

How AssetMark Trust Protects Client Assets

Your assets are secure with AssetMark Trust Company. AssetMark Trust is a trust company licensed and regulated by the Arizona Department of Financial Institutions. AssetMark Trust was established in 1994 to act as custodian of the client assets managed by its affiliate, AssetMark, Inc. ("AssetMark"), an investment adviser registered with the Securities and Exchange Commission. AssetMark Trust specializes in providing custodial services to clients of independent financial advisors. Currently, AssetMark Trust clients include the advisory clients of AssetMark and the clients of advisors who use the AssetMark Platform advisory services.

EACH CLIENT'S ASSETS ARE MAINTAINED IN A SEPARATE ACCOUNT

AssetMark Trust is legally required to maintain a separate account for each client's assets and to maintain client assets separate from its corporate assets. Assets are held in the name of each individual client and are not comingled, or allowed to be comingled, with the corporate assets of AssetMark Trust for any purpose. Creditors of AssetMark Trust cannot reach or attach the assets of AssetMark Trust's custodial clients.

AssetMark Trust client accounts are closely monitored. AssetMark Trust accounts (positions and cash) are reconciled daily, weekly and monthly, based on a rigorous oversight process that is audited frequently by both internal and external auditors. Reconciliations are examined annually by the Arizona Department of Financial Institutions and audited annually by external auditors. AssetMark Trust maintains a number of risk management policies and practices that help protect its physical location and customer data, prevent unauthorized transactions and provide assurance against other forms of financial risk.

AssetMark Trust maintains rigorous controls and monitoring of its people, facilities, procedures and data. However, in the unlikely event of theft, fraud or missing funds for other reasons, client assets are well-protected by the following requirements, precautions and insurances.

ASSETMARK TRUST MAINTAINS CAPITAL WELL ABOVE MINIMUM REQUIREMENTS

As an Arizona trust company, AssetMark Trust is required by statute to maintain certain minimums of liquid and illiquid capital. AssetMark Trust maintains certificate of deposit and Stockholder's Equity in excess of these minimums. Additionally, AssetMark Trust has operated as a profitable company each year since its 1994 incorporation and continues to operate as a profitable company. Sufficient capital exists for AssetMark Trust to maintain its operations so that it can respond to client requests for their assets in a timely manner.

CLIENT ASSETS ARE COVERED BY A FIDELITY BOND AND OTHER PROTECTIONS

A fidelity bond and a number of insurance policies are in force to protect AssetMark Trust operations and client assets.

Insurance Purchased by AssetMark Trust and AssetMark

As an Arizona trust company, AssetMark Trust is required to maintain a fidelity bond in an amount specified by Arizona statute. AssetMark Trust maintains for itself a fidelity bond in excess of the required amount.

In addition, AssetMark Trust is covered under various insurance policies provided by third-party insurers based upon periodic reviews to determine the adequate and appropriate levels and types of coverage, as well as the financial strength and stability of the insurance carriers underwriting the coverage.

Coverage includes a \$40,000,000 policy to cover errors and omissions arising out of the provision of professional services to AssetMark Trust customers. AssetMark Trust also maintains fiduciary and crime coverage, which covers losses resulting directly from dishonest or fraudulent acts committed by an employee, as well as cybercrime coverage and ERISA fiduciary coverage for applicable accounts.

AssetMark Trust and AssetMark regularly evaluate their insurance program and consider changes or additions to their program as investor assets and business lines evolve.

SIPC® Coverage for Equities, Fixed Income and Exchange Traded Funds

With regard to the equity, fixed income, ETFs, closed-end fund and most mutual fund securities the AssetMark Trust holds for client accounts, AssetMark Trust employs Fidelity Brokerage Services LLC and National Financial Services LLC (collectively, "Fidelity") as sub-custodian and to provide certain custodial and brokerage services. Fidelity is a member of both the Financial Industry Regulatory Authority (FINRA) and the New York Stock Exchange. Fidelity maintains separate accounts for AssetMark Trust. The registrations of AssetMark Trust's accounts at Fidelity specify that the securities are held by AssetMark Trust for the benefit of AssetMark Trust clients, and these assets are held separately from Fidelity's corporate assets. Fidelity is a member of Securities Investor Protection Corporation ("SIPC") and maintains reasonable levels of excess SIPC coverage for the protection of the value of all cash and securities held on behalf of AssetMark Trust's clients. In addition, Fidelity maintains a fidelity bond and errors and omissions liability coverage. Specifically, for the securities it holds, Fidelity is contractually obligated to AssetMark Trust to maintain commercially reasonable levels of excess SIPC coverage so that the assets of each AssetMark Trust client are protected by the basic SIPC insurance (of up to \$500,000, including cash claims up to \$250,000) plus additional insurance protections in excess of the \$500,000/\$250,000 coverage provided by SIPC.

NSCC-Traded Mutual Funds

AssetMark Trust is a member of the National Securities Clearing Corporation ("NSCC"), the leading provider of centralized clearance, settlement and information services for the securities industry. For some of the mutual funds shares it holds for clients, AssetMark Trust executes trades of the shares directly through NSCC's Fund SERV platform, which is the industry standard for automated processing of mutual fund purchases, redemptions, settlement, and shareholder registration. NSCC serves as the central clearing and settlement agent for the US mutual fund industry and is regulated and overseen by the

US Securities and Exchange Commission ("SEC"). Use of the NSCC eliminates counterparty risk in transactions once they are accepted for settlement. After settlement, share ownership of mutual funds is recorded at each mutual fund's transfer agent in an account registration, which specifies that the shares are held by AssetMark Trust for the benefit of AssetMark Trust clients. Transfer agents are typically required to be registered with the SEC, and registered transfer agents are regulated and overseen by the SEC. AssetMark Trust maintains the records indicating each of its clients' positions in the mutual funds subject to the controls discussed above.

Controls and Oversight of AssetMark Platform

All assets on the AssetMark Platform are held through an independent third-party custodian (Pershing, TDA, Fidelity or Schwab) or at AssetMark Trust. AssetMark Trust's assets are ultimately held (sub-custodied) at Fidelity or direct with the mutual fund companies.

AssetMark Trust receives independent financial statement audits, surprise custody audits and internal control audits, all performed by a major, reputable independent accounting firm. Its operations, controls and practices are led by an experienced senior management team and AssetMark Trust Company's Board of Directors are comprised of highly accomplished industry executives who provide oversight to company operations and programs.

The Arizona Department of Financial Institutions oversees AssetMark Trust and completes a comprehensive annual exam of AssetMark Trust's management, compliance and control structure.

AssetMark Trust Company

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