Model Capital Management LLC

572 Washington Street, Suite M2 • Wellesley, Massachusetts 02482 • team@modelcapital.com • 844-213-1031 • modelcapital.com

For advisor use only. Not for public distribution.

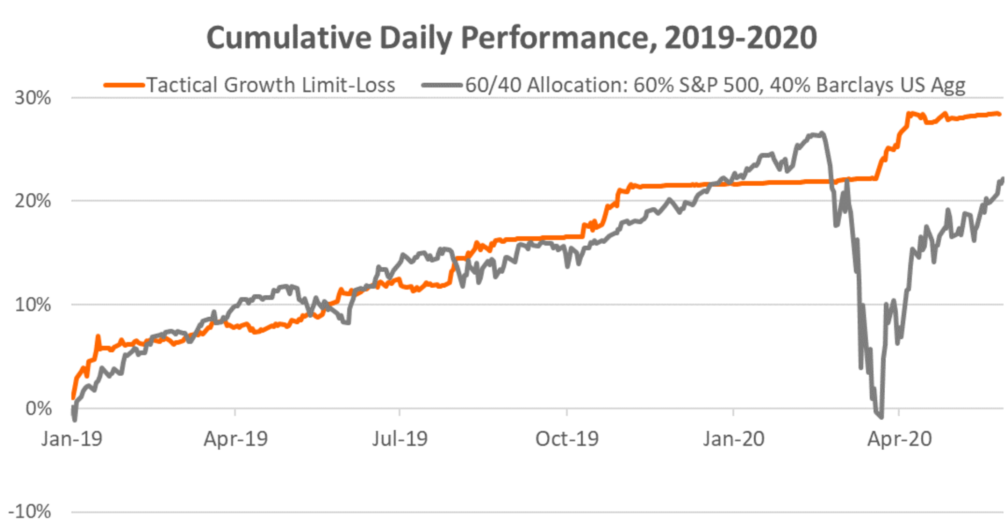
FIRM'S INVESTMENT PHILOSOPHY

Model Capital Management LLC is an investment manager that focuses on tactical and dynamic asset management. Tactical management is a strategy that invests in asset classes with the best return-risk outlook. As opposed to buy-and-hold, this strategy alters portfolio allocations based on expected returns and risks – attempting to avoid significant market downturns, but to participate in market upside. However, it is as challenging as all of active management, and simplistic methods can hardly work. We think that tactical management can be successful if we incorporate fundamental factors that drive markets as part of a forward-looking (forecasting) approach.

Our process determines allocations to risk asset by utilizing our statistical model designed to forecast 6-month equity index returns. The model was developed since 2003 and applied to asset management since 2012. It includes over 20 fundamental factors such as valuation and economic variables. It dynamically adjusts to the market environment by detecting the factors that tend to "work" at any point in time. Each of our strategy's allocation to risk assets is then determined, subject to its risk profile, based to the model's latest forecast – in risky assets (risk-on), fixed income/cash markets (risk-off), or a combination. We offer U.S. core dynamic and tactical strategies ranging in risk profiles from capital preservation to growth-plus (up to 2x leverage).

STRATEGY PROFILE: Tactical Growth Limit-Loss

Benchmark: **Morningstar® Tactical Allocation**
Investment Objective: The objective of the Tactical Growth Limit-Loss strategy is to provide US market exposure and participation in rising markets while heavily emphasizing risk in down markets through the combination of multiple asset classes including equity, fixed income, and cash equivalents. The strategy allocates up to 100% of assets to equities (risk-on allocation) or to fixed-income or cash equivalents (risk-off), primarily based on our model's 6-month return forecast for the S&P 500, also taking into account risk and other fundamentals



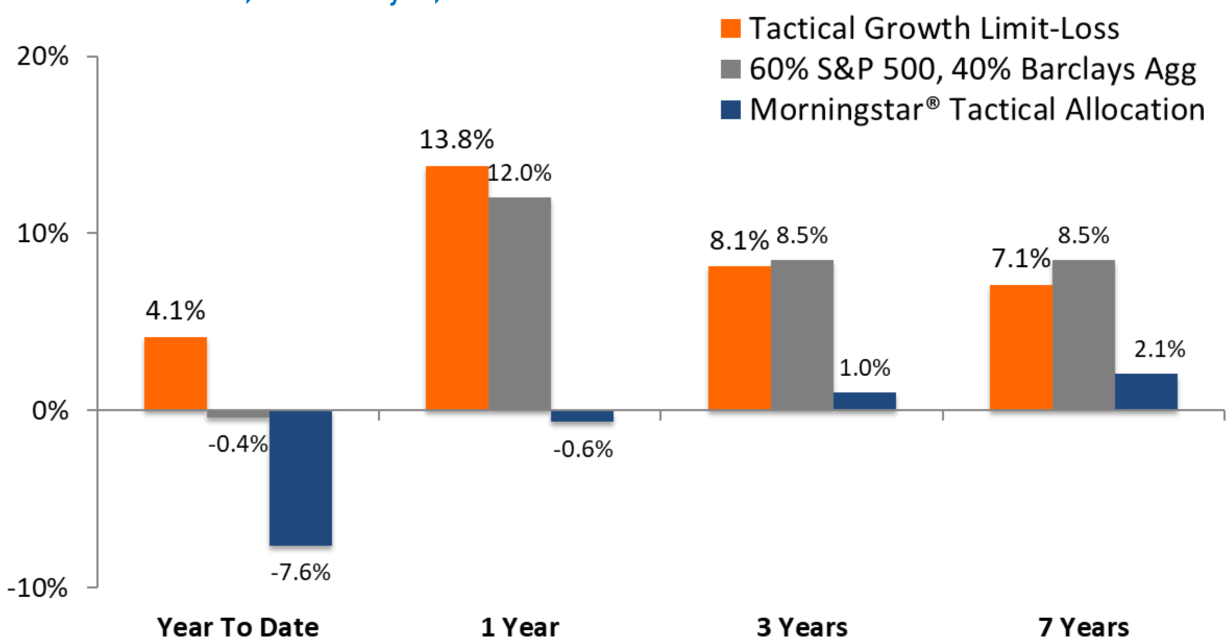
MCM commenced investment management to its Tactical Growth Limit-Loss strategy on Mar 1, 2013 (the strategy Inception Date). MCM commenced composites of client accounts managed to the strategy on Feb 1, 2014 (Composite Inception Date).

This chart is provided to illustrate the strategy's reduced downside volatility and uncorrelated returns. It covers only the most recent period, from 1/1/2019. The performance presented is for a model portfolio, not the composite of managed accounts. Actual account performance may vary due to timing of trades, security pricing, and trading expenses set by each particular advisor and/or investment platform.

PERFORMANCE AND RISK, March 1, 2013 – May 31, 2020

Performance	Tactical Growth LL	Morningstar® Tactical Allocation	Relative	Risk & Return-on-risk, 3y	Tactical Growth LL	Morningstar® Tactical Allocation	Relative
2020 YTD	4.1%	-7.6%	11.8%	Standard Deviation	9.9%	10.2%	-0.3%
2019	21.7%	13.2%	8.4%	Beta vs. S&P 500	0.28	0.59	-0.31
2018	-5.9%	-7.7%	1.8%				
2017	15.1%	12.3%	2.8%				
2016	4.4%	6.2%	-1.8%				
2015	-8.8%	-6.0%	-2.9%	Sharpe Ratio	0.70	-0.02	0.72
2014	9.0%	2.7%	6.4%	Sortino Ratio	0.97	-0.02	0.99
Mar-Dec 2013	21.5%	5.9%	15.6%	Information Ratio	0.69		0.69
Since Inception (ann)	7.9%	2.3%	5.6%				

PERFORMANCE March 1, 2013 – May 31, 2020



REPRESENTATIVE ETFs CONSIDERED FOR THE STRATEGY

Type	Ticker	Security Name	AUM, $mil	Expense Ratio
Equity	SPY	SPDR S&P 500 ETF Trust	$262,090	0.09%
Equity	QQQ	PowerShares QQQ ETF	$84,630	0.20%
Equity	VTV	Vanguard Value ETF	$32,060	0.06%
Equity	VUG	Vanguard Growth ETF	$23,310	0.08%
Fixed Income	LQD	iShares iBoxx $ Investment Grade Corp. Bnd	$34,240	0.15%
Fixed Income	IEF	iShares 7-10 Year Treasury Bond ETF	$21,350	0.15%
Fixed Income	VCSH	Vanguard Short-Term Corporate Bond	$31,790	0.05%
Fixed Income	FLRN	SPDR Bloomberg Barclays Investment Grade F	$3,400	0.15%
Fixed Income	TIP	iShares TIPS Bond ETF	$21,570	0.19%
Cash Equiv	BIL	SPDR Bloomberg Barclays 1-3 Month T-Bill	$9,130	0.14%

Source for AUM and expenses: Morningstar

Fund Expenses: MCM implements the desired portfolio exposures primarily with **low-cost index ETFs**. We select ETFs that meet our criteria of large AUM size, high liquidity, and low fees. We are not limited to any particular ETF sponsor. The vast majority of ETFs currently approved have expense ratios below 0.2%. Our choice of ETFs may change infrequently.

APPENDIX 1
GIPS® - COMPLIANT PERFORMANCE PRESENTATION

Tactical Growth Composite
February 1, 2014 through May 31, 2020

Year	Composite Gross Return (%)	Composite Net Return (%)	Benchmark Return (%)	Composite 3yr St. Dev. (%)	Benchmark 3yr St. Dev. (%)	Number of Portfolios	Internal Dispersion (%)	Composite Assets ($ M)	Firm Assets ($ M)
2020 YTD	4.54%	4.15%	-7.61%	9.90%	10.24%	<6	0.05%	3.5	255.0
2019	22.47%	21.65%	13.21%	10.02%	7.26%	<6	0.05%	3.5	255.0
2018	-5.41%	-5.88%	-7.67%	9.08%	6.60%	<6	0.01%	2.8	224.0
2017	15.68%	15.11%	12.34%	5.28%	5.34%	<6	0.04%	2.8	195.1
2016	4.92%	4.40%	6.17%	N/A	N/A	<6	N/A	1.4	29.8
2015	-8.00%	-8.82%	-5.97%	N/A	N/A	<6	N/A	13.2	31.5
Feb-Dec 2014	14.05%	13.28%	4.53%	N/A	N/A	<6	N/A	20.3	49.9

Model Capital Management LLC ("MCM") claims compliance with the Global Investment Performance Standards (GIPS®), and has prepared and presented this report in compliance with the GIPS® standards. MCM has been independently verified to comply with GIPS® standards for the periods from February 1, 2014 to December 31, 2018. The verification reports are available upon request. Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.

Notes:

1. Model Capital Management LLC is an independent investment advisor focused on active asset allocation management.

2. The Tactical Growth Limit-Loss Composite was created on Feb 1, 2014, and includes all accounts managed to MCM's Tactical Growth Limit-Loss strategy on a unified managed account (UMA) platform. Each UMA platform is considered as one portfolio for GIPS® purposes. All accounts allocated to the strategy from the beginning to the end of a month are included in the composite for that month. Monthly composite returns represent total returns. Geometric linking of monthly returns is used to calculate longer-term returns.

3. The Tactical Growth Limit-Loss Composite's objective is to provide US market exposure and participation in rising markets while heavily emphasizing risk in down markets through the combination of multiple asset classes including equity, fixed income, and cash equivalents. The strategy allocates up to 100% of assets to equities (risk-on allocation) or to fixed-income or cash equivalents (risk-off), primarily based on the equity model's 6-month return forecast for equities, while also taking into account sort-term risk and other factors. The benchmark for the composite is the average net total return of all funds included in Morningstar® Tactical Allocation category, updated monthly.

4. Gross-of-fees returns are presented in the exhibit on this page only, and are before management fees but after all trading expenses. Net-of-fees returns are calculated by deducting the MCM's highest advertised management fee from the monthly gross composite returns.

5. Internal dispersion is calculated using the equal-weighted standard deviation of monthly net returns of those portfolios that were included in the composite for the entire year.

6. The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding three-year period.

7. Valuations are computed and performance is presented in US Dollars. A listing of composite descriptions and policies for valuing portfolios, calculating performance and preparing compliant presentations are available upon request.

Additional Disclosures

DEFINITIONS

Relative Return: The portfolio's return relative to its benchmark. It is calculated as the difference between the portfolio's annualized return and its benchmark annualized return for the same period. Active return can be used to measure the value added or subtracted by a fund manager relative to passive index benchmark.

Standard Deviation: measures the volatility, or the degree of variation of returns around the average return. The higher the volatility of investment returns, the higher the standard deviation will be. For this reason, standard deviation is often used as a measure of investment risk. A more volatile stock or investment would have a higher standard deviation.

Maximum Drawdown: A measure of risk that captures the largest percentage drop of an investment from any peak to trough, in a given historical period. It is generally calculated using month-end data. It shows in percentage terms the largest loss during that particular historical period. For example, if you began with a $100,000 investment and your maximum drawdown was 30%, your maximum loss from peak to trough during that period would have been $30,000.

Sharpe Ratio: A return-to-risk ratio developed by William Sharpe that measures the return generated per unit of risk. The return (numerator) is defined as the incremental average return over the risk-free rate (such as 3-month Libor). Risk (denominator) is defined as the standard deviation of these incremental returns over the risk-free rate. A higher Sharpe Ratio would indicate an investment manager, method, or strategy achieving higher returns (relative to risk-free rate) per unit of risk.

Information Ratio: An active return-to-risk ratio that measures the active return (over benchmark) generated per unit of active risk. The active return (numerator) is defined as difference between the portfolio's annualized return and its benchmark annualized return for the same period. The active risk (denominator) is defined as the standard deviation of these active returns over the benchmark. A higher Information Ratio would indicate an investment manager, method, or strategy achieving higher active returns per unit of active risk. In active investment management analysis, Information Ratio is often considered to be a measure of skill of a manager or method.

PERFORMANCE CALCULATION

MCM commenced investment management to its tactical strategies on Mar 1, 2013 (the strategies' Inception Date). The Tactical Growth Limit-Loss composite was created on February 1, 2014. Composite returns reflect the performance of all fee-paying accounts managed to the Tactical Growth Limit-Loss strategy since inception of the composite on Feb 1, 2014. Actual account performance may vary due to timing of trades, security pricing, and trading expenses, among other factors.

Unless noted otherwise, all performance figures presented are net of trading costs and of MCM's maximum investment management fee. Past performance is not a guarantee of future returns.

MCM claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared this report in compliance with GIPS® standards. MCM's performance has been independently verified for compliance with GIPS® standards. The verification reports are available upon request.

Investment results are time-weighted performance calculations representing total return. Monthly geometric linking of performance results is used to calculate annual returns. All realized and unrealized capital gains and losses as well as all dividends and interest from investments and cash balances are included in return calculation.

The investment results shown are not representative of an individually managed account's rate of return, and differences can occur due to factors such as timing of initial investment, client restrictions, cash movement, etc. securities used to implement the strategies can differ based on account size, custodian, and client guidelines.

RISKS

The value of investments and the income derived from them can go down as well as up. Future returns are not guaranteed and a loss of principal may occur.

The investment strategy described herein does not ensure a profit and does not protect against losses in declining markets. Model Capital Management's risk-management process includes an effort to monitor and manage risk, but should not be confused with (and does not imply) low risk.

The time period since 2013 shown in performance charts is short, and does not include all potential market scenarios that can occur, and their impact on the portfolio.

There are risks associated with any investment approach. Investors should carefully consider risks before Investing in this strategy. Only some of the risks are described as follows:

1. **Equities**: Our tactical strategies may, from time to time, allocate 100% of client portfolios to a broad equity market index or a combination of equity market indices. Investing in equity markets involves significant risks: (a) Common stock holders of a company may lose 100% of their investment in case of bankruptcy of the company. (b) Broad equity market indices (such as the S&P 500) are volatile – the index level, or price, fluctuates significantly over time. Investors may incur a loss if the time of redemption of their investment coincides with a downturn in general equity market.

2. **Exchange-Traded Funds** ("ETFs"): ETFs are securities the price of which is based on the underlying portfolio or index. ETF's total assets (size), liquidity, expenses, and premium/discount to their net asset value (NAV) are subject to change due to the ETF sponsor or manager actions, market conditions, or other reasons beyond our control. One or more of the following risks may cause an ETF investment to deviate from the underlying index and to erode the value of a portfolio investment: high expenses, low liquidity, the price being materially different from NAV.

BENCHMARKS

The benchmark for the Tactical Growth Limit-Loss strategy's real-time performance is the average total return of all funds included in Morningstar® Tactical Allocation category, updated monthly by Morningstar®. This benchmark is relevant due to similarity of its management style, average equity/bond allocation, and risk profile to those of the strategy.

This benchmark is chosen based on similar management style and risk profile between the benchmark and the portfolio's strategy. The benchmarks have not been selected to represent that an investor's performance would follow it closely, but rather is disclosed to allow for comparison of the investor's performance to that of a similar management style.

Reference to a benchmark does not imply that the Tactical Growth Limit-Loss strategy will achieve returns, experience volatility, or have other results similar to the index. The composition of a benchmark does not reflect the manner in which the Tactical Growth Limit-Loss investment portfolio is constructed in relation to expected or achieved returns, investment holdings, asset allocation guidelines, restrictions, sectors, correlations, concentrations, volatility, or tracking error targets, all of which are subject to change over time.

ABOUT THE MANAGER

Model Capital Management LLC ("MCM") is an independent SEC-registered investment advisor, and is based in Boston. Utilizing its fundamental, forward-looking approach to asset allocation, MCM provides asset management services that help other advisors implement its dynamic investment strategies designed to reduce significant downside risk. MCM is available to advisors on AssetMark, Envestnet, and other SMA/UMA platforms, but is not affiliated with those firms.

ABOUT THE INVESTMENT

Tactical Growth Limit-Loss strategy may be offered to investors as a separately-managed account (SMA) or as an investment portfolio on a custodian platform. It is typically managed by the applicable Investment Advisor or Financial Advisor who holds custody of client assets, and sub-advised by Model Capital Management LLC. Terms and restrictions may apply, such as a minimum investment amount.