EDGE ASSET MANAGEMENT, INC.

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This brochure provides information about the qualifications and business practices of Edge Asset Management, Inc. ("EDGE"). If you have any questions about the contents of this brochure, please contact us at (206) 913-5800.

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.

Edge Asset Management, Inc. is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Edge Asset Management, Inc. also is available on the SEC's web-site at www.adviserinfo.sec.gov.

Item 2 - Material Changes

This amended brochure dated, February 17, 2017 replaces the previously amended brochure dated, November 15, 2016. Material changes from the last annual brochure are summarized as follows:

Changes made as part of this update include:

Item 4 – Updated AUM as of January 31, 2017

Item 10 – Updating affiliated broker-dealer name from Princor Financial Services Corporation to Principal Securities

Changes made during November 15, 2016 amendment included:

Item 4 – Updated AUM as of October 31, 2016

Item 8 – Updating index name from Barclays to Bloomberg Barclays

Item 13 – Remove President from the Investment & Risk Committee.

Item 3 - Table of Contents

Item 4 – Advisory Business

Edge Asset Management, Inc. ("EDGE") was incorporated on March 23, 1944, as Bond Research Corporation. In 1952, the company changed its name to Composite Research & Management Co. In 1982, the company was acquired by Washington Mutual Savings Bank and later changed its name to WM Advisors, Inc. in 1998. On December 31, 2006, the company was acquired by Principal Management Corporation ("PMC") and renamed Edge Asset Management, Inc. Today, EDGE is a direct, wholly-owned subsidiary of PMC and is an indirect subsidiary of Principal Financial Group, Inc.®, a publicly held company that is traded on the New York Stock Exchange under the ticker symbol PFG.

EDGE provides investment advisory services to registered investment companies, exchange traded funds ("ETFs") and other institutional clients. EDGE specializes in equities, taxable fixed-income and asset allocation strategies.

Investment advisory services are tailored to meet the needs of each client and are based on the client's investment objectives and risk tolerance. Clients may impose restrictions on investing in certain securities or types of securities. Client specific investment guidelines and restrictions are typically detailed in an executed investment advisory agreement or a supplemental agreement.

Managed Account Advisory Services/Wrap Fee Programs

EDGE provides investment advisory services to various managed accounts sponsored by broker-dealers, banks or other investment advisers whereby EDGE manages model portfolios and provides them to the program sponsors or their designees on a daily basis. The delivery of changes to each model portfolio typically occurs after similar changes have been implemented or may be in the process of implementation across fully discretionary accounts managed by EDGE. As a result, managed accounts may not achieve the same performance as other discretionary accounts managed by EDGE. EDGE receives a portion of the wrap fees collected by the program sponsor for the investment advisory services it provides to wrap fee programs. In some cases, EDGE may be retained by its affiliate investment adviser, Principal Global Investors, LLC ("PGI"), to serve as a sub-adviser for managed accounts.

For equity strategies, for trade rotation purposes, "model only" programs are accorded rotation slots on a similar basis as the slots accorded to other SMA discretionary programs. The only difference is that the model portfolio is communicated to the "model only" program sponsors or designated overlay manager for execution.

As of January 31, 2017, EDGE managed approximately $33 billion in total assets under management on a fully-discretionary basis.

Item 5 – Fees and Compensation

Our Fees

All management fee arrangements are subject to negotiation. The specific manner in which management fees are paid is established in a written agreement between the client and EDGE. Investment advisory contracts with registered investment companies are subject to annual renewal by the respective registered investment company's board of directors in accordance with requirements under the Investment Company Act of 1940.

How Fees Are Paid

Management fees may be computed and paid at annual rates (percentages) of an account's net assets on a monthly, quarterly, semi-annual or annual basis. The contractually agreed upon rates at which EDGE is compensated vary on an account-by-account basis as negotiated with the client. Accounts initiated during a billing period may be charged a prorated fee. EDGE does not deduct fees from client assets. Fees may be invoiced to the client, and will generally be paid from client assets through the client's custodian or other administrator on a monthly, quarterly, semi-annual or annual basis. Fees may be billed and paid in arrears, or may be paid in advance, as negotiated with the client. With respect to fees paid in advance, EDGE will refund the pro-rata portion of the fee it received for the remainder of a period for accounts closed within that billing period.

Cancellation and Termination of Agreement

Investment advisory contracts may be terminated at any time, by either party, upon receipt of written notice or as negotiated, and preferably with 90 days written notice. Accounts terminated during a billing period may be charged a prorated fee. With respect to fees paid in advance, EDGE will refund the pro-rata portion of the fee it received after the termination of the account for the applicable billing period.

Fee Schedule

Published management fees are based upon asset classes and/or stated portfolios for unaffiliated client portfolios which are individually managed (segregated and discretionary) and subject to the stated minimum account sizes. Management fees may be subject to negotiation as appropriate, and may be higher or lower than those described below.

Equity Strategies	Fee Schedule
Capital Appreciation	0.50% on the first $50 mm 0.45% on the next $50 mm 0.40% on the next $100 mm Negotiable on all thereafter
Large Cap Value/Equity Income	0.50% on the first $50 mm 0.45% on the next $50 mm 0.40% on the next $100 mm Negotiable on all thereafter
International Equity Income ADR	0.60% on the first $50 mm 0.55% on the next $50 mm 0.50% on the next $100 mm Negotiable on all thereafter
Mid Cap Core	0.60% on the first $50 mm 0.55% on the next $50 mm 0.50% on the next $100mm Negotiable on all thereafter

Small Mid Cap Value/Equity Income	0.70% on the first $50 mm 0.65% on the next $50 mm 0.60% on the next $100 mm Negotiable on all thereafter
Small Mid Cap U.S. Value/Equity Income	0.70% on the first $50 mm 0.65% on the next $50 mm 0.60% on the next $100 mm Negotiable on all thereafter
All Cap Value/Equity Income	0.65% on the first $50 mm 0.60% on the next $50 mm 0.50% on the next $100 mm Negotiable on all thereafter
North American High Income Equity	0.70% on the first $50 mm 0.65% on the next $50 mm 0.55% on the next $100 mm Negotiable on all thereafter

Fixed Income Strategies	**Fee Schedule**
Core Plus	0.30% on the first $100 mm 0.25% on the next $100 mm 0.20% on the next $100 mm Negotiable on all thereafter
High Yield High Quality	0.50% on the first $50 mm 0.45% on the next $50 mm 0.40% on the next $50 mm Negotiable on all thereafter
Investment Grade Corporate	0.30% on the first $50 mm 0.25% on the first $50 mm 0.20% on the next $50 mm Negotiable on all thereafter
Intermediate Corporate Plus	0.30% on the first $50 mm 0.25% on the first $50 mm 0.20% on the next $50 mm Negotiable on all thereafter
Mortgage Securities	0.25% on the first $100 mm 0.20% on the next $100 mm 0.15% on the next $100 mm Negotiable on all thereafter
Short Term Income	0.25% on the first $50 mm 0.20% on the next $50 mm 0.15% on the next $50 mm Negotiable on all thereafter

Asset Allocation Strategies	Fee Schedule
Asset Allocation	0.60% on the first $50 mm
Balanced Asset Allocation	0.50% on the next $50 mm
Conservative Balanced Asset Allocation	0.40% on the next $100 mm
Conservative Growth Asset Allocation	Negotiable on all thereafter
Flexible Income Asset Allocation	
Strategic Growth Asset Allocation	
Multi-Asset High Income	

Managed Account Advisory Services/Wrap Fee Programs Fees

EDGE provides investment advisory services to various managed accounts. Each managed account fee arrangement is unique, is subject to negotiation and is a portion of the wrap sponsor's fee. The annual fees paid to EDGE by wrap program sponsors generally range from 0.35% to 0.50% of the account holder's respective account and may vary based upon the arrangement and/or by asset style (e.g., fees for fixed income styles typically are lower than fees for equity styles). Actual investment advisory fees incurred by clients may vary. In the event EDGE engages the services of a subsidiary or affiliate in accordance with management of the account, any fees charged by the subsidiary or affiliate shall be paid by EDGE out of the management fee. Some wrap programs provide for the wrap fee (including the portfolio management portion payable to EDGE out of that wrap fee) to be paid by the client before the services are rendered to the client by EDGE, while some wrap programs provide for the wrap fee (and EDGE's portfolio management portion) to be paid in arrears by the client after EDGE provides services for the period covered by the fee. In the event the wrap program provides for prepayment of fees by the client, the client is directed to the program sponsor's brochure for information concerning termination and refund conditions and procedures.

Other Fees or Expenses Paid in Connection with Advisory Services

EDGE's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by advisors, mutual funds, i.e., transactions costs, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in such fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to EDGE's fee. EDGE does not receive any portion of these commissions, fees and costs.

Item 12 further describes the factors that EDGE considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

EDGE and its supervised persons do not accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Fee rebates may also be exercised for client accounts that exceed a percentage of the annual management fee.

Item 6 – Performance Based Fees and Side-by-Side Management

EDGE does not typically charge any performance-based fees nor does it manage accounts which impose performance-based fee. However, if there is a case where performance fees is negotiated it will be on an individual client basis and in compliance with Rule 205-3 of the Investment Advisers Act of 1940.

Item 7 – Types of Clients

EDGE provides investment advisory services to institutional clients including registered investment companies, corporations, investment advisers, collective investment trusts, insurance separate accounts, defined benefit plans, trusts, foreign funds and other pooled investment vehicles. Some of EDGE's clients also include Principal affiliates. EDGE also provides investment advisory services to wrap fee programs and other managed accounts as an affiliate manager to Principal Global Investors, LLC ("PGI").

EDGE will typically not manage accounts under $25,000,000 in market value. The minimum account size for the managed account and wrap programs that EDGE advises is generally $100,000. However, the investment minimum differs from program to program and is determined by the wrap program sponsor and PGI.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

EDGE offers a broad array of equity, fixed-income and asset allocation strategies to help its clients meet their investment objectives and goals. Each of these strategies involves the risk of loss resulting from the purchase and sale of securities, which each client should be prepared to bear. While EDGE seeks to reduce non-compensated risk to which a client may be exposed, other risks (including but not limited to the risk of a general financial market decline) may be assumed in order to seek to attain investment objectives and goals of the client. However, EDGE cannot provide any guarantee that the client's goals and objectives will be achieved. EDGE manages client portfolios that may have similar investment policies and/or guidelines, which are non-exclusive to any one client. EDGE does not guarantee the future performance or any specific level of performance for client portfolio(s), the success of any investment decision or strategy that EDGE may use, or the success of EDGE's overall management of client portfolios.

Equity Strategies

EDGE currently offers the Capital Appreciation, All Cap Value/Equity Income, Large Cap Value/Equity Income, Mid-Cap Core, Small Mid-Cap Value/Equity Income, Small Mid Cap U.S. Value/Equity Income, North American High Income Equity and International Equity Income ADR Strategies (collectively, the "Equity Strategies"), which primarily invest in the common stocks of U.S. and foreign corporations. Each of the Equity Strategies maintains a long-term focus and, has an investment horizon over three to five years.

The actively managed Equity Strategies apply a four step process toward investing that includes (i) quantitative screens, (ii) fundamental research, (iii) stock selection and portfolio construction, and (iv) risk management. The Equity Strategies seek to invest in stocks with attractive risk/reward characteristics. EDGE screens companies using traditional financial metrics, such as measures of profitability, revenues, sales growth, price ratios, dividend yield and market capitalization. EDGE then conducts fundamental research designed to give a comprehensive overview of the industry and helps identify quality companies, aiding the Portfolio Managers in identifying investment candidates. Analysts have assigned areas of industry expertise and are responsible for covering each company in their industry, modeling the supply/demand components for each industry and identifying companies with strong positions and/or competitive advantages in the industry. The Portfolio Management team has ultimate responsibility for security selection decisions, portfolio construction and ensuring that Analysts' ideas are reflected in the portfolio based on the Portfolio Managers' conviction in the investment thesis. Although idea generation is collaborative and research is systematic, final decisions are made by the Portfolio Management team. Risk management plays a key part in EDGE's investment process and is integrated throughout its processes. Not only does risk management provide checks and balances in the construction of portfolios, it is also intertwined throughout our four step investment process. EDGE has a multi-layer risk monitoring and oversight process including portfolio risk analysis, performance attribution review, risk reporting, compliance oversight, and Investment & Risk Committee oversight, as well as ongoing checks and balances with the Portfolio Management team.

The Capital Appreciation Strategy seeks long-term growth of capital by investing in common stocks of companies across the capitalization spectrum. The benchmark for this strategy is the Russell 3000 Index.

The All Cap Value/Equity Income Strategy seeks a relatively high level of current income and long-term growth of income and capital by investing primarily in common stocks of U.S. companies across the capitalization spectrum. The benchmark for this strategy is the Russell 3000 Value Index.

The Large Cap Value/Equity Income Strategy seeks a relatively high level of current income and long-term growth of income and capital by investing primarily in the common stocks of U.S. large-cap companies. The benchmark for this strategy is the Russell 1000 Value Index.

The Mid Cap Core Strategy seeks long term growth of capital by investing primarily in the common stocks of U.S. companies in the medium market capitalization range. The benchmark for this strategy is the Russell MidCap Index.

The Small Mid-Cap Value/Equity Income Strategy seeks a relatively high level of current income and long-term growth of income and capital by investing primarily in common stocks of small and mid-cap U.S. companies. The benchmark for this strategy is the Russell 2500 Value Index.

The Small Mid-Cap U.S. Value/Equity Income Strategy seeks a relatively high level of current income and long-term growth of income and capital by investing primarily in common stocks of small and mid-cap U.S. companies. This strategy typically does not invest in ADRs. The benchmark for this strategy is the Russell 2500 Value Index.

The International Equity Income ADR Strategy seeks a relatively high level of current income and long-term growth of income and capital by investing primarily in non-U.S. companies in developed markets. The benchmark for this strategy is the MSCI EAFE (Net) Index.

The North American High Income Equity Strategy seeks a high level of current income consistent with the preservation of capital by investing primarily in dividend-paying stocks. The benchmark is the S&P 500 Index.

The Fixed Income Strategies

EDGE currently offers the Core Plus, Intermediate Corporate Plus, Investment Grade Corporate, Short Term Income, Mortgage Securities and High Yield High Quality (collectively, the "Fixed Income Strategies"), which invest primarily in fixed income securities including, but not limited to, corporate bonds, asset-backed and mortgage-backed securities, and securities issued by the U.S. Government, its agencies or instrumentalities. EDGE's core long term positioning and investment horizon is based on the premise that we buy bonds which we expect to hold over the long term. EDGE seeks to identify issuers with strong business fundamentals from sectors and industries that traditionally have the characteristics which we believe allow them to deliver consistent results through multiple business cycles. Those characteristics include steady cash flows, positive demographic trends, and defensible market positions. Our fundamental research-driven strategy is opportunistic and flexible to adapt to changing market conditions while remaining true to our focus as long-term investors.

The actively managed Fixed Income Strategies apply a disciplined four-step process that combines top-down strategy with bottom-up fundamental research supported at each step with rigorous risk controls. Our four step process toward investing includes (i) idea generation, (ii) fundamental research, (iii) portfolio construction and issue selection, and (iv) portfolio monitoring & risk management. The actively managed Fixed Income Strategies evaluate macroeconomic landscape and analyze sector and credit conditions. Fundamental research includes performing sector, industry, issuer, and issue analysis to identify attractive investment opportunities. Portfolio construction is based upon integration of macro, sector and industry themes focusing on attractively priced securities to maximize risk adjusted returns. Risk controls are built-in throughout the process.

The Core Plus Strategy seeks a high level of current income consistent with the preservation of capital by investing in a broad array of fixed income securities. The benchmark for this strategy is the Bloomberg Barclays U.S. Aggregate Bond Index.

The Intermediate Corporate Plus Strategy seeks a high level of current income consistent with the preservation of capital by investing primarily in intermediate-term investment grade corporate bonds. The benchmark for this strategy is the Bloomberg Barclays U.S. Intermediate Corporate Investment Grade Index.

The Investment Grade Corporate Strategy seeks a high level of current income consistent with the stability of principal by investing primarily in corporate fixed income securities that are deemed to be investment grade. The benchmark for this strategy is the Bloomberg Barclays U.S. Corporate Investment Grade Index.

The Short Term Income Strategy seeks a high level of current income consistent with the stability of principal by investing primarily in high quality short-term fixed income securities that are deemed to be investment grade at the time of purchase. The benchmark for this strategy is the Bloomberg Barclays U.S. Credit 1-3 Year Index.

The Mortgage Securities Strategy seeks to provide a high level of current income consistent with stability and liquidity by investing primarily in securities issued by the U.S. government, its agencies and instrumentalities, and other high quality mortgage-backed securities. The strategy does not invest in securities deemed to be below-investment grade at the time of purchase. The benchmark for this strategy is the Bloomberg Barclays U.S. MBS: Agency Fixed Rate MBS Index.

The High Yield High Quality Strategy seeks a high level of current income by investing primarily in below investment grade fixed income securities. The benchmark for this strategy is the Bloomberg Barclays U.S. Corporate High Yield Ba/B 2% Index.

Asset Allocation Strategies

EDGE currently offers a range of asset allocation investment capabilities covering balanced, target-risk, and customized multi-asset class investment strategies. Each of the asset allocation strategies employs a top down approach to multi-asset solutions, and can be composed of a diverse mix of equity, fixed income, and alternative asset class investments. EDGE's asset allocation strategies can be implemented in a "fund-of-funds" structure or through directly held positions in securities, including exchange traded funds.

Each of the asset allocation strategies is long-term focused and employs EDGE's time-tested three-step asset allocation investment approach. The strategies utilize its three-step process toward multi-asset investing: (i) long term strategic asset allocation, (ii) intermediate-term tactical asset allocation adjustments, and (iii) active implementation. EDGE's long term strategic analysis focuses on analyzing historical risk-return correlations for each asset class to determine or revise long-term asset class exposure targets. EDGE then evaluates short-term economic conditions as well as relevant market forces to formulate measured tactical deviations from the strategic targets. Once the tactical preferences are determined, EDGE determines the optimal blend of investment strategies or securities to fit the current tactical positioning. Finally, the EDGE asset allocation investment team utilizes its global, multi-asset class risk and performance attribution system for ongoing risk management and portfolio construction enhancements.

The Asset Allocation strategy seeks a medium level of income and capital growth consistent with a medium level of principal risk.

The Flexible Income strategy seeks a high level of income and a low level of capital growth, with exposure to a low level of principal risk. The benchmark for this strategy is the 20% Russell 3000/5% MSCI EAFE/75% Bloomberg Barclays U.S. Aggregate Bond.

The Conservative Balanced strategy seeks a medium to high level of income and a medium to low level of capital growth, with exposure to a medium to low level of principal risk. The benchmark for this strategy is the 30% Russell 3000/10% MSCI EAFE/60% Bloomberg Barclays U.S. Aggregate Bond.

The Balanced strategy seeks a medium level of income and capital growth consistent with a medium level of principal risk. The benchmark for this strategy is the 45% Russell 3000/15% MSCI EAFE/40% Bloomberg Barclays U.S. Aggregate Bond.

The Conservative Growth strategy seeks a low to medium level of income and a medium to high level of capital growth, with exposure to a medium to high level of principal risk. The benchmark for this strategy is the 60% Russell 3000/20% MSCI EAFE/20% Bloomberg Barclays U.S. Aggregate Bond.

The Strategic Growth strategy seeks a high level of capital growth with a corresponding level of principal risk. The benchmark for this strategy is the 70% Russell 3000/25% MSCI EAFE/5% Bloomberg Barclays U.S. Aggregate Bond.

The Multi-Asset High Income strategy seeks current income with reasonable capital appreciation potential by investing primarily in investment grade and non-investment grade corporate bonds, preferred securities, CMBS, North American high dividend equities, REITs & MLPs. The benchmark for this strategy is the Bloomberg Barclays High Yield 2% Issuer Capped Index.

Strategy Risks
The material risks that are common across the asset classes.

		Equity	Fixed Income	Asset Allocation
	Emerging Market Risk: Risk that the stocks of companies located in emerging markets will be substantially more volatile, and substantially less liquid, than the stocks of companies located in more developed foreign markets.	X		X
	Equity Securities Risk: Equity securities, which include common, preferred or convertible preferred stocks, could decline in value if the issuer's financial condition declines or in response to overall market or economic conditions. A strategy's primary market segment, such as large-cap, mid-cap or small-cap stocks, or growth or value stocks, may underperform other market segments. Investments in smaller or mid-sized companies may involve greater risk and price volatility then investments in larger, more mature companies.	X		X
	Convertible Securities Risk: Convertible securities can be bonds, notes, debentures, preferred stock or other securities which are convertible into common stock. Convertible securities are subject to both the credit and interest rate risks associated with fixed income securities and to the stock market risk associated with equity securities.	X	X	X
	Currency Risk: Risk that the value of a foreign investment, measured in U.S. Dollars, will decrease because of unfavorable changes in currency exchange rates. Currency risk is especially high in emerging markets.	X		X
	Manager Risk: Risk that the investment process, techniques and analyses applied will not produce the desired results. Poor security selection or focus on securities in a particular sector, category, or group of companies will cause the strategy to underperform relevant benchmarks or other strategies with a similar investment objective.	X	X	X
	Cyber Security Risk: Portfolios can be susceptible to operational, information security and related risks. In general, cyber incidents can result from deliberate attacks or unintentional events and can include but are not limited to gaining unauthorized access to digital systems and misappropriating assets or sensitive information, corrupting data, or causing operational disruptions. Cyber security failures or breaches by a third party service provider and the issuers of securities in which the portfolio invests have the ability to cause disruption and impact business operations, potentially resulting in financial losses, inability to transaction business, violation of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, and/or additional related costs.	X	X	X

	Operational Risk: A portfolio may suffer a loss arising from shortcomings or failures in internal processes, people or systems, or from external events. Operational risk can arise from many factors ranging from routine processing errors to potentially costly incidents related to, for example, a major system failure.	X	X	X
	Master Limited Partnership ("MLP") Risk: Investments in MLPs involve risks that differ from investments in common stock, including risks related to limited control and limited rights to vote on matters affecting the MLP, risks related to potential conflicts of interest between the MLP and the MLP's general partner, and cash flow risk. As partnerships, MLPs may be subject to less regulation (and less protection for investors) under state laws than corporations. MLP common units and other equity securities can be affected by macro-economic and other factors affecting the stock market in general, expectations of interest rates, investor sentiment towards MLPs, changes in a particular issuer's financial condition, or unfavorable or unanticipated poor performance of a particular issuer (in the case of MLPs, generally measured in terms of distributable cash flow). Prices of common units of individual MLPs and other equity securities also can be affected by fundamentals unique to the partnership or company, including earnings power and coverage ratios.	X		X
	MLP Tax Risk: MLPs may be subject to taxation in certain jurisdictions, which may reduce the amount of income an MLP pays to its investors. MLPs do not pay U.S. federal income tax at the partnership level. Rather, each partner is allocated a share of the partnership's income, gains, losses, deductions and expenses. A change in current tax law, or a change in the underlying business mix of a given MLP, could result in an MLP being treated as a corporation for U.S. federal income tax purposes, which would result in such MLP being required to pay U.S. federal income tax on its taxable income. The classification of an MLP as a corporation for U.S. federal income tax purposes would have the effect of reducing the amount of cash available for distribution by the MLP. Thus, if any of the MLPs owned by a mutual fund were treated as corporations for U.S. federal income tax purposes, it could result in a reduction in the value of its investment in the Fund and lower income.	X		X
	Preferred Securities Risk: Preferred securities are junior subordinated securities in a company's capital structure and therefore can be subject to greater credit and liquidation risk.	X	X	X
	Real Estate Securities Risk: Real estate securities (including REITS) are subject to the risks associated with the direct ownership of real estate, including declines in value, adverse economic conditions, and increase in expenses, regulatory changes and environmental problems.	X	X	X

	Real Estate Investment Trusts ("REITs") Risk: A REIT could fail to qualify for a tax-free pass-through of income under the Internal Revenue Code, and investors would indirectly bear their proportionate share of the expenses of REITs in which a portfolio invests.	X		X
	Royalty Trust Risk: A royalty trust generally acquires an interest in natural resource or chemical companies and distributes the income it receives to its investors. A sustained decline in demand for natural resources and related products could adversely affect royalty trust revenues and cash flows. Such a decline could result from a recession or other adverse economic conditions, an increase in the market price of the underlying commodity, higher taxes or other regulatory actions that increase costs or a shift in consumer demand. Rising interest rates could adversely affect the performance and limit the capital appreciation of royalty trusts because of the increased availability of alternative investments at more competitive yields. Investors will indirectly bear their proportionate share of the royalty trusts' expenses.	X	X	X
	Stock Market Risk: Risk that stock prices overall will decline. Stock markets tend to move in cycles, with periods of risking prices and periods of falling prices.	X		X
	Valuation Risk: The financial risk that an asset is overvalued and is worth less than expected when it matures or is sold. Factors contributing to valuation risk can include incomplete data, market instability, financial modeling uncertainties and poor data analysis by the people responsible for determining the value of the asset.	X	X	X
	Trading Risk: Although frequent trading is not a strategy utilized by the equity and fixed income strategies, it can occur. Frequent trading can affect investment performance through increased brokerage and other transactions costs and taxes.	X	X	X
	Trading Issues: Trading in Shares on NYSE Arca may be halted due to market conditions or for reasons that, in the view of NYSE Arca, make trading in Shares inadvisable. Trading in shares on NYSE Arca is subject to trading halts caused by extraordinary market volatility pursuant to NYSE Arca "circuit breakers" rules.	X	X	X
	Financial Services Sector Risk: The financial services sector is subject to extensive government regulation, can be subject to relatively rapid change due to increasingly blurred distinctions between service segments, and can be significantly affected by availability and cost of capital funds, changes in interest rates, the rate of corporate and consumer debt defaults, and price competition. Companies in the financial services sector may be subject to extensive government regulation that affects the scope of their activities, the prices they can charge and the amount of	X	X	X

	capital they must maintain. The profitability of companies in the financial services sector may be adversely affected by increases in interest rates, by loan losses, which usually increase in economic downturns, and by credit rating downgrades.			
	Energy Sector Risk: The profitability of companies in the energy sector is related to worldwide energy prices, exploration, and production spending. Such companies also are subject to risks of changes in exchange rates, government regulation, world events, depletion of resources and economic conditions, as well as market, economic and political risks of the countries where energy companies are located or do business. Oil and gas exploration and production can be significantly affected by natural disasters. Oil exploration and production companies may be adversely affected by changes in exchange rates, interest rates, government regulation, world events, and economic conditions. Oil exploration a production companies may be at risk for environmental damage claims.	X	X	X
	Small and Medium-Sized Company Risk: Investing in securities of small and medium-sized companies involves greater risk than is customarily associated with investing in larger, more established companies. Securities of these companies present additional risks because their earnings are less predictable and they are more likely than larger companies to have narrower product lines, markets or financial resources. These companies' stocks may be more volatile and less liquid than those of larger, more established companies. These stocks may have returns that vary, sometimes significantly, from the overall stock market.	X		X
	Investment Objective Risk: The possibility that the client investment objectives/guidelines may not be met.	X	X	X
	Concentration Risk: A strategy that concentrates investments in a particular industry or group has greater exposure than other strategies to market, economic and other factors affecting the industry or group.	X	X	X
	Credit Risk: The possibility a bond issuer will fail to pay interest and principal in a timely manner or that negative perceptions of the issuer's ability to make such payments will cause the price of the bond to decline.		X	X
	Derivatives Risk: Transactions in derivatives (such as options, futures, and swaps) may increase volatility, cause liquidation of portfolio positions when not advantageous to do so and produce disproportionate losses.		X	X
	Duration Risk: Duration is a measure of the expected life of a fixed income security and its sensitivity to changes in interest rates. The longer a portfolio's average duration, the more sensitive the fund will be to changes in interest rates.		X	X

	Foreign Securities Risk: Transactions in foreign securities risk includes the loss of value as a result of political or economic instability; nationalization, expropriation or confiscatory taxation; changes in foreign exchange rates and restrictions; settlement delays and limited government regulation.	X	X	X
	Interest Rate Risk: Risk that bond prices overall will decline because of rising interest rates.		X	X
	Liquidity Risk: Risk that the strategy could experience difficulties in valuing and selling illiquid securities. In the event the strategy needs to sell a portfolio security during periods of infrequent trading of the security, it may not receive full value for the security.	X	X	X
	Prepayment Risk: Unscheduled prepayments on mortgage-backed and asset-backed securities may have to be reinvested at lower rates. A reduction in prepayments may increase the effective maturities of these securities, exposing them to the risk of decline in market value over time.		X	X
	U.S. Government Securities Risk: Yields available from U.S. government securities are generally lower than yields from other fixed income securities.		X	X
	U.S. Government Sponsored Securities Risk: Securities issued by U.S. government sponsored enterprises such as FHLMC, FNMA and the Federal Home Loan Bank are not issued or guaranteed by the U.S. Treasury.		X	X
	The High Yield Risk: This strategy is subject to greater credit quality risk than higher rated fixed income securities and should be considered speculative.		X	X
	Counterparty Risk: Transactions, including certain derivative transactions, entered into directly with a counterparty is subject to risk that the counterparty will fail to perform its obligations in accordance with the agreed terms and conditions of the transaction. A counterparty may become bankrupt or otherwise fail to perform its obligations due to financial difficulties, resulting in significant delays in obtaining any recovery in a bankruptcy or other reorganization proceeding or no recovery in such circumstances.		X	X
	Asset Allocation Risk: A strategy's selection and weighting of asset classes may cause it to underperform other strategies with a similar investment objective.	X	X	X
	Conflict of Interest Risk: for those strategies which utilize a fund-of-funds structure, EDGE may have an incentive to increase the management fees it receives by allocating more fund-of-fund assets to underlying funds also managed by EDGE as opposed to underlying funds managed by other advisers.			X
	Investment Company Risk: for those strategies which utilize a fund-of-funds structure, investors will bear indirectly their proportionate share of the expenses of other investment companies in which the strategy invests.	X	X	X

Item 9 – Disciplinary Information

EDGE is not currently involved in any pending legal events or disciplinary actions that are viewed by management as having a materially adverse effect on EDGE's business, operations, financial position or net income. Given the size and scope of the operations of the Principal Financial Group ®, member companies of Principal are regularly involved in litigation, both as defendant and as plaintiff. However, EDGE does not believe any pending litigation will have a material effect on EDGE's business, financial position or net income.

Item 10 – Other Financial Industry Activities and Affiliations

EDGE is under common control with Principal Securities, a broker-dealer registered with the SEC and a FINRA member firm that markets a variety of mutual funds, unit investment trusts and limited partnerships. Principal Securities is the principal underwriter and distributor of institutional shares of a family of mutual funds organized by Principal Life Insurance Company ("Principal Life"). EDGE currently does not conduct any brokerage business with Principal Securities.

EDGE is under common control with Principal Funds Distributor, Inc. ("PFD"), a broker-dealer registered with the SEC and a FINRA member firm. PFD is the principal underwriter and distributor of retail and institutional shares of a family of mutual funds organized by Principal Life. EDGE currently does not conduct any brokerage business with PFD.

EDGE is under common control with Principal Global Investors (Ireland) Ltd. ("PGI-Ireland"), an investment adviser registered with the Central Bank of Ireland. PGI-Ireland serves as the Managing Director of the Principal Global Investors Funds. EDGE provides investment advisory services to Principal Global Investors Funds, which is organized in Ireland as an Undertaking for Collective Investment in Transferrable Securities ("UCITS") and are generally available to investors in Europe.

EDGE is a direct, wholly owned subsidiary of Principal Management Corporation ("PMC"), an investment adviser registered with the SEC. PMC primarily serves as a "manager of managers" on behalf of the Principal mutual funds organized by Principal Life Insurance Company. EDGE serves as sub-adviser to certain series of Principal Funds.

Affiliate entities of Principal provides EDGE with various resources and services, including but not limited to legal/compliance, trade settlement, corporate actions processing, account reconciliation, human resources, sales and marketing, and information systems. EDGE is under common control with Principal Global Investors, LLC ("PGI"), an investment adviser registered with the SEC. EDGE has entered into sub-advisory agreements with PGI for different investment vehicles such as collective investment trusts, and managed account advisory services. In some arrangements, PGI implements the placement of trades in wrap fee program client accounts and in ETFs. EDGE has common officers and directors with PGI and other Principal affiliates.

EDGE is under common control with Principal Global Investors Trust Company, a trust company organized under the laws of the state of Oregon. Principal Global Investors Trust Company may provide administrative services to collective investment trusts organized on behalf of EDGE clients.

EDGE is under common control with Principal Life Insurance Company, a life insurance company licensed in all 50 states and the District of Columbia. The Funds and other separate accounts sub-advised by EDGE are organized by Principal Life Insurance Company and are sold by licensed agents of Principal Life.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Participation or Interest in Client Transaction & Personal Trading

EDGE may recommend to its clients the purchase, sale or holding of shares of affiliated mutual funds and/or ETFs, for which EDGE and its affiliates also provide advisory services while considering suitability. In such situations, EDGE has a fiduciary duty to its clients. EDGE has policies and procedures that address trading and conflicts of interest. These conflicts, along with all conflicts of interest are overseen by EDGE's Investment & Risk Committee. EDGE does not buy or sell for itself securities that it also recommends to clients. However, employees of EDGE may personally buy or sell securities that are similar to EDGE's clients. EDGE employees are subject to a Code of Ethics which is designed to resolve potential conflicts of interest related to employees personal securities trading activities. Access Persons shall not prefer his or her own interest to that of an advisory client nor make personal investment decisions based on investment decision of advisory clients.

Code of Ethics

EDGE has adopted a written Code of Ethics (the "Code") pursuant to Rule 204A-1 of the Investment Advisers Act of 1940. The Code was adopted to set standards of business conduct as a fiduciary and requires all Access Persons, as defined in the Code, to comply with all applicable federal securities laws. The principal objectives of the Code are (i) to provide policies and procedures consistent with applicable laws and regulations, including Rule 17j-1 under the Investment Company Act of 1940 and Rule 204A-1 the Investment Advisers Act of 1940; and (ii) to make certain that the personal trading and other business activities of Access Persons are conducted in a manner consistent with applicable law, regulations and the general principles set forth in the Code.

All Access Persons of EDGE receive a copy of the Code at the beginning of their employment by or association with EDGE and certify that they understand and will abide by the Code. Access Persons are also provided a copy of the Code whenever material amendments are made and they are required to certify, upon such amendment as well as on an annual basis that they understand and have complied with the Code.

The Code requires that Access Persons report any violations of the Code promptly to EDGE's Chief Compliance Officer or his/her designee. Material violations of the Code will be reported to EDGE's Board of Directors and may be reported to client(s) as appropriate.

To avoid conflicts of interest or the appearance of conflicts of interest with clients, Access Persons of EDGE are subject to pre-clearance, holding and reporting requirements with respect to personal securities holdings. Access Persons must receive pre-approval from Compliance before trading a Covered Security, as defined in the Code, and generally may not trade a Covered Security for a period of seven calendar days before or after the Covered Security has been traded by any client account. Access Persons must hold affiliated mutual funds for a period of 60 calendar days before they can be sold. Covered Securities must be held for 30 calendar days before they can be sold. Access Persons are required to provide duplicate investment account statements to EDGE for review and must certify personal securities transactions on a quarterly basis and personal securities holdings on an annual basis. There are processes in place to prevent instances where potential conflicts of interest arise between the personal securities transactions of Access Persons and the securities transactions that EDGE effects for client accounts. The compliance group monitors personal trading via SunGard PTA. This includes maintenance of a master securities list that includes all securities traded by EDGE for purchase or sale on behalf of clients. EDGE's Access Persons are required to preclear buys and sells of reportable securities (excluding exempt securities and transactions) through SunGard PTA, which compares the request to the master securities list to determine whether a conflict of interest exists before the Access Person can place a trade for their own benefit.

In cases where Principal Global Investors, LLC ("PGI") implements the trading execution, PGI personnel are subject to similar personal securities restrictions through PGI's Code of Ethics and PGI trading policies and procedures.

A copy of EDGE's Code of Ethics will be provided to any client or prospective client upon written request.

Item 12 – Brokerage Practices

Broker-Dealer Selection & Execution

In executing portfolio transactions and selecting broker-dealers, EDGE uses its best efforts to seek, on behalf of each client, the best overall terms available. In assessing the best overall terms available for any transaction, EDGE may consider all factors it deems relevant including the breadth of the market in the security; the price of the security; the size of the transaction; the timing of the transaction; the reputation, financial condition, experience, and execution capability of a broker-dealer; and the amount of the commission and the value of any brokerage and research services (as those terms are defined in Section 28 (e) of the Securities Exchange Act of 1934, as amended) provided by a broker-dealer. EDGE does not typically engage in the execution of any security transaction with affiliated broker-dealers.

The staff of the SEC has expressed the view that the best price and execution of over-the-counter transactions in portfolio securities may be secured by dealing directly with principal market makers, thereby avoiding the payment of compensation to another broker-dealer. In certain situations, EDGE believes that the facilities, expert personnel, and technological systems of a broker-dealer often enable its clients to secure a net price by dealing with a broker-dealer that is as good as or better than the price they could have received from a principal market maker, even after payment of the compensation to the broker-dealer. EDGE may place its over-the-counter transactions with principal market makers, but may also deal on a brokerage basis when utilizing electronic trading networks or as circumstances warrant.

The evaluation of broker-dealers is performed by the Counterparty Team of Principal Global Investors, LLC before trading can begin through the new brokerage firm, and annually thereafter. EDGE traders are required to direct trades only through approved broker-dealers. Broker-dealers are regularly monitored by the Counterparty Team for signs that may include but not limited to deterioration in business operations, creditworthiness and rating changes. The Investment & Risk Committee shall deny the future use of counterparties/brokerage firms if it concludes that the execution quality is not in the best interest of EDGE's clients; and/or does not appear reasonable.

Affiliated Transactions

EDGE typically does not engage in agency cross transactions, principal transactions, and proprietary trading. On a periodic basis, Compliance personnel will review the firm's trading activity to verify that such transactions have not taken place. If an affiliated transaction has occurred, EDGE will work with the client to ensure policy and procedures are being met.

Research & Other Soft Dollar Benefits

EDGE may share common research among the equity and fixed income teams, however trading is separated between equity and fixed income. EDGE may receive research or other products or services other than execution from a broker-dealer or a third party in connection with client securities transactions ("soft dollar benefits") for equity strategies only. The use of client funds to purchase brokerage and research services for its client accounts shall be within the safe harbor of Section 28(e) of the Securities Exchange Act of 1934.

EDGE may pay broker-dealers who provide equity brokerage and research services a commission for executing a transaction on behalf of a client which is in excess of the amount of commission another broker-dealer would have charged for effecting the transaction. As a result of this practice, there is an incentive to select a broker-dealer based on its interest in receiving the research and/or services, rather than on its clients' interest in receiving most favorable execution. Notwithstanding the foregoing, in each instance, EDGE must determine in good faith that such commission is reasonable in relation to the value of the brokerage and research services provided by the broker-dealer, viewed in terms of that particular transaction or in terms of the overall responsibilities of EDGE to each account over which EDGE exercises investment discretion. EDGE may pay commission dollars to brokers or financial institutions for specific equity research materials or products ("soft dollar services") that it considers useful in advising its clients. Soft dollar benefits are not limited to those clients who may have generated a particular benefit although certain soft dollar allocations are connected to particular clients or group of clients. Soft dollar benefits are not proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits. As a matter of policy, EDGE will not pay for soft dollar services with commissions generated by fixed income strategies.

The soft dollar services are expected to enhance EDGE's general portfolio management capabilities for the benefit of any or all of its clients, some of which may otherwise be unobtainable. EDGE does not have to produce or pay for the research, products or services. EDGE's soft dollar benefits are intended to meet the requirements for qualification of the safe harbor under Section 28(e) of the Securities Exchange Act, as amended. Soft dollar research and product services furnished to EDGE may include but are not limited to: written and/or electronic reports analyzing economic, financial, and portfolio characteristics; market data systems; portfolio evaluation and modeling tools, which assist with the investment decision making and trade execution processes. Products and services that do not qualify under the safe harbor under section 28(e) of the Securities Exchange Act include such services that do not aid in the investment decision and trade execution processes.

EDGE may also commit to pay commission dollars/soft dollars along with its own funds for specific research materials or products ("mixed use service") that provide usefulness in advising its clients as well as having other non-research related uses. EDGE will make a reasonable allocation of the cost between that portion which is research and that portion which is not. The eligible research portion may be paid with commission dollars and the non-eligible portion will be paid by EDGE. Some of these soft dollar and mixed use services are of value to EDGE in advising several of its clients, although not all of these services are necessarily useful and of value in managing the assets of any particular client, including the client on whose behalf a particular transaction is executed. The management fees paid to EDGE are not reduced because they receive those brokerage or research services, even though they might otherwise be required to purchase these services for cash.

EDGE's procedures to direct client transactions to a particular broker-dealer in return for soft dollar benefit entails a formalized approval process of such research to ensure that it qualifies under the safe harbor, and selection of a broker-dealer for client transactions are based upon factors described above. Additionally, proportion of overall commissions are allocated to each broker or dealer used in effecting equity trades on behalf of its clients. There is an annual broker voting process that includes research analyst, portfolio managers and traders. The broker vote is designed to rank brokers based on the quality of research and trading services provided. Recommendations are made for commission allocation based on the results of the vote but can be adjusted throughout the year. These factors and the results of the broker vote are used as general guidelines by the equity trading desk in deciding which broker-dealer to use for specific securities transactions. Research paid for through third parties is also reviewed annually to determine its value and usefulness to the equity investment process. This is followed by ongoing monitoring of soft dollar use and oversight by EDGE's Investment & Risk Committee. The Investment & Risk Committee is also responsible for the oversight of allocation, division and reasonableness of commissions.

Trade Allocation

EDGE has adopted trade allocation procedures that are designed to treat all clients in a fair and equitable manner. Client orders are generally processed and executed on a first-in, first-out basis by a trader. When there are multiple orders for the same security and it is advantageous to the clients, EDGE may aggregate the orders for a block execution. All clients participating in any aggregated transactions will receive an average share price with transaction costs being shared equally on a per share basis. If the full amount of the aggregated order is not filled, the partial amount actually executed will be allocated on a pro-rata basis among the participating clients. A portfolio manager has the discretion to instruct smaller orders in the same security to reduce cost and market impact. EDGE's new issue allocation procedure includes that the shares allocated to the firm will be allocated among the participating accounts based on each client's unfilled indication, subject to rounding to "round lot" amounts. All client accounts participating in a new issue allocation shall receive the same net execution price.

Client Directed Brokerage

In certain circumstances, clients may instruct EDGE to direct brokerage to a particular brokerage firm. EDGE will not participate in any directed brokerage practice unless it has received formal written instruction to do so by a client. All directed brokerage transactions shall be executed in accordance with EDGE's best efforts to obtain best execution. It is the practice of EDGE to obtain best execution and that if forced to choose between obtaining best execution or meeting the obligations of a directed brokerage agreement, EDGE would seek to obtain best execution. This approach attempts to minimize the risk with potential conflict of interest, however, risks associated with such activity are still present and procedures have been adopted to approve, monitor and disclose EDGE's practice.

EDGE is not responsible for any liabilities related to directed brokerage arrangements. There are limitations present which present risk which have been outlined herein. The effects of such practices on commissions charges to its clients possess limitations such as those outlined in the Bailey Case Disclosure that includes: (i) the adviser's inability under those circumstances to negotiate commissions or obtain best execution; (ii) its inability to obtain volume discounts; (iii) that there may be a disparity in commission charges among clients; and (iv) any potential conflicts of interest arising from brokerage firm referrals. These limitations are present when transacting in such activity, however risk may vary as EDGE's practice is to obtain best execution over directing brokerage.

The Investment & Risk Committee has the responsibility to oversee EDGE's client directed brokerage practices. The Investment & Risk Committee will review directed brokerage transactions and commissions on an ongoing basis to oversee the approximate target percentage or dollar amount of any applicable transactions and evaluate whether the transactions are consistent with EDGE's best execution standards.

Managed Account Advisory Services/Wrap Fee Programs

EDGE provides advisory services to managed account programs whereby EDGE manages model portfolios and communicates adjustments to the models to its affiliate Principal Global Investors, LLC ("PGI"), who implements the models and adjustments with the program sponsors or their overlay managers. EDGE does not execute trades for customers of the programs whose individual accounts have assets invested in accordance with EDGE's model portfolios. The program sponsor and/or its overlay manager, which in some case may be PGI is responsible for executing and settling trades on behalf of its customers. Since adjustments to the model portfolios are generally transmitted on an agreed upon delivery timeframe, the model portfolios may have performance that is different than EDGE's discretionary accounts in similar strategies.

For certain managed accounts, PGI may implement the placement of trades in separately managed account/wrap fee programs ("SMA Programs") client accounts based on model portfolios maintained by EDGE. Such SMA Program arrangements occasionally include sponsor directed brokerage provisions. No assurance can be given that transactions executed in accordance with such directed brokerage arrangements result in the best execution available to the client. Typically, SMA Program clients pay a fee to the program sponsor that covers, among other things, brokerage commissions for trades executed with the sponsor or the sponsor-designated broker-dealer, but does not cover brokerage commissions charged on trades executed with other broker-dealers ("Wrap Fee"). As a result, best execution decisions by PGI for SMA Program trades tend to favor use of the program sponsor or the sponsor-designated broker-dealer because of the commission expense, although other circumstances sometimes dictate that other brokers be used to achieve best execution. Depending on a variety of factors including the amount of the wrap fee, the trading activity and the value of custodial and other services, the Wrap Fee may or may not exceed the separate costs of such services.

In addition to the placement of trades in SMA Programs, PGI handles the delivery of the model portfolios to "model only" wrap fee program sponsors ("UMA Programs") on behalf of EDGE. The delivery of changes to UMA Program sponsors typically occurs after similar changes have been implemented or may be in the process of implementation, across institutional accounts managed by EDGE. It should be expected therefore that accounts having recommendations that are implemented following EDGE's institutional accounts will have different performance than the institutional accounts because of favorable or unfavorable market changes during the ensuing period. For equity trade rotation purposes, PGI accords UMA Program sponsors rotation slots on a similar basis as the slots accorded to SMA Program sponsors, the only difference being that the model portfolio and changes thereto are communicated to the UMA Program sponsors, and trade orders, based on the model portfolios maintained by EDGE, are effected directly in SMA Program client accounts.

Exchange Traded Funds

EDGE, along with Principal Global Investors, LLC ("PGI"), serves as a co-sub-advisor to an exchange traded fund. EDGE is responsible for ongoing issue selection and portfolio construction. PGI is responsible for trade execution in a manner which seeks to avoid detrimental effect of the client's next day creation unit. PGI has established policies and procedures that address trading activity and brokerage practices which cover these accounts. Trading price of Shares of the Fund are on NYSE Arca may differ from the Fund's daily NAV. The price of the Shares will be subject to factors such as supply and demand, as well as the current value of the Fund's portfolio securities. Secondary market shares, which are available for purchase or sale on an intraday basis, do not have a fixed relationship to either the previous day's NAV or to the current day's NAV. Prices in the secondary market, therefore, may be below, at, or above the most recently calculated NAV per share.

Item 13 – Review of Accounts

All of EDGE's client accounts are monitored by their assigned portfolio managers. Each account's holdings, performance, market value and cash are updated regularly and available for evaluation on a real-time basis. An automated compliance system reviews trades to ensure compliance with the respective account's investment guidelines. Every compliance alert generated by the system is evaluated by EDGE's Compliance Department. Each account is assigned to an investment team, based upon each account's principal investment strategies and risks. For managed advisory service accounts, models are reviewed periodically and communicated to the program sponsor or the designated investment adviser.

The Equity Investment Team includes the Head of Equities, portfolio managers and equity investment analysts. The equity portfolio managers review their assigned accounts on a regular basis and also conduct a review of the portfolios on a monthly and quarterly basis to reconfirm their sector allocation, company specific investment thesis and the specific position size for each investment. The equity portfolio managers also meet with the analysts on an informal and periodic basis to review specific securities within their assigned sectors as well as discuss client accounts.

The Fixed-Income Team is comprised of the Head of Fixed Income, portfolio managers and fixed income analysts. The fixed income portfolio managers review their assigned accounts on a regular basis as they monitor cash flows, interest payments received and maturities to determine the best way to invest cash holdings. Portfolio managers also meet with the fixed income analysts on an informal and periodic basis to review specific securities within their assigned sectors. The fixed income portfolio managers also meet with the analysts on an informal and periodic basis to discuss any changes or proposed changes in accounts and receives updates from the analysts on sectors and individual securities.

The Asset Allocation Team consists of the Head of Asset Allocation, portfolio managers and investment analysts. The asset allocation portfolio managers review their assigned accounts on a regular basis by monitoring holdings, pricing and allocation of assets among underlying securities and/or funds. Detailed analyses of underlying holdings is performed which are updated at least monthly and more often when market conditions are volatile or when a significant portfolio change is planned. The asset allocation portfolio managers and analysts also meet on an informal and periodic basis to discuss any changes or proposed changes in accounts and receives updates from the analysts.

EDGE has an Investment & Risk Committee ("Committee") that reviews and provides oversight of EDGE's investment strategies, risk management, client accounts, trading and operational activities. This Committee provides a multi-level risk management oversight process with key functions provided by applicable senior management. The Committee conducts a quarterly review of all portfolios, examining investment risk (performance, holdings, flows, trading activity, portfolio positioning, etc.) compliance risk (Code of Ethics, client guidelines, conflicts of interest, etc.) operational risk (investment processes, brokerage statistics, trade errors, etc.), as well as valuation risk (review of any pricing issues, etc.) The Committee also evaluates risk reports, which tracks turnover, standard deviation, beta, as well as changes in the active risk profile of the portfolios. It is important to note that the Committee is not responsible for security selection decisions. The Committee consists of the Head of Asset Allocation/Chief Investment Officer, Head of Equities, Head of Fixed Income, Chief Compliance Officer and the Director of Strategy & Operations.

EDGE provides client reporting at the request of each client's needs. Monthly, quarterly and annual written commentaries may be provided which may include positive and negative contributors to performance during the period along with specific characteristics. Periodic certifications regarding EDGE's practices and client account management are also provided at the request of each client.

Item 14 – Client Referrals and Other Compensation

EDGE may engage in client solicitation and obtain referrals from affiliated investment advisers and compensation may or may not be provided in such circumstances. Any compensation paid for referrals to EDGE of advisory clients will be done in compliance with applicable law and any other obligations of the person(s) receiving such compensation.

Item 15 – Custody

As a matter of policy, EDGE and its employees are not permitted to accept or maintain custody of client assets, funds or securities.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains the client's investment assets. Clients are urged to compare the account statements received from their qualified custodian with their own financial records. EDGE's records may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

EDGE is generally provided discretionary authority from its clients to select the securities to be bought and sold, the amount of securities to be bought and sold, the broker or dealer to be used to execute trades and the commission rates to be paid. In all such cases, investment and brokerage discretion is to be exercised in a manner consistent with stated investment objectives and guidelines for each specific client account.

EDGE typically accepts discretionary authority from a client at the time both parties enter into a written investment advisory agreement. EDGE will not provide advisory service until an advisory agreement has been fully executed and written investment guidelines and restrictions have been provided to EDGE in writing.

Item 17 – Voting Client Securities

In accordance with Rule 206(4)-6 of the Investment Advisers Act, EDGE has adopted proxy voting policies and procedures to fulfill its fiduciary obligation of voting proxies in the best interest of its clients.

In its capacity as an investment adviser EDGE shall, except where EDGE and the client have otherwise agreed, assist the client in voting proxies with respect to its portfolio securities to the extent that such proxies relate to matters involving investment judgment. In addition, the client may authorize EDGE, in its capacity as adviser, to vote the client's proxies. In such cases, EDGE is responsible for casting the proxy votes in a manner consistent with the best interests of the client. Clients may direct a vote in a particular solicitation for their account in the event a conflict of interest is not present. The client request along with applicable documentation supporting the request shall be retained.

EDGE has engaged Institutional Shareholder Services, Inc. (“ISS”) to assist in the voting of proxies. ISS provides research, analysis, reporting, and voting recommendations along with the processing of the vote submissions. ISS is also responsible for coordinating with the client's custodian to ensure that all proxy materials received by the custodian relating to the client's portfolio securities are processed in a timely fashion. EDGE will vote all proxies in accordance with ISS proxy voting guidelines as long as it is in the best interest of the client. On the occasions when ISS’s voting recommendations is in conflict with the vote or if EDGE feels an override of the ISS recommendation is necessary, upon evaluation of conflicts of interest EDGE can instruct ISS to vote a particular proxy in a specific manner.

Clients may obtain information about how their proxies were voted or obtain a copy of EDGE’s proxy voting policies and procedures by contacting EDGE at (206) 913-5800. If a client desires to vote a particular proxy solicitation, they must contact EDGE not less than 2 business days prior to the proxy voting deadline.

EDGE does not vote proxies on behalf of managed advisory accounts where EDGE is merely supplying the model portfolio to the program sponsor or the investment adviser. Clients in managed account programs should contact the wrap free program sponsor to obtain information about how their proxies were voted or how to vote a particular proxy solicitation.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide certain financial information or disclosure about their financial condition. EDGE has no financial commitment that impairs its ability to meet its contractual and fiduciary commitments to clients, and has not been the subject of any bankruptcy proceeding.

Item 19 – Requirement for State Registered Advisers

Not applicable to EDGE.

Principal[SM]

Rev. 01/2017

FACTS	WHAT DOES PRINCIPAL GLOBAL INVESTORS DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: • Social Security number and transaction history • Income and account investment experience • Account transactions and risk tolerance When you are no longer our customer, we continue to share your information as described in this notice.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Principal Global Investors chooses to share; and whether you can limit this sharing.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	DOES PRINCIPAL GLOBAL INVESTORS SHARE?	CAN YOU LIMIT THIS SHARING?
For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes—to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes—information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes—information about your creditworthiness	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?	Call 1-800-533-1390 or go to www.principalglobal.com/about-us/contact-information

EE11865PGI

Who we are	
Who is providing this notice?	Principal Global Investors and its affiliates.
What we do	
How does Principal Global Investors protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Principal Global Investors collect my personal information?	We collect your personal information, for example, when you • Open an account or seek advice about your investments • Direct us to buy securities or make deposits, or withdrawals from your account • Give us your contact information or show your government issued ID We also collect your personal information from others, such as affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • Our affiliates include companies with the Principal Global Investor name as listed below, and other financial companies such as Edge Management, Inc. and Spectrum Asset Management, Inc.
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • Principal Global Investors does not share with nonaffiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. • Principal Global Investors doesn't jointly market.

Other important information

Who is providing this notice: Principal Global Investors, LLC companies, including the following: Principal Global Investors Trust, Principal Real Estate Investors, LLC, Principal Commercial Acceptance, LLC, Principal Commercial Funding, LLC, Principal Green Fund I, LP / PGF GP, LLC, Principal Green Property Fund Employees II, LLC, Principal Real Estate Debt Fund I, LP Principal Real Estate Debt Fund, GP, LLC, Edge Asset Management, Inc., Spectrum Asset Management, Inc., Principal Funds Distributor, Inc.

BROCHURE SUPPLEMENT TO FORM ADV PART 2B

February 17, 2017

Item 1 – Cover Page

Name of Supervised Person
CHARLES AVERILL

Firm Name, Address, Telephone Number
Edge Asset Management, Inc.
601 Union Street, Suite 2200
Seattle, Washington 98101
(206) 913-5800

This brochure supplement provides information about Charles Averill that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

CHARLES DOUGLAS AVERILL, CFA
1954
B.A. Economics, Reed College
M.A. Economics, Princeton University
Portfolio Manager, Edge Asset Management, Inc., 01/10 - current

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who have successfully completed a series of three examinations. To become a CFA Charter-holder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charter-holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3 – Disciplinary Information

Mr. Averill has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Mr. Averill is not actively engaged in any investment-related businesses or other occupations.

Item 5 – Additional Compensation

Mr. Averill does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

Mr. Averill is a member of the Asset Allocation Team at EDGE. Todd Jablonski, who currently serves as the Chief Investment officer, supervises Mr. Averill and the other members of the Asset Allocation Team. Investment advisory services provided by Mr. Averill to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Jablonski may be reached at (206) 913-5800.

BROCHURE SUPPLEMENT TO FORM ADV PART 2B

February 17, 2017

Item 1 – Cover Page

Name of Supervised Person
DAN R. COLEMAN

Firm Name, Address, Telephone Number
Edge Asset Management, Inc.
601 Union Street, Suite 2200
Seattle, Washington 98101
(206) 913-5800

This brochure supplement provides information about Dan Coleman that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

DANIEL ROGERS COLEMAN
1956
B.A. Finance, University of Washington
M.B.A. Finance, New York University
Head of Equities, Edge Asset Management, Inc. 05/05 - current

Item 3 – Disciplinary Information

Mr. Coleman has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Mr. Coleman is not actively engaged in any investment-related businesses or other occupations.

Item 5 – Additional Compensation

Mr. Coleman does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

Mr. Coleman serves as the Head of Equities and supervises the Equity Investment Team at EDGE. Investment advisory services provided by Mr. Coleman to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Coleman is supervised by Todd Jablonski, the Chief Investment Officer. Mr. Jablonski may be reached at (206) 913-5800.

BROCHURE SUPPLEMENT TO FORM ADV PART 2B

February 17, 2017

Item 1 – Cover Page

Name of Supervised Person
JOHN FRIEDL

Firm Name, Address, Telephone Number
Edge Asset Management, Inc.
601 Union Street, Suite 2200
Seattle, Washington 98101
(206) 913-5800

This brochure supplement provides information about John Friedl that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

JOHN ROGER FRIEDL, CFA
1968
B.A. Communications and History, University of Washington
M.S., Finance, Seattle University
Portfolio Manager, Edge Asset Management, Inc., 01/07 - current

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who have successfully completed a series of three examinations. To become a CFA Charter-holder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charter-holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3 – Disciplinary Information

Mr. Friedl has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Mr. Friedl is not actively engaged in any investment-related businesses or other occupations.

Item 5 – Additional Compensation

Mr. Friedl does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

Mr. Friedl is a member of the Fixed Income Team at EDGE. Greg Tornga, who currently serves as the Head of Fixed Income, supervises Mr. Friedl and the other members of the Fixed Income Team. Investment advisory services provided by Mr. Friedl to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Tornga may be reached at (206) 913-5800.

EDGE ASSET MANAGEMENT

BROCHURE SUPPLEMENT TO FORM ADV PART 2B

February 17, 2017

Item 1 – Cover Page

Name of Supervised Person
TODD JABLONSKI

Firm Name, Address, Telephone Number
Edge Asset Management, Inc.
601 Union Street, Suite 2200
Seattle, Washington 98101
(206) 913-5800

This brochure supplement provides information about Todd Jablonski that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

TODD ANTHONY JABLONKSI, CFA
1976
B.A. Economics, University of Virginia
M.B.A. New York University
Chief Investment Officer, Edge Asset Management, 01/10 - current

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who have successfully completed a series of three examinations. To become a CFA Charter-holder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charter-holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3 – Disciplinary Information

Mr. Jablonski has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Mr. Jablonski is not actively engaged in any investment-related businesses or other occupations.

Item 5 – Additional Compensation

Mr. Jablonski does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

As the Head of Asset Allocation, Mr. Jablonski supervises the other members of the Asset Allocation Team. Investment advisory services provided by Mr. Jablonski to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Jablonski is supervised by Barb McKenzie, the Senior Executive Director of Principal Global Investors. Ms. McKenzie may be reached at (515) 362-2088.

BROCHURE SUPPLEMENT TO FORM ADV PART 2B

February 17, 2017

Item 1 – Cover Page

Name of Supervised Person	*Firm Name, Address, Telephone Number*
Theodore Bissell Parker Jayne	Edge Asset Management, Inc. 601 Union Street, Suite 2200 Seattle, Washington 98101 (206) 913-5800

This brochure supplement provides information about Toby Jayne that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

THEODORE BISSELL PARKER JAYNE, CFA
1976
B.A. Anthropology, Harvard
Managing Director, Wellington Management Company. 08/98 –02/14
Portfolio Manager, Edge Asset Management Inc, 08/15 - current

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who have successfully completed a series of three examinations. To become a CFA Charter-holder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charter-holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3 – Disciplinary Information

Mr. Jayne has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Mr. Jayne is not actively engaged in any investment-related businesses or other occupations.

Item 5 – Additional Compensation

Mr. Jayne does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

Mr. Jayne is a member of the Equity Investment Team at EDGE. Dan Coleman, who currently serves as the Head of Equities, supervises Mr. Jayne and the other members of the Equity Investment Team. Investment advisory services provided by Mr. Jayne to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Coleman may be reached at (206) 913-5800.

BROCHURE SUPPLEMENT TO FORM ADV PART 2B

February 17, 2017

Item 1 – Cover Page

<u>*Name of Supervised Person*</u>
RYAN MCCANN

<u>*Firm Name, Address, Telephone Number*</u>
Edge Asset Management, Inc.
601 Union Street, Suite 2200
Seattle, Washington 98101
(206) 913-5800

This brochure supplement provides information about Ryan McCann that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

RYAN PATRICK MCCANN, CFA
1970
B.A., Business Administration, Washington State University
Portfolio Manager, Edge Asset Management, Inc., 04/10 - current
Vice President/Portfolio Manager/Trader, Columbia Asset Management, 02/05-04/10

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who have successfully completed a series of three examinations. To become a CFA Charter-holder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charter-holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3 – Disciplinary Information

Mr. McCann has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Mr. McCann is not actively engaged in any investment-related businesses or other occupations.

Item 5 – Additional Compensation

Mr. McCann does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

Mr. McCann is a member of the Fixed Income Team at EDGE. Greg Tornga, who currently serves as the Head of Fixed Income, supervises Mr. McCann and the other members of the Fixed Income Team. Investment advisory services provided by Mr. McCann to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Tornga may be reached at (206) 913-5800.

BROCHURE SUPPLEMENT TO FORM ADV PART 2B

February 17, 2017

Item 1 – Cover Page

Name of Supervised Person
SCOTT PETERSON

Firm Name, Address, Telephone Number
Edge Asset Management, Inc.
601 Union Street, Suite 2200
Seattle, Washington 98101
(206) 913-5800

This brochure supplement provides information about Scott Peterson that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

SCOTT JEFFREY PETERSON, CFA
1960
B.S. Math, Brigham Young University
M.B.A. Finance, New York University
Portfolio Manager, Edge Asset Management, Inc., 01/07 - current

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who have successfully completed a series of three examinations. To become a CFA Charter-holder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charter-holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3 – Disciplinary Information

Mr. Peterson has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Mr. Peterson is not actively engaged in any investment-related businesses or other occupations.

Item 5 – Additional Compensation

Mr. Peterson does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

Mr. Peterson is a member of the Fixed Income Team at EDGE. Greg Tornga, who currently serves as the Head of Fixed Income, supervises Mr. Peterson and the other members of the Fixed Income Team. Investment advisory services provided by Mr. Peterson to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Tornga may be reached at (206) 913-5800.

BROCHURE SUPPLEMENT TO FORM ADV PART 2B

February 17, 2017

Item 1 – Cover Page

Name of Supervised Person
SARAH RADECKI

Firm Name, Address, Telephone Number
Edge Asset Management, Inc.
601 Union Street, Suite 2200
Seattle, Washington 98101
(206) 913-5800

This brochure supplement provides information about Sarah Radecki that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

SARAH ELIZABETH RADECKI, CFA
1971
B.A. Political Science, Saint Mary's College of California
B.S. Economics, Saint Mary's College of California
M.A. Economics, University of California, Santa Barbara
Associate Portfolio Manager/Sr. Investment Analyst, Edge Asset Management, Inc. 4/11 - current

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who have successfully completed a series of three examinations. To become a CFA Charter-holder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charter-holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3 – Disciplinary Information

Ms. Radecki has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Ms. Radecki is not actively engaged in any investment-related businesses or other occupations.

Item 5 – Additional Compensation

Ms. Radecki does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

Ms. Radecki is a member of the Equity Investment Team at EDGE. Dan Coleman, who currently serves as the Head of Equities, supervises Ms. Radecki and the other members of the Equity Investment Team. Investment advisory services provided by Ms. Radecki to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Coleman may be reached at (206) 913-5800.

BROCHURE SUPPLEMENT TO FORM ADV PART 2B

February 17, 2017

Item 1 – Cover Page

Name of Supervised Person
CLIFF JOSEPH REMILY

Firm Name, Address, Telephone Number
Edge Asset Management, Inc.
601 Union Street, Suite 2200
Seattle, Washington 98101
(206) 913-5800

This brochure supplement provides information about Dan Coleman that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

CLIFF JOSEPH REMILY
1976
B.A. Business Administration, University of Washington
M.B.A. Investment Finance, University of Southern California
Portfolio Manager, Edge Asset Management, Inc. 03/15 – current
Managing Partner, Founder, Northwest Priority Capital 2014
Executive Vice President, Global Equity Portfolio Manager, Pacific Investment Management Company 2011-2013
Managing Director, Global Equity Portfolio Manager, Thornburg Investment Management 2006-2011

Item 3 – Disciplinary Information

Mr. Remily has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Mr. Remily established Northwest Priority Capital LLC ("NWPC") which is an investment adviser to small separate accounts. Mr. Remily reported that he will be closing NWPC on or around April 1, 2015. Currently, only close relatives are the only active clients of NWPC. Mr. Remily has reported existing accounts to EDGE which will undergo monitoring of trading activity and impose pre-clearance requirements to manage conflicts of interest. Mr. Remily further confirmed there has been no activity in these accounts since his start date with EDGE.

Item 5 – Additional Compensation

Mr. Remily does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

Mr. Remily is a member of the Equity Investment Team at EDGE. Dan Coleman, who currently serves as the Head of Equities, supervises Mr. Remily and the other members of the Equity Investment Team. Investment advisory services provided by Mr. Remily to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Coleman may be reached at (206) 913-5800.

BROCHURE SUPPLEMENT TO FORM ADV PART 2B

February 17, 2017

Item 1 – Cover Page

Name of Supervised Person
DAVID W. SIMPSON

Firm Name, Address, Telephone Number
Edge Asset Management, Inc.
601 Union Street, Suite 2200
Seattle, Washington 98101
(206) 913-5800

This brochure supplement provides information about David Simpson that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

DAVID WARREN SIMPSON, CFA
1958
B.S. Agricultural Sciences, University of Illinois
M.B.A. Finance, University of Wisconsin
Portfolio Manager, Edge Asset Management, Inc., 01/07 - current

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who have successfully completed a series of three examinations. To become a CFA Charter-holder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charter-holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3 – Disciplinary Information

Mr. Simpson has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Mr. Simpson is not actively engaged in any investment-related businesses or other occupations.

Item 5 – Additional Compensation

Mr. Simpson does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

Mr. Simpson is a member of the Equity Investment Team at EDGE. Dan Coleman, who currently serves as the Head of Equities, supervises Mr. Simpson and the other members of the Equity Investment Team. Investment advisory services provided by Mr. Simpson to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Coleman may be reached at (206) 913-5800.

BROCHURE SUPPLEMENT TO FORM ADV PART 2B

February 17, 2017

Item 1 – Cover Page

Name of Supervised Person
GREG TORNGA

Firm Name, Address, Telephone Number
Edge Asset Management, Inc.
601 Union Street, Suite 2200
Seattle, Washington 98101
(206) 913-5800

This brochure supplement provides information about Greg Tornga that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

GREGORY LEE TORNGA, CFA
1969
B.A., General Studies, University of Michigan
M.B.A., Chapman University
Head of Fixed Income/Portfolio Manager, Edge Asset Management, Inc., 05/11-current
Sr. Vice President, Payden & Rygel Investment Management, 01/11-04/11
Vice President, Payden & Rygel Investment Management, 09/07-12/10

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who have successfully completed a series of three examinations. To become a CFA Charter-holder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charter-holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3 – Disciplinary Information

Mr. Tornga has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Mr. Tornga is not actively engaged in any investment-related businesses or other occupations.

Item 5 – Additional Compensation

Mr. Tornga does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

Mr. Tornga serves as the Head of Fixed Income and supervises the Fixed Income Team at EDGE. Investment advisory services provided by Mr. Tornga to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Tornga is supervised by Todd Jablonski, the Chief Investment Officer of Edge Asset Management. Mr. Jablonski may be reached at (206) 913-5800.

BROCHURE SUPPLEMENT TO FORM ADV Part 2B

February 17, 2017

Item 1 – Cover Page

Name of Supervised Person
NEDRET VIDINLI

Firm Name, Address, Telephone Number
Edge Asset Management, Inc.
601 Union Street, Suite 2200
Seattle, Washington 98101
(206) 913-5800

This brochure supplement provides information about Ned Vidinli that supplements the Edge Asset Management, Inc. brochure. EDGE is required to provide its brochure to each client or prospective client. Please contact Cindy Kim, Chief Compliance Officer, at (206) 913-5800 if you did not receive EDGE's brochure or if you have any questions about the contents of this supplement.

Item 2 – Educational Background and Business Experience

Listed below is the year of birth, formal education after high school, and business background for the preceding five years for the Supervised Person:

NEDRET VIDINLI, CFA
1967
B.A. Business Administration, Drake University
M.B.A. Benedictine University
Associate Portfolio Manager/Sr. Investment Analyst, Edge Asset Management, Inc., 03/13 – current
Sr. Investment Analyst, Edge Asset Management, Inc., 11/10 – 03/13
Vice President & Sr. Analyst, FSI Group, Inc., 05/02 – 06/10

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who have successfully completed a series of three examinations. To become a CFA Charter-holder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charter-holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Item 3 – Disciplinary Information

Mr. Vidinli has not been involved in any legal events or subjected to any disciplinary actions which are material to EDGE's clients or prospective clients.

Item 4 – Other Business Activities

Mr. Vidinli is not actively engaged in any investment-related businesses or other occupations.

Item 5 – Additional Compensation

Mr. Vidinli does not receive from third parties, any special economic benefits, including sales awards, commissions, prizes or bonuses which are based upon the number or amount of sales, client referrals or new accounts.

Item 6 – Supervision

Mr. Vidinli is a member of the Equity Investment Team at EDGE. Dan Coleman, who currently serves as the Head of Equities, supervises Mr. Vidinli and the other members of the Equity Investment Team. Investment advisory services provided by Mr. Vidinli to clients are monitored through EDGE's review of accounts process, which is outlined in item #13 - Review of Accounts in the Brochure. Mr. Coleman may be reached at (206) 913-5800.

Edge Asset Management, Inc.

Proxy Voting Policy
Dated November 2011

Policy

Edge Asset Management, Inc. ("EDGE") has been delegated by certain clients the responsibility for voting proxies. It is the policy of EDGE to vote proxies in the best interest of its clients, to identify and disclose potential conflicts of interest, to promptly provide client proxy voting results upon request of a client, and to maintain records of proxy voting activities as required. EDGE maintains written policies and procedures which address EDGE's proxy policies and practices and which include the responsibility to receive and vote client proxies, to disclose any potential conflicts of interest, to make its proxy voting record available to clients and to maintain relevant and required records.

Background

Proxy voting is an important right of shareholders and reasonable care and diligence must be undertaken to ensure that such rights are properly and timely exercised. Investment advisers registered with the SEC that exercise voting authority with respect to client securities are required by Rule 206(4)-6 of the Advisers Act to (a) adopt and implement written policies and procedures that are reasonably designed to ensure that client securities are voted in the best interests of clients, which procedures must include how the adviser addresses material conflicts that may arise between the adviser's interests and those of its clients; (b) disclose to clients how they may obtain information from the adviser about how the adviser voted proxies for their securities; and (c) describe its proxy voting policies and procedures to clients and furnish a copy to its requesting clients. Further, Rule 204-2 of the Advisers Act requires registered investment advisers that vote client securities to maintain certain records relating to the adviser's proxy voting activities.

Responsibility

EDGE has the responsibility for the execution of its proxy voting policy, practices, disclosures and recordkeeping.

Summary Procedures

EDGE has adopted and implemented procedures to ensure the firm's policy is observed, executed properly and amended or updated, as appropriate. The procedures are summarized as follows:

1. Voting Procedures

- EDGE believes it is in the best interest of its clients to delegate the proxy voting responsibility to expert third-party proxy voting organization, Institutional Shareholder Services, Inc. ("ISS"). ISS provides policy guidelines and proxy research and analysis in addition to proxy voting. EDGE may override any ISS guideline or recommendation that EDGE feels is not in the best interest of the client.

- EDGE has elected to follow the ISS Standard Proxy Voting Guidelines (the “ Guidelines”), which embody the positions and factors that EDGE generally considers important in casting proxy votes, including, but not limited to, shareholder voting rights, anti-takeover defenses, board structures, election of directors, executive and director compensation, reorganizations, mergers and various shareholder proposals.

2. Conflicts of Interest

- Votes cast by ISS on EDGE’s behalf consistent with its Guidelines and recommendations are not considered to create a conflict of interest. If ISS or EDGE abstains from voting a proxy due to a conflict, or if EDGE elects to override an ISS recommendation, it will seek to identify and evaluate whether any conflicts of interest may exist between the issuer and EDGE or its employees and clients.

- Material conflicts will be evaluated, and if it’s determined that one exists, EDGE will disclose the conflict to the affected client, and request instruction from the client as to how the proxy should be voted.

3. New Accounts

- EDGE or its affiliate, Principal Global Investors, shall provide a proxy authorization letter to the client’s custodian upon the opening of a new client account. Clients may also choose to vote proxies themselves or receive individualized reports or services.

4. Abstentions

- EDGE may refrain from voting when it believes it is in the client’s best interests.

5. Proxy Solicitations & Information Requests

- EDGE will not reveal or disclose to any third-party how it may have voted or intends to vote until such proxies have been counted at a shareholders’ meeting. EDGE may in any event disclose its general policy to follow ISS’s guidelines. No employee of EDGE may accept any remuneration in the solicitation of proxies.

6. Errors

- EDGE will document errors and the resolution of errors.

7. Recordkeeping

- Documentation shall be maintained for at least five years. EDGE will keep records regarding all client requests to review proxy votes and accompanying responses. EDGE may rely on proxy statements filed on the SEC’s EDGAR system instead of keeping its own copies.

- EDGE’s proxy voting record will be maintained by ISS. EDGE will maintain documentation to support any decisions to vote against ISS Guidelines or recommendations.

8. Class Actions

- EDGE generally does not file class action claims on behalf of its clients and specifically will not act on behalf of former clients that have terminated their relationship with EDGE. EDGE will only file permitted class action claims if that responsibility in specifically stated in the advisory contract. EDGE will maintain documentation related to any cost-benefit analysis to support decisions to opt out of any class action settlement. This policy is disclosed in the firm’s Form ADV filing.

Historical Policies: Revised October 2010; February 2009; January 1, 2007; October 9, 2006
Adopted policy: March 31, 2004

Principal Global Investors, LLC

Form ADV Part 2A

801 Grand Ave
Des Moines, IA 50309
Phone: 800-533-1390

www.principalglobal.com

March 30, 2017

This brochure provides information about the qualifications and business practices of Principal Global Investors, LLC. If you have any questions about the contents of this brochure, please contact us at 800-533-1390. 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. Additional information about Principal Global Investors, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Principal Global Investors, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any certain level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Item 2: Material Changes Summary

This brochure is our annual updating amendment to the prior brochure dated March 30, 2016. There have been no material changes from the last annual update.

Item 3 – Table of Contents

ITEM 4 -- ADVISORY BUSINESS

Principal Global Investors is a diversified global asset management organization utilizing a multi-boutique strategy which enables Principal Global Investors to provide an expanded range of diverse investment capabilities through a network of specialized investment groups and affiliates. Principal Global Investors' capabilities encompass an extensive range of equity and fixed income investments. Principal Global Investors, established in 1998, is an indirect wholly owned affiliate of the Principal Financial Group, Inc. (NYSE: PFG). Principal Financial Group is a leading global financial institution offering a wide range of financial products and services. Principal Global Investors is directly owned by Principal Life Insurance Company, a member of the Principal Financial Group. Principal Life Insurance Company was founded in 1879 and began managing retirement assets in 1941.

Principal Global Investors provides investment advisory services to institutional investors and individuals. Principal Global Investors has divided its investment management operations into Equities boutiques, a Fixed Income boutique, a Currency boutique, and an Asset Allocation boutique. The Equities boutiques render advice primarily with regard to equity securities. The Fixed Income boutique renders advice primarily with regard to debt securities. The Currency boutique renders advice with regard to active and passive currency. The Asset Allocation boutique renders advice primarily on asset allocation strategies.

Principal Global Investors works with clients to determine their investment needs. Individual portfolios may be tailored to the specific requirements of the client through an investment advisory agreement. Clients may impose restrictions on investing in certain securities or certain types of securities.

Separately Managed Accounts (SMA) / Wrap Programs

Principal Global Investors provides investment advisory services in connection with Separately Managed Account/Wrap fee programs ("SMA Programs") or similar programs, sponsored by broker-dealers, banks or other investment advisers affiliated with broker-dealers Principal Global Investors may handle the placement of trades in some SMA program client accounts or may provide model portfolio recommendations to the program sponsor. The delivery of changes in model portfolio recommendations typically occur after similar changes have been implemented, or may be in the process of implementation, across institutional accounts managed by Principal Global Investors. It should be expected therefore that accounts receiving recommendations that are implemented following Principal Global Investors' institutional accounts may have different performance than the institutional accounts because of favorable or unfavorable market changes during the ensuing period.

In Equities, for trade rotation purposes, "model only" programs are accorded rotation slots on a similar basis as the slots accorded to other SMA discretionary programs. The only difference is that the model portfolio is communicated to the "model only" program sponsors or designated overlay manager for execution.

Fixed Income SMA Program clients currently trade at the same time as other Fixed Income clients except for time limitations set forth in client agreements.

Generally, the services provided by Principal Global Investors to SMA program ERISA plan clients ordinarily are described in the client's contract with the SMA sponsor and/or in the sponsor's program brochure.

Assets Under Management
Principal Global Investors managed $144,050,010,799 in discretionary assets and$ 49,951,938,340 in non-discretionary assets as of December 31, 2016.

ITEM 5 – FEES AND COMPENSATION

Principal Global Investors offers its services for compensation based primarily on a percentage of assets under management or on a fixed fee basis.

Equities Fee Schedules:
Principal Global Investors' standard annual fees for investment management services provided by its Equities boutiques are based on the fair market value of assets under management as outlined in the table below. Published fee schedules are shown for unaffiliated client portfolios which are individually managed (segregated and discretionary) and subject to the stated minimum accounts sizes. Fees and minimum investment amounts in all categories and ranges may be subject to the negotiation as appropriate, and may be higher or lower than those described below.

International Equity	Fee Schedule
International Core Equity International Growth Equity	0.65% on the first $50 mm 0.60% on the next $50 mm 0.50% on all thereafter Minimum separate account size: $25 mm
Global Equity Global Growth Equity Global Value and Income Equity	0.60% on the first $50 mm 0.50% on the next $50 mm 0.40% on all thereafter Minimum separate account size: $25 mm
Diversified International Equity International Opportunities Equity International All Country Equity	0.75% on the first $50 mm 0.65% on the next $50 mm 0.55% on all thereafter Minimum separate account size: $50 mm
International Small Cap Equity Global Small Cap Equity	0.85% on the first $50 mm 0.80% on the next $50 mm 0.70% on all thereafter Minimum separate account size: $25 mm

Emerging Markets Equity Emerging Global Leaders Equity	0.85% on the first $50 mm 0.80% on the next $50 mm 0.70% on all thereafter Minimum separate account size: $25 mm
Global Opportunities Equity Global All Country Equity	0.65% on the first $50 mm 0.55% on the next $50 mm 0.45% on all thereafter Minimum separate account size: $50 mm
Global Strategic Beta	0.30% on the first $50 mm 0.25% on the next $50mm 0.20% on all thereafter Minimum separate account size: $50mm

Domestic Equity	Fee Schedule
U.S. Mid-Cap Value Equity	0.60% on the first $50 mm 0.55% on the next $50 mm 0.45% on all thereafter Minimum separate account size: $10 mm
U.S. Blue Chip Equity U.S. Mid-Cap Equity	0.60% on the first $50mm 0.55% on the next $50mm 0.45% on all thereafter Minimum separate account size: $25mm
U.S. Value Equity	0.55% on the first $50 mm 0.50% on the next $50 mm 0.40% on all thereafter Minimum separate account size: $10 mm
U.S. Small Cap Equity U.S. Small Cap Select Equity U.S. Small Cap Opportunities Equity	0.75% on the first $50 mm 0.70% on the next $50 mm 0.60% on all thereafter Minimum separate account size: $10 mm
U.S. Select Equity	0.45% on the first $50 mm 0.40% on the next $50 mm 0.35% on all thereafter Minimum separate account size: $10 mm
U.S. Strategic Beta	0.25% on the first $50mm 0.20% on the next $50mm 0.15% on all thereafter Minimum separate account size: $50mm

Fixed Income Fee Schedules:

Principal Global Investors' standard annual fees for investment management services provided by its Fixed Income boutique are based on the fair market value (unless book value is specified in the negotiated contract) of assets under management as outlined in the tables below. Published fee schedules are shown for unaffiliated client portfolios which are individually managed (segregated and discretionary) and subject to the stated minimum accounts sizes. Fees in all categories and ranges described below may be subject to negotiation as appropriate. Fees and minimum investment amounts in all categories and ranges may be subject to the negotiation as appropriate, and may be higher or lower than those described below.

Fixed Income	Fee Schedule
Global Bonds Global Corporate Plus Global Investment Grade Corporate Core Plus Bond Core Plus Universal	0.35% on the first $50 mm 0.30% on the next $50 mm 0.25% on the next $50 mm 0.20% on all thereafter Minimum account size: $50 mm
Mortgage Backed Securities	0.35% on the first $50 mm 0.30% on the next $50 mm 0.25% on all thereafter Minimum account size: $50 mm
Global Capital Structure Opportunities	0.55% on the first $50 mm 0.50% on the next $50 mm 0.45% on all thereafter Minimum account size: $50 mm
Global Credit Alpha Investment Grade Opportunistic	0.65% on the first $50mm 0.60% on the next $50mm 0.55% on all thereafter Minimum account size: $50 mm
Global Credit Opportunities	0.45% on the first $50 mm 0.40% on the next $50 mm 0.35% on all thereafter Minimum account size: $50 mm
Global Short Duration Credit Global Short Duration Fixed Income	0.35% on the first $50 mm 0.30% on the next $50 mm 0.25% on all thereafter Minimum account size: $50 mm
Global Sovereign Bonds	0.40% on the first $50 mm 0.35% on the next $50 mm 0.30% on the next $50 mm 0.25% on all thereafter Minimum account size: $50 mm
Emerging Market Broad	0.55% on the first $50 mm 0.50% on the next $50 mm 0.45% on all thereafter Minimum account size: $50 mm

Core Plus Bond Opportunistic	0.40% on the first $50 mm 0.35% on the next $50 mm 0.30% on the next $50mm 0.25% on all thereafter Minimum account size: $50mm
Corporate Plus Investment Grade Corporate Intermediate Duration Investment Grade Corporate Long Duration Investment Grade Corporate Long Duration Fixed Income Credit Emphasis Long Duration Core Plus	0.30% on the first $50 mm 0.25% on the next $50 mm 0.20% on all thereafter Minimum account size: $50 mm
Private Market	0.25% on the first $100 mm 0.20% on the next $100 mm 0.15% on all thereafter Minimum account size: $50 mm
Ultra Short High Quality	0.20% on the first $50 mm 0.15% on the next $200 mm 0.10% on all thereafter Minimum account size: $50 mm
Ultra Short Enhanced Yield	0.25% on the first $25 mm 0.20% on the next $75 mm 0.15% on all thereafter Minimum account size: $50 mm
MBS CMO Interest Only Focus	0.38% on the first $100mm 0.33% on the next $150mm 0.28% on all thereafter Minimum account size: $50mm

High Yield	Fee Schedule
Global Tactical High Yield	0.65% on the first $100 mm 0.55% on the next $150 mm 0.45% on all thereafter Minimum account size: $50 mm
Global Floating Rate	0.50% on the first $100 mm 0.45% on the next $150 mm 0.35% on all thereafter Minimum account size: $50 mm
High Yield High Yield Traditional High Yield Quality Constrained	0.50% on the first $50 mm 0.45% on the next $50 mm 0.40% on all thereafter Minimum account size: $50 mm

Global High Yield High Yield Opportunistic	0.55% on the first $50 mm 0.50% on the next $50 mm 0.45% on all thereafter Minimum separate account size: $50 mm
Short Duration High Yield	0.50% on the first $100 mm 0.40% on the next $150 mm 0.30% on all thereafter Minimum account size: $50 mm
Bank Loans	0.50% on the first $100 mm 0.45% on the next $150 mm 0.40% on all thereafter Minimum account size: $50 mm

Municipal	Fee Schedule
Opportunistic Municipal	0.35% on the first $50 mm 0.30% on the next $100 mm 0.25% on all thereafter Minimum account size: $50 mm
Municipal California Fixed Income Municipal Fixed Income	0.30% on the first $50 mm 0.25% on the next $100 mm 0.20% on all thereafter Minimum account size: $50 mm

Currency Fee Schedule:

Principal Global Investors' standard annual fees for investment management services provided by its Currency boutique are based on the value of assets under management as outlined in the table below. Published fee schedules are shown for unaffiliated client portfolios which are individually managed (segregated and discretionary) and subject to the stated minimum accounts sizes. Fees in all categories and ranges described below may be subject to negotiation as appropriate. Fees and minimum investment amounts in all categories and ranges may be subject to the negotiation as appropriate, and may be higher or lower than those described below.

Active Currency Strategies	Fee Schedule
Passive	0.03% on the first $500 mm 0.025% on the next $500 mm 0.02% on all thereafter Minimum account size: $100 mm
Fundamental Discretionary Absolute Return	0.25% on the first $100 mm 0.20% on the next $400 mm 0.15% on all thereafter Minimum account size: $100 mm
G10 Global Time Diversified	2.0% flat fee and 20% performance fee Minimum account size: $20 mm

G10 Strategic Currency Program	0.125% on the first $100 mm 0.100% on the next $400 mm 0.075% on all thereafter Minimum account size: $100 mm
High Alpha Broad Universe Global Macro	1.5% flat fee and 20% performance fee Minimum account size: $20 mm

Asset Allocation Fee Schedule:

Principal Global Investors' standard annual fees for investment management services provided by its Principal Portfolio Strategies boutique are based on the value of assets under management as outlined in the table below. Published fee schedules are shown for unaffiliated client portfolios and subject to the stated minimum accounts sizes. Fees and minimum investment amounts in all categories and ranges may be subject to the negotiation as appropriate, and may be higher or lower than those described below.

Asset Allocation Strategies	Fee Schedule
Lifetime 2010 Lifetime 2020 Lifetime 2030 Lifetime 2040 Lifetime 2050 Lifetime Strategic Income	0.60% on the first $250 mm 0.55% on the next $250 mm 0.50% on the next $500 mm negotiable on all thereafter Minimum account size: $100 mm

Principal Portfolio Strategies' clients are institutional clients. Each institutional client has the ability to negotiate individual fee schedules based upon a number of factors which include, but are not limited to; specific asset classes, asset allocation models and the overall size of the relationship. The fees charged by the Principal Portfolio Strategies fee schedule take into account the management fees that are charged on the underlying investment level as well as the services provided by the Adviser.

Other:

Principal Global Investors provides investment advisory services to eligible investors in the private commingled vehicles offered through the Principal Global Investors Trust. The fees are negotiated with each investor. The minimum account size is $5,000,000. Additional information and disclosures would be provided through the subscription agreement or offering memorandum.

Fee payment and termination:

Generally, compensation is payable following provision of service. Generally fees are computed and billed to the client within the first 20 days of each quarter. The fee calculation generally is a two-step process. Step 1: Unless otherwise provided in a negotiated contract, the annual stated rate for investment advisory services is multiplied by the market value of the account on the last day of the previous quarter to calculate an annualized fee. Step 2: Unless otherwise provided, in a negotiated contract, the annualized fee is multiplied by the ratio of the number of days in the quarter over number of days in the year to determine the quarterly fee.

Fees are due upon receipt of invoice by the client. Electronic remittance of fees is encouraged.

Generally, contracts are terminable by any client upon not more than 30 day's notice unless otherwise specified in the negotiated contract.

For Separately Managed Account/Wrap fee programs ("SMA Programs"):

The annual SMA fees paid for Principal Global Investors by SMA strategies generally range from 0.30% to .50% of the relevant SMA account holders respective accounts.. Some SMA programs provide for the wrap fee (including the portfolio management portion payable to Principal Global Investors out of that wrap fee) to be paid by the SMA account holder before the services are rendered to the SMA account holder by Principal Global Investors, while some SMA programs provide for the wrap fee (and Principal Global Investors' portfolio management portion) to be paid in arrears by the SMA account holder after Principal Global Investors provides services for the period covered by the fee. In the event the SMA program provides for prepayment of fees by the SMA account holder, the SMA account holder is directed to the program sponsor's brochure for information concerning termination and refund conditions and procedures.

For additional information regarding brokerage fees and other transaction costs, see Item 12.

ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Principal Global Investors may charge performance fees in compliance with Rule 205-3 of the Investment Advisers Act of 1940. Any such performance fees will be negotiated on an individual basis with the client. Principal Global Investors is willing to consider incentive fees in appropriate circumstances. In measuring clients' assets for the calculation of performance-based fees, Principal Global Investors may include realized and unrealized capital gains and losses. Performance based fee arrangements may create an incentive for the adviser to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor performance based fee paying accounts over other accounts in the allocation of investment opportunities.

Principal Global Investors manages investments for a variety of client including pension funds, retirement plans, mutual funds, exchange-traded funds, large institutional clients, SMA program accounts and Private Funds. Potential conflicts of interest may arise from the side-by-side management of these clients based on fees structures.

Principal Global Investors has procedures designed and implemented to ensure that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients.

ITEM 7 – TYPES OF CLIENTS

Principal Global Investors provides portfolio management services to individuals, high net worth individuals, corporate pension and profit–sharing plans, Taft-Hartley plans, charitable institutions, foundations, endowments, municipalities, registered mutual funds, private investment funds, trusts, sovereign wealth funds, foreign funds, supranationals, central banks, collective investment trusts, wrap programs, insurance separate accounts, life insurance company general account, and other U.S. and international institutions. Some of Principal Global Investors' clients are affiliates including our parent company.

Generally the minimum account size for opening and maintaining a separately managed account is $25-50 million for an equity portfolio and is based on the type of strategy used for the client's portfolio.

Generally the minimum account size for opening and maintaining a separately managed account is $50-100 million for a fixed income portfolio and is based on the type of strategy used for the client's portfolio.

Generally the minimum account size for opening and maintaining a separately managed account is $20-100 million for a currency portfolio and is based on the type of strategy used for the client's portfolio.

Generally the minimum account size for investing in the Principal Global Investors Business Trust is $5,000,000.

Principal Global Investors reserves the right in its sole discretion to accept client accounts with fewer initial assets.

The minimum account size for the SMA programs that Principal Global Investors participates in are generally $100,000, although the investment minimum differs from program to program and is determined by wrap program sponsor, not Principal Global Investors.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Investing in securities involves risk of loss that clients should be prepared to bear.

For Equities:

Principal Global Equities and Aligned Investors ("the Equity Boutiques") offers a number of actively managed strategies, enhanced index strategies as well as passively managed strategies, all utilizing equity securities to help meet its clients' investment objectives and goals. The Equity Boutiques are generally a long-only manager. The vast majority of the portfolios are discretionary. Please refer to Item 16 regarding discretion over client accounts.

The Equity Boutiques provide client-focused investment solutions spanning equity markets worldwide. It utilizes internally generated fundamental research that focuses on bottom-up stock selection within a sophisticated comparative framework. The entire scope of research encompasses over 10,000 companies, large and small, in emerging and developed markets. It may also use technical methods of analysis. The proprietary systems include some data sourced from outside investment research specialists. Teams of investment analysts are organized by regions and industry sectors globally. Their research plays an integral part in the selection of securities for the client portfolios. These teams may meet with senior management of companies whose stocks in which the Equity Boutiques have invested or may invest in. The analysts will also research investment publications on general economic conditions, financial publications from the investment banking industry, corporate annual reports and regulatory filings.

The types of equity securities typically utilized for these strategies include common stock (exchange traded, over the counter and initial public offerings) issued by US and foreign (ex-US) corporations or other issuers. The Equity Boutiques may prefer to invest in American Depositary Receipts and Global Depositary Receipts if liquidity is suitable. They may invest in open end funds and Exchange Traded Funds (ETFs) for cash equitization purposes. Although it is rare, the Equity Boutiques may invest in closed-end funds, participation notes, private placement securities and rights and warrants on equity securities. The Equity Boutiques may use forward currency contracts to hedge the exposure of foreign currency fluctuations in the equity portfolios.

The Equity Boutiques offer a broad range of global and regional equity strategies across developed and emerging markets, specified market segments and style preferences which include, but not limited to:

Global Equity Strategies

Global Opportunities Equity
This strategy that can provide a broad-market approach including developed and emerging markets, managed with the aim of delivering high risk-adjusted results without reference to capitalization-weighted benchmarks or strict region or sector constraints. This strategy is designed for investors with long investment time horizons and a preference for upside participation along with greater downside risk protection. This strategy has been further tailored to exclude emerging markets or single countries or sectors.

Global Equity, Global Value and Income, Global Growth
These strategies are designed for investors seeking broad exposure to selected equity investment opportunities in developed markets based companies. The value oriented strategy has a secondary emphasis on above average dividend yields in developed markets worldwide; and the growth oriented strategy has a secondary emphasis on above average growth characteristics. These can be further tailored to include emerging markets: Global All Country Equity, Global All Country Value and Income and Global All Country Growth.

Global Strategic Beta
This strategy is actively managed with a quantitative approach, incorporating measures of variable risk premiums (i.e. multi-factor) for stock selection decisions. The objective is to provide stronger returns or minimize risk relative to a traditional market-capitalization-weighted benchmark.

Global Small-Cap Equity
The Global Small-Cap strategy invests in a broad-market of developed and emerging market economies. It is focused on investing in small-capitalization companies and managed to provide broadly diversified portfolios by region, country, and sector. This strategy has been further tailored to expand into mid-cap companies, with an overall portfolio income objective: Global SMID value & income.

International Equity Strategies

Diversified International, International All-Country Equity, International Opportunities Equity
This strategy offers a broad exposure to equity investment opportunities outside the United States. It is an active core strategy including moderate strategic allocations to emerging markets.

International Core, International Growth
These strategies can provide broad exposure to selected equity investment opportunities in developed markets outside of the U.S., utilizing a disciplined active approach. The growth oriented strategy is focused on delivering growth without excessive valuation premiums.

International Small Cap
The objective is to provide a diversified exposure among selected smaller capitalization companies in developed regions outside the U.S. utilizing a disciplined active core approach.

All of the above strategies can be tailored to include emerging market country exposure upon request.

Emerging Markets Equity Strategy

Emerging Markets Equity, Emerging Global Leaders Equity
These strategies can provide diversified exposure among companies within growing segments of the economy in emerging markets countries and focused on delivering growth without excessive valuation premiums.

Domestic Equity Strategies

U.S. Select, U.S. Value, U.S. Mid-Cap Value
These strategies can provide diversified exposure among selected companies within growing segments of the U.S. economy. The overall portfolios are constructed to exhibit a consistent bias towards core, growth or value oriented companies through disciplined stock selection.

U.S. Small Cap, U.S. Small Cap Select Value, U.S. Small Cap Select Opportunities
The objectives of these strategies are to provide a diversified exposure among selected smaller capitalization U.S. companies. With the exception of U.S. Small Cap Select Value, these portfolios have no particular style bias and invest in companies with both growth and value oriented characteristics.

U.S. Mid Cap, U.S. Blue Chip
The U.S. Mid Cap Equity strategy and U.S. Blue Chip strategy managed by the Aligned Investors team are designed for investors seeking equity investment opportunities irrespective of benchmark orientation. The strategy focuses primarily on high quality businesses with sustainable competitive advantages, with an owner/operator management philosophy and trading at a discount.

U.S. Strategic Beta
This strategy is actively managed with a quantitative approach, incorporating measures of variable risk premiums (i.e. multi-factor) for stock selection decisions. The objective is to provide stronger returns or minimize risk relative to a traditional market-capitalization-weighted benchmark.

Enhanced Index and Passive Equity Strategies

In addition to passively managed strategies, Principal Global Investors also offers benchmark-focused strategies that provide a low-cost enhancement to traditional passive management. This enhanced index strategy reflects an exclusion approach, distinct and complementary to traditional active strategies. It utilizes the systematic identification of a small subset of stocks best avoided or underweighted, while keeping the overall benchmark risk profile and style characteristics intact.

Philosophy and Risk Management
The Equity Boutiques' philosophy is that equity markets are not perfectly efficient, and therefore provide opportunities to add value through fundamental research and active risk management. The strategies are built on the belief that bottom-up stock selection is the most reliable and repeatable source of consistent competitive performance over time. To that end, the lead portfolio manager for each strategy collaborates directly with the investment analysts regarding the output of their analysis, and is ultimately responsible for security selection and for the individual weighting of each portfolio holding.

Risk management is embedded in the Equity Boutiques' investment process. The Equity Boutiques' portfolio managers have a number of risk management systems/tools at their disposal, each serving a different purpose within the portfolio construction process. These systems monitor risk and guidelines (in terms of region, country, currency, sector, industry, market capitalization distribution, style factor distribution, beta sensitivity and individual position weights) in each client's portfolio. Generally, the portfolio management teams monitor portfolio risk exposures through a series of weighting constraints relative to each portfolio's benchmark and each portfolio's overall characteristics and individual security holdings.

Furthermore, the risk management tools allow for Senior Management of the Equity Boutiques to view portfolio positioning for all strategies at any time. The Chief Investment Officers are charged with supporting risk management efforts that quantify the portfolio managers' success in achieving risk and return objectives for the accounts they manage. There is a peer review meeting on a monthly basis to discuss risks across all strategies. These meetings focus on a review of all strategies and use detailed reports of absolute and relative portfolio weightings in sectors, companies, industries and market capitalization as well as a wide range of portfolio level systematic risk metrics.

Prospective clients should be aware that no risk management system is fail-safe, and no assurance can be given that risk frameworks employed by the Equity Boutiques will achieve their objectives and prevent or otherwise limit substantial losses. There is also the risk that the investment approach may be out of favor at times, causing strategies to underperform other strategies or funds that also seek capital appreciation but use different approaches to the stock selection and portfolio construction process.

Risks of Investment Strategies
All of the Equity Boutiques' strategies entail market risk, liquidity risk and operational risk. Past performance does not necessarily predict future returns. Clients are subject to the risk that stock prices will fall over short or extended periods of time, and clients could lose all, or a substantial portion, of the value of their investments. Historically, the equity markets have moved in cycles, and the value of equity securities may fluctuate significantly from day to day. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of these companies' securities may decline in response. These factors contribute to price volatility, which is a principal risk of equity investing.

The Japanese Equity Strategy is more concentrated, which means that they invest in a single country and consequently in the securities of fewer issuers than a more diversified investment strategy. As a result, this strategy may be more susceptible to a single adverse economic or regulatory occurrence affecting one or more of these issuers, and may experience increased volatility.

The Global and International Equity strategies utilize foreign investments. Foreign investments are subject to special risks not typically associated with domestic U.S. stocks. Investing in issuers headquartered or otherwise located in foreign countries poses additional risks since political and economic events unique to a country or region will affect those markets and their issuers. These events will not necessarily affect the U.S. economy or similar issuers located in the United States.

For Fixed Income:

Principal Global Fixed Income ("PG- Fixed Income") boutique manages strategies covering a full range of global fixed income securities including products that integrate multiple fixed income sectors (multi-strategy) as well as products that emphasize a single fixed income sector.

The fixed income multi-strategy services focus on U.S. dollar-denominated securities as well as fixed income securities issued outside the United States and denominated in multiple currencies benchmarked to a range of short, intermediate and long duration strategies. Within the single sector focused strategies these include global and U.S. dollar-denominated strategies focused on investment grade corporate credit, high yield securities, emerging market debt or government and government related bonds.

PG-Fixed Income believes superior returns are best achieved through the integration of rigorous fundamental research, a global perspective and disciplined risk management.

These common threads serve as the three cornerstones of the fixed income process:

Macro/Risk Perspective

A broad approach to identifying macro trends and inconsistencies.

Investment Research Framework

A consistent comparative framework based on fundamentals, technicals, valuations and independent internal research, which is used throughout the investment process and facilitates communication as well as portfolio positioning.

Risk Management

> A comprehensive, multi-dimensional approach to risk management at each stage of the investment process.

Fixed Income Strategies

Bank Loans
The Bank Loan strategy seeks to provide a return consisting of income and capital appreciation over the long term primarily through security selection. Investments are in U.S. dollar denominated floating rate bank loan securities.

Emerging Market Broad
The Emerging Market Broad strategy focuses on independent, forward-looking fundamental analysis of both sovereign and corporate credits within the context of the global business cycle. The goal of the strategy is to add value to an actively managed emerging markets debt portfolio.

Global Bonds
The Global Bonds strategy aims to exploit global bond market opportunities through assessment of the global business/growth cycle and the relative position of individual countries within the cycle. The goal of the strategy is to add value to an actively managed global bond portfolio. The strategy includes: Global Bonds, Global Corporate Plus, Global Investment Grade Corporate, Global Sovereign Bonds, Global Credit Opportunities, Global Credit Alpha, Global Short Duration Credit and Global Short Duration Fixed Income.

High Yield
The high yield strategy tactically allocates across the high yield spectrum, focusing on the individual ratings of securities. The goal of the strategy is outperformance of the benchmark over a three to five year period with a below market level of volatility. High yield strategies include: High Yield Traditional, Global High Yield, Global Tactical High Yield, High Yield Opportunistic, High Yield, High Yield Quality Constrained and Short Duration High Yield.

Investment Grade Corporate
The Investment Grade Corporate Credit strategy is built upon a forward looking credit research process to identify quality issuers in the investment grade universe. This strategy benefits from a dedicated team of credit analysts and high yield specialists to add value to an actively managed credit portfolio. This strategy includes: Ultra Short High Quality, and Ultra Short Enhanced Yield.

Long Duration
The Long Duration strategy seeks to provide consistent outperformance through an active management strategy capturing multiple sources of excess returns. The goal of the

strategy is to add value to an actively managed long duration portfolio. This strategy includes: Long Duration Fixed Income Credit Emphasis, Long Duration Core Plus, Long Duration Investment Grade Corporate, and Investment Grade Corporate.

Multi-Sector Fixed Income
The Multi-Sector Fixed Income strategy seeks to provide consistent risk-adjusted returns through balancing the understanding of the quantitative risks with the associated return opportunities. The goal is to provide consistent alpha created through sector allocation, security selection and structural positioning/asset replication. This strategy includes: Core Plus Bond Opportunistic, Core Plus Bond, Corporate Plus and Core Plus Universal.

Municipal Bonds
The municipal strategies invest in securities issued by, or on behalf of, state or local governments, and other public authorities and are tax-exempt. The strategies invest is a broad array of municipal bonds with varying maturities. Municipal strategies include: Municipal California Fixed Income, Municipal Fixed Income and Opportunistic Municipal.

Other Strategies
Private Market seeks to provide incremental yield and return over comparable public corporate bonds, while also focusing on preservation of capital. Performance will primarily come from security selection.

Mortgage-Backed Securities strategy invests primarily in Fannie Mae, Freddie Mac, and Ginnie Mae agency mortgage-backed securities(MBS), with the ability to invest in treasurys, U.S. agencies, asset-backed securities (ABS) and non-agency MBS. This strategy invests entirely in U.S. based issuers.

The Global Floating Rate strategy aims to provide a high rate of current income with medium to long-term growth by investing primarily in bank loans, with the balance of the assets invested in a range of satellite fixed income sectors including short duration high yields bonds, emerging market debt, investment grade credit, and government debt. Allocations to these sectors are dynamically adjusted as market opportunities shift.

The Global Capital Structure Opportunities strategy has a global credit focus that invests primarily in investment grade-rated financial issuers and opportunistically allocates across the entire debt capital structure. The strategy consists of high conviction portfolios, holding fewer issuers than traditional investment-grade corporate mandates. The strategy maintains an average of investment grade credit quality at all times.

The Investment Grade Opportunistic strategy is a global investment grade credit strategy that invests primarily in global investment grade corporate bonds and opportunistically in some lower rated issuers maintaining an average portfolio credit quality of BBB or higher. This strategy uses thematically driven security selection to build highly concentrated portfolios and is implemented on a best ideas basis.

The Intermediate Duration Investment Grade Corporate strategy primarily invests in investment grade corporate bonds with maturity of 10 years or shorter. The strategy is diversified across all sectors of the investment grade universe,

The MBS CMO Interest Only Focus strategy invests primarily in agency mortgage-backed securities and collateralized mortgage obligation – intern only (IO) and inverse interest only (IIO) securities. The strategy also has allocations to asset-backed securities and securities to hedge interest rate risks.

Derivatives
While derivatives are not a specific strategy, periodically they may be utilized in certain portfolios by agreement with the client. Common fixed income derivatives used are credit default swaps (CDS) (Risk – credit exposure or protection), interest rate swaps (Risk – fixed rate for floating rate exposure or the reverse), Treasury Futures (Risk – exposure or protection on interest rate movements), TBA (To Be Announced MBS Forward) (Risk - Risk – exposure or protection on upcoming issuance), collateralized debt obligations (CDO) (Risk – see structured instruments below), and currency swaps (Risk – exposure or protection on rate movement between two or a basket of currencies) among others. Certain of these instruments are subject to regulation by the Commodity Futures Trading Commission under the provisions of Dodd-Frank Financial Reform legislation. The purchase of derivatives occurs in either the exchange traded and over the counter markets. The exchange traded derivatives market is very transparent as are the settlement risks (i.e. Treasury Futures). This is not necessarily the case in the over the counter market (CDS, interest rate swaps, etc.). In this market, one trades a portfolio risk for a counterparty risk. Certain of the instruments have moved to centralized clearing over the past year. In addition several of the instruments are moving to electronic trading (SEFs) as the CFTC and SEC approves trading platforms. With the advent of centralized clearing, there are initial and ongoing margin requirements the client must meet. In addition, a Legal Entity Identifier ("LEI") number must be obtained by the client and contained on each trade. This is to help identify systemic risk at an entity or consolidated enterprise level.

With the financial turmoil in the recent past, many institutions and clients have moved to the use of Credit Support Annexes to minimize the credit exposure for in the money derivatives on previously executed trades. These rules and efforts in part are intended to resolve counterparty risk and provide improved transparency in the derivatives marketplace.

Derivatives are primarily used for asset replication, hedging and structured products. In an asset replication use, credit default swaps are purchased due to attractive pricing versus the cash bond market to gain exposure to a given name, sector or index.

All derivatives used for hedging purposes involve basis risk. This occurs when the value of underlying hedging instrument moves differently (not perfectly correlated) than the corresponding item being hedged.

Risks of the Fixed Income Strategies

Structured products are complex credit instruments involving a series of CDS or CDOs as an example. The instruments typically have several tranches and the investing party may have exposure to one or several levels of payment risk. The instrument will have provisions which spell out participation in revenue and loss or repayment of principal when certain conditions are experienced by the underlying assets.

PG-Fixed Income does not primarily recommend a particular type of fixed income security. However within the fixed income team, PG-Fixed Income manages strategies that are solutions to institutional investors seeking fixed income solutions to their investment objectives.

There are a number of risks which affect fixed income investments and include but are not limited to: interest rate, credit, volatility, liquidity, duration, prepayment, derivative, optionality, inflation, reinvestment, event, sector, disclosure, foreign exchange, legal, economic, geopolitical, and systemic.

All fixed income securities are subject to interest rate and credit quality risk. The market value of fixed income securities generally declines when interest rates rise and an issuer of fixed income securities may default on its payment obligations.

Concentration Risk: a strategy that concentrates investments in a particular industry or group has greater exposure than other strategies to market, economic and other factors affecting the industry or group.

Derivatives Risk: transactions in derivatives (such as options, futures, and swaps) may increase volatility, cause liquidation of portfolio positions when not advantageous to do so and produce disproportionate losses.

Duration Risk: duration is a measure of the expected life of a fixed income security and its sensitivity to changes in interest rates. The longer a portfolio's average duration, the more sensitive the fund will be to changes in interest rates.

Prepayment Risk: unscheduled prepayments on mortgage-backed and asset-backed securities may have to be reinvested at lower rates. A reduction in prepayments may increase the effective maturities of these securities, exposing them to the risk of decline in market value over time.

U.S. Government Securities Risk: Yields available from U.S. government securities are generally lower than yields from other fixed income securities.

U.S. Government Sponsored Securities Risk: securities issued by U.S. government sponsored enterprises such as FHLMC, FNMA and the Federal Home Loan Bank are not issued or guaranteed by the U.S. Treasury.

The High Yield strategy is also subject to greater credit quality risk than higher rated fixed income securities and should be considered speculative.

The Emerging Market Debt and Global Bonds strategies are also subject to Foreign Securities Risk, which includes the loss of value as a result of: political or economic instability; nationalization, expropriation or confiscatory taxation; changes in foreign exchange rates and restrictions; settlement delays and limited government regulation.

State and Political Subdivisions Risk: subject to credit, transparency/disclosure, political, and other similar risks.

Changes to tax laws may cause various risks in regards to bonds.

For Currency:

Macro Currency Group ("MCG") offers currency management strategies tailored to client requirements. Applying a fundamental-discretionary, macroeconomic theme-based investment approach to portfolio management, the strategies include absolute return as well as base currency hedging strategies. Portfolio positions are primarily implemented via currency forward contracts although MCG does use exchange traded currency options from time to time where portfolio guidelines enable.

Active, absolute return:
Investing on a forward-looking basis, MCG looks to identify global investment themes that are large enough to drive significant cross-border capital flow and so influence exchange rate pricing. Investment themes can be economic or financial market trends expected to unfold over the next two-to-six months. Portfolio construction philosophy focuses on the identification of multiple independent themes which can provide portfolio diversification.

Working within the currencies of the Fundamental Discretionary Absolute Return strategy and the G10 Strategic Currency Program (SCP) (developed market) and G10 Global Time Diversified strategy and High Alpha Broad Universe Global Macro strategy universes, and to client portfolio guidelines, MCG implements a consistent view formation process with position sizes scaled to the required volatility of the various portfolios. MCG manages portfolios across a range of volatility targets, from traditional low tracking error overlays (2-4% tracking error) to leveraged pooled vehicles (15-25% volatility); there is no guarantee, however, that the target will be realized.

Base currency hedging:
This process is designed to reduce the impact that adverse exchange rate moves may have on investment portfolio where the investments are made outside of the home market of the investor, and the primary aim of a base currency hedging strategy is risk reduction. The risk exposure of adverse exchange rate moves can be hedged using currency forwards and options at different levels. MCG can provide clients and prospects with the strategic views relating to currency markets, and offer advice on the where to set hedge ratios appropriate to their investment portfolios. However, the ultimate decision as to

where to set the hedge ratio lies with the client. In the view of MCG, a 0% hedge ratio (i.e. the portfolio retains full exposure to non-domestic currency risk) is appropriate when the home currency is depreciating; a 100% hedge ratio (i.e. there is no currency diversification within the portfolio) is best when the home currency is expected to appreciate.

Risk Management and Risks of the Currency Strategies

The primary focus of risk management is strategy dependent: for base currency hedging strategies, risk management is concentrated on minimizing deviation of a portfolio's currency exposures from targeted exposures, best execution, settlement and counterparty management, while managing investment risk is the key focus within the active managed portfolios. However, it is important to note that risk management – both investment and operational – underpins the process across all strategies.

Base currency hedging: once the preferred hedge ratio has been agreed and the hedges put in place, portfolios are rebalanced daily so as to minimize tracking error, while the size of the hedge, the underlying currency exposures, and the benchmark can be reset as preferred by the client – this is usually done on a monthly basis. MCG operates a broad counterparty panel of leading investment banks, all of whom have been reviewed by the Counterparty Team. The service MCG receives from the counterparties is evaluated on a trade-by-trade basis in an open manner; by engaging with the banks on matters of service and pricing MCG believes MCG can implement best execution for the clients.

Active, absolute return: for the active portfolios, currency positions are implemented within a conviction-driven risk unit methodology framework. Risk unit sizing is a function of the volatility, downside risk and liquidity of the featured currency pairs, ensuring that themes of the same risk unit size have the same potential ratio of upside returns to downside risk on the portfolio regardless of the currencies utilized to implement the theme. Themes are generally initiated with a single risk unit size, position size increasing (to a maximum of five risk units) based on the Portfolio Manager's level of conviction.

There are a number of risks which affect currency investments and include but are not limited to: volatility, liquidity, events, economic, geopolitical, and systemic. MCG can also employ leverage if consistent with the client's investment objectives and risk tolerance. The potential benefit of leverage is that it can amplify investment returns. Leverage also increases risk, because it magnifies negative returns when performance and/or market conditions deteriorate.

For Asset Allocation:

Principal Portfolios Strategies ("PPS") primarily provides asset allocation services, which may include recommendations relating to overall asset class selection, risk management, asset class rebalancing and manager selection within asset classes, both within and outside of Principal Global Investors. PPS can utilize asset classes in their modeling such as U.S. and foreign equity, U.S. and foreign fixed income, cash equivalents, and real estate with further differentiation based on market capitalization (as an example, large-cap vs. small-cap) and/or investment style (as an example, value vs. growth) as well as other asset subclasses. PPS also makes recommendations and allocations to underlying investment strategies as detailed below.

PPS conducts detailed analyses and review of the appropriateness of the exposure and weightings of each asset class within a specific client's portfolio or mandate based upon the agreed upon parameters of each investment management agreement. PPS will assess current asset class weightings based upon any number of individual factors and may make adjustments to those allocations over time. In identifying potential areas of investment, PPS may take into consideration the ability of an asset class to provide capital appreciation, the ability to generate current income, certain diversification characteristics of the asset class, the potential need for capital preservation and/or certain risk hedging characteristics when making its allocation recommendations.

PPS also evaluates the risk premium associated with each asset class or sector in an effort to determine the appropriateness of the allocations related to the overall intended risk profile and strategy of the client. PPS employs a fund of funds approach to portfolio construction as client assets are allocated across one or any number of predetermined commingled funds. PPS primarily utilizes mutual funds, unit investment trusts, separate accounts, and/or other commingled funds that are typically sub-advised by affiliated managers. The portfolio construction process includes a comprehensive analysis of manager style for each of the asset classes employed in the asset allocation strategy, based on their portfolio returns and holdings.

PPS conducts a rigorous investment due diligence process on each affiliated manager, and on other managers who might be specified by the client. This due diligence takes into account qualitative factors: quantitative factors; an assessment of each manager's style against our medium-term view on markets; and finally an assessment of their ability to manage the investment risk in their holdings.

After a portfolio is initially constructed, PPS monitors the aggregate portfolio as well as the underlying managers for each asset class on an ongoing basis to determine that the asset allocation model continues to operate within each client's stated investment guidelines. The asset class selection and risk management analyses are used to determine both the timing of portfolio rebalancing and the magnitude by which allocations are allowed to drift away from neutral target allocations. Portfolio rebalancing recommendations typically rely on a combination of fundamental and quantitative inputs within pre-established risk parameters and rebalancing is employed generally as a risk reduction measure rather than a tactical measure.

Underlying portfolio risks include, but are not limited to, size/style drift and earnings quality for equities; credit quality and interest rate sensitivity for fixed income portfolios; specific sectors and countries for real estate portfolios. There is also a risk that one, some or all of the underlying portfolios selected for inclusion in the asset allocation models may not meet their stated investment objective or that the overall asset allocation recommendations that are made by PPS do not perform as expected. As with every investment, there is also the risk that the investment decisions made may result in the loss of principal and that the investment may be worth less money at the time of redemption than the investor contributed to the portfolio.

PPS monitors portfolio risk in a number of ways, including the processes detailed above relating to portfolio construction and the ongoing monitoring of the portfolios. PPS may also monitor portfolio risk or perceived risk in any number of ways. PPS monitors the performance of each underlying manager for in the portfolio relative to the benchmark established for each asset class as well as relative to a peer group.

PPS also continually monitors the macro-economic environment to which the asset classes are exposed. PPS then reviews the level of conviction about its asset mix decisions. PPS then seeks to make a determination as to whether to limit or enhance the size of portfolio's asset class over- or under-weightings from guidelines. A weekly proprietary monitoring of the risk behavior of investors provides an additional market view of overall economic risk.

A variety of software applications are used to monitor the current asset allocation mix in the client's portfolio and that the risk/return profile for the portfolio is in agreement with the client's stated investment objective and applicable guidelines. These analytical methods employed are used on a regular basis to decompose tracking error and identify the principal sources of portfolio risk.

Other risks:

With the increased use of technologies such as the Internet to conduct business and the sensitivity of client information, investment strategy and holdings, a portfolio is susceptible to operational, information security and related risks. In general, cyber incidents can result from deliberate internal or external attacks or unintentional events and are not limited to gaining unauthorized access to digital systems, and misappropriating assets or sensitive information, corrupting data, or causing operational disruption, including the denial-of-service attacks on websites. Cyber security failures or breaches either internally at Principal Global Investors or externally by a third party service provider or at or against issuers of securities in which the portfolio invests have the ability to cause disruptions and impact business operations. Such events may potentially result in financial losses, the inability to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, and/or additional compliance costs, including the cost to prevent cyber incidents.

ITEM 9 – DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Principal Global Investors or the integrity of Principal Global Investors' management. Principal Global Investors has no information applicable to this item.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Principal Global Investors is registered with the U.S. Commodity Futures Trading Commission (CFTC) as a commodity trading advisor (CTA) and is a member of the National Futures Association (NFA). Principal Global Investors advises qualified eligible persons (QEPs) under CFTC Regulation 4.7.

Principal Global Investors is under common control with Principal Securities, Inc. ("PSI"), a retail investment adviser and a broker-dealer registered with the Securities and Exchange Commission and a FINRA member firm that markets a variety of proprietary and non-proprietary mutual funds, unit investment trusts and limited partnerships. Principal Global Investors currently does not conduct any brokerage business with PSI.

Principal Global Investors is under common control with Principal Funds Distributor, Inc. ("PFD"), a broker/dealer and a FINRA member. Principal Funds Distributor, Inc. is the principal underwriter for an investment company, Principal Funds, Inc. Principal Global Investors acts as sub-adviser to certain of the Principal Funds. Principal Global Investors does not currently conduct any brokerage business with Principal Funds Distributor, Inc.

Some members of Principal Global Investors' staff act as registered representatives of the PFD or PSI. From time to time in their capacity as registered representatives of PSI, solicit investment in Principal Funds or in unregistered private investment funds sponsored or managed by Principal Global Investors or its affiliates from Principal Global Investors' clients or prospective clients. Only the registered representatives on Principal Global Investors' distribution staff are eligible to receive sales compensation for any sales of shares of the Principal Funds or interests in unregistered private investment funds. In addition to the sales compensation paid to Principal Global Investors' distribution staff by PSI, these Principal Funds and unregistered private investment funds pay advisory fees that are received by Principal Global Investors or its affiliated advisers, as the case may be. As such, there is a conflict of interest when these Funds that are paying advisory fees to Principal Global Investors or its affiliated advisers are recommended by the sales staff.

Principal Global Investors is the sole direct owner of Spectrum Asset Management, Inc. ("Spectrum"), a registered broker-dealer and an investment adviser registered with the Securities and Exchange Commission. Principal Global Investors may execute securities for clients through Spectrum in certain circumstances, but only in compliance with applicable rules. Spectrum is also a member of the National Futures Association and registered with the Commodity Futures Trading Commission.

Principal Global Investors is a sub-adviser to Principal Management Corporation ("Principal Management") with regard to a number of the Principal Funds, a family of funds organized by Principal Life. Principal Management, an investment adviser registered with the Securities and Exchange Commission, is an indirect wholly owned subsidiary of Principal Financial Services, Inc. ("PFSI"). Principal Management offers portfolio management, transfer agent and shareholder services to the family of mutual funds organized by Principal Life Insurance Company. Princor, a direct wholly owned subsidiary of PFSI, is a sister company to Principal Management. Principal Global Investors is under common control with Principal Management, Principal Funds Distributor, Inc. and Princor. Principal Global Investors is a sub-adviser to Principal Management with regard to a number of the mutual funds organized by Principal Life. Principal Management and Principal Global Investors share personnel in the performance of investment advisory services.

Principal Global Investors is the sole member with 100% ownership and controlling interest of Principal Real Estate Investors, LLC, an investment adviser registered with the Securities and Exchange Commission. Principal Real Estate Investors offers portfolio management and investment advisory and subadvisory services concerning primarily equity real estate and commercial mortgage investments to affiliated (including Principal Global Investors) and non-affiliated persons. Principal Global Investors furnishes certain personnel, facilities, and other resources to Principal Real Estate Investors and certain of its clients. On occasion, Principal Global Investors may utilize personnel or other resources of Principal Real Estate Investors to assist Principal Global Investors in the performance of investment advisory services. Principal Global Investors and Principal Real Estate Investors have other common directors and officers.

Principal Global Investors is under common control with Principal Financial Advisers, Inc. (“PFA”), a registered investment adviser with the Securities and Exchange Commission. Principal Global Investors and PFA share personnel in the performance of investment advisory services.

Principal Global Investors has majority, direct ownership of Post Advisory Group, LLC (“Post”), an investment adviser registered with the Securities and Exchange Commission. Post in general offers services in managing client funds invested in high yield debt securities and distressed securities. On occasion, Post provides such services as a sub-adviser to Principal Global Investors. Principal Global Investors and its affiliates share investment and compliance information, as well as certain personnel and other resources, with Post as necessary for Post to fulfill its service as sub-adviser to Principal Global Investors. On occasion, Principal Global Investors may use personnel or other resources of Post to assist Principal Global Investors in the performance of investment advisory services.

Principal Global Investors has a majority, indirect ownership of Columbus Circle Investors ("Columbus Circle", an investment adviser registered with the Securities and Exchange Commission. Columbus Circle in general offers services in managing client funds invested in equity securities. On occasion, Columbus Circle provides such services as a sub-adviser for Principal Global Investors. Principal Global Investors and its affiliates share investment and compliance information, as well as certain personnel and other resources, with Columbus Circle to fulfill its service as sub-adviser to Principal Global Investors. On occasion, Principal Global Investors may utilize personnel or other resources of Columbus Circle to assist Principal Global Investors in the performance of investment advisory services.

Principal Global Investors is the sole direct owner of Spectrum Asset Management, Inc. ("Spectrum"), an investment adviser registered with the Securities and Exchange Commission. Spectrum offers portfolio management and investment advisory and subadvisory services concerning primarily preferred securities to affiliated (including Principal Global Investors) and non-affiliated persons. Principal Global Investors and its affiliates share investment and compliance information, as well as certain personnel and other resources, with Spectrum to fulfill its service as sub-adviser to Principal Global Investors. Principal Global Investors is a party to a revenue sharing agreement dated September 28, 2001, with Spectrum, as amended, a wholly owned subsidiary of Principal Global Investors, whereby certain advisory fees generated by Spectrum and its affiliate broker-dealer are allocated between the Principal Global Investors and Spectrum.

Edge Asset Management, Inc. ("Edge"), an investment adviser registered with the Securities and Exchange Commission, is an affiliate and under common control of Principal Global Investors. Edge offers portfolio management and investment advisory and subadvisory services concerning primarily equity securities. Principal Global Investors and its affiliates share investment and compliance information, as well as certain personnel and other resources, with Edge to fulfill its service as sub-adviser to Principal Global Investors. On occasion, Principal Global Investors may utilize personnel or other resources of Edge to assist Principal Global Investors in the performance of investment advisory services.

Morley Capital Management, Inc. ("Morley"), an investment adviser registered with the Securities and Exchange Commission, is an affiliate and under common control of Principal Global Investors. Morley offers portfolio management and investment advisory and subadvisory services concerning primarily fixed income and stable value securities. Principal Global Investors and its affiliates share investment and compliance information, as well as certain personnel and other resources, with Morley to fulfill its service as sub-adviser to Principal Global Investors. On occasion, Principal Global Investors may utilize personnel or other resources of Morley to assist Principal Global Investors in the performance of investment advisory services.

Principal Global Investors has a majority, indirect ownership of Origin Asset Management LLP ("Origin"), an investment adviser registered with the Securities and Exchange Commission. Origin in general offers services in managing client funds invested in global (ex U.S.) equity securities. On occasion, Principal Global Investors may utilize personnel or other resources of Origin to assist Principal Global Investors in the performance of investment advisory services.

Principal Global Investors has a majority, indirect ownership of Finisterre Capital LLP ("Finisterre"), an investment adviser registered with the Securities and Exchange Commission. Finisterre in general offers services in managing client funds invested in emerging market fixed income securities. Finisterre is also a member of the National Futures Association and registered with the Commodity Futures Trading Commission as a commodity trading advisor and a commodity pool operator. On occasion, Principal Global Investors may utilize personnel or other resources of Finisterre to assist Principal Global Investors in the performance of investment advisory services.

Principal Global Investors has sole ownership of Principal Enterprise Capital, LLC ("PEC"), an investment adviser registered with the Securities and Exchange Commission. PEC is the manager for a single client, an entity that was created for the benefit of an unaffiliated third party and includes a trust for the benefit of affiliated employees of Principal Life Insurance Company. PEC identifies structures, creates and manages strategic investments of equity capital primarily in private real estate operating companies ("REOCs"). REOCs are entities that generally acquire, develop, redevelop and operate commercial real estate properties and are the entities in which investments are made.

Some Separately Managed Account/Wrap fee programs ("SMA Programs") include investment styles with respect to which one or more of Principal Global Investors' affiliated investment advisory firms has particular expertise and experience. Where that is the case, both Principal Global Investors and the affiliated advisory firm(s) will be involved in the provision of investment advisory services to program participants electing the investment style, with (i) the affiliated advisory firm responsible for providing model portfolio creation and maintenance services for the style, and (ii) Principal Global Investors responsible for placing client account trades, proxy voting (for those clients electing to authorize the investment adviser to vote proxies), implementing reasonable client-imposed investment restrictions, establishing and implementing procedures used to select securities to be liquidated when a client requests partial liquidation of the client's account, and all other responsibilities imposed upon the investment adviser in the particular wrap fee program. In some wrap fee programs, the affiliated advisory firm may also have the authority to handle larger trades, typically those associated with changes to the model portfolio, where appropriate in order to seek best execution. In those situations in which one of Principal Global Investors' affiliated advisory firms provides model portfolio creation and maintenance services, the affiliated advisory firm ordinarily provides those services as a sub-adviser to Principal Global Investors and the client's direct agreement ordinarily is with Principal Global Investors as the investment adviser. In those situations, Principal Global Investors is responsible to the client for the actions and decisions of Principal Global Investors' affiliated sub-adviser and Principal Global Investors is responsible for paying its affiliated sub-adviser out of the fees Principal Global Investors receives as the client's investment adviser. In the event that Principal

Global Investors uses Spectrum as a broker on trades for accounts in wrap fee programs, no brokerage commissions will be paid to Spectrum in connection with those trades.

Principal Global Investors Trust Company ("PGI Trust"), an Oregon banking corporation, is an affiliate and under common control with Principal Global Investors. PGI Trust is trustee of certain collective investment trusts. Principal Global Investors Trust Company, as trustee, retains Principal Global Investors as investment adviser for one or more bank collective investment trusts. For some of the bank collective investment trusts, Principal Global Investors may retain one or more affiliated investment advisory firms as subadvisers to Principal Global Investors.

Principal Life is the sole member (i.e., the 100% legal and beneficial owner) of Principal Global Investors. Principal Life is licensed as an insurance company in all 50 states and the District of Columbia. Principal Global Investors and Principal Life have entered into a Subsidiary Expense Reimbursement Agreement pursuant to which Principal Life or its global affiliates will furnish certain personnel, services and facilities used by Principal Global Investors and Principal Global Investors will reimburse Principal Life for its expenses incurred in that regard. Principal Global Investors and Principal Life have certain common officers. Principal Global Investors manages certain portfolios and accounts within the general and separate accounts of Principal Life. Principal Global Investors provides advice and management services to Principal Life's spread lending operations.

Principal International, Inc. is under common control with Principal Global Investors, as both Principal International, Inc. and Principal Global Investors are direct or indirect wholly owned subsidiaries of PFSI. Principal Global Investors manages certain portfolios of Principal International, Inc. and of Principal International, Inc.'s insurance subsidiaries. Principal Insurance Company (Hong Kong) Limited ("PIC Hong Kong") is under common control with Principal Global Investors, as both PIC Hong Kong and Principal Global Investors are indirect wholly-owned subsidiaries of PFSI. Principal Global Investors acts as sub-adviser with regard to certain portfolios of PIC Hong Kong.

Principal Global Investors may utilize personnel or other resources or services of its non-US affiliates, Principal Global Investors (Europe) Ltd, Principal Global Investors (Singapore) Ltd, Principal Global Investors (Australia) Ltd, Principal Global Investors (Hong Kong) Ltd, and Principal Global Investors (Japan) Ltd to assist Principal Global Investors in the performance of investment advisory services. Those advisory affiliates may recommend to their clients, or invest on behalf of their clients in securities that are the subject of recommendations to, or discretionary trading on behalf of, Principal Global Investors' clients. Investment professionals from the advisory affiliates may render portfolio management, research or trading services to Principal Global Investors' clients, including registered investment companies, and are subject to supervision by Principal Global Investors. Biographies of these professionals will be provided as required or upon request.

Principal Global Investors is a part of a diversified, global financial services organization with many types of affiliated financial services providers, including but not limited to broker-dealers, insurance companies and other investment advisers. Principal Global Investors may enter into arrangements to provide services or otherwise enter into some form of business relationship with these foreign affiliates. Additional disclosure of these relationships will be provided upon request.

Principal Global Investors acts as investment adviser to certain index ETFs for which The NASDAQ Stock Market LLC ("NASDAQ") serves as index service provider. Principal Global Investors retains certain intellectual property rights with respect to such indexes and may also be consulted by NASDAQ prior to the implementation of index rule changes. Principal Global Investors has not identified any material conflicts of interest resulting from such relationship.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Principal Global Investors has adopted a Code of Ethics (the "Code"). The principal purposes of the Code are to provide policies and procedures consistent with applicable laws and regulations, including Rule 204A-1 under the Investment Advisers Act of 1940, to prevent conflicts of interests or the appearance of such conflicts when Principal Global Investors officers, directors, employees and certain non-employees of Principal Global Investors with access to client and trading information of Principal Global Investors ("Access Persons") own or engage in their own personal transactions involving securities. The Code requires all Access Persons to adhere to high standards of honest and ethical conduct, and the interests of our advisory clients must be placed first at all times. All Access Persons of the firm are required to certify upon association/employment and annually thereafter that they have read, understood and complied with the Code. This includes that they have complied with the requirements and disclosed covered accounts, reportable securities and pre-cleared transactions as required by the Code. Access Persons are permitted to personally buy and sell securities of issuers that Principal Global Investors also trades for its clients, so long as those buy and sell transactions are conducted in accordance with the Code. As such, there are procedures in place to prevent instances where potential conflicts of interest arise between the personal securities transactions of the Access Persons and the securities transactions that Principal Global Investors does for the accounts of the clients. The compliance area monitors personal trading via the on-line pre-clearance system, FIS Personal trading Assistant. The procedures provide for the maintenance of a master securities list that includes all securities traded by Principal Global Investors for purchase or sale on behalf of clients. All Access Persons are required to obtain pre-clearance approval to buy and sell reportable securities (excluding exempt securities and transactions) through our online monitoring system, FIS Personal Trading Assistant, before executing a personal security transaction to make sure the proposed transaction conforms to our Code provisions. There is also quarterly review of reportable transactions, as well as annual certification of accounts and holdings by Access Persons. Please refer to our Code policy for a detailed overview of provisions.

Clients of Principal Global Investors may obtain a copy of the Code of Ethics by contacting the Chief Compliance Officer at 800-533-1390.

Principal Global Investors may advise clients to purchase securities which at the time the client purchases, one or more affiliates of Principal Global Investors may also (1) be purchasing or selling and/or (2) holding. Such situations will be subject to procedures designed to assure fair allocation of available transactions. Principal Global Investors may also advise clients to participate in investment vehicles (e.g. Principal Global Investors Trust), with other participants which may include one or more affiliates of Principal Global Investors.

Principal Global Investors, Principal Real Estate Investors, Spectrum Asset Management, and Columbus Circle Investors are investment managers for Principal Global Investors Trust (the “Trust”). Principal Global Investors organized the Trust, a Delaware business trust and a private investment company of the series type, in June 1999. The Directed Trustee is the Bank of New York. Principal Trust Company is the resident trustee, but does not have any discretion of the Trust. The Trust offers a number of commingled investment portfolios having different investment objectives. Principal Life acts as “tax matters partner” for, and owns units of, most of the portfolios. An indirect wholly-owned subsidiary of Principal Life (Equity F.C., Ltd.), (i) acts as tax matters partner in these instances where Principal Life does not and (ii) owns units of some of those portfolios. Members of Principal Global Investors’ staff will, from time to time solicit investment in the Trust to Principal Global Investors’ clients or prospective clients, when circumstances indicate that an investment in the Trust would be appropriate for the client or prospective client. Only members of Principal Global Investors’ marketing registered representative staff are eligible to receive compensation for any sales of investments in the Trust made to clients or prospective clients.

Principal Global Investors will invest its own financial assets primarily in U.S. Treasury securities that it may also recommend to clients. It may also invest its own financial assets in a short-term investment pool of its indirect parent company, PFSI or in a checking account in the name of Principal Global Investors. In addition, Principal Life owns units in various portfolios of Principal Global Investors Trust.

Principal Global Investors furnishes investment advice with respect to various portfolios of its direct parent company, Principal Life. In fulfilling its responsibilities, Principal Global Investors may buy or sell for Principal Life securities or other investment products that it also recommends to its clients who are not related persons of Principal Global Investors.

Principal Global Investors is the investment manager of various securities portfolios of Principal Life, Principal International, Inc. and other related persons. Principal Global Investors is the sub-adviser to a number of the Principal Funds, a family of mutual funds organized by Principal Life, managed by Principal Management Corporation, and distributed by Principal Securities, Inc. and Principal Funds Distributor, Inc. Principal Life, Principal International, Principal Management, and PSI, and PFD are related persons of Principal Global Investors. In carrying out its responsibilities in each of these arrangements, Principal Global Investors may buy or sell for related persons securities that it also recommends to its clients who are not related persons of Principal Global Investors.

ITEM 12 – BROKERAGE PRACTICES

As a discretionary adviser, Principal Global Investors determines which securities or other instruments are bought or sold for an account, the amount of such securities or other instruments and the timing of the purchases and sales, the broker, dealer, underwriter (and in the case of the Currency Boutique, the foreign exchange dealer) through which transactions are effected and the commission rates or spreads paid, except as specifically directed by the client. Our discretion in those matters, however, is limited by our responsibility to act in the best interest of our clients in fulfilling their investment objectives. Principal Global Investors does not engage in principal trading with client accounts.

For Equities:

Selection of Brokers and Dealers

Principal Global Equities and Aligned Investors seek to obtain the best overall execution when selecting a broker or dealer for Client portfolio transactions. In selecting brokers and dealers, the Equity Boutiques consider a variety of factors including, but not limited to:

- Their financial strength and stability;
- Best price for the trade;
- Reasonableness of their commission, spreads or markups;
- Their ability to execute and clear the trade in a prompt, orderly and satisfactory manner;
- Quality of their executions in the past and existing relationship to date;
- The confidentiality they provide as to the trades placed through them by Principal Global Investors;
- Their execution capabilities and any related risks in trading a particular block of securities;
- Their broad market coverage resulting in a continuous flow of information concerning bids and offerings;
- The consistent quality of their services, including the quality of any investment-related services provided (e.g. a first call on the release of influential securities reports);
- Their record keeping practices (e.g. timely and accurate confirmations); and
- Their cooperation in resolving differences.

The Equity Boutiques may also use the above factors to establish generally the proportion of the overall commissions to be allocated to each broker or dealer used in effecting equity trades on behalf of its clients. There is a semi-annual broker voting process that includes research analysts, portfolio managers and traders. The broker vote is designed to rank brokers based on the quality of research and trading services provided. Recommendations are made for commission allocation based on the results of the vote. These factors and the results of the broker vote are used as general guidelines by the equity trading desk in deciding which broker-dealer to use for specific securities transactions. Because of the variety of factors used to select brokers or dealers, the determining factor in seeking best execution is not the lowest possible commission, but whether the transaction represents the best overall execution for the client. In some instances, the Equity Boutiques will pay a broker commissions that are higher than the commissions another broker might have charged for the same transaction. Further, in the case where a firm bundles research services with its execution services, the Equity Boutiques may consider the receipt of research services provided (including soft dollar services) if it does not compromise the selection of best overall execution. Please see the section on Soft Dollar Practices below for additional information about brokerage and research services received by the Equity Boutiques.

The Equity Boutiques maintain an approved list of brokers and dealers. New counterparty arrangements must be reviewed and approved by the Counterparty Team of Principal Global Investors before trading can begin through the new counterparty. Alternative trading systems that meet the guidelines are also eligible for consideration. The traders at the Equity Boutiques are required to direct trades only through approved counterparties. Counterparties are regularly monitored by the Counterparty Team for signs of deterioration in business operations, creditworthiness and rating changes.

The Equity Boutiques do not use affiliated broker-dealers to place client trades.

Brokerage Commissions

Transactions on stock exchanges and other agency transactions involve the payment by the client of negotiated brokerage commissions. Such commissions vary among different brokers and dealers and a particular broker or dealer often charges different commissions according to such factors as the difficulty and size of the transaction or the means of execution (i.e. program, algorithmic or sales trader) Although commission rates are considered by the Equity Boutiques in our brokerage selection process and are reasonable in relation to the value of the services provided, our clients may not realize the lowest possible commission rates as our determination process considers the additional factors outlined above.

Client Directed Brokerage

If the Equity Boutiques agree, a client may instruct the Equity Boutiques to direct trading for their account to a particular broker. If a client directs the Equity Boutiques to use a particular broker or dealer, the boutique may be unable to negotiate commissions, obtain volume discounts, ensure best execution, and to batch trades on the client's behalf. Consequently, clients who direct the boutique to use a particular broker may pay more in commissions than those who do not. No assurance can be given that transactions executed in accordance with such directed brokerage arrangements result in the best execution available to the client. Separately Managed Account/Wrap fee programs ("SMA Programs") occasionally include client directed brokerage provisions. More commonly SMA Program clients pay a fee to the sponsor that covers, among other things, brokerage commissions for trades executed with the sponsor or the sponsor-designated broker-dealer. The fee does not cover brokerage commissions charged on trades executed with other broker-dealers. As a result, best execution decisions by the Equity Boutiques for SMA Program trades tend to favor use of the program sponsor or the sponsor-designated broker-dealer because of the commission expense, although other circumstances sometimes dictate that other brokers be used to achieve best execution. Depending on a variety of factors, including the amount of the wrap fee, the trading activity and the value of custodial and other services, the single fee may or may not exceed the separate costs of such services. The policy is to seek execution of portfolio transactions at prices which are advantageous to our clients as a whole and at commission rates that are competitive, taking into account the full range and quality of an executing broker-dealer firm's services. This process of weighing the interests of each of the clients may result in the trade orders for accounts subject to client directed brokerage arrangements, (including SMA Programs) being placed after completion of non-directed orders so as to avoid conflicts in the trading marketplace. In addition, client directed brokerage on behalf of employee benefit plan clients might be subject to special requirements under the Employee Retirement Income Security Act of 1974 ("ERISA").

Soft Dollar Practices

It is Principal Global Investors' policy to use all soft dollar credits generated by brokerage commissions attributable to client accounts in a manner consistent with the "safe harbor" established by Section 28(e) of the Securities Exchange Act. In most cases, services retained via soft dollar arrangements are exclusively used for either research or in connection with brokerage and trading functions within that "safe harbor". In isolated-soft dollar arrangements, Principal Global Investors may receive products and services that may perform an administrative function as well as a research function, a brokerage/trading function, or both. In such cases, Principal Global Investors will make a reasonable allocation of the cost of the product or service according to the use. Principal Global Investors will pay for the portion of the product or service that consists of research or brokerage/trading in commission dollars. Principal Global Investors will pay for the portion that provides administrative or non-research or non-brokerage/trading support directly rather than use soft dollar commissions. Principal Global Investors allocation of the cost of such products and services between research and non-research functions poses a conflict of interest between Principal Global Investors and its clients because, to the extent we categorize products and services as research or brokerage/trading related, Principal Global Investors avoids paying for those products and services with its own money.

In allocating brokerage business, Principal Global Investors gives consideration to products and services provided to it by introducing as well as clearing brokers (e.g., the furnishing of statistical data and research generally consisting of information of the following types: analyses and reports concerning issuers, industries, economic factors and trends, portfolio strategy and performance of client accounts as well as systematic or quantitative processes that supports research). It is not Principal Global Investors' practice to negotiate "execution-only" transaction costs, thus clients may be deemed to be paying for products and services provided by the broker which are included in the transactions costs. In making such allocations, the primary criterion used is obtaining the best overall terms for such transactions. Principal Global Investors may pay additional commission amounts for research services but generally does not do so. Such statistical data and research information received from brokers or dealers may be useful in varying degrees, and Principal Global Investors may use it in servicing some or all of the accounts it manages. Clients may pay higher commission rates than those normally obtained from other brokers. Some of the products and services may benefit a specific segment of Principal Global Investors' clients. Commission credits are used in aggregate and are not attributed nor specifically benefit the client whose transaction created the credit unless otherwise directed by the client. Some products and services obtained from brokers may not necessarily be used for a client even though its commission dollars (or other transaction charges) paid for the products and services. Therefore it is possible a client may not be a direct or indirect beneficiary of the products and services provided. Some statistical data and research information paid for by a particular client account brokerage may not be useful to Principal Global Investors in managing the client account. However, in Principal Global Investors' opinion, the value thereof is not determinable and it is not expected that client's expenses will be significantly raised since the receipt of such statistical data and research information is only supplementary to Principal Global Investors' own research efforts.

Principal Global Investors does not utilize all commissions attributable by client accounts to purchase research services through soft dollar arrangements. Principal Global Investors will generally limit its participation in soft dollar arrangements annually to an amount that, in its judgment, ensures best execution of client transactions.

With respect to Principal Global Investors' purchase of statistical data and research information with commission dollars, clients who afford Principal Global Investors complete discretion in selecting brokers to execute transactions for their accounts may, in effect, subsidize the purchase of research Principal Global Investors utilizes in managing accounts of those clients who do not afford Principal Global Investors such discretion.

Trade Order Aggregation and Allocation for Equity Accounts

In carrying out the investment objectives of its clients, occasions arise in which Principal Global Investors deems it advisable to purchase or sell the same equity securities for two or more client accounts at the same or approximately the same time. In those cases, Principal Global Investors may submit the orders to purchase or sell to a broker or dealer for execution on an aggregate or "bunched" basis. Principal Global Investors expects aggregation or "bunching" of orders, on average, to reduce the cost of execution. Principal Global Investors, generally, will not aggregate a client's order if, in a particular instance, it believes that aggregation will increase the client's cost of execution. In some cases, aggregation or "bunching" of orders may increase the price a client pays or receives for a security or reduce the amount of securities purchased or sold for a client account. Trade orders for SMA Programs are not generally "bunched" with institutional client account orders. Principal Global Investors may on occasion, “bunch” trades with its affiliate, Principal Real Estate Investors.

Principal Global Investors will not aggregate orders unless it believes that aggregation is consistent with (1) its duty to seek best execution and (2) the terms of its investment advisory agreements with its clients. Aggregated orders will be executed only after order tickets have been received by the trading desk specifying the participating accounts and the number or percentage of shares to be allocated among the various accounts (“allocation statement”); each client portfolio that participates in an aggregated order will generally participate at the average share price for the securities in the same aggregate transaction on a given business day, with all transaction costs shared pro rata based on each client’s participation in the transaction; and if an aggregated order cannot be filled completely, allocation among orders will be made pro rata based on the allocation statement.

However, the order may be allocated on a basis different from that specified in the Allocation Statement if all accounts of clients whose orders are allocated receive fair and equitable treatment. Principal Global Investors’ trading desk may depart from the above procedures if, in the exercise of its reasonable judgment, it determines that such a departure is in the clients’ interests taken as a whole. As a result of such allocations, there may be instances when a client’s account does not participate in a transaction that is allocated among other clients. As an example, there can be de minimis deviation from that stated in the Allocation Statement when necessary to correct a pro rata distribution that results in a participating account holding (1) too small a number of shares in relation to the size of the participating account or its investment strategy or (2) an odd-lot.

Principal Global Investors may enter aggregated orders to participate in initial public equity offerings (IPOs). In determining whether to enter an order for an IPO for any client account, Principal Global Investors considers the account's investment restrictions, risk profile, asset composition and cash level. Accordingly, it is unlikely that every client account will participate in every available IPO order. Partially filled aggregated IPO orders will be allocated pro rata across participating accounts in accordance with the procedures set out above. It is possible, therefore, that some accounts participating in the aggregated order will receive no shares in the allocation.

Cross Trades

Principal Global Investors generally will not arrange for one client to purchase or sell securities to another client (a “cross trade”) unless the clients in question have adopted a policy that permits the Principal Global Investors to cross securities and the regulatory authority governing the client accounts clearly permits the cross trade to occur. However, policies and procedures exist for those situations where cross trade transactions are appropriate and permitted by applicable law. Cross trades are only considered in isolated instances when it is determined that there are two parties; one of which wishes to dispose of a particular security while the other wishes to add it to its portfolio. Steps are taken to ensure that the transaction is in the best interests of both parties, the purchase and sale of the security satisfy the investment guidelines for each of the portfolios involved and the applicable regulatory requirements are satisfied,(as an example for mutual funds, consistent with the funds' Rule 17a-7 procedures).

When entering into cross trade transactions, Principal Global Investors takes steps to obtain a price it has determined by reference to independent market indicators, and which Principal Global Investors believes is consistent with its duty of "best execution" for both parties and all parties are informed of all relevant details of the transaction and have consented to the transaction. For all cross trade transactions that are entered into, a form must be completed and signed by the Portfolio Managers assigned to the portfolios and Compliance. The form requires that the Portfolio Managers provide written statements explaining why they believe the transaction is beneficial for both of the parties involved. The form also asks about any commissions or fees that may be paid and how the market price was determined.

Transactions involving the purchase and sale of a security that involves an ERISA plan have additional requirements that are outlined in the policies and procedures.

Because Principal Global Investors manages different styles of accounts with different portfolio managers, it sometimes happens that two or more portfolio managers may initiate orders to buy or sell the same security at the same time. If one portfolio manager has entered a buy order for a stock while another portfolio manager has a sell order, the orders will be worked separately to ensure that one account does not buy from the other.

<u>Trade Errors</u>

Principal Global Investors maintains a system of checks and balances designed to limit the errors it makes in placing trades for client accounts. Nonetheless, Principal Global Investors will, from time to time, make such errors. It is Principal Global Investors' policy to absorb all losses on trades it places in error. In rectifying erroneous trades, Principal Global Investors distinguishes between errors it identifies prior to the time a client's custodian settles the erroneous trade and posts it to the client's custodial statement ("Time of Settlement") and those it identifies after the Time of Settlement. Principal Global Investors maintains an error account and settles into it all erroneous trades it identifies prior to the Time of Settlement. Any profits from erroneous trades identified before settlement are retained in the error account and can only be used to offset losses caused by subsequent errors. It is Principal Global Investors' policy to accord clients any profitable erroneous trades it identifies after the Time of Settlement.

Principal Global Investor's policy covering the correction of trading errors generally applies only to the extent that Principal Global Investors has control of resolving errors for client accounts. For the SMA Programs, the Sponsor Firms may have control over the resolution of errors of participating investment managers, including Principal Global Investors.

Because of the actions or omissions by a broker-dealer, a trade executed in the market may materially differ from the instructions or order given by the Adviser's Portfolio

Manager or the trading desk personnel for that trade. Errors attributable to brokers are not trade errors but the Principal Global Investors will oversee the resolution of a broker's error.

Foreign Exchange Transactions – Incidental to Management of Equity Accounts

It is the responsibility of a client's custodian to handle foreign exchange transactions ("FX Transactions") for client accounts to settle trades and to repatriate dividends, interest and other income payments received into the client account's base currency when necessary. However, Principal Global Investors will, when requested by the client and Principal Global Investors determines that it is cost effective or efficient, arrange for its trade desk or a third party to handle trade settlement related FX Transactions in unrestricted currencies. Under this type of arrangement, should a client so request, the trade desk is responsible for seeking best execution of FX Transactions, either with the client's custodian or with third parties. Unless otherwise agreed to, Principal Global Investors will continue to issue standing instructions to each client's custodian for all other types of FX Transactions in unrestricted currencies, such as those related to dividend and interest repatriation Because of various limitations regarding transactions in restricted currencies, (generally in jurisdictions where all FX Transactions must be done by the client's custodian) all FX Transactions in restricted currencies will continue to be effected by each client's custodian pursuant to standing instructions and Principal Global Investors will not seek best execution.

In cases where a client has not requested that Principal Global Investors handle arrangements for trade settlement related FX Transactions in non-U.S. securities, and/or Principal Global Investors has deemed that it is not cost effective to do so, Principal Global Investors will instruct the client's custodian to execute the necessary FX Transactions. This is done either through standing instructions communicated to the custodian when the account is established, or at the time settlement instructions are sent to the custodian for a particular transaction. The custodian is responsible for executing FX Transactions, including the timing and applicable rate, of such execution pursuant to its own internal processes. As clients generally have arrangements with their custodian regarding the execution of FX Transactions, such arrangements may impact the fees and expenses charged to the client by the custodian.

For Fixed Income:

Principal Global Investors' principal objective in selecting broker-dealers and entering client trades is to seek best execution for clients' transactions. In general, best execution means executing trades at the best net price considering all relevant circumstances. While best execution is the objective for all transactions, it may be measured over time through several transactions rather than through a single transaction. In seeking best execution, the key factor is not necessarily the highest bid or the lowest offers, but whether the transaction represents the best qualitative execution.

Principal Global Investors may take into account the following considerations in determining best execution:

- Best price for the trade;
- The broker or dealer's ability to execute and clear the trade in a prompt, orderly and satisfactory manner;
- Quality of executions in the past and existing relationship to date;
- Confidentiality provided by the broker or dealer;
- The broker or dealer's execution capabilities and any related risks in trading a block of securities;
- The broker or dealer's broad market coverage resulting in a continuous flow of information concerning bids and offerings;
- The broker or dealer's consistent quality of service, including the quality of any investment-related services provided (e.g. a first call on the release of influential securities reports);
- The broker or dealer's record keeping practices (e.g. timely and accurate confirmations); and
- Cooperation in resolving differences.

Principal Global Investors reviews a variety of internal and external trading reports and forensic tests to evaluate best execution with its Fixed Income trades.

Principal Global Investors only executes trades through brokers or dealers that are approved by its Counterparty Team. Brokers and dealers are evaluated internally by the Counterparty Team credit analyst to determine the financial capability and stability of the counterparty. Once a broker or dealer is approved, it is added to the Counterparty Authorization List and communicated to Traders.

Principal Global Investors conducts an annual fixed income broker review that gathers input from key investment staff. Portfolio managers, research analysts and traders rate brokers and dealers based on the value they believe they receive from the broker or dealer through reports, meetings, conference calls, management visits and other research. Traders rate brokers and dealers based on factors that may include, but are not limited to, execution quality, information flow, volume of trading in Principal Global Investors' orders, willingness to take the other side of the trade in a principal transaction, bids and offers and the broker's execution cost history.

Based on their responses, an aggregate score will be calculated for each broker and dealer and a relative ranking determined. In addition to ratings, feedback is gathered on the strengths and weaknesses of each broker and dealer (e.g. research sales, strategy and trading).

Principal Global Investors will act as investment adviser for a variety of accounts and will place orders to trade portfolio securities for each of those accounts from time to time. If, in carrying out the investment objectives of the accounts, occasions arise when purchases or sales of the same securities are to be made for two or more of the accounts at the same time, Principal Global Investors may submit the orders to purchase or sell to a broker or dealer for execution on an aggregate or "bunched" basis (including orders for accounts in which Principal Global Investors, its affiliates and/or its personnel have beneficial interests). In aggregating trade orders and allocating available securities, Principal Global Investors must provide fair and equitable treatment to all clients participating in the "bunched order". It is important to recognize, however, that all clients cannot be treated exactly alike. The fairness of a given allocation depends on the facts and circumstances involved, including the client's investment criteria and account size and the size of the order. Principal Global Investors aggregates trades to give clients the benefits of efficient and cost-effective delivery of investment management services. By aggregating trades, Principal Global Investors may also obtain more favorable executions. Principal Global Investors may create several aggregate or "bunched" orders relating to a single security at different times during the same day. On such occasions when not restricted by the client's investment management agreement, Principal Global Investors generally prepares, before entering an aggregated order, a written allocation statement as to how the order will be allocated among the various accounts. Securities purchased or proceeds of sales received on each trading day with respect to each such aggregate or "bunched" order shall be allocated to the various accounts whose individual orders for purchase or sale make up the aggregate or "bunched" order by filling each account's order in accordance with the allocation statement. In the event that the aggregated order cannot be completely filled, the securities purchased or sold will generally be allocated among the various accounts on a pro rata basis, subject to rounding to avoid less easily traded lots and individual issuer de minimis limits. Securities purchased for client accounts participating in an aggregate or "bunched" order will be placed into those accounts at a price equal to the average of the weighted prices achieved in the course of filling that aggregate or "bunched" order.

Although, Principal Global Investors generally follows a pro rata allocation method various judgmental and other factors may support non-pro rata allocations. Judgmental factors (e.g. changes in the availability of cash or liquidity needs subsequent to the initial order, a de minimis holding resulting from such an allocation, , a change in the client's needs subsequent to an initial allocation or other such judgmental factors) may form the basis of a decision for a non-pro rata allocation. In these cases, a portfolio manager must use reasonable business judgment in making a non-pro rata allocation that he or she believes is in the best interest of the affected clients.

Principal Global Investors expects aggregation or "bunching" of orders, on average, to reduce the cost of execution. Principal Global Investors, generally, will not aggregate a client's order if, in a particular instance, it believes that aggregation will increase the client's cost of execution. In some cases, aggregation or "bunching" of orders may increase the price a client pays or receives for a security or reduce the amount of securities purchased or sold for a client account.

Principal Global Investors generally does not engage in cross trades. However, Principal Global Investors has procedures in place to effect cross trades when permitted by the clients and if permissible under applicable regulations applicable to both accounts. In all situations that involve a cross trade, the portfolio manager will be required to provide a statement that explains why the transaction is in the best interest of both parties. Under no circumstances an ERISA account will be permitted to participate in a cross trade without prior approval of the management of Principal Global Investors and Compliance.

Principal Global Investors generally does not intend to place portfolio trades for any of its fund clients with an affiliated broker-dealer.

It is the Principal Global Investors' policy that the utmost care to be taken in making and implementing investment decisions on behalf of our funds and our client accounts. Nonetheless, Principal Global Investors will, from time to time, make such errors. It is Principal Global Investors' policy to absorb all losses on trades it places in error. In rectifying erroneous trades, Principal Global Investors distinguishes between errors it identifies prior to the time a client's custodian settles the erroneous trade and posts it to the client's custodial statement ("Time of Settlement") and those it identifies after the Time of Settlement.

Principal Global Investor's policy covering the correction of trading errors generally applies only to the extent that Principal Global Investors has control of resolving errors for client accounts. For the SMA Programs, the Sponsor Firms may have control over the resolution of errors of participating investment managers, including Principal Global Investors.

Because of the actions or omissions by a broker-dealer, a trade executed in the market may materially differ from the instructions or order given by the Adviser's Portfolio Manager or the trading desk personnel for that trade. Errors attributable to brokers are not trade errors but the Principal Global Investors will oversee the resolution of a broker's error.

Principal Global Investors does not generally engage in principal transactions, as defined by Section 206-3 under the Advisers Act, as part of its trading processes for clients. In the event the Firm should endeavor to engage in a principal transaction, the Firm will take action to ensure compliance with the relevant requirements of the Advisers Act. Section 206(3) prohibits any investment adviser from engaging in or effecting a transaction on behalf of a client while acting either as principal for its own account, or as broker for a person other than the client, without disclosing in writing to the client, before the completion of the transaction, the adviser's role in the transaction and obtaining the client's consent. An investment adviser is not "acting as broker" if the adviser receives no compensation (other than its advisory fee) for effecting a particular agency transaction between advisory clients.

New issue portfolio securities (including new securities sold in reliance on Securities and Exchange Commission Rule 144A) will normally be purchased directly from the issuer or from an underwriter for the securities. Such transactions involve no brokerage commissions. Purchases from underwriters will include a commission or concession paid by the issuer (and not by clients of Principal Global Investors) to the underwriter. In some new issue transactions, there may be only one underwriter and, accordingly, any orders for that new issue security will be placed with that underwriter. In other new issue transactions in which an underwriting group is involved, pricing should be uniform among the underwriters and Principal Global Investors will normally place its orders with the lead manager, in an effort to maximize the prospects for getting the orders filled. Secondary purchases from and sales to dealers will include the spread between the bid and asked prices. In general, Principal Global Investors' primary objective in exercising any available authority concerning the selection of an underwriter, broker, or dealer is to obtain the best overall terms for Principal Global Investors' clients. In pursuing this objective, Principal Global Investors considers all matters it deems relevant (both for the specific transaction and on a continuing basis), including the breadth of the market in the security, the price of the security, the financial condition and executing capability of the broker or dealer and the reasonableness of the compensation, if any, received by the underwriter, broker or dealer.

Principal Global Investors Fixed Income boutique does not accept the use of soft dollar credits and currently does not engage in "deal credit" arrangements in municipal bond transactions.

It is the responsibility of a client's custodian to handle foreign exchange transactions ("FX Transactions") for client accounts to settle trades and to repatriate dividends, interest and other income payments received into the client account to the account's base currency when necessary. However, Principal Global Investors will, when requested by the client and Principal Global Investors determines that it is cost effective or efficient, arrange for its trade desk to handle trade settlement related FX transactions in unrestricted currencies. Under this type of arrangement, should a client so request, the trade desk is responsible for seeking best execution of FX transactions, either with the client's custodian or with third parties. Unless otherwise agreed to, Principal Global Investors will continue to issue standing instructions to each client's custodian for all other types of FX transactions in unrestricted currencies, such as those related to dividend and interest repatriation   Because of various limitations regarding transactions in restricted currencies, (generally in jurisdictions where all FX Transactions must be done by the client's custodian) all FX Transactions in restricted currencies will continue to be effected by each client's custodian pursuant to standing instructions and PGI-Fixed Income will not seek best execution.

In cases where a client has not requested that Principal Global Investors handle arrangements for trade settlement related FX transactions in non-U.S. securities, and/or Principal Global Investors has deemed that it is not cost effective to do so, Principal Global Investors will instruct the client's custodian to effect the necessary FX transactions. This is done either through standing instructions communicated to the custodian when the account is established, or at the time settlement instructions are sent to the custodian for a particular transaction. The custodian is responsible for executing FX transactions, including the timing and applicable rate, of such execution pursuant to its own internal processes. As clients generally have arrangements with their custodian regarding the execution of FX transactions, such arrangements may impact the fees and expenses charged to the client by the custodian.

For Currency:

The Macro Currency Boutique's execution process has been designed to ensure the provision of best execution whenever possible. The process is implemented by a trading teams sitting across multiple time zones and draws on support from compliance and credit research functions within Principal Global Investors.

ITEM 13 – REVIEW OF ACCOUNTS

Review of Accounts

Principal Global Investors reviews each client account to monitor portfolio performance and to ensure that each portfolio conforms to guidelines established by Principal Global Investors and the client. Separately negotiated contracts with each client contain the precise nature of the advisory services to be furnished to that client. These contracts can specify the criteria and process for the account review furnished by the client. In addition, Principal Global Investors uses its own review processes and procedures during the ongoing management of the client's portfolio. Principal Global Investors generally sends reports to clients on the investment status of their portfolios quarterly, or more frequently if required under the terms of the client contract.

Reviews

For Equities:
Equity portfolios receive ongoing review during the trading process. Principal Global Investors utilizes a compliance system to assist in the automated review and monitoring of portfolios. Many client account investment guidelines can be input into this compliance system. Each equity trade order is submitted into the system and reviewed

electronically for compliance with the account's investment guidelines. This is done prior to the trade order being submitted to Principal Global Investors' trade desk. The system blocks trades that would cause an explicit breach of client guidelines. Principal Global Investors generates daily reports identifying exceptions for further analysis.

The portfolio managers utilize proprietary and third party portfolio construction tools to monitor pre-trade and post-trade risks before trade orders are ever sent to the trading desk. These systems allow the team to evaluate the impact of potential trades on the overall portfolio exposures which cannot be monitored through automated compliance system, yet may be a client objective or guideline.

All members of the Equity Boutiques can monitor portfolios on an ongoing basis and allow for senior management to view portfolio positioning for all strategies at any time. Daily performance reports on representative samples of client portfolios are compared to relative benchmarks. Principal Global Investors runs monthly risk analysis and exception reports on a representative sample of portfolios relative to benchmarks, and in addition, portfolio managers formally review a representative group of client portfolios each month.

For Fixed Income:
Each fixed income portfolio is reviewed daily by its portfolio manager and team members assigned to that portfolio. Principal Global Investors runs daily reports on a sampling of accounts indicating performance of each portfolio, market value and cash for each account included in the sampling. Principal Global Investors maintains a Fixed Income Investment Committee. Principal Global Investors runs monthly performance reports on all accounts, which are provided to the members of the Fixed Income Investment Committee. Risk management reports showing tracking error and characteristics are run at least quarterly and provided to the Fixed Income Investment Committee. Each portfolio manager meets quarterly with the Fixed Income Investment Committee to review the activity in the portfolio(s) for which the portfolio manager is responsible.

For Currency:
Views are implemented on a consistent basis across the relevant portfolios (working within each portfolio's specified guidelines), with position size scaled to meet the volatility requirements of each portfolio. Portfolios are monitored in real time by the portfolio, trading and risk management functions so as to ensure coherency and minimize dispersion.

Portfolio parameters are agreed in conjunction with the client so as to most effectively meet their needs. These guidelines are hard coded into ThinkFolio so as to ensure compliance on both a pre- and post-trade basis. Oversight is provided by the independent compliance function of Principal Global Investors. Guideline amendments are only executed upon the receipt of an amended client-specific investment advisory agreement.

Reviewers

Principal Global Investors has several Committees that review all client portfolios falling within their respective equities or fixed income area of focus. All committee members are officers of Principal Global Investors and generally hold the title of Director, Managing Director or Executive Director. The appropriate Committee assists the Portfolio Manager in reviewing objectives and constraints of the client, investment activity, operational activity, and client relations at least quarterly. The number of accounts each Committee reviews varies by Committee.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

Principal Global Investors enters into compensation arrangements with certain related persons who act as solicitors of clients for Principal Global Investors. In addition, Principal Global Investors may enter into arrangements with other persons who act as solicitors of clients for Principal Global Investors when it appears to Principal Global Investors that a solicitor may provide Principal Global Investors with access to clients Principal Global Investors might not otherwise have. Such arrangements will at all times be maintained in compliance with Rule 206(4)-3 of the Investment Advisers Act of 1940. Principal Global Investors may pay any such solicitor (a) a salary, or (b) a percentage of the management fee Principal Global Investors earns from the account a solicitor has introduced, or (c) a one-time fee, or (d) any combination of (a), (b), or (c). In the event the Principal Global Investors utilizes unaffiliated solicitors to procure clients for investment pools they manage, the payments will not be treated as cash solicitation fees per Rule 206(4)-3. The SEC in an Interpretive Letter dated July 28, 2008 to Mayer Brown LLP indicated that Rule 206(4)-3 does not apply to an investment adviser's cash payment to a person solely to compensate that person for soliciting investments in investment pools managed by the investment adviser.

ITEM 15 – CUSTODY

When required, clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client’s investment assets. Principal Global Investors urges you to carefully review such statements and compare such official custodial records to the account statements that Principal Global Investors may provide to you. The statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

ITEM 16 – INVESTMENT DISCRETION

Principal Global Investors generally receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Principal Global Investors observes the investment policies, limitations and restrictions of the clients for which it advises.

Investment guidelines and restrictions must be provided to Principal Global Investors in writing.

ITEM 17 – VOTING CLIENT SECURITIES

Principal Global Investors has adopted and implemented written Proxy Voting Policies and Procedures which are designed to reasonably ensure that Principal Global Investors votes proxies in the best interests of its advisory clients who have authorized the Principal Global Investors to address these matters on their behalf. Principal Global Investors' guiding principles in performing proxy voting are to make decisions that (i) favor proposals that tend to maximize a company's shareholder value and (ii) are not influenced by conflicts of interest.

The principles and positions in the Policy are designed to guide Principal Global Investors in voting proxies, and not necessarily in making investment decisions. Portfolio Management Teams base their determinations of whether to invest in a particular company on a variety of factors

The client may authorize Principal Global Investors to vote proxies. Clients may obtain a summary report relating to their account by contacting their representative.

Principal Global Investors has established a general Proxy Voting Policy using the Institutional Shareholder Services, Inc. (ISS) Standard Proxy Voting Guidelines (the Guidelines) except where a portfolio management team may decide to diverge from the Guidelines. In this case, the policy requires certain procedures and documentation to be met.

Clients may obtain a copy of Principal Global Investors' complete proxy voting policies and procedures upon request.

In the rare event that a proxy ballot is received for a Fixed Income account, the relevant portfolio manager will be responsible for voting the ballot.

ITEM 18 – FINANCIAL INFORMATION

Registered investment advisers are required in this Item to provide clients with certain financial information or disclosures about Principal Global Investors' financial condition. Principal Global Investors has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Proxy Voting and Class Action Monitoring

Background

Rule 206(4)-6 under the Advisers Act requires every investment adviser who exercises voting authority with respect to client securities to adopt and implement written policies and procedures, reasonably designed to ensure that the adviser votes proxies in the best interest of its clients. The procedures must address material conflicts that may arise in connection with proxy voting. The Rule further requires the adviser to provide a concise summary of the adviser's proxy voting process and offer to provide copies of the complete proxy voting policy and procedures to clients upon request. Lastly, the Rule requires that the adviser disclose to clients how they may obtain information on how the adviser voted their proxies.

Risks

In developing this policy and procedures, the Advisers considered numerous risks associated with their voting of client proxies. This analysis includes risks such as:

- The Advisers do not maintain a written proxy voting policy as required by Rule 206(4)-6.

- Proxies are not voted in Clients' best interests.

- Proxies are not identified and voted in a timely manner.

- Conflicts between the Advisers' interests and the Client are not identified; therefore, proxies are not voted appropriately.

- The third-party proxy voting services utilized by the Advisers are not independent.

- Proxy voting records and Client requests to review proxy votes are not maintained.

The Advisers have established the following guidelines as an attempt to mitigate these risks.

Policy

The Advisers believe that proxy voting and the analysis of corporate governance issues, in general, are important elements of the portfolio management services provided to advisory clients. The Advisers' guiding principles in performing proxy voting are to make decisions that (i) favor proposals that tend to maximize a company's shareholder value and (ii) are not influenced by conflicts of interest. These principles reflect the Advisers' belief that sound corporate governance creates a framework within which a company can be managed in the interests of its shareholders.

In addition, as a fiduciary, the Advisers also monitor Clients' ability to participate in class action events through the regular portfolio management process. Accordingly, the Advisers have adopted the policies and procedures set out below, which are designed to ensure that the Advisers comply with legal, fiduciary, and contractual obligations with respect to proxy voting and class actions.

Proxy Voting Procedures

The Advisers have implemented these procedures with the premise that portfolio management personnel base their determinations of whether to invest in a particular company on a variety of factors, and while corporate governance is one such factor, it may not be the primary consideration. As such, the principles and positions reflected in the procedures are designed to guide in the voting of proxies, and not necessarily in making investment decisions.

The Investment Accounting Department has assigned a Proxy Voting Team to manage the proxy voting process. The Investment Accounting Department has delegated the handling of class action activities to a Senior Investment Accounting Leader.

Institutional Shareholder Services

Based on the Advisers' investment philosophy and approach to portfolio construction, and given the complexity of the issues that may be raised in connection with proxy votes, the Advisers have retained the services of Institutional Shareholder Services ("ISS"). ISS is a wholly owned subsidiary MSCI, Inc. which is a leading global provider of investment decision support tools. ISS offers proxy voting solutions to institutional clients globally. The services provided to the Advisers include in-depth research, voting recommendations, vote execution, recordkeeping, and reporting.

The Advisers have elected to follow the ISS Standard Proxy Voting Guidelines (the "Guidelines"), which embody the positions and factors that the Advisers' Portfolio Management Teams ("PM Teams") generally consider important in casting proxy votes.[1] The Guidelines address a wide variety of individual topics, including, among other matters, shareholder voting rights, anti-takeover defenses, board structures, the election of directors, executive and director compensation, reorganizations, mergers, and various shareholder proposals. In connection with each proxy vote, ISS prepares a written analysis and recommendation ("ISS Recommendation") that reflects ISS's application of the Guidelines to the particular proxy issues. ISS Proxy Voting Guidelines Summaries are accessible to all PM Teams on the ISS system. They are also available from the Proxy Voting Team.

Voting Against ISS Recommendations

On any particular proxy vote, Portfolio Managers may decide to diverge from the Guidelines. Where the Guidelines do not direct a particular response and instead list relevant factors, the ISS Recommendation will reflect ISS's own evaluation of the factors.

If the Portfolio Manager's judgment differs from that of ISS, a written record is created reflecting the process (See Appendix titled "*Report for Proxy Vote(s) Against the ISS Recommendation(s)*"*), including:*

1. The requesting PM Team's reasons for the decision;
2. The approval of the lead Portfolio Manager for the requesting PM Team;
3. Notification to the Proxy Voting Team and other appropriate personnel (including other Advisers Portfolio Managers who may own the particular security);
4. A determination that the decision is not influenced by any conflict of interest; and review and approval by the Compliance Department.

[1] The Advisers have various Portfolio Manager Teams organized by asset classes and investment strategies.

Conflicts of Interest

The Advisers have implemented procedures designed to prevent conflicts of interest from influencing proxy voting decisions. These procedures include our use of the Guidelines and ISS Recommendations. Proxy votes cast by the Advisers in accordance with the Guidelines and ISS Recommendations are generally not viewed as being the product of any conflicts of interest because the Advisers cast such votes pursuant to a pre-determined policy based upon the recommendations of an independent third party.

Our procedures also prohibit the influence of conflicts of interest where a PM Team decides to vote against an ISS Recommendation, as described above. In exceptional circumstances, the approval process may also include consultation with the Advisers' senior management, the Law Department, Outside Counsel, and/or the Client whose account may be affected by the conflict. The Advisers maintain records of the resolution of any proxy voting conflict of interest.

Proxy Voting Instructions and New Accounts

Institutional Accounts

As part of the new account opening process for discretionary institutional Clients, the Advisers' Investment Accounting Department is responsible for sending a proxy letter to the Client's custodian. This letter instructs the custodian to send the Client's proxy materials to ISS for voting. The custodian must complete the letter and fax it to ISS, with a copy to the Advisers' Investment Accounting Department. This process is designed to ensure and document that the custodian is aware of its responsibility to send proxies to ISS.

The Investment Accounting Department is responsible for maintaining this proxy instruction letter in the Client's file and for scanning it into the Advisers' OnBase system. These steps are part of the Advisers' Account Opening Process.

SMA – Wrap Accounts

The Advisers' SMA Operations Department is responsible for servicing wrap accounts, which includes providing instructions to the relevant wrap sponsor for setting up accounts with ISS.
Fixed Income and Private Investments

Voting decisions with respect to Client investments in fixed income securities and the securities of privately-held issuers will generally be made by the relevant Portfolio Managers based on their assessment of the particular transactions or other matters at issue.

Client Direction

Clients may choose to vote proxies themselves, in which case they must arrange for their custodians to send proxy materials directly to them. Upon request, the Advisers can accommodate individual Clients that have developed their own guidelines with ISS or another proxy service. Clients may also discuss with the Advisers the possibility of receiving individualized reports or other individualized services regarding proxy voting conducted on their behalf. Such requests should be centralized through the Advisers' Proxy Voting Team.

Securities Lending

At times, neither the Advisers nor ISS will be allowed to vote proxies on behalf of Clients when those Clients have adopted a securities lending program. Typically, Clients who have adopted securities lending programs have made a general determination that the lending program provides a greater economic benefit than retaining the ability to vote proxies. Notwithstanding this fact, in the event that a proxy voting matter has the potential to materially enhance the economic value of the Client's position and that position is lent out, the Advisers will make reasonable efforts to inform the Client that neither the Advisers nor ISS is able to vote the proxy until the lent security is recalled.

Abstaining from Voting Certain Proxies

The Advisers shall at no time ignore or neglect their proxy voting responsibilities. However, there may be times when refraining from voting is in the Client's best interest, such as when the Advisers' analysis of a particular proxy issue reveals that the cost of voting the proxy may exceed the expected benefit to the Client. Such proxies may be voted on a best-efforts basis. These issues may include, but are not limited to:

- Restrictions for share blocking countries;[2]
- Casting a vote on a foreign security may require that the adviser engage a translator;
- Restrictions on foreigners' ability to exercise votes;
- Requirements to vote proxies in person;
- Requirements to provide local agents with power of attorney to facilitate the voting instructions;
- Untimely notice of shareholder meeting;
- Restrictions on the sale of securities for a period of time in proximity to the shareholder meeting.

Proxy Solicitation

Employees must promptly inform the Advisers' Proxy Voting Team of the receipt of any solicitation from any person related to Clients' proxies. As a matter of practice, the Advisers do not reveal or disclose to any third party how the Advisers may have voted (or intend to vote) on a particular proxy until after such proxies have been counted at a shareholder's meeting. However, the Proxy Voting Team may disclose that it is the Advisers' general policy to follow the ISS Guidelines. At no time may any Employee accept any remuneration in the solicitation of proxies.

Handling of Information Requests Regarding Proxies

Employees may be contacted by various entities that request or provide information related to particular proxy issues. Specifically, investor relations, proxy solicitation, and corporate/financial communications firms (e.g., Ipreo, Richard Davies, DF King, Georgeson Shareholder) may contact the Advisers to ask questions regarding total holdings of a particular stock across advisory Clients, or how the Advisers intends to vote on a particular proxy. In addition, issuers may call (or hire third parties to call) with intentions to influence the Advisers' votes (i.e., to vote against ISS).

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[2] In certain markets where share blocking occurs, shares must be "frozen" for trading purposes at the custodian or sub-custodian in order to vote. During the time that shares are blocked, any pending trades will not settle. Depending on the market, this period can last from one day to three weeks. Any sales that must be executed will settle late and potentially be subject to interest charges or other punitive fees.

Employees that receive information requests related to proxy votes should forward such communications (e.g., calls, e-mails, etc.) to the Advisers' Proxy Voting Team. The Proxy Voting Team will take steps to verify the identity of the caller and his/her firm prior to exchanging any information. In addition, the Proxy Voting Team may consult with the appropriate Portfolio Manager(s) and/or the CCO or CCO NA with respect to the type of information that can be disclosed. Certain information may have to be provided pursuant to foreign legal requirements (e.g., Section 793 of the UK Companies Act).

External Managers

Where Client assets are placed with managers outside of the Advisers, whether through separate accounts, funds-of-funds or other structures, such external managers are responsible for voting proxies in accordance with the managers' own policies. The Advisers may, however, retain such responsibilities where deemed appropriate.

Proxy Voting Errors

In the event that any Employee becomes aware of an error related to proxy voting, he/she must promptly report that matter to the Advisers' Proxy Voting Team. The Proxy Voting Team will take immediate steps to determine whether the impact of the error is material and to address the matter. The Proxy Voting Team, with the assistance of the CCO or CCO NA (or their designee), will generally prepare a memo describing the analysis and the resolution of the matter. Supporting documentation (e.g., correspondence with ISS, Client, Portfolio Managers/ analysts, etc.) will be maintained by the Compliance Department. Depending on the severity of the issue, the Law Department, Outside Counsel, and/or affected Clients may be contacted. However, the Advisers may opt to refrain from notifying non-material de minimis errors to Clients.

Recordkeeping

The Advisers must maintain the documentation described in the following section for a period of not less than five (5) years, the first two (2) years at the principal place of business. The Proxy Voting Team, in coordination with ISS, is responsible for the following procedures and for ensuring that the required documentation is retained.

Client request to review proxy votes:

- Any request, whether written (including e-mail) or oral, received by any Employee of the Advisers, must be promptly reported to the Proxy Voting Team. All written requests must be retained in the Client's permanent file.

- The Proxy Voting Team records the identity of the Client, the date of the request, and the disposition (e.g., provided a written or oral response to Client's request, referred to third party, not a proxy voting client, other dispositions, etc.) in a suitable place.

- The Proxy Voting Team furnishes the information requested to the Client within a reasonable time period (generally within 10 business days). The Advisers maintain a copy of the written record provided in response to Client's written (including e-mail) or oral request. A copy of the written response should be attached and maintained with the Client's written request, if applicable and maintained in the permanent file.

- Clients are permitted to request the proxy voting record for the 5 year period prior to their request.

Proxy statements received regarding client securities:

- Upon inadvertent receipt of a proxy, the Advisers forward the proxy to ISS for voting, unless the client has instructed otherwise.

  Note: The Advisers are permitted to rely on proxy statements filed on the SEC's EDGAR system instead of keeping their own copies.

Proxy voting records:

- The Advisers' proxy voting record is maintained by ISS. The Proxy Voting Team, with the assistance of the Investment Accounting and SMA Operations Departments, periodically ensures that ISS has complete, accurate, and current records of Clients who have instructed the Advisers to vote proxies on their behalf.

- The Advisers maintain documentation to support the decision to vote against the ISS recommendation.

- The Advisers maintain documentation or any communications received from third parties, other industry analysts, third party service providers, company's management discussions, etc. that were material in the basis for any voting decision.

Procedures for Class Actions

In general, it is the Advisers' policy not to file class action claims on behalf of Clients. The Advisers specifically do not act on behalf of former Clients who may have owned the affected security but subsequently terminated their relationship with the Advisers. The Advisers only file class actions on behalf of Clients if that responsibility is specifically stated in the advisory contract, as it is the Advisers' general policy not to act as lead plaintiff in class actions.
The process of g class action claims is carried out by the Investment Accounting Department. In the event the Advisers opt out of a class action settlement, the Advisers will maintain documentation of any cost/benefit analysis to support that decision.

The Advisers are mindful that they have a duty to avoid and detect conflicts of interest that may arise in the class action claim process. Where actual, potential or apparent conflicts are identified regarding any material matter, the Advisers manage the conflict by seeking instruction from the Law Department and/or outside counsel.

Disclosure

The Advisers ensure that Part 2A of Form ADV is updated as necessary to reflect: (i) all material changes to this policy; and (ii) regulatory requirements.

Responsibility

Various individuals and departments are responsible for carrying out the Advisers' proxy voting and class action practices, as mentioned throughout these policies and procedures. The Investment Accounting Department has assigned a Proxy Voting Team to manage the proxy voting process. The Investment Accounting Department has delegated the handling of class action activities to a Senior Investment Accounting Leader.

In general, the Advisers' CCO or CCO NA (or their designee) oversees the decisions related to proxy voting, class actions, conflicts of interest, and applicable record keeping and disclosures. In addition, the Compliance Department periodically reviews the voting of proxies to ensure that all such votes – particularly those diverging from the judgment of ISS – were voted in a manner consistent with the Advisers' fiduciary duties.