during their live history (7/1/2012-9/30/2020). Figure 5 compares the SmartALPHA® Defensive Indexes versus other selected available low volatility products and the overall market. Although the live period is relatively short, it encompasses a variety of market conditions including volatility spikes, market drops, and a sharp drawdown associated with the COVID-19 pandemic. Over this period, the SmartALPHA® Defensive Indexes have not only outperformed the other low volatility strategies but have also kept up with the S&P 500. Specifically, an equal-weighted blend of the Growth and Value indexes has generated an average compound return of 14.6% versus 11.3% for the S&P Low Volatility Index and 11.8% for the MSCI Minimum Volatility Index. The S&P 500 returned 13.9% over the same period. This is a remarkable achievement given that over this period we have been in a bull market supported by a positive economic backdrop and very accommodative monetary policy. These results are even more impressive given the recent market polarization and the dominance of technology stocks.

Figure 5. Live Performance (7/1/2012 - 09/30/2020)

As an alternative view of the sensitivity of portfolio performance to different states of the market, AQM analyzed the variation in performance across the strategies in different market regimes.

In down markets - defined as months when the S&P 500 had a negative return - the Defensive Value and Defensive Growth indexes report average monthly returns of -2.45% and -2.51%, respectively versus -3.5% for the S&P 500.

The maximum drawdown of the SmartALPHA® Defensive indexes is also significantly better with a decline from peak to trough of only 12.7% for the Defensive Blend versus 19.6% for the S&P 500, 21.4% for the S&P 500 Low Volatility and 19.1% for the MSCI Minimum Volatility. The number of months to full recovery is only 2 months for the Defensive Blend versus 4 months for the S&P 500. The other two low volatility indexes were still below their preceding peak as of 09/30/2020. In up markets the Defensive Value and Defensive Growth indexes earned respectable average monthly returns of 2.29% and 2.64%, respectively, versus 2.8% for the S&P 500. This asymmetric behavior of the SmartALPHA® Defensive indexes in up and down markets, results in strong risk adjusted performance, and in the long-term, contributes substantially to capital growth.

J	contributes substantially to capital growth.					
	SmartALPHA Defensive Value	SmartALPHA Defensive Growth	SmartALPHA Defensive Blend	S&P 500 Low Volatility	MSCI USA Minimum Volatility	S&P 500
Return	13.0	16.2	14.6	11.3	11.8	13.9
Std Dev	12.1	12.8	12.1	11.2	10.6	13.0
Sharpe Ratio	1.0	1.2	1.2	0.9	1.0	1.0
Tracking Error	8.0	7.3	6.9	7.5	5.9	0.0
				_		0.0
Alpha		4.2				0.0
Beta	0.8	0.8	0.8	0.7	0.7	1.0
Information Ratio	-0.1	0.3	0.1	-0.3	-0.4	_
Max Drawdown						
Peak	10/1/2018	1/1/2020	1/1/2020	2/1/2020	2/1/2020	1/1/2020
Max Drawdown	-11.8	-16.1	-12.7	-21.4	-19.1	-19.6
Max Drawdown Recovery # of						
Periods	10.0	4.0	2.0	_	_	4.0
Down Capture Return	-2.45	-2.51	-2.48	-2.15	-2.25	-3.5
Up Capture Return	2.29	2.64	2.47	2.00	2.09	2.8

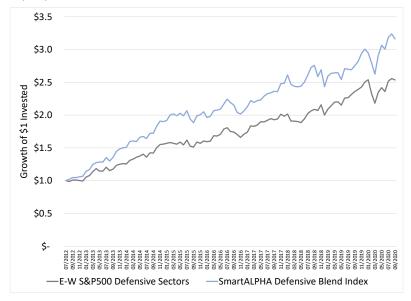


Sector Performance Analysis

Since the SmartALPHA® Defensive Indexes invest only in large-cap stocks from "defensive" sectors, it's important to compare their performance to an appropriate benchmark made of stocks from the same sectors.

Figure 6 shows the performance of the SmartALPHA® Defensive Indexes Blend versus an equal-weighted composite of the three S&P 500 defensive sectors (Staples, Healthcare, Utilities).

Figure 6. Growth of \$1 Invested Since Inception Through 9/30/2020



Source: Alpha Quant Models, S&P/Dow, FactSet

The chart shows clearly the value added by the SmartALPHA® Defensive strategy above the typical performance of an equal-weighted portfolio made of defensive sectors. Since inception, the SmartALPHA® Defensive strategy generated a compounded annualized average return of 15.1% vs. 12.1% for the equal-weighted defensive sectors benchmark. This 300 basis points per annum of out-performance is in line with our historical portfolio backtests and is the direct result of our process which selects a sub-set of defensive stocks with attractive fundamental and valuation metrics.





Massimo Santicchia is a Co-Founder and Managing Member of Alpha Quant Models LLC. Massimo has over 20 years of investment experience including: CIO at Alpha Quant Advisors, CIO at Cypress Trust Company, and VP of Investment Strategy at S&P Investment Advisory Services LLC. His expertise encompasses fundamental, quantitative analysis, portfolio management and investment strategy development.

This document is produced by Alpha Quant Models, LLC (AQM). AQM is not a registered or licensed broker, dealer, broker-dealer, investment adviser nor investment manager, nor does AQM engage in any activities that would require such registration. AQM does not provide investment advice, endorsement, analysis, or recommendations with respect to any securities or investment opportunities, and its services to or statements about companies or information in this document should never be construed as any endorsement of or opinion about any such securities, investment opportunities, companies or information. No material or information contained here is an offer to sell, a solicitation of an offer to buy, or a recommendation of any securities, investment opportunities, or any other similar product or service regardless of whether such securities, investment opportunities, products or services are referenced in this document. Further, nothing in this document is intended to provide tax, legal, accounting or investment advice and nothing on this site should be construed as a recommendation to buy, sell, or hold any investments or securities or to engage in any investment strategy or transaction.

Past performance is not indicative of future results. It is not possible to invest directly in an index.

The SmartALPHA® Strategy Indexes represented in this material do not reflect the actual trading of any client account. No representation is being made that any client will or is likely to achieve results similar to those presented herein. The results shown do not reflect the deduction of any advisory fees or expenses, nor trading costs, all of which will decrease the return experienced by a client. The performance is adjusted to reflect the reinvestment of dividends. None of the indexes referred to herein reflect the deduction of the fees and expenses to be borne by a client. Concentration, volatility and other risk characteristics of a portfolio also may differ from the indices shown herein. Index data is provided only for reference purposes and is not intended to suggest that any portfolio will achieve performance similar to, or better than, an index. All investment strategies have the potential for profit or loss. Changes or differences in investment strategies, contributions or withdrawals, and economic conditions, may materially alter the performance of a portfolio. Different types of investments involve varying degrees of risk, and there can be no assurance that any specific investment or strategy will be suitable or profitable for an investor's portfolio. Historical performance results for investment indexes and/or categories, generally do not reflect the deduction of transaction and/or custodial charges or the deduction of an investment-management fee, the incurrence of which would have the effect of decreasing historical performance results. There are no assurances that a portfolio will match or outperform any particular benchmark. The S&P 500® Index is a broad-based unmanaged index of 500 stocks, which is widely recognized as a representative of the equity market in general.

The SmartALPHA® Business Cycle Indexes (the "Indexes") which include SmartALPHA® Cyclical Growth, SmartALPHA® Cyclical Value, SmartALPHA® Defensive Growth, SmartALPHA® Defensive Value (the "Index") are the property of Alpha Quant Models, LLC (AQM) which has contracted with S&P Opco, LLC (a subsidiary of S&P Dow Jones Indices LLC) to calculate and maintain the Index. The Indexes are not sponsored by S&P Dow Jones Indices LLC or its affiliates or its third party licensors, including Standard & Poor's Financial Services LLC and Dow Jones Trademark Holdings LLC (collectively, "S&P Dow Jones Indices"). S&P Dow Jones Indices will not be liable for any errors or omissions in calculating the Index. "Calculated by S&P Dow Jones Indices" and the related stylized mark(s) of S&P Dow Jones Indices and have been licensed for use by Alpha Quant Models LLC. S&P® is a registered trademark of Standard & Poor's Financial Services LLC, and Dow Jones® is a registered trademark of Dow Jones Trademark Holdings LLC.

S&P DOW JONES INDICES DOES OT GUARANTEE THE ADEQUACY, ACCURACY, TIMELINESS AND/OR THE COMPLETENESS OF THE INDEX OR ANY DATA RELATED THERETO OR ANY COMMUNICATION WITH RESPECT THERETO, INCLUDING, ORAL, WRITTEN, OR ELECTRONIC COMMUNICATIONS. S&P DOW JONES INDICES SHALL NOT BE SUBJECT TO ANY DAMAGES OR LIABILITY FOR ANY ERRORS, OMMISSIONS, OR DELAYS THEREIN. S&P DOW JONES INDICES MAKES NO EXPRESS OR IMPLIED WARRANTIES AND EXPRESSLY DISCLAIMS ALL WARRANTIES, OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE OR AS TO RESULTS TO BE OBTAINED BY AQM, OWNERS OF ANY INVESTABLE PRODUCTS, OR ANY OTHER PERSON OR ENTITY FROM THE USE OF THE INDEX OR WITH RESPECT TO ANY DATA RELATED THERETO. WITHOUT LIMITING ANY OF THE FOREGOING, IN NO EVENT WHATSOSEVER SHALL S&P DOWN JONES INDICES BE LIABLE FOR ANY INDIRECT, SPECIAL, INCIDENTAL, PUNITIVE, OR CONSEQUENTIAL DAMAAGES, INCLUIDING BUT NOT LIMITED TO, LOSS OF PROFITS, TRADING LOSSES, LOST TIME, OR GOODWILL, EVEN IF THEY HAVE BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES WHETHER IN CONTRACT, TORT, STRICT LIABILITY OR OTHERWISE.

Important Notes

This does not constitute an offer or solicitation in any jurisdiction where to any person to whom it would be unauthorized orunlawful to do so. Opinions expressed are current opinions as of the date appearing in this material only. This information should not be considered investment advice or a recommendation to buy or sell any particular security. While every effort has been made to verify the information containedherein, we make no representations as to its accuracy. The information in this material and specific securities mentioned are not representative of all securities purchased, sold or recommended for advisory clients. Actual portfolio holdings will vary for each client and there is no guarantee thata particular client's account will hold any, or all, of the securities identified. It should not be assumed that any of the securities or recommendations made in the future will be profitable or will equal the performance of the listed securities. Past performance does not predict future results.

