WCM INVESTMENT MANAGEMENT

Client Relationship Summary

March 21, 2022

Introduction

WCM Investment Management, LLC (our "firm" "us", "we") is an investment adviser registered with the Securities and Exchange Commission.

Brokerage and investment advisory services and fees differ, and we feel that it is important for you to understand the difference. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services on a discretionary basis to *retail investors* through the following vehicles: Separately Managed Accounts (which includes Wrap Programs), Mutual Funds, and Private Funds.

Authority: When you establish a relationship with us to invest your assets, you give us discretionary authority to make the following determinations without obtaining your consent: (1) which securities to buy or sell; (2) the total amount of securities to buy or sell; and (3) the prices at which securities are to be bought or sold, which may include dealer spreads or mark-ups and transaction costs. Depending on the investment vehicle you chose, we may also determine: (4) the broker or dealer through whom securities are bought or sold; and (5) the commission rates at which securities transactions for the account are effected. Our discretionary authority is subject to conditions imposed by either a written advisory agreement, or the terms of the applicable fund documents.

Monitoring: As part of our standard services, we monitor your investments for compliance with stated investment guidelines and restrictions. Such reviews include daily reviews of cash positions, pre-trade compliance checks, weekly post-trade and model drift comparisons, monthly peer-performance comparisons, and annual reviews of performance and objectives.

Limitations & Minimums: We only provide investment advice with respect to equity securities. You can establish a relationship with us with an investment advisory agreement or the appropriate fund subscription documents. Our minimum investment requirements differ by vehicle: Separately Managed Account - $10 million; Wrap - $100,000-$250,000 (as determined by the platform); Mutual Fund - $25,000 / $100,000 (as determined by the Mutual Fund Class); and Private Fund - $5 million. We may, however, at our sole discretion, reduce or waive the minimum account size requirements on a case-by case basis.

*Additional information about our advisory services is in the **Advisory Business** and **Types of Clients** sections of our Firm Brochure, which is available online at* https://adviserinfo.sec.gov/firm/brochure/104702.

Questions to ask us:

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What fees will I pay?

Principal Fees: Separately managed accounts, Mutual Funds and Private Funds will pay an advisory fee based on the value of your total assets managed by our firm. The more assets there are in your account, the more you will pay in fees, and our firm has an incentive to encourage you to increase the assets in your account. Asset-based fees associated with wrap-fee programs include most transaction costs, and fees to the broker-dealer or bank that has custody of these assets, and therefore are higher than a typical asset-based advisory fee.

Other Fees and Costs: Depending on the investment vehicle you choose, you may pay additional fees and costs, such as custodian, transaction, legal, audit and other fund related expenses.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

*Additional information about our fees is in the **Fees and Compensation** section of our Firm Brochure, which is available online at* https://adviserinfo.sec.gov/firm/brochure/104702

Questions to ask us:

- *Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. For example, there is an incentive for us to favor accounts that pay a performance-based fee because this could result in higher fees received by us.

Additional information about our conflicts is in our Firm Brochure, which is available online at https://adviserinfo.sec.gov/firm/brochure/104702.

Questions to ask us:

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

How do your financial professionals make money?

Our financial professionals' compensation is comprised of a base salary, discretionary bonus, revenue share, and possible equity ownership. The following factors are taken into consideration when determining their compensation: the amount of client assets they service; the product sold (i.e., differential compensation); product sales commissions; and revenue the firm earns from the financial professional's advisory recommendations. This creates a conflict of interest as financial professionals have an incentive to drive profits and sales.

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

No, our firm and financial professionals do not have any legal and disciplinary history to disclose. Please visit Investor.gov/CRS, for a free, simple tool to learn more about our firm and financial professionals.

Questions to ask us:

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

Additional Information

You can find additional information regarding our investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching CRD # 104702. You may also contact our firm at **949-380-0200** to request up-to-date information and obtain a copy of this *Relationship Summary*.

Questions to ask us:

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

281 Brooks Street, Laguna Beach, CA 92651

949.380.0200 (p); 949.380.0819 (f)

www.wcminvest.com

This brochure provides information about the qualification and business practices of WCM Investment Management, LLC. If you have any questions about the contents of this brochure, please contact us at (949) 380-0200, or by email at learnmore@wcminvest.com. 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.

WCM Investment Management, LLC is a registered investment adviser with the Securities and Exchange Commission ("SEC"). SEC registration does not imply any certain level of skill or training. Additional information about WCM Investment Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

March 21, 2022

Material Changes

Annual Update

WCM Investment Management, LLC is providing this information as part of our annual updating amendment, which contains material changes from our last annual update. This section discusses only material changes since the last annual update, which most recently occurred on March 22, 2021.

Material Changes since the Last Update

This brochure contains the following updates:

- Effective December 31, 2021, Kurt Winrich, co-CEO of WCM and Portfolio Manager on two strategies, Focused Growth International ("FGI") and Quality Global Growth ("QGG"), retired. Kurt continues to be a Principal Owner and remains Chairman of the Board of WCM.
- Added *ERISA & Retirement Accounts* section
- Launched the following mutual funds. See *Other Financial Industry Activities and Affiliations* section:
    - WCM International Long-Term Growth Fund
    - WCM Focused International Opportunities Fund
- Launched the WCM Partners L.P. See *Other Financial Industry Activities and Affiliations* section;
- Launched the following new strategies. See *Methods of Analysis: Investment Strategies* section;
    - International Long-Term Growth

Full Brochure Availability

A copy of the full Brochure can be obtained from our website www.wcminvest.com, or additionally may be requested free of charge by contacting us at (949) 380-0200 or learnmore@wcminvest.com.

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Advisory Business

Firm Description

Established in 1976, WCM Investment Management, LLC ("WCM" or "Firm") is an independent investment advisory firm, registered with the SEC that specializes in providing innovative, equity investment advisory services.

Principal Owners

The principal owners of the Firm are Kurt Winrich and Paul Black, both of whom joined the organization in the mid-to-late 1980s. Other key owners include Sloane Payne, Peter Hunkel, Michael Trigg, Sanjay Ayer. Together they control over 83% of the company. These individuals are all employees. This provides employees with a stake in the Firm's success. The Firm's ownership is held through a holding company, Thalia Street Partners LLC.

Types of Advisory Services

WCM is an investment adviser that provides discretionary investment advisory services in accordance with the methods described in the *Methods of Analysis, Investment Strategies and Risk of Loss* section of this brochure.

WCM provides discretionary investment advisory services to Separately Managed Accounts, Mutual Funds, and Private Funds as described in the *Types of Clients* section of this brochure.

The Firm is investment adviser to the "WCM Mutual Funds," "WCM Private Funds," a Collective Investment Trust (CIT). WCM is a Portfolio Manager to a Canadian fund and some Australian funds. WCM is sub-adviser to three UCITS, and the General Partner of the "WCM Private Funds". This is all described in the *Industry Affiliation* section of this brochure.

WCM also participates as a sub-adviser in various wrap fee programs, as described in the *Advisory Business: Wrap Fee Programs* section below, and provides investment models to a few advisers, as described in the Brokerage Practices: UMA Programs section below.

Tailored Relationships

For Separately Managed Accounts, WCM tailors its standard services to Clients' investment objectives. Clients may impose reasonable restrictions on investing in certain securities or types of securities. Such restrictions must be submitted to WCM in writing. Client-imposed restrictions may affect WCM's ability to implement our stated investment strategy, including how trades are executed (as described in the *Brokerage Practices* section of this brochure). As a result, investment performance may differ from other accounts managed in accordance with the unrestricted strategy.

The Private Funds, Mutual Funds, Canadian Fund, Australian Funds, CIT and UCITS are managed only in accordance with each fund's objectives and are not tailored to any particular fund investor (each a "Fund Investor"). Since WCM does not provide individualized advice to Fund Investors, they should consider whether a particular fund meets their investment objectives and risk tolerance prior to investing. Information about each fund can be found in each fund's respective Private Placement Memorandum ("PPM"), Prospectus, or Offering Memorandum ("OM"). This disclosure brochure is designed solely to provide information about WCM and should not be considered an offer of interest in the WCM Funds.

Wrap Fee Programs

WCM provides investment advisory services with respect to accounts in wrap fee programs sponsored by various broker-dealers, investment advisers, consultants or other organizations ("Sponsors"). In these programs, Clients of the Sponsor generally receive a package of services, which includes any or all of the following: discretionary investment management, trade execution, account custody, performance monitoring, and manager evaluation. Sponsors typically: (1) assist Clients in defining their investment objectives based on information provided by the Clients; (2) determine whether the given wrap fee arrangement is suitable for each Client; (3) aid in the selection and monitoring of investment advisers (whether WCM or another adviser) to manage accounts (or a portion of account assets); and (4) periodically contact Clients to ascertain whether there have been any changes in Clients' financial circumstances or objectives that warrant changes in the arrangement or the manner in which Clients' assets are managed. Client information is generally channeled to WCM through the program Sponsor, and WCM relies on the Sponsor to forward current and accurate Client information on a timely basis to assist in the day-to-day management of wrap accounts. Under certain programs, a Client may contact WCM directly concerning their account. WCM offers its discretionary investment advisory services under a number of these programs, which are described in more detail below.

Wrap fee programs come in many different forms. In some programs, the Client has a contract with only the Sponsor, and the discretionary manager enters into a sub-advisory contract with the Sponsor to provide discretionary investment advisory services to the Sponsor's Clients. In these programs, WCM is paid by the Sponsor and receives a portion of the wrap fee collected by the Sponsor. In other programs, the Client has a contract with both the Sponsor and with the discretionary adviser. In these programs, WCM generally uses its standard investment advisory agreement, and Clients usually pay the standard WCM investment advisory fee schedule, although fees and account minimums may be negotiable under certain circumstances. In broker-dealer sponsored wrap programs, the Client's contract with the Sponsor is charged either as an asset-based fee or a transaction-based fee (i.e. commission). Currently WCM participates in only asset-based wrap fee programs. Typically, account minimums for these programs range between $100,000 and $250,000, and the wrap fee charged by the Sponsor ranges between 1.25% and 3.00%.

Wrap fee arrangements are not suitable for all Clients. When evaluating wrap fee arrangements, a Client should consider a number of factors including, but not limited to: the applicable wrap fee; account size; anticipated account trading activity; the Client's financial needs; circumstances and objectives; and the value of the various services provided. In some instances, these services may be obtained at a lower aggregate cost if purchased separately.

As a provider of investment advice under a wrap program, WCM is generally not responsible for determining whether a particular wrap program, WCM's investment style or a specific strategy is suitable, appropriate, or advisable for any particular wrap program Client. Rather, such determinations are generally the responsibility of the Sponsor and the Client (or the Client's financial advisor and the Client) and WCM is responsible only for managing the account in accordance with the selected investment strategy and any "reasonable restrictions" imposed by the Client.

Although WCM is typically responsible for directing trades to brokers or dealers that it believes are capable of providing best execution, trades for asset-based wrap fee accounts are generally executed by the Sponsor so that the Client is not charged commissions on the trades, as would be the case if WCM were to direct trades to other broker-dealers for execution. Even in the event that another broker-dealer quotes a more favorable price than that quoted by the Sponsor in a given trade, the aforementioned lower price, along with the added commission may, on balance, be less favorable to the Client than the Sponsor's higher quoted price. Broker-dealer Sponsors providing execution services under a wrap fee are responsible for providing best price and execution for Client trades.

Also, for asset-based wrap fees which cover trades executed by a broker-dealer Sponsor, Clients are charged both commissions on trades executed by other broker-dealers, as well as "mark-ups" and "mark-downs" on trades affected by the Sponsor or another dealer as principal, as well as: odd-lot differentials; transfer taxes; handling charges; exchange fees; offering concessions and related fees for purchases of unit investment trusts; mutual funds and other public offerings of securities; and other charges imposed by law with regard to transactions in Client accounts. Because Sponsors do not receive commissions from trades affected on an agency basis, Sponsors have an incentive to affect trades as principal in order to obtain "mark-ups" and "mark-downs." Asset-based fees may be considered by the Internal Revenue Service as an investment expense, rather than a transaction charge, which may result in less favorable tax treatment for certain investors. (Clients should consult with their professional tax advisers concerning the effect of this tax treatment on their individual circumstances.) See the *Brokerage Practices: Wrap Fee Programs* section of this brochure for additional information.

UMA Programs

WCM provides model portfolio recommendations for UMA ("Unified Managed Account") Programs offered by broker-dealers, advisers and other Sponsors ("Sponsors"). WCM delivers the model portfolio recommendations to Sponsors on a rotational basis for trading by the Sponsor. See the *Brokerage Practices: UMA Programs* section for more details.

ERISA & Retirement Accounts

Under a written advisory agreement, WCM provides discretionary investment management services to plan sponsors of ERISA plans and is deemed a Section 3(21) fiduciary as defined under the Employee Retirement Income Security Act of 1974 ("ERISA"). Discretionary investment management services provided as an ERISA 3(21) investment manager means WCM makes the investment decisions in its sole discretion, subject to the investment objectives and guidelines designed by the Plan trustees. WCM does not provide rollover recommendations to ERISA and other retirement accounts.

Back Office Support

In connection with certain directed trading accounts, WCM has engaged SEI Global Services, Inc. ("SEI"), to provide certain back-office support services on our behalf. SEI's services include, but are not limited to, trading, settlements, reconciliation, and account maintenance. WCM continues to monitor accounts serviced by SEI, and supervise all functions performed on behalf of our firm and our clients.

Client Assets

As of December 31, 2021, WCM managed $93,301 million assets on a discretionary basis. WCM also provides model portfolio recommendations for $14,159 million in UMA Programs.

Fees and Compensation

WCM charges advisory fees based on the value of Client assets managed. Unless otherwise specified, valuation of securities follows WCM's *Valuation Policy.*

Separately Managed Account Fees

The specific manner in which WCM charges advisory fees for separately managed account fees for the client's portfolio is set out in the investment management agreement. Generally, Separately Managed Account fees are payable quarterly in advance and are calculated based on the value of an account's assets on the last business day of each calendar quarter.

If an account commences or terminates on a date other than the first or last business day of a billing period, the fee is prorated based upon the portion of the billing period in which WCM provided services. All unearned, pre-paid fees will be refunded upon account termination. At WCM's discretion, assets of related accounts, such as family or business relationship, may be aggregated for purposes of calculating the applicable advisory fee. Separately Managed Account agreements may be terminated at any time by either party, for any reason upon written notice.

When fees are paid in advance and a significant Client deposit or withdrawal occurs, fees are normally adjusted, as specified in a Client Investment Management Agreement. A significant deposit or withdrawal is typically defined as a capital flow in excess of 25%. An adjustment is calculated based on the amount of the deposit or withdrawal applied to the fee schedule and prorated for the portion of the calendar quarter in which WCM provided services. Such adjustments are generally applied in the subsequent billing period.

WCM's standard fee schedule is 1% of assets under management for Separately Managed Accounts, and the minimum account size is $10 million.

Management fees and minimums are negotiable. To the extent they are, some Clients will pay more or less than other Clients for the same management services, depending, for example, on account inception date, number of related investment accounts or total assets under management. WCM will also, in its sole discretion, charge lower management fees or waive account minimums based on certain criteria (e.g., historical relationship, related accounts, account composition, anticipated future earning capacity, anticipated future additional assets, accounts referred to adviser by another professional, etc.). We charge lower fees for accounts managed through wrap-fee programs, or pursuant to other consulting or referral arrangements in which broker-dealers, investment advisers, trust companies and other providers of financial services typically provide Clients with services that complement or supplement our services. Fees for such accounts vary depending on the nature of the arrangement and other circumstances. Additionally, fee reductions or waivers are available to WCM personnel and their family members.

Clients may either choose to pay management fees themselves or, after written authorization, have them automatically deducted each quarter from Client accounts by billing their custodians. In either case, Clients receive an invoice detailing the management fee calculation.

Typically, Clients are charged fees in addition to the advisory fee paid WCM, which can include brokerage commissions, SEC fees and other custodian fees. Please refer to the section entitled *Brokerage Practices* for more information.

Clients in certain international and global strategies will incur fees and costs associated with the purchase of non-U.S. securities in ordinary form and conversion of such ordinary shares into ADRs. To the extent that WCM purchases non-U.S. ordinary shares and arranges for such shares to be converted into ADRs, client accounts will incur certain fees and costs associated with the conversion. Such fees and costs may be attributable to local broker fees, stamp fees, and local taxes, and are generally included in the net price of the ADR.

To the extent that Client assets are invested in shares of non-WCM-related investment companies (e.g., mutual funds, ETFs), these assets are included in calculating the value of an account for purposes of computing WCM's fees. They are also subject to additional advisory and other fees and expenses as set forth in the prospectuses or offering memoranda of those investment companies, which are paid by the investment companies, but ultimately borne by investors. For Client assets invested in the WCM Mutual Funds for reasons other than tax-loss selling, and for which WCM serves as the adviser or sub-adviser, these assets are excluded in calculating the value of an account for purposes of computing WCM's fees.

WCM Private Fund Fees

Fees for WCM Private Funds are described in each private fund's respective Private Placement Memorandum ("PPM"). Investors are generally charged an advisory fee, paid quarterly, based upon the net asset value of the investor's capital account on the first day of each calendar quarter. The WCM Focused Global Growth Long-Short Fund L.P. and WCM Partners L.P is entitled to an additional fee based on any net profit allocation. The private funds also pay brokerage commissions, as well as other transaction and fund-related expenses.

As General Partner to the WCM Private Funds, WCM will not pay an advisory fee on its capital account, and advisory fees may be altered, reduced or waived with respect to investors who are related parties or persons of the General Partner, or those deemed to involve a significant or strategic relationship. Thus, different investors will pay different advisory fees. As General Partner, WCM accesses the assets of the WCM Private Funds for payment of Fund expenses as described in the Fund's PPM. WCM complies with the requirements of the Custody Rule with regard to the WCM Private Funds.

Specific procedures and restrictions apply to redemptions, as described in each private fund's respective PPM. The General Partner, in its sole discretion, may impose minimum redemption amounts and require the maintenance of a minimum capital account size in the event of a partial redemption. The General Partner may also, in its sole discretion, require an investor to redeem all or part of its interest in a private fund to ensure that the private fund remains in compliance with applicable law, or for any reason supported by the applicable limited partnership agreement.

WCM Mutual Fund Fees

Information on the fees and expenses paid directly from each WCM Mutual Fund and the funds' service providers are described in each funds' Prospectus. Such fees include management fees (paid to WCM) and other expenses (paid to fund service providers). The WCM Mutual Funds are no-load funds and have multiple class structures. The class structures represent the same underlying investments. Only the Investor Share Class pays a 12b-1 fee, which is primarily used to pay for distribution expenses on non-transaction fee platforms. A portion of the 12b-1 fees could be paid to WCM by the Funds' distributor for reimbursement of marketing and distribution services. WCM mitigates this conflict of interest by not recommending one class share over another. Rather, the class share is chosen by the client based on eligibility. See *Account Minimum* section below.

Additionally, each fund pays brokerage commissions, as well as other transaction or fund-related expenses out of each respective fund.

The higher expenses associated with the Investor Share Class will reduce an investor's return over time.

As discussed above, the value of the WCM Mutual Funds is excluded from the value of the assets for the calculation of the management fees when a client account holds WCM Mutual Funds for reasons other than tax-loss selling.

Other Fund Fees

Fees for the Canadian Fund, Australian Funds, CIT and UCITS are described in each fund's respective disclosure documents.

Compensation for the Sales of Investment Products

WCM's Investment Adviser Representatives ("IARs") are licensed as agents with a broker-dealer. In such capacity, the IARs will discuss and offer WCM Funds to institutional clients and investment consultants. This does not present a conflict of interest as IARs do not have an incentive to recommend one investment vehicle over another based on the compensation received, because the fee sharing arrangements are the same for all vehicles. In addition, IARs are not incentivized to recommend one Share Class over another as no portion of the 12b-1 fee is passed on to the IAR. Clients have the option to purchase investment products that are recommended through other brokers or agents that are not affiliated with us.

Performance-Based Fees and Side-By-Side Management

Performance-Based Fees

Performance-based fees are based on a percentage of the capital appreciation of the assets in a fund or account. In limited circumstances, WCM accepts client requests to charge a performance-based fee. Because WCM manages accounts that are charged an asset-based fee and accounts that are charged a performance-based fee, there is an incentive for WCM to favor accounts for which we receive a performance-based fee and/or to make investments that are riskier or more speculative than would be the case in the absence of such a compensation framework. Please refer to the Brokerage Practices section for additional information on how WCM mitigates such presented conflicts by aggregating orders.

Side-By-Side Management

Management of multiple portfolios gives rise to conflicts of interest. The conflicts of interest that arise in managing multiple accounts include, for example, conflicts among investment strategies or conflicts in the allocation of investment opportunities. WCM mitigates these conflicts of interest through our Order Aggregation and Trade Rotation policies and procedures, designed so that all client accounts are treated fairly and equitably and that no one client account receives, over time, preferential treatment over another, as described in the *Brokerage Practices* section below. In addition, WCM uses a model portfolio as the basis of portfolio construction for separate accounts in the same strategy so those accounts are treated the same, subject to each client's investment mandate. WCM also performs a periodic review of each investment strategy's model portfolio versus each client account. In this review, every position size for each client account is compared to our model weights. In addition, portfolios are monitored by our compliance department for consistency with client objectives and restrictions.

WCM has another potential conflict of interest as an adviser to both long-only accounts and accounts that execute short sales. WCM could sell short securities in a long-short account in one strategy while holding the same security long in a long-only account in another strategy. In this case, we could harm the performance of the long-only accounts for the benefit of accounts that execute short sales, which may include performance-based fee accounts. For example, continually selling a position short may depress the stock price, potentially harming a long-only account if it holds the same security. To mitigate this conflict of interest, WCM requires pre-approval of any short position, in the event the same security is held as a long position by another managed account. Compliance periodically performs side-by-side testing of the trades in these accounts to ensure all clients are being treated fairly.

Types of Clients

Description

WCM generally provides discretionary investment advisory services to institutional clients, such as pension and profit-sharing plans, business entities, charitable organizations, foundations, endowments, trusts, public funds, ERISA and other retirement accounts; individuals (collectively, "Separately Managed Accounts"); mutual funds ("Mutual Funds"), privately placed pooled investment vehicles organized as limited partnerships ("Private Funds"); CITs, Canadian Fund, Australian Funds and UCITS; (collectively, "Clients".)

Account Minimums

WCM's minimum account size for a Separately Managed Account is $10 million as noted under *Separately Managed Account Fees* section. Minimums are sometimes waived depending on the circumstances. It is not required that a minimum be maintained as a condition of continued management. Initial minimum investment requirements for the WCM Private Funds are $5 million, and $10 million for the WCM Focused International Growth Private Fund. Initial minimum investment requirements for the WCM Mutual Funds are $100 thousand for the Institutional Share Class and $1 thousand for the Investor Share Class. Additional details regarding the minimum investment requirements are set forth in each fund's respective Private Placement Memorandum, Prospectus or Offering Memorandum. This disclosure brochure is designed solely to provide information about WCM and should not be considered to be an offer of interest in the WCM Funds.

Methods of Analysis, Investment Strategies and Risk of Loss

Types of Investments

At the highest level, our investment philosophy rests on four timeless principles in support of our overall goal of providing significant, long-term excess return ("alpha") over appropriate benchmarks:

1. **Differentiation:** we believe that to outperform a benchmark, a portfolio has to be meaningfully different than the benchmark;

2. **Simplicity:** regardless of approach, we think that unnecessary complication ultimately detracts from returns;

3. **Culture:** we believe that successful investing includes an element of gifted ability, so we strive to foster a firm culture that attracts and keeps gifted investors, including a commitment to keep the Firm simple, and thus relatively small; and

4. **Temperament**: we think that temperament—which includes discipline, patience, the ability to look through the short term to the long term—is a necessary ingredient in the recipe for long-term excess return.

Our firm's overall vision embraces multiple strategies, each run by gifted, passionate investors within an atmosphere of inquiry and intellectual rigor. We believe this ensures that investment results are not constrained by the arbitrary orthodoxy that defines traditional methodologies.

Methods of Analysis & Investment Philosophy

WCM employs a bottom-up, fundamental method of analysis that emphasizes long-horizon growth prospects, competitive advantages, and company cultures conducive to attracting great people. Valuation also plays an important factor in our analysis method, predominantly impacting the timing of decisions and portfolio position sizing.

Investment Philosophy

The philosophical underpinnings for our strategies are comprised of several key elements:

1. **Structural Differentiation:** It should be clear that to outperform the benchmark, the portfolio has to be meaningfully different from the benchmark. Unconstrained from the benchmark, we are free to seek those companies we believe will benefit from their competitive positioning and/or favorable long-term trends developing throughout the world. This provides us with a significant structural advantage as we strive towards the goal of providing significant, long-term excess return ("alpha").

2. **Company Culture:** We believe that successful investing includes an element of gifted ability, so we strive to foster a firm culture that attracts and keeps gifted investors, including a commitment to keep the firm simple, and thus relatively small. In a similar way, we view corporate culture as important to the long-term success of any enterprise. So, when selecting companies, we work on understanding the "DNA" of the enterprise. As but one example, we view as extremely important the strength, quality and trustworthiness of management. We think a primary goal of any company should be to attract and retain quality people. In our view, the culture is what foundationally enables the success or failure of a business, and what separates the great businesses from the mere good ones.

3. **Focused Portfolio:** Since our objective is to significantly outperform the indices over an extended period of time, we employ a focused approach to investing. We believe exceptional returns can only be achieved by structuring a portfolio distinct from the indices, so we concentrate on our best ideas. Said positively, we would rather own a lot of a good company than a little bit of an average one. Said negatively, we refuse to dilute the portfolio with inferior ideas.

4. **Temperament:** The longer we are in this investment business, the more convinced we become that temperament is what sets the great investors apart from the pack. Temperament is that attitude or approach to investing that includes discipline, patience, the ability to look through the short term to the long term, the ability to "buy when others are despondently selling and sell when others are greedily buying," as Templeton used to say, and the ability to stay rational when all your emotions are screaming at you to be otherwise. We think temperament is an oft overlooked yet important "edge" an investor can have.

Investment Strategies

Our strategies utilize different capitalization ranges (e.g., large-cap, small-cap, all-cap,) different geographical scopes (e.g., international, global, emerging markets, U.S. domestic) and different security types (e.g., foreign ordinary shares, American Depository Receipts "ADR".)

Global Growth Equity Strategies:

Focused Growth International

Seeks non-U.S., quality growth businesses with strengthening competitive advantages ("economic moats"), supported by moat-aligned corporate cultures and durable global tailwinds. These companies tend to have high or rising returns on invested capital, superior growth prospects, and low (or no) debt.

Vehicles: Separately Managed Accounts, Private Fund, Mutual Fund, CIT, Wrap Programs, UMA Program

Material Risks: Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuers

Quality Global Growth

Seeks global, quality growth businesses with strengthening competitive advantages ("economic moats"), supported by moat-aligned corporate cultures and durable global tailwinds. These companies tend to have high or rising returns on invested capital, superior growth prospects, and low (or no) debt.

Vehicles: Separately Managed Accounts, Private Fund, Mutual Fund, UCITS, Canadian Fund, Australian Fund, Wrap Programs, UMA Programs

Material Risks: Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuers

Emerging Markets

Seeks emerging markets, quality growth businesses in with strengthening competitive advantages ("economic moats"), supported by moat-aligned corporate cultures and durable global tailwinds. These companies tend to have high or rising returns on invested capital, superior growth prospects, and low (or no) debt.

Vehicles: Separately Managed Accounts, Private Fund, Mutual Fund, SICAV, UCITS

Material Risks: Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuers

International Small Cap Growth

Seeks small-cap, non-U.S., quality growth businesses with strengthening competitive advantages ("economic moats"), supported by moat-aligned corporate cultures and durable global tailwinds. These companies tend to have high or rising returns on invested capital, superior growth prospects, and low (or no) debt.

Vehicles: Separately Managed Accounts, Private Fund, Mutual Fund

Material Risks: Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuers

China Quality Growth

Seeks Chinese, quality growth businesses with strengthening competitive advantages ("economic moats"), supported by moat-aligned corporate cultures and durable global tailwinds. These companies tend to have high or rising returns on invested capital, superior growth prospects, and low (or no) debt.

Vehicles: Separately Managed Accounts, Mutual Fund

Material Risks: China Investment, Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuer

Quality Global Growth Long-Short

Seeks a long position in global, quality growth businesses with strengthening competitive advantages ("economic moats"), supported by moat-aligned corporate cultures and durable global tailwinds. These companies tend to have high or rising returns on invested capital, superior growth prospects, and low (or no) debt.

Seeks to short global businesses with low or falling returns on invested capital, high potential for negative operating leverage, decreasing margins, macro sensitivity, and/or a history of low to no-or decreasing-growth

Vehicles: Private Fund

Material Risks: Counterparty, Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuer, Short Sale, Derivatives

Select Global Growth

Seeks global, quality growth businesses with strengthening competitive advantages ("economic moats"), supported by moat-aligned corporate cultures and durable global tailwinds. The portfolio places an emphasis on identification of early generational winners as well as companies with

uniquely durable growth. These companies tend to have rising returns on invested capital, a substantial growth runway, and low (or no) debt.
Vehicles: Separately Managed Accounts, UCITs
Material Risks: Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuers

Focused International Opportunities
Seeks small- and mid-cap, non-U.S., quality growth businesses with strengthening competitive advantages ("economic moats"), supported by moat-aligned corporate cultures and durable global tailwinds. These companies tend to have high or rising returns on invested capital, superior growth prospects, and low (or no) debt.
Vehicles: Separately Managed Accounts, Mutual Fund
Material Risks: Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuers

International Long-Term Growth
Seeks non-U.S., quality growth businesses with strengthening competitive advantages ("economic moats"), supported by moat-aligned corporate cultures and durable global tailwinds. These companies tend to have high or rising returns on invested capital, superior growth prospects, and low (or no) debt.
Vehicles: Separately Managed Accounts, Mutual Fund
Material Risks: Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuers

Global Value Equity Strategies:

Focused International Value
Seeks to exploit structural inefficiencies within the non-U.S. universe by investing in underappreciated companies with improving fundamentals and/or growing competitive advantages.
Vehicles: Separately Managed Accounts, Mutual Fund, Wrap/UMA
Material Risks: Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuers

U.S. Value Strategies:

Focused Small Cap
Seeks U.S. small cap businesses with durable competitive advantages and shareholder-friendly management teams, trading at discounts to their intrinsic values. Characteristics of these businesses

include sustained, high returns on invested capital, consistent free cash flow generation, and impressive compounding of net book value over time.
Vehicles: Separately Managed Accounts, Mutual Fund
Material Risks: Equity, Focused Portfolio, Interest-rate, Management and Strategy, Market and Economic, Liquidity, Market Capitalization, Risks Affecting Specific Issuers

<u>Focused SMID Cap</u>
Seeks U.S. SMID-cap businesses with durable competitive advantages and shareholder-friendly management teams, trading at discounts to their intrinsic values. Characteristics of these businesses include sustained, high returns on invested capital, consistent free cash flow generation, and impressive compounding of net book value over time.
Vehicles: Separately Managed Accounts
Material Risks: Equity, Focused Portfolio, Interest-rate, Management and Strategy, Market and Economic, Liquidity, Market Capitalization, Risks Affecting Specific Issuers

<u>Focused Mid Cap</u>
Seeks U.S. mid-cap businesses with durable competitive advantages and shareholder-friendly management teams, trading at discounts to their intrinsic values. Characteristics of these businesses include sustained, high returns on invested capital, consistent free cash flow generation, and impressive compounding of net book value over time.
Vehicles: Separately Managed Accounts
Material Risks: Equity, Focused Portfolio, Interest-rate, Management and Strategy, Market and Economic, Liquidity, Market Capitalization, Risks Affecting Specific Issuers

U.S. Growth Strategies:

<u>Small Cap Growth</u>
Seeks U.S. small cap growth businesses with increasing cash flow returns on invested capital, growing asset bases, and the ability to reinvest cash flows into additional assets to generate recursive business models.
Vehicles: Separately Managed Accounts, Mutual Fund, Wrap Program
Material Risks: Equity, Focused Portfolio, Interest-rate, Management and Strategy, Market and Economic, Liquidity, Market Capitalization, Risks Affecting Specific Issuers

<u>Focused U.S. Growth</u>
Seeks U.S. SMID-cap growth businesses with increasing cash flow returns on invested capital, growing asset bases, and the ability to reinvest cash flows into additional assets to generate recursive business models.
Vehicles: Separately Managed Accounts
Material Risks: Equity, Focused Portfolio, Interest-rate, Management and Strategy, Market and Economic, Liquidity, Market Capitalization, Risks Affecting Specific Issuers

Focused U.S. Opportunities

Seeks U.S. growth businesses, with markets caps between $2 billion and $20 at time of purchase, with increasing cash flow returns on invested capital, growing asset bases, and the ability to reinvest cash flows into additional assets to generate recursive business models.

Vehicles: Separately Managed Accounts

Material Risks: Equity, Focused Portfolio, Interest-rate, Management and Strategy, Market and Economic, Liquidity, Market Capitalization, Risks Affecting Specific Issuers

Select U.S. Growth

Seeks U.S. mid cap growth businesses with increasing cash flow returns on invested capital, growing asset bases, and the ability to reinvest cash flows into additional assets to generate recursive business models.

Vehicles: Separately Managed Accounts

Material Risks: Equity, Focused Portfolio, Interest-rate, Management and Strategy, Market and Economic, Liquidity, Market Capitalization, Risks Affecting Specific Issuers

Sustainable Equity Strategies:

WCM Sustainable International

Seeks international businesses that exhibit strong or strengthening competitive advantages ("economic moats"), wide runways for growth within their core competencies, and strong or strengthening ESG characteristics ("ESG trajectory").

Vehicles: Separately Managed Accounts, Mutual Fund

Material Risks: Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuer

WCM Sustainable Global

Seeks global businesses that exhibit strong or strengthening competitive advantages ("economic moats"), wide runways for growth within their core competencies, and strong or strengthening ESG characteristics ("ESG trajectory").

Vehicles: Separately Managed Accounts

Material Risks: Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuer

WCM Sustainable Developing World

Seeks emerging markets businesses that exhibit strong or strengthening competitive advantages ("economic moats"), wide runways for growth within their core competencies, and strong or strengthening ESG characteristics ("ESG trajectory").

Vehicles: Separately Managed Accounts, Mutual Fund

Material Risks: Currency, Emerging Market, Equity, Focused Portfolio, Foreign Equity, Frontier Market, Interest-rate, Liquidity, Management and Strategy, Market and Economic, Market Capitalization, Risks Affecting Specific Issuer

Risk of Loss

Although WCM makes every effort to preserve each Client's capital and achieve real growth of wealth, investing involves risk of loss that each Client should be prepared to bear. The following is a brief description of the material risks associated with an investment in the investment strategies described above, as well as other general risks with WCM.

ADR Conversion Risk: Certain strategies gain international investment exposure by investing in American Depositary Receipts ("ADRs"). ADRs are the receipts for the shares of a non-U.S.-based company traded on U.S. exchanges. Accounts of large institutional clients may hold ordinary non-U.S. securities (sometimes referred to as "ORD") directly (instead of or in addition to ADRs). ADR portfolios may have reduced exposure to the range of international investment opportunities available through ordinary non-U.S. securities. ADRs may be more thinly traded in the U.S. than the underlying shares traded in the country of origin, which may increase volatility and affect purchase or sale prices. ADRs do not eliminate the currency and economic risks associated with international investing. To the extent a portfolio invests in ADRs, a portfolio will be generally subject to substantially all of the same risks as when investing directly in ordinary non-U.S. securities.

Business Continuity & Disaster Recovery Risk: WCM maintains a Business Continuity and Disaster Recovery Plan that is reasonably designed to ensure continuity of the business and that essential business functions are restored in the event of a disaster and unforeseen occurrences (including, but not limited to natural disasters, epidemics, pandemics, outbreaks of disease and other health issues, acts of war, terrorism, etc.). While we strive to maintain such processes to support to the Plan, WCM cannot ensure it will be able to continue business operations in the event of every disaster event, given the unknown nature and scope of future disaster events, WCM will make reasonable attempts in light of the situation to notify clients of the impact of the event on WCM and its clients.

Additional Disclosures: Summary of Business Continuity and Disaster Recovery Plan, below.

China Investment Risk: Certain accounts that invest in emerging market countries may invest in securities and instruments that are economically tied to the People's Republic of China. The Chinese economy is dependent on the economies of other countries and can be significantly affected by currency fluctuations and increasing competition from Asia's other low-cost emerging economies. The willingness and ability of the Chinese government to support the Chinese economy and markets is uncertain. China has yet to develop comprehensive securities, corporate, or commercial laws, its market is relatively new and less developed, and its economy is experiencing a relative slowdown. Changes in Chinese government policy and economic growth rates could significantly affect local markets. Reduction in spending on Chinese products and services, institution of tariffs or other trade barriers or a downturn in any of the economies of China's key trading partners may have an adverse impact on the securities of Chinese issuers. Concerns exist regarding a potential trade war between China and the United States, which may trigger a significant reduction in international trade, the oversupply of certain manufactured goods, substantial price reductions of goods and possible failure of individual companies and/or large segments of China's export industry, all of which may have a negative impact on investments.

Counterparty Risk: The risk that counterparties may encounter financial difficulties, fail, or otherwise become unable to meet their obligations. The long-short strategy may invest in securities and derivatives that have institutional counterparties, including brokerage firms and banks; client assets may also be entrusted for custodial and prime brokerage purposes to such counterparties. Any such development could cause damaging losses, or even complete loss, of investors' capital. In the event that the counterparty to such a derivative instrument becomes insolvent, a strategy potentially could lose all or a large portion of its investment in the derivative instrument.

Currency Risk: Non-U.S. securities that trade in, and receive revenues in, foreign currencies are subject to the risk that those currencies will fluctuate in value relative to the U.S. dollar.

Cybersecurity: With the increased use of technologies such as the Internet and the dependence on computer systems to perform necessary business functions, WCM and its service providers may be prone to operational and information security risks resulting from cyber-attacks and/or other technological malfunctions and also those risks associated with power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. In general, cyber-attacks are deliberate, but unintentional events may have similar effects. Cyber-attacks include, among other things, stealing or corrupting data maintained online or digitally, preventing legitimate users from accessing information or services on a website, releasing confidential information without authorization, and causing operational disruption. Successful cyber-attacks against, or security breakdowns of WCM or other third-party service provider may adversely affect the clients. For instance, cyber-attacks and/or certain disasters may affect WCM's cause the release of private client information or confidential firm information, impede trading, cause WCM's information and technology systems to become inoperable for extended periods of time or to cease to function properly, expose WCM to theft or embezzlement, cause reputational damage, and subject WCM to regulatory fines, penalties or financial losses, reimbursement or other compensation costs, and additional compliance costs. While WCM and its service providers have established information security, business continuity plans, disaster recovery plans, and systems designed to prevent or reduce the impact of cyber-attacks, such plans and systems have inherent limitations due in part to the ever-changing nature of technology and cyber security attack tactics, and there is a possibility that certain risks have not been adequately identified or prepared for. There is also a risk that cybersecurity breaches may not be detected. Please refer to the section in this document titled *Additional Disclosures: Summary of Business Continuity and Disaster Recovery Plan*, below.

Emerging Markets Risk: Investments in emerging market countries involve exposure to changes in economic and political factors. The economies of most emerging market countries are in the infancy stage of capital market development. As a result, their economic systems are still evolving and their political systems are typically less stable than those in developed economies. For example, emerging market countries can suffer from currency devaluation and higher rates of inflation.

Equity Risk: Investment in equity securities involves risks and may be subject to wide and sudden fluctuations in market value, with a resulting fluctuation in the amount of profits and losses. The market value of a stock may fluctuate for any number of reasons that directly relate to the company, such as management performance, financial leverage, and reduced demand for the company's goods or services.

Focused Portfolio Risk: By definition, concentrated portfolios hold larger position sizes. In principle, a large loss in any one holding has a greater impact on portfolio return for a concentrated portfolio than it would for a broadly diversified portfolio.

Foreign Equity Risk: This is the risk that prices of non-U.S. securities may be more volatile than those of U.S. securities because of reduced liquidity, economic conditions abroad, political developments, and changes in the regulatory environment of foreign countries. Non-U.S. companies are generally subject to different legal and accounting standards than U.S. companies, and foreign financial intermediaries may be subject to less supervision and regulation than U.S. financial firms. In some countries there are restrictions on investments or investors such that the only practicable way to invest in such markets is by entering into swaps or other derivative transactions. Such transactions involve counterparty risks which are not present in the case of direct investments.

Frontier Market Risk: Frontier market countries generally have smaller economies and even less developed capital markets than traditional emerging markets, and as a result, the risks of investing in emerging market countries are magnified in frontier market countries. The magnification of risks is the result of potential for extreme price volatility and illiquidity in frontier markets; government ownership or control of parts of private sector and of certain companies; trade barriers, exchange controls, managed adjustments in relative currency values and other protectionist measures imposed or negotiated by the countries with which frontier market countries trade; and the relatively new and unsettled securities laws in many frontier market countries.

Interest-rate Risk: Fluctuations in interest rates may cause stock prices to fluctuate. For example, companies with higher rates of earnings growth, selling at higher price/earnings ratios, may be more susceptible to price declines if interest rates rise.

Liquidity Risk: Liquidity risk exists when particular investments are difficult to purchase or sell, and may be particularly pronounced for long-term investments. An Account's investments in illiquid securities may reduce the returns of the Account because it may be unable to sell the illiquid securities at an advantageous time or price or possibly require an Account to dispose of other investments at unfavorable times or prices in order to satisfy its obligations, which could prevent the Account from taking advantage of other investment opportunities. Additionally, the market for certain investments may become illiquid under adverse market or economic conditions independent of any specific adverse changes in the conditions of a particular issuer. To the extent that an Account's principal investment strategy involves securities of companies with smaller market capitalizations, foreign (non-U.S.) securities, Rule 144A securities, illiquid sectors derivatives or securities with substantial market risk, the Account will tend to have the greatest exposure to liquidity risk.

Management and Strategy Risk: The value of your investment depends on the judgment of WCM about the quality, relative yield, value or market trends affecting a particular security, industry, sector or region, which may prove to be incorrect. Investment strategies employed by WCM in selecting investments for a strategy may not result in an increase in the value of your investment or in overall performance equal to other investments.

Market and Economic Risk: This is the risk that portfolio value may be affected by a sudden overall price decline in the financial markets. The prices of equities may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a stock's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

Market Capitalization Risk: Larger, more established companies may be unable to attain the high growth rates of successful, smaller companies during periods of economic expansion. In addition, large-capitalization companies may be unable to respond quickly to new competitive challenges, such as changes in technology and consumer tastes and may be more prone to global economic risks. Investing in small-capitalization and mid-capitalization companies generally involves greater risks than investing in large-capitalization companies. Small or mid-cap companies may have limited product lines, markets or financial resources or may depend on the expertise of a few people and may be subject to more abrupt or erratic market movements than securities of larger, more established companies or market averages in general. Many small capitalization companies may be in the early stages of development. Since equity securities of smaller companies may lack sufficient market liquidity and may not be regularly traded, it may be difficult or impossible to sell securities at an advantageous time or a desirable price.

Multiple Strategies Risk: WCM manages multiple investment strategies under the direction of multiple, different PMs. These strategies occasionally overlap with an investment in the same security, which creates potential conflicts of interest. Investment in the same security by different strategies may occur at different times, which gives opportunity for one strategy to trade ahead of another thereby potentially favoring one over the other. Another conflict happens when strategy objectives or PM opinions differ for an investment in a common security between strategies. For example, one strategy may buy/hold a security while another strategy choses to sell/trim the same company. It is also possible for one strategy to be long a holding while another strategy shorts the same position. Differences are primarily explained by dissimilar investment objectives, guidelines, and portfolio construction decisions. WCM seeks to mitigate these conflicts through its order aggregation and allocation policy. When aggregation is not possible due to different timing for trade decisions, the Compliance Team reviews the PM trade decision rationale for such trades. Additionally, the Compliance Team audits the sequence for these decisions over time to assess if there is any pattern of abuse or favoritism by one strategy over another.

Short Sale Risk: A short sale involves the sale of a borrowed security, in anticipation of purchasing that same security at a lower price in the future in order to close the short position. If the value of the borrowed security increases between the date the account enters into the short sale and the date that the account buys that security to cover its short position, the account may experience a loss.

Specific Issuer Risk: The value of an equity security or debt obligation may decline in response to developments affecting the specific issuer of the security or obligation, even if the overall industry or economy is unaffected. These developments may include a variety of factors, including but not limited to management issues or other corporate disruption, political factors adversely affecting governmental issuers, a decline in revenues or profitability, an increase in costs, or an adverse effect on the issuer’s competitive position.

Disciplinary Information

Neither WCM nor any of its management personnel have been involved in a disciplinary proceeding. In addition, they have not been involved in any legal proceeding that might reasonably be considered material to a Client’s evaluation of WCM’s advisory business or the integrity of its management.

Other Financial Industry Activities and Affiliations

Industry Activities

Some of WCM’s Investment Adviser Representatives (“IARs”) are licensed as agents with a broker-dealer. In such capacity, the IARs will discuss and offer WCM Funds to institutional clients and investment consultants. For further information, see the *Fees and Compensation* and *Code of Ethics* sections.

Industry Affiliations

Mutual Funds

As noted earlier in *Types of Advisory Services* section, WCM serves as the adviser to the following WCM Mutual Funds:

- WCM Focused International Growth Fund
- WCM Focused Global Growth Fund
- WCM Focused Emerging Markets Fund
- WCM International Small Cap Growth Fund
- WCM China Quality Growth Fund
- WCM Focused Small Cap Fund
- WCM Small Cap Growth Fund
- WCM Sustainable International Fund
- WCM Sustainable Developing World Fund
- WCM Focused International Value Fund
- WCM International Long-Term Growth Fund
- WCM Focused International Opportunities Fund

If deemed by WCM to be in the Client's best interest, WCM invests Clients in such mutual funds. The WCM Mutual Funds are advised by WCM following WCM's investment philosophy and management strategies. Fees paid to WCM with respect to the WCM Mutual Funds are described in the *Fees and Compensation* section.

Private Funds

As noted earlier in *Types of Advisory Services* section, WCM serves as adviser and General Partner to the following WCM Private Funds:

- WCM Focused International Growth Fund LP
- WCM Focused Global Growth Fund LP
- WCM Focused Emerging Markets Fund LP
- WCM International Small Cap Growth Fund LP
- WCM Focused Global Growth Long-Short Fund (master-feeder structure with one onshore and one offshore fund: The WCM Focused Global Growth Long-Short Offshore Fund Ltd. is a Cayman Islands exempted company and invests all of its assets in limited partnership interests of the Master Fund, the WCM Focused Global Growth Long-Short Fund L.P., a Delaware limited partnership)
- WCM Partners L.P.

WCM IARs will offer the private funds to eligible Clients as a possible vehicle for investing in one of WCM's strategies. The WCM Private Funds are advised by WCM following WCM's respective investment philosophy and management strategy. Fees paid to WCM with respect to the WCM Private Funds are described in the *Fees and Compensation* section.

Canadian Fund

As noted earlier in *Types of Advisory Services* section, WCM serves as a portfolio manager to the WCM (Canada) Focused Global Growth Fund. This fund is available for eligible (Canadian) clients, who are interested in our Quality Global Growth strategy.

Australian Funds

As described earlier in *Types of Advisory Services* section, WCM serves as a portfolio manager to the WCM Global Growth LIC, WCM Quality Global Growth ETMF, WCM Quality Global Growth Managed Fund, and WCM International Small Cap Growth Fund. These funds are available for eligible (Australian) clients who are interested in our Quality Global Growth and International Small Cap Growth strategies.

CIT

As noted earlier in *Types of Advisory Services* section, WCM serves as the adviser to a Collective Investment Trust, the WCM Focused Growth International CIT. This fund is offered to eligible U.S. 401k and other retirement and employee benefit plans that are interested in our Focused Growth International strategy.

UCITS

As noted earlier in *Types of Advisory Services* section, WCM serves as the sub-adviser to the following UCITS, which are investment companies operating pursuant to the European Union's UCITS (Undertakings for Collective Investment in Transferable Securities) Regulations:

- WCM Global Equity Fund of Heptagon Fund plc
- WCM Global Emerging Markets Equity Fund
- WCM Select Global Growth Equity Fund

The funds are offered to eligible non-U.S. clients, who are interested in our Quality Global Growth strategy or Emerging Markets strategy.

Material Industry Business Relationships

Natixis

Natixis IM holds a minority equity interest in WCM Investment Management, LLC. As described below, WCM and Natixis IM and its affiliates have also entered into a global distribution relationship.

Natixis IM is not an advisory affiliate or related person of WCM, and the operations and management of WCM are completely separate and independent of Natixis IM and all of its affiliates. To avoid the appearance of any conflicts of interest, WCM has implemented a policy of not entering into transactions (e.g. trade execution, participation in underwritings, cross trades, etc.) with Natixis IM or any Natixis affiliates on behalf of WCM's clients. However, WCM does engage in business activities with some of these entities, subject to its policies and procedures governing conflicts of interest. These activities are generally limited to UMA model recommendation, marketing and referral arrangements.

WCM has been engaged by Natixis Global Asset Management ("NGAM") Advisors to provide investment recommendations (UMA Program model recommendations) to assist NGAM Advisors in providing non-discretionary model portfolio provider services. These recommendations are subject to WCM's trade aggregation, allocation and rotation procedures that require equitable allocation of trades among accounts. See the *Brokerage Practices* section below.

Natixis Distribution, L.P., Natixis Advisors, L.P., Natixis Investment Managers S.A. and WCM have also entered into certain referral agreements. These agreements provide that Natixis IM and Natixis IM affiliates, generally on a global basis, will (or will enter into distribution arrangements with third parties for such third parties to) provide consulting, sales and other distribution-related services with respect to investment products advised or sub-advised by WCM (other than the WCM Mutual Funds, which are discussed below) in exchange for certain fees. These agreements are subject to Rule 206(4)-3 under the Investment Advisers Act of 1940 (Cash Solicitation Rule). For information about referral arrangements, see the *Client Referrals and Other Compensation* section.

In addition, Natixis Distribution, L.P. acts as the principal underwriter to the WCM Mutual Funds. In connection therewith, WCM and Natixis Distribution, L.P., a subsidiary of Natixis IM., entered into a Mutual Fund Support Services Agreement. Under this agreement, Natixis Distribution, L.P. is responsible for providing investor support services and other marketing, sales, and distribution-related activities relating to the WCM Mutual Funds. For more details about this relationship, see the *Client Referrals and Placement Arrangements* section.

Clifford Capital

WCM maintains a passive 24.9% investment in Clifford Capital Partners, LLC ("Clifford"). Clifford is not an advisory affiliate or related person of WCM, the operations of WCM and Clifford are completely separate and independent and WCM does not conduct business with Clifford. WCM supervised persons are permitted to invest in mutual funds where Clifford Capital is adviser. Such transactions are subject to the Firm's policies and procedures for Personal Trading, as described below.

Wanzenberg

WCM maintains a passive 12.5% investment in Wanzenberg Partners, LLC ("Wanzenberg"). Wanzenberg is not an advisory affiliate or related person of WCM and the operations of the two companies are completely separate and independent. WCM provides investment recommendations (UMA Program model recommendations) to Wanzenberg Partners, LLC. and WCM has a small corporate account that participates in this UMA program. WCM has adopted trade aggregation, allocation and rotation procedures that require equitable allocation of trades among accounts. See the *Brokerage Practices* section below.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

WCM has adopted a Code of Ethics ("Code") pursuant to Rule 204A-1 that sets forth the standards of business conduct required of WCM's personnel and requires an affirmative commitment that we will comply with federal securities laws. As a matter of Firm policy, WCM's Code of Ethics states:

> ***"WCM is committed to maintaining the highest legal and ethical standards in the conduct of our business. We have built our reputation on Client trust and confidence in our professional abilities and our integrity. As fiduciaries, we place our Clients' interests above our own. Meeting this commitment is the responsibility of WCM and each and every one of our employees."***

All WCM personnel are subject to the Code's restrictions and procedures on personal securities transactions. Among other things, the Code addresses:

- WCM's fiduciary obligations to Clients.
- WCM's obligation to provide all personnel with a copy of the current Code and any subsequent amendments and obtain a written acknowledgement of their receipt of the Code and any amendments.
- WCM's restrictions on purchases and sales for personal accounts of securities purchased or sold for Clients and reporting requirements.
- WCM's requirement of all Supervised Persons to report Outside Business Activities.

The Code is based upon the following principle: "The personal investing activities of all WCM personnel and family members must be conducted in a manner to avoid actual or potential conflicts of interest with WCM's Clients and WCM itself. No employee of WCM may use his or her position with WCM or any investment opportunities they learn of because of his or her position with WCM to the detriment of WCM's Clients or WCM."

The Code generally requires pre-clearance by the Chief Compliance Officer of all personal securities transactions in any Covered Security as defined in the rule and the Code. Pre-clearance requests will be approved or based upon: the general policies set forth in this Code; the requirements of applicable law; the timing of the proposed transaction in relation to transactions made or contemplated for Clients of WCM; the nature of the security and transaction involved; and the potential for conflicts with the interests of Clients or WCM, or the appearance of such conflicts. For instruments that adhere to market hours, pre-clearance is valid until the subsequent close of the applicable market. All WCM personnel must provide to the Chief Compliance Officer personal securities' holdings reports and quarterly transaction reports within 30 days of the end of each calendar quarter, which may consist of monthly brokerage statements for all accounts in which they have a beneficial interest. Typically, this requirement is satisfied when WCM personnel electronically link their brokerage accounts to the Firm's compliance portal for real-time monitoring by the Chief Compliance Officer. All WCM personnel are also required to comply with ethical restraints relating to Clients and their accounts, including restrictions on giving gifts or political contributions to, and receiving gifts from, Clients in violation of WCM's general standards of conduct.

All WCM personnel must comply fully with the Code and related procedures. Failure to do so may result in disciplinary action, up to and including termination of employment.

An existing or prospective Client may obtain a copy of the Code upon request.

Recommend Securities with Material Financial Interest

WCM receives a fee for its role as adviser to the WCM Mutual Funds. When instructed in writing by a Client, WCM will place such fund in a Client's account when the Client's investment objectives seek such an investment opportunity. Yet, direct ownership of the individual securities may not be cost effective due to the size of the Client's account. If the fund is held in a Client's account for reasons other than tax-loss selling, its value is not included in the account value when computing WCM's management fee.

Under special circumstances, if eligible, WCM IARs will solicit Clients to invest in the WCM Private Funds in which WCM has a financial interest. As General Partner to the WCM Private Funds, WCM participates in the private funds' investments, pro rata, in accordance with its capital accounts (as described in the *Brokerage Practices* section of this brochure). Principal executive officers and other personnel of WCM receive annual compensation and bonuses based, in part, on the performance of the private funds, and are also be permitted to invest in the private funds as "knowledgeable employees."

Invest in Same Securities Recommended to Clients

WCM acts as investment adviser to numerous accounts. WCM gives advice and takes action with respect to any Client account or for its own account, or the account of its officers, directors, employee, or agents, that may differ from actions taken by WCM on behalf of other accounts. WCM is not obligated to recommend, buy or sell — or to refrain from recommending, buying or selling— any security that WCM, its officers, directors, employees or agents, buy or sell, directly or indirectly, for its or their own accounts, or for any other account WCM manages. WCM is not obligated to refrain from investing in securities held in the accounts it manages, except to the extent that such investments violate the Code adopted by WCM.

From time to time, access persons of WCM will have interests in securities owned by or recommended to Clients. On occasion, WCM purchases or sells for its advisory accounts securities of an issuer in which WCM or its access persons also have a position or interest. To mitigate this conflict of interest, WCM aggregates transactions for its proprietary accounts and accounts of its personnel, and averages prices across all accounts participating in the transaction to the extent that such aggregated transactions do not violate the securities laws or regulations or the Code. Additionally, some "knowledgeable employees" of WCM invest in private funds which, in turn, may invest in securities in which WCM invests on behalf of other managed accounts. As these situations represent a potential conflict of interest, WCM has implemented procedures, relating to personal securities transactions and insider trading, that are designed to prevent actual conflicts of interest.

Insider Trading Policy

Access persons may, from time to time, come into possession of material nonpublic and other confidential information which, if disclosed, might affect an investor's decision to buy, sell or hold a security. Under applicable law, access persons are prohibited from improperly disclosing or using such information for their personal benefit or for the benefit of any other person, regardless of whether such other person is an advisory Client. Accordingly, should access persons come into possession of material nonpublic or other confidential information with respect to any company, they are prohibited from communicating such information to, or using such information for the benefit of themselves or WCM Clients, and have no obligation or responsibility to disclose such information to, nor responsibility to use such information for the benefit of, Clients when following policies and procedures designed to comply with law.

The Code contains a policy on *Protection of Material, Nonpublic and Other Confidential Information and Prevention of Insider Trading and Tipping*, adopted in accordance with Advisers Act Section 204A, which establishes procedures to prevent the misuse of material nonpublic information by access persons. Any WCM officer, director, employee or other access person who fails to observe the above-described policies risks serious sanctions, including dismissal and personal liability.

Brokerage Practices

Selecting Brokerage Firms

In determining the ability of a broker-dealer to obtain best execution of securities transactions, WCM considers a number of factors, including: size; access to various markets; history in effectively completing transactions in certain types of securities (e.g., bonds, over-the-counter securities, listed stocks); ability, based on our own experience with them, to execute transactions quickly and effectively; execution capabilities required by the transactions; the importance to the account of speed, efficiency and confidentiality; the broker-dealer's apparent familiarity with sources from or to whom particular securities might be purchased or sold; the reputation and perceived soundness of the broker-dealer; research services received from the broker-dealer; as well as other matters relevant to the selection of a broker-dealer for portfolio transactions.

In evaluating the reasonableness of brokerage commissions, we consider the size of the transaction, the difficulty of the transaction (e.g., liquidity), and the degree of effort put forth by the broker to achieve the best possible price. Except in connection with Clients who are treated as Directed Brokerage Clients (see *Directed Brokerage and Consultant Accounts, Wrap Fee Programs* and *UMA Programs* below), wherever possible, we negotiate commissions at the lowest commission level based on the previously mentioned factors. We do require that the commission discounts be competitive with those offered by other firms for like transactions. Occasionally, we perform a trade with a broker and pay a higher commission than another might charge; however, if this is done, it will be because of our need for specific expertise a firm has in a particular type of transaction (due to factors such as size or difficulty), or for speed/efficiency in execution, or for research services provided (see *Research and Soft Dollars* below). In all cases though, the transaction costs will still remain competitive.

When a Client does not have a brokerage arrangement or is not using a bank or trust company as custodian for the Client's assets, WCM will sometimes suggest the services of a broker-dealer or bank trust department. Our suggestion is generally based on our past experience with a custodian and a confidence in their abilities to service our Clients.

Certain WCM investment strategies involve making direct private equity investments. The terms of such transactions are typically subject to negotiation and brokerage firms are not usually involved. Therefore, WCM does not generally utilize broker dealers to effect securities transactions. WCM may also engage in other types of individually negotiated transactions. Because of the negotiation involved in these transactions, WCM believes that it meets its “best execution” obligation.

Commission Rates or Equivalent Policy

WCM has no duty or obligation to seek, in advance, competitive bidding for the most favorable commission rate applicable to any particular portfolio transaction or to select any broker-dealer on the basis of its purported or “posted” commission rate. WCM, however, will research current level of the charges of eligible brokers and to minimize the expenses incurred for effecting portfolio transactions to the extent consistent with the interests and policies of the accounts. Although WCM generally seeks competitive commission rates, it will not necessarily pay the lowest commission or commission equivalent. Transactions may involve specialized services on the part of the broker-dealer involved and thereby entail higher commissions (or their equivalents) than would be the case with other transactions requiring more routine services.

Research and Soft Dollars

Under Section 28(e) of the Securities Exchange Act of 1934, WCM pays commissions to broker-dealers for Client portfolio transactions that exceed the amount of commissions that would be charged by another broker-dealer for the same transaction, provided that WCM determines in good faith that the amount of commissions paid are reasonable in relation to the value of the brokerage and research services provided by such broker-dealer, either in terms of a particular transaction or WCM's overall responsibilities with respect to accounts for which it exercises investment discretion. Pursuant to Section 28(e), WCM has entered into soft dollar arrangements with third parties and broker-dealers for eligible “brokerage” and “research” products and services (as defined under Section 28(e)) used by WCM in connection with its investment process, including, without limitation, general economic and security market analyses and reports, industry and company analyses and reports, third party and proprietary analyses and reports concerning securities, and market data. WCM uses these eligible research and brokerage products and services in providing investment advisory services to all of its

Clients, rather than just those portfolios for which soft dollar transactions are executed. A potential conflict of interest exists because WCM receives these products and services from broker-dealers in exchange for directing commissions from Client portfolio transactions, rather than paying for these products and services with its own assets. WCM has an incentive to select or recommend a broker-dealer based on our interest in receiving the research or other products or services, rather than on our Clients' interest in receiving most favorable execution. To mitigate this conflict, WCM conducts quarterly reviews of our best execution efforts, as described in the *Brokerage Reviews* section below.

Brokerage Reviews

All the topics discussed in this *Brokerage Reviews* section are reviewed quarterly by WCM's Best-Execution Committee. Among other things, the committee reviews the approved broker list, all trade activity, commissions paid, commission allocation, execution quality, qualitative performance of brokers, directed broker relationships, and soft dollar commissions, research and execution services. This committee is comprised of representatives from the Investment Strategy Group (ISG) and Portfolio Management Team, the Leadership Team, the Trade Team, the Ops Team, and the Chief Compliance Officer.

Order Aggregation

Except as disclosed in *Directed Brokerage and Consultant Accounts, Wrap Fee Programs* and *UMA Programs,* WCM generally aggregates or "blocks" orders being placed for execution at the same time for the accounts of two or more Clients where it believes such aggregation is appropriate and in the best interest of Clients. WCM believes this practice enables WCM to seek more favorable executions and net prices for the combined order.

All block orders are subject to WCM's order aggregation and allocation policy and procedures ("Procedures"). The Procedures are designed to meet applicable legal standards. They have been designed to ensure that Clients whose orders are eligible for aggregation are treated fairly vis-à-vis one another. WCM makes decisions to recommend, purchase, sell or hold securities for all of its Client accounts, including affiliated Client accounts, based on the specific investment objectives, guidelines, restrictions and circumstances of each account. Accounts for WCM personnel which are managed by the Firm are aggregated with Client trades as permitted by the Code of Ethics discussed above.

WCM believes that aggregating orders will, in general, benefit its Clients as a whole over time by lowering the commissions for the aggregate transaction. Aggregation typically benefits the accounts because of the much larger volume discount obtainable with the aggregate transaction than that possible with the single account. However, in any particular instance, aggregation may result in a less favorable price or execution for any particular Client than might have been obtained if a particular transaction had been effected separately.

Trade Rotation

To avoid competition in the markets among orders for its Clients, WCM executes orders on a rotational basis. WCM utilizes a two-bucket trade rotation system for executing orders. Bucket A consists of all accounts over which WCM has full discretion for trade execution and settlement ("Non-Directed

Brokerage Clients”). These accounts generally have the following characteristics: (1) the Client has not provided directed-brokerage instructions to WCM for currency or securities trades; (2) the Client’s custodian does not provide bundled brokerage services and does not charge “trade away” fees; and (3) the Client is not participating in a Wrap Fee Program or UMA Program. Bucket B consists of all other accounts, including: (1) those for which the Client has provided explicit directed-brokerage instructions to WCM; (2) accounts whose custodian provides bundled brokerage services and charges a “trade away” fee (e.g., Charles Schwab, Fidelity, TD Ameritrade, etc.); (3) accounts participating in Wrap Fee Programs or UMA Programs; (4) accounts with non-standard trade or settlement systems/processes (or systems/processes that are otherwise incompatible with WCM’s trade systems/processes); and (5) accounts with Client-imposed restrictions or certain other specialized requirements.

For each investment decision that leads to transactions in Client accounts (“Trade Program”), accounts in Bucket A will typically trade first, so that Non-Directed Brokerage Clients are not disadvantaged as a result of the specialized requirements of the other Clients. Accounts in Bucket B are placed into one of three groups – Wrap Fee Programs, UMA Programs, and remaining Bucket B accounts. Upon completion of trading for accounts in Bucket A, the three groups in Bucket B are traded on a straight rotational basis (i.e., the group at the end of the last Trade Program moves to the beginning of the next Trade Program.) Blocks of accounts within each group are traded on a random basis. This procedure is designed to ensure that no one Client, or group of Clients, within this Bucket has an unfair advantage over another Client, or group of Clients, within this Bucket. If an account impedes the trade rotation by unduly slowing the execution of a specific trade due its trading limitations, with the approval of the Compliance Team, the account will be placed at the end of the rotation to avoid disadvantaging clients still waiting to trade.

Because Bucket B usually trades after Bucket A, trades for accounts in Bucket B are subject to potential adverse price movements, particularly if they follow large block trades, involve illiquid securities or occur in volatile markets. This risk is heightened by the fact that trading for accounts in Bucket B often is not complete until several days, sometimes weeks or even months, following the start of trading for accounts in Bucket A. Consequently, accounts in Bucket B may receive prices/executions that are less favorable than those obtained for accounts in Bucket A. While WCM seeks to mitigate this risk through careful management of the trade execution process and attention to market impacts, accounts in Bucket B may achieve comparatively lower returns than accounts in Bucket A.

Additionally, an account may trade outside its typically assigned Bucket or position in the trade rotation due to a Client-directed event, such as a cash flow, tax-loss harvesting, or liquidation request. As a result, these Client-directed events or otherwise special circumstances may cause an account to receive less favorable execution or achieve comparatively lower returns than it would otherwise receive or achieve.

Trade Allocation

To the extent operationally and otherwise practical, WCM will allocate investment opportunities to each Client over a period of time in a fair and equitable way relative to the Firm’s other Clients. Each account that participates in an aggregated order will participate at the average share price of all trades that comprise the aggregated order. Block trades are generally pre-allocated (i.e., allocated prior to trade execution.)

If an aggregated order is only partially filled, the trades will generally be allocated on a pro-rata basis at the market's close, when the average price of the trades can be calculated. In the case of an aggregated order that has not been completely filled, WCM's portfolio management system programmatically increases or decreases the number of securities allocated to one or more accounts to avoid allocating odd-lots or an insignificant number of shares to a Client account.

Where advisory accounts have competing interests in a limited investment opportunity, WCM will allocate investment opportunities based on a number of considerations, including cash availability and/or liquidity requirements, the time competing accounts have had funds available for investment or have had securities available for sale, investment objectives and restrictions, an account's participation in other opportunities, tax considerations and relative size of portfolio holdings of the same or comparable securities.

ADR-Only Accounts

Some WCM strategies are offered in an ADR-Only format. ADR-Only accounts are often limited in their access to certain investments, which subjects them to disadvantages, when compared to other accounts in the same strategy.

Additionally, accounts eligible to hold ORDs (ORD accounts) will normally trade before other accounts that are limited to US-traded holdings (ADR accounts). Consequently, ADR accounts may be subject to adverse price movements, particularly if they follow large ORD trades, involve illiquid securities or occur in volatile markets. This risk is heightened by the fact that trading for ADR accounts does not commence until the completion of trading the ORD accounts, which could take several days, sometimes weeks or even months. As a result, ADR accounts may receive prices/executions for similar securities that are less favorable than those obtained for ORD accounts. Further, where WCM believes it is more advantageous to trade ADRs directly in local markets, ADR-only accounts may be subject to additional conversion and commission charges.

While WCM seeks to mitigate these risks through careful construction of the ADR-Only model and management of the trade execution process, ADR accounts may achieve comparatively lower returns than ORD accounts.

IPOs, Limited Offerings and Restricted Securities

Notwithstanding the allocation procedures described above, any particular allocation decision for IPOs, limited, or restricted securities among eligible accounts may be more or less advantageous to any one Client or group of Clients and certain allocations will, to the extent consistent with our fiduciary obligations, deviate from a pro rata basis among Clients in order to address, for example, differences in legal, tax, regulatory, risk management, concentration, exposure, Client guideline limitations and/or mandate or strategy considerations.

WCM may determine that a restricted investment opportunity is appropriate for one or more Clients, but not appropriate for other Clients, or are appropriate or suitable for, or available to, Clients but in different sizes, terms, or timing than is appropriate or suitable for other Clients. For example, some Clients have higher risk tolerances than other Clients, such as private funds, which, in turn, allows WCM to allocate a wider variety and/or greater percentage of certain types of investments (which may or may not outperform other types of investments) to such Clients. Those Clients receiving an increased allocation as a result of the effect of their respective risk tolerance may be Clients that pay higher investment management fees or that pay incentive fees. In addition, certain account categories focusing on certain types of investments or asset classes (e.g., emerging market securities, long-short or other specialized strategies) may be given priority in new issue distribution and allocation with respect to the investments or asset classes that are the focus of their investment mandate.

Given all of the factors above, the amount, timing, structuring, or terms of a restricted investment by a Client may differ from, and performance may be lower than, investments and performance of other Clients, including those that may provide greater fees or other compensation (including performance-based fees or allocations) to WCM.

Directed Brokerage and Consultant Accounts

Clients may direct WCM to use specific broker-dealers to execute transactions in their accounts by separate written notice, or through selection of a custodian that provides bundled brokerage services and may charge “trade away” fees (e.g., Charles Schwab, Fidelity, TD Ameritrade, etc.). Such Clients are referred to as “Directed Brokerage Clients.” For such Clients, notwithstanding any information provided elsewhere in this *Brokerage Practices* section, WCM is not in a position to negotiate commission rates, spreads or other transaction costs, or to seek best execution.

Directed Brokerage Clients are solely responsible for establishing, negotiating and monitoring their brokerage arrangements (e.g., ensuring that the broker-dealer complies with the terms of the brokerage arrangement, ensuring that the nature and quality of services provided by the broker-dealer are as agreed between the Client and the broker-dealer, and negotiating commission rates to be paid to the broker-dealer by the Client). Directed Brokerage Clients may not be able to participate in investment opportunities if the directed broker-dealer does not have access to the relevant securities or the systems or expertise to effectively process transactions. Moreover, directed brokerage arrangements may adversely affect WCM’s ability to obtain research-related services, which benefit all Clients, including Directed Brokerage Clients.

Directed Brokerage Clients are also subject to other disadvantages. For example, for execution purposes, WCM generally attempts to aggregate orders for all accounts participating in a particular transaction (see *Order Aggregation* above). However, orders for Directed Brokerage Clients are not generally aggregated with orders for the same securities for other accounts managed by WCM for which WCM selects broker-dealers (i.e., “Non-Directed Brokerage Clients”). As a result, Directed Brokerage Clients may not participate in potential savings on execution costs resulting from volume discounts that WCM might otherwise be able to obtain for Non-Directed Brokerage Clients. Under these circumstances, a disparity exists between the brokerage commission rates for trades executed for a Directed Brokerage Client as compared to the rates charged to a Non-Directed Brokerage Client.

Further, to avoid competition in the markets among orders for its Clients, WCM executes orders for Directed Brokerage Clients on a rotational basis. As noted above in *Brokerage Practices: Trade Rotation*, Directed Brokerage Clients are included in the rotation of Bucket B and under normal circumstances trade after corresponding orders have been executed for Bucket A. Consequently, they are subject to all of the potential disadvantages described above in *Brokerage Practices: Trade Rotation.*

Notwithstanding WCM's policy of executing orders for Directed Brokerage Clients after corresponding orders have been executed for Non-Directed Brokerage Clients, WCM will, at its discretion, execute an order for a Directed Brokerage Client as part of a "block" trade (see *Order Aggregation* above) with Non-Directed Brokerage Clients under either of the following circumstances:

(1) The designated broker-dealer is the executing broker-dealer for an otherwise blocked trade; or

(2) The executing broker-dealer for the block trade is willing to "step out" the Directed Brokerage Client's portion of the trade in a way that does not disadvantage other participating accounts, and the broker-dealer designated by the Directed Brokerage Client is willing to accept a trade handled in such manner. However, executing broker-dealers generally do not view "step out" transactions as a profitable business and thus may limit or refuse to engage in such transactions. Moreover, commission rates for "step out" transactions may differ from the rates negotiated with the executing broker-dealer in the aggregated transaction.

Clients should be aware that the above-described issues relating to directed brokerage arrangements also arise in connection with accounts that are introduced to WCM by other investment advisers ("consultants") that have separately negotiated with certain designated brokers to provide brokerage and custody services to Clients of the consultant. The brokerage arrangements negotiated by these consultants often subject their Clients to additional charges, such as trade away service fees if trades are not executed through the selected brokers. In order to attempt to minimize the total execution cost of trades for these accounts, WCM generally treats these accounts as Directed Brokerage Client accounts and directs most, if not all, transactions for these accounts to the selected brokers. Because WCM generally treats these Clients as Directed Brokerage Clients, Clients of consultants who have negotiated these brokerage arrangements should understand that their accounts will be subject to all the constraints that generally affect Directed Brokerage Clients discussed above.

Any Directed Brokerage Client who wishes to cease directing its brokerage and to begin permitting WCM to select broker-dealers to execute its orders must notify WCM in writing of this change and satisfy the custody arrangements described for Bucket A above in *Brokerage Practices: Trade Rotation.*

Wrap Fee Programs

WCM participates in wrap fee programs offered by broker-dealers and other Sponsors as described above in the *Advisory Business: Wrap Fee Programs* section. In evaluating such an arrangement, a Client should recognize that, notwithstanding any information provided elsewhere in this *Brokerage Practices* section, brokerage commissions for the execution of transactions in the Client's account are not negotiated by WCM.

Securities transactions for accounts that are under an asset-based wrap fee arrangement are effected without commission, and a portion of the wrap fee is generally considered as being in lieu of commissions. Trades are generally executed only with the broker-dealer Sponsor with which the Client has entered into the "wrap fee" arrangement, such that WCM will not seek best price and execution by placing transactions with other broker-dealers. Clients should also consider that, depending on the level of the wrap fee charged by the broker-dealer, the services provided under the arrangement, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were provided separately and if WCM were free to negotiate commissions and seek best price and execution of transactions for the Client's account. Wrap accounts are subject to many of the potential disadvantages described above in *Directed Brokerage and Consultant Accounts.*

Further, to avoid competition in the markets among orders for its Clients, WCM executes orders for wrap fee programs on a rotational basis. As noted above in *Trade Rotation*, wrap fee program accounts are included in the rotation of Bucket B and under normal circumstances trade after corresponding orders have been executed for Bucket A. Consequently, they are subject to many of the potential disadvantages described above in *Brokerage Practices: Trade Rotation.* See the *Advisory Business: Wrap Fee Programs* section of this brochure for additional information.

UMA Programs

WCM provides model portfolio recommendations for UMA ("Unified Managed Account") Programs offered by broker-dealers, advisers and other Sponsors ("Sponsors"). WCM delivers the model portfolio recommendations to Sponsors on a rotational basis for trading by the Sponsor. As noted above in *Trade Rotation*, UMA Programs are included in the rotation of Bucket B and under normal circumstances recommendations are delivered after corresponding trades have been executed for Bucket A. Consequently, accounts in the UMA Program are subject to many of the potential disadvantages described above in *Brokerage Practices: Trade Rotation.*

Trade Errors

Generally, a "trade error" is defined as (1) an unintentional action directly related to a trade (e.g., a buy order may be executed as a sell, or vice versa, or a security other than that which the Portfolio Manager ordered may be purchased or sold); or (2) a violation of a Client's investment restrictions (e.g., a decision may be to purchase a security or an amount of a security that is inconsistent with a Client's investment restrictions). As a fiduciary, WCM has the responsibility to effect orders correctly, promptly and in the best interests of its clients. In the event any error occurs in the handling of any Client transactions, due to WCM's actions, or inaction, WCM's policy is to: (1) notify the Client of such error, if material (2) ensure that the Client is treated fairly when correcting such errors, and (3) correct the error as soon as practicable and in such a manner that the Client will be in the same position they would have been if the error had not occurred. WCM's investment personnel are responsible for reviewing all accounts for which they authorize trades to determine that the transactions entered are correct and are correctly entered. Upon detection of a trade error, the investment person will research the trade error and immediately report the trade error to the Chief Compliance Officer. The Chief Compliance Officer, along with the Portfolio Manager for the account, will determine the appropriate method for correcting the error.

If the error is the responsibility of WCM and reimbursement is appropriate, any Client transaction will be corrected and WCM will be responsible for any Client loss resulting from an inaccurate or erroneous order. The calculation of the amount of any gain or loss will depend on the particular facts surrounding the trade error, and therefore methodology used by WCM to calculate gain or loss may vary. Any Client gain resulting from an inaccurate or erroneous order will be credited to the Client account, unless directed otherwise by the Client. WCM will not use “soft dollars” to correct trade errors.

Review of Accounts

Periodic Reviews

The Portfolio Management Team reviews accounts for compliance with Client stated investment guidelines and restrictions. Frequencies vary with the level of review, which include daily reviews of cash positions, weekly post-trade compliance and drift auditing, monthly peer-performance comparison, and annual reviews of performance and objectives. WCM makes extensive use of technology (e.g., portfolio management system, customer relationship management system, and document management system) to monitor and review accounts.

Review Triggers

Other factors that trigger an account review include: (1) a change in a Client's investment objectives or guidelines; (2) change in diversification; (3) change in asset allocation; (4) tax considerations (although WCM does not provide tax advice); (5) cash added or withdrawn from management; (6) strategy trade program; (7) exception reports which monitor cash available for investment and security holdings whose size must meet certain guidelines; (8) developments in domestic or international economies; and (9) developments in a particular business in which Clients hold a position.

Regular Reports

WCM provides reports to Clients as requested by the Client in writing.

Clients receive quarterly or monthly statements from the account custodian showing all activity during the reporting period, including transactions and account holdings as well as the deduction of any fees, expenses or other charges from the account.

Wrap accounts will receive reports regarding their investments from the Wrap Sponsor, as described in the Sponsor’s own disclosure documents.

Mutual fund and UCITS investors receive reports as described in the respective Prospectus and Statement of Additional Information.

Private fund Investors receive reports as described in the applicable Private Placement Memorandum. The fund administrator supplies monthly reports to Investors which include investment summaries as well as the performance of the private fund. Each Investor also receives relevant tax reporting information. Annual audit reports are provided in accordance with the Custody Rule. Reports may be sent by a third-party service provider on behalf of WCM.

Australian and Canadian fund investors receive reports as described in the applicable Offering Memorandum.

Client Referrals and Other Compensation

Client Referrals

WCM compensates, either directly or indirectly, third parties for Client referrals. These third parties include entities with which WCM has material business relationships as described earlier, including Natixis IM and its affiliates. Such referral arrangements are governed by a written agreement between WCM and the particular third party that (i) complies with the SEC's "cash solicitation" rule (Rule 206(4)-3); (ii) requires that Clients be provided with copies of WCM's ADV brochure, separate disclosure of the nature of the referral arrangement (including compensation features) applicable to the Client being referred and containing the information required by the Rule , and any other document required to be provided under applicable regulations; and (iii) provides that the third party will not be paid compensation for any Client referral unless it is registered as an investment adviser or investment adviser agent to the extent required under applicable regulations. Solicitors are paid either a base fee and a portion of the fee paid by each Client or only a portion of the fee paid by each Client they refer to WCM. WCM does not charge solicited Clients fees greater than those charged to new WCM Clients with similar portfolios managed by WCM who were not introduced by a third-party solicitor, subject to the conditions for case-by-case fee negotiation described in the *Fees and Compensation* section of this brochure.

Placement Arrangements

As described above, Natixis Distribution, LLC, a subsidiary of Natixis IM, acts as the principal underwriter to the WCM Mutual Funds. In connection therewith, WCM and Natixis Distribution, LLC, a subsidiary of Natixis IM., entered into a Mutual Fund Support Services Agreement. Under this agreement, Natixis Distribution, LLC is responsible for providing investor support services and other marketing, sales, and distribution-related activities relating to the WCM Mutual Funds. Natixis Distribution, LLC does not receive compensation from the Funds for its distribution services except the distribution/service fees with respect to the shares of those classes of funds for which a 12b-1 plan is effective. Therefore, Natixis Distribution, LLC has an incentive to recommend the investor share class over the institutional share class. For more information on the compensation paid to Natixis Distribution, LLC for these services, the WCM Mutual Funds' offering documents.

Former Employees

Although currently WCM does not have any fee share arrangements with former employees, WCM will on occasion share a portion of the management fee received on Client accounts with former employees as part of a severance or retirement agreement. Such an arrangement will not change the management fee paid by the Client (i.e., the Client will not pay a higher fee).

Charitable Contributions

WCM makes charitable contributions to organizations associated or affiliated with clients, intermediaries or consultants, and provides entertainment and gives gifts to intermediaries, consultants or others in the process of soliciting new business and providing services to existing clients, in compliance with its Code of Ethics and regulatory limits.

Custody

Account Statements

WCM is not a broker-dealer and does not take physical possession of Client assets. Our Client assets are maintained in nationally recognized banks or brokerage firms, otherwise known as custodians, selected by the Client. WCM has the authority to directly debit Client accounts for quarterly fees, if authorized in writing by the Client, and therefore is deemed to have custody.

WCM requires that the custodian, selected by the Client, send account statements directly to our Clients at a minimum of a quarterly basis. We urge Clients to compare the account statements they receive from the qualified custodian with those reports they receive from WCM (if requested).

WCM is deemed to have custody over the assets maintained in the WCM Investment Management Employee Savings Plan Trust, as the Principals of the Firm act as trustee to this WCM managed account.

As required under the Custody Rule, WCM has retained a third-party certified public accounting firm to conduct an annual surprise Custody Examination on these assets.

The funds for which WCM acts as the General Partner receive an annual audit from an independent accounting firm registered with, and subject to, regular inspection by the Public Company Accounting Oversight Board. Audited financial statements are provided to the limited partners of the fund within 120 days after its fiscal year ends.

Investment Discretion

Discretionary Authority for Trading

WCM renders advice primarily on a discretionary basis. By signing the investment management agreement, the Client generally gives WCM full discretion on all investment decisions regarding their account. Depending on the terms of the agreement that WCM has entered into with each Client for whom it provides discretionary management, WCM is generally given authority to make the following determinations without obtaining the consent of the Client before a transaction is effected:

- Which securities to buy or sell;
- The total amount of securities to buy or sell;
- The broker or dealer through whom securities are bought or sold;
- The commission rates at which securities transactions for Client accounts are effected;
- The prices at which securities are to be bought or sold, which may include dealer spreads or mark-ups and transaction costs.

WCM's authority is, however, subject to conditions imposed pursuant to its agreement with the Client. Examples might include (a) restrictions on ownership of securities in a specific industry, or (b) directions that transactions be accomplished using particular brokers.

Clients retaining WCM for discretionary services are free to select their own brokers as outlined in the *Directed Brokerage* section*.* WCM does not select or recommend custodians.

WCM is retained as a discretionary sub-adviser. Additionally, WCM provides model portfolio recommendations to UMA Programs, which are implemented by the UMA Sponsor (see *Brokerage Practices: UMA Programs.*)

Limited Power of Attorney

By signing the investment management agreement, the Client gives WCM Power of Attorney on all investment decisions regarding their account. Unless WCM otherwise agrees in writing, WCM does not advise or take any action on behalf of Clients in any legal proceedings, including bankruptcies or class actions, involving securities held or formerly held in Client accounts or the issuers of those securities.

Voting Client Securities

Proxy Voting

WCM has written proxy voting policies and procedures as required by Advisers Act Rule 206(4)-6. Each Client's investment management agreement should specify whether WCM is to vote proxies relating to securities held for the Client's account. If the agreement is silent as to the proxy voting and no instructions from the client are on file, WCM will assume responsibility of proxy voting.

In cases in which WCM has proxy voting authority for securities held by its advisory clients, WCM will ensure securities are voted for the exclusive benefit, and in the best economic interest, of those clients and their beneficiaries, subject to any restrictions or directions from a client. Such voting responsibilities will be exercised in a manner that is consistent with the general antifraud provisions of the Advisers Act, and the Proxy Voting Rule, Rule 206(4)-6, as well as with WCM's fiduciary duties under federal and state law to act in the best interests of its clients. A Client may request that WCM vote in a certain manner even though they have given proxy voting authority to WCM.

WCM utilizes the proxy voting recommendations of a Proxy Adviser. The purpose of the Proxy Advisers proxy research and advice is to facilitate shareholder voting in favor of governance structures that will drive performance, create shareholder value and maintain a proper tone at the top. Because the Proxy Adviser is not in the business of providing consulting services to public companies, it can focus solely on the best interests of investors. The Proxy Adviser analyzes corporate governance, accounting, executive compensation, compliance with regulation and law, risks and risk disclosure, litigation and other matters that reflect on the quality of board oversight and company transparency.

The voting recommendations of the Proxy Adviser are strongly considered; however, the final determination for voting in the best economic interest of the clients is the responsibility of the relevant strategy Investment Strategy Group ("ISG"). When a decision is reached to vote contrary to the recommendation of the Proxy Adviser, the ISG addresses any potential conflicts of interest (as described in the Proxy policy) and proceed accordingly.

WCM acknowledges its responsibility for identifying material conflicts of interest relating to voting proxies. When a material conflict of interest between WCM's interests and its Clients' interests appears to exist, WCM will either (1) obtain a Client's consent to how the ISG will vote the proxy; or (2) vote in accordance with the Proxy Advisor's recommendation. In the event that a conflict of interest arises between the Proxy Advisor or the proxy issuer and a Client of WCM, WCM will evaluate the circumstances and either (1) elevate the decision to the ISG who will make a determination as to what would be in the Client's best interest; (2) if practical, notify affected Clients of the conflict of interest and seek a waiver of the conflict; or (3) if agreed upon in writing with the Clients, forward the proxies to affected Clients allowing them to vote their own proxies.

For each proxy, WCM maintains all related records as required by applicable law. Clients may obtain copies of WCM's written proxy voting policies and procedures, as well as information on how proxies were voted for their accounts by requesting such information from WCM at the address and phone listed on the cover of this brochure. WCM will not disclose proxy votes for a Client to other Clients or third parties unless specifically requested in writing by the Client; however, to the extent that WCM serves as a sub-adviser to another adviser to a Client, WCM will be deemed to be authorized to provide proxy voting records on such Client accounts to such other adviser.

In the event WCM does not have the authority to vote proxies on a Client's behalf, Clients should instruct their custodian to send proxies directly to them. Any proxies erroneously received by WCM for the Client will be forwarded to the Client. Clients are welcome to contact WCM with questions regarding proxy ballots or other solicitations.

Financial Information

WCM has never been the subject of a bankruptcy petition, and it is not aware of any financial condition that is reasonably likely to impair its ability to meet any contractual commitments to Clients.

Additional Disclosures

Investor Privacy Notice

Last updated: March 21, 2022

WCM Investment Management, LLC ("WCM", "We", "Our", "Us") respects your privacy rights. In offering or providing investment management services to you, WCM obtains certain non-public personal information. We recognize the sensitive nature of this information and take appropriate precautions to protect your privacy.

Our policy is to keep this information strictly safeguarded and confidential, and to use or disclose it only as necessary to provide services to you or as otherwise permitted or required by law. We do not sell, rent or trade your information with other companies. We are sharing this Notice with you so you can understand how we use, store, and share your data. We also want you to know your rights with regards to this information and the data we collect about you.

For privacy disclosures concerning your visits to our website or general marketing of our services, please refer to our online privacy policy available at https://www.wcminvest.com/disclosures.

This privacy disclosure applies to all clients, including investors in our funds.

1. What Types of Personal Information Do We Collect?

Information You Give Us. You may give us information in subscription agreements, investor questionnaires, applications or other forms. You may also provide us information in your correspondence and transactions with us in person, by phone, mail, e-mail or other electronic means. In most cases, you give us this information yourself or through a person you have authorized to share it.

The categories of information include:

- Identifiers, such as name, address, email, telephone number
- Personal information under California Civil Code section 1798.80, such as signature or date of birth.
- Background information, such as information revealed in know-your- customer (KYC) and anti-money laundering (AML) due diligence
- Financial information, such as assets, income, net worth, investment amounts and history, transaction information, tax information, brokerage, custodial arrangements, and family relationships (for family trusts)
- Professional or employment-related information, such as your employer and employment history
- Inferences drawn from any of the above information categories

The categories of sensitive personal information include:

- National identification information, such as social security number, taxpayer identification number, driver's license, passport, or other government identification

Information We Collect From Third Parties. We may collect your information from third party service providers, such as broker-dealers, screening companies, investor placement entities, or public databases, who perform services on our behalf or at your request to verify or supplement our information.

2. Retention of Information We Collect and Process

We will only retain your personal information and data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

3. How Do We Use Personal Information?

We use your personal information as follows:

- To fulfill your requests for financial and investment products and services offered and subscribed or accepted by you, through any medium of communication

- To deliver to you any administrative notices, advice and communications relevant to your use of the products and/or services
- To market our advisory or investment services to you
- For market research, project planning, troubleshooting problems
- For detecting and protecting against error, fraud or other criminal activity

4. <u>How Do We Share Personal Information?</u>

We may disclose non-public personal information about you that we have collected, only to those persons that provide necessary services to your account or as permitted or required by law or specifically authorized by you. The following discussion identifies categories of persons who may have access to this information.

Within WCM

WCM employees are permitted access to the information they need to perform their jobs on your behalf. We maintain strict internal policies against unauthorized disclosure or use of client information by employees.

Companies That You Ask Us to Share With

From time to time, you may request that we provide information to third parties such as financial planners, portfolio consultants, tax advisors or legal counsel. In these cases, WCM will obtain your permission prior to sharing your information with the outside firm. WCM may get your written, online, or verbal permission to share your information. Your consent will apply only to the specific parties you request. If you have previously requested that we block the sharing of your information, that request will remain in place for all other situations, except where required by law.

Outside Service Providers

We have arrangements with companies whose experience is essential for our advisory services to operate properly. For example, we work with firms that execute securities transactions for us or our clients, custody client assets, provide systems or write software for accounting, compliance and other critical operational functions. These companies work at WCM's direction and only the client information necessary for them to perform these functions is shared. They are required to safeguard your information and only use it for authorized purposes, and within the guidelines established by WCM for the protection of client information.

Courts and Government Bodies

Certain federal and state laws may require us to share information about you. For example, if you are involved in a legal matter with a third party, we may be ordered to provide information to a court or other party. In these circumstances, only the specific information required by law, subpoena, or court order will be shared. The Fair Credit Reporting Act and other laws allow us to share specific details about your transactions and experience with us. The use of this information is limited by federal law to specific permissible purposes, such as applications for credit, insurance or employment.

5. Your Privacy Choices

We have listed several privacy rights below, but we understand you may have additional rights in your jurisdiction. You may contact us directly at any time about exercising your data protection rights. We will consider your request in accordance with applicable laws.

For certain U.S. state privacy rights concerning your personal information collected for general marketing purposes, please refer to our online privacy policy at https://www.wcminvest.com/files/wcm--online-privacy-policy-20200320.pdf**Right to Access/ Rectification:** Please contact us if you would like to request a copy of your information or to make any changes to your personal information.

Marketing Opt-Out: We may use your personal information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe instructions provided in any email we send. You will still continue to receive service-related messages concerning products and services you have purchased (unless we have indicated otherwise).

EEA/ UK Disclosures

In some countries, and in particular if you are located in the EEA or the UK, you may have the right to:

- Access your personal information;
- Correct inaccurate personal information;
- Request erasure of your personal information without undue delay;
- Request the restricted processing of your personal information;
- Request portability of the personal information that you have given us; and
- Object to the processing of your personal information.

To exercise any of these rights, please contact us as set forth in the "Contact Information" section below and specify which privacy right(s) you wish to exercise. We may need to verify your identity in order to honor your request

Automated Processing/Profiling. WCM does not use automated processing/ profiling of an individual in order to make investment decisions on their behalf, e.g. automated scoring based on background checks.

Complaints. You have the right to lodge a complaint against WCM with a local supervisory authority.

6. Legal Bases for Processing (EEA and UK)

If you are from the European Economic Area or the United Kingdom, our legal bases for collecting and using your Personal Information is as follows:

- The processing is necessary for the performance of a contract for investment or advisory services to which you are a party or in order to take steps at your request prior to entering into a contract.

- Our legitimate business interests. For example, fraud prevention, maintaining the security of our network and services, direct marketing to you, and improvement of our services.
- Compliance with a mandatory legal obligation. For example, accounting and tax requirements, which are subject to mandatary retention periods. We may also collect your Personal Information to record your requests to exercise your rights and to verify your identity for such requests.
- Consent you provide where we do not rely on another legal basis. Consent may be withdrawn at any time.
- In some limited cases, we may also have a legal obligation to collect Personal Information from you, in response to lawful requests by public authorities, including to meet law enforcement requirements, as described above in "How Do We Share Personal Information?"

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided in the "Contact Information" section below.

7. <u>International Transfers of Data</u>

Any data that you provide to us may be accessed, shared or processed by our offices, located in the United States, and service providers located in the United States, if such data transfer is necessary for the specific purpose for which you submitted your data (such as the provision of goods or services under a written contract).

This may entail a transfer of your personal information across international borders. The data protections standards may differ and be lower than the standards enforced in your jurisdiction.

We maintain appropriate safeguards as required by applicable law for any personal information transferred internationally, and as required by applicable law, will seek your consent prior to such transfers.

8. <u>Safeguarding Your Data</u>

To protect the personal information of individuals, we permit access only by authorized employees who need access to that information to provide services to us and to you. To guard investors' personal information, we maintain physical, electronic and procedural safeguards that comply with applicable federal and state standards.

Your right to privacy extends to all forms of contact with us, including telephone, written correspondence and electronic media, such as the internet.

9. Change of Control

Personal information may be transferred to a third party as a result of a sale, acquisition, merger, reorganization or other change in control. If we sell, merge or transfer any part of the business, part of the sale may include your personal information.

10. Policy Changes

For current investors, we will provide you with a copy of this Privacy Notice annually, if there are changes. For prospective investors, we encourage you to periodically review this Privacy Notice to ensure you are familiar with the most current version.

11. Contact Information

If you wish to contact us or have any questions about or complaints in relation to this Investor Privacy Notice, please contact us at:

- privacy@wcminvest.com OR (949) 380-0200

Summary of Business Continuity and Disaster Recovery Plan

WCM maintains a document that outlines its immediate and long-term business continuity and disaster recovery plan (the "Plan"). The purpose of the Plan is to provide specific guidelines WCM and its employees will follow in the event of a disruption or failure of any critical business capability whether due to an emergency, disaster or otherwise.

Key Concept

Distributed Workspace Environment ("DWE"): This is WCM's architecture of systems that gives personnel the ability to perform all business functions from anywhere and at any time. With access to the Internet, personnel are able to perform all portfolio management functions (e.g., portfolio monitoring, trade allocation, trading, trade settlement, reconciling, reporting); access client files; maintain electronic communications; retrieve company research; process client billing; conduct HR functions; and process company payables. A secured connection provides personnel access to the company network, which is maintained at redundant data centers.

Areas Addressed by the Plan

- The Emergency Response Team
- The safety and mobility of employees
- Lack of access to office facilities
- Disruption to office communications
- The disaster recovery plans of key third-party vendors
- The stability and security of WCM's computer network
- The protection, preservation, and recovery of critical data
- Key personnel
- Cash reserves & Insurance protection
- Maintenance and testing of the Plan

Notice to Canadian Clients

WCM Investment Management, LLC (“WCM”) provides advice to persons and companies located in Canada in reliance upon the international adviser exemption that is available to persons or companies registered, or exempt from registration, in a foreign jurisdiction pursuant to section 8.26 of National Instrument 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations (“NI 31-103”) and for purposes of such exemption we are required to advise you of the following:

1. WCM is not registered in any province or territory of Canada to engage in the advisory activity that is contemplated by section 8.26(3).
2. The foreign jurisdiction in which WCM’s head office or principal place of business is located in California, USA.
3. All or substantially all of WCM’s assets may be situated outside of Canada.
4. Consequently, there may be difficulty enforcing legal rights against WCM.

WCM is limited to advising clients in Canada who are “Permitted Clients” as defined under NI 31-103.

WCM has appointed the following agents for service of process in the Canadian provinces listed below:

Alberta
McCarthy Tétrault LLP
Suite 4000
421 – 7th Avenue SW
Calgary, AL T2P 4K9
Attention: John Osler, Q.C.

British Columbia
McCarthy Tétrault LLP
Suite 2400
745 Thurlow Street
Vancouver, British Columbia V6E 0C5
Attention: Robin Mahood

Ontario
Cartan Limited
Suite 5300
Toronto Dominion Bank Tower
Toronto, Ontario M5K 1E6
Attention: Sean D. Sadler

Nova Scotia
Stewart McKelvey LLP
Purdy's Wharf Tower One
1959 Upper Water St.
Halifax NS B3J 3N2
Attention: Richard Hirsch

Quebec
McCarthy Tétrault LLP
Bureau 2500
1000, De La Gauchetière Street West
Montréal QC H3B 0A2
Attention: Sonia J. Struthers

Manitoba
MLT Aikins LLP
30th Floor
Commodity Exchange Tower
360 Main Street
Winnipeg, MB R3C 4G1
Attention: Richard L. Yaffe

Notice to Australian Clients

WCM Investment Management, LLC ("WCM") is exempt from the requirement to hold an Australian financial services license under the Corporations Act 2001 (Cth) in respect of its financial services. WCM is regulated by the SEC under US laws, which differ from Australian laws.