Strategic Income Management, LLC

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This Brochure provides information about the qualifications and business practices of Strategic Income Management, LLC ("SiM" or "Adviser"). If you have any questions about the contents of this Brochure, please contact us at (206) 971-3773 or ClientRelations@sim-llc.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Strategic Income Management, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Strategic Income Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material changes to this Brochure

Brian Placzek, one of the Firm's Portfolio Managers, retired at the end of 2022. There are no other material changes to this brochure since the last published version.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Our Brochure may be requested by contacting Timothy Black at (206) 529-3247 or tblack@sim-llc.com. Our Brochure is also available on our website www.sim-llc.com, also free of charge.

Additional information about Strategic Income Management, LLC is also available via the SEC's website www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with us who are registered, or are required to be registered, as investment adviser representatives of Strategic Income Management, LLC.

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Item 4 – Advisory Business

SiM provides fixed income high yield investment advisory services to institutional clients such as mutual funds, and pension plans. We began operations on October 1, 2010. Our principals have many years of experience in theinvestment management industry. Our owners are Gary Pokrzywinski, Brian Placzek, Tim Black, Ryan Larson, and Kevin Power.

Types of advisory services we offer. SiM manages accounts for institutions on a discretionary basis, which means that SiM makes the decisions with respect to which securities to buy or sell for SiM's clients' accounts.

Currently, SiM acts as subadvisor for a mutual fund (the "Registered Fund") registered under the Investment Company Act of 1940, as amended (the "Company Act"), as subadvisor for an Ireland registered UCITS fund (the "UCITS Fund"), and as a separate account manager for three institutions (the "Separate Accounts"). The Registered Fund, the UCITS Fund, and the Separate Accounts are collectively referred to as "Clients."

Each of the Registered Fund, the UCITS Fund and the Separate Accounts follow a fixed income high yield strategy managed by our high yield investment team.

The high yield investment team makes and executes investment decisions on behalf of our Clients. SiM tailors its investment advice to individual client needs on a case-by-case basis. Requests for specific restrictions on investment are entertained on an as-needed basis.

As of December 31, 2022, SiM was managing $1,749.38 million for institutional clients. All of these accounts are discretionary.

Item 5 – Fees and Compensation

SiM charges annual management fees that are computed and paid in arrears monthly or quarterly based upon the average account value for the prior period. SiM's fee rates vary on a portfolio-by-portfolio basis depending upon the size and type of the account, and whether SiM is the sole manager or if SiM is one of a group of managers for an account Fees are negotiated with each client depending on the characteristics of the account and can range from 20bps to 60bps.

Pursuant to an individual agreement with each Client, SiM manages such Client's assets in accordance with the account's investment objectives and policies. Each agreement and its fees are individually negotiated. The investment advisory agreement with the Registered Fund is subject to annual renewal by the Registered Fund's board of directors in accordance with the requirements under the Company Act. For more information concerning the investment advisory fees for the Registered Fund, please consult the Registered Fund's prospectus and statement of additional information ("SAI") on file with the Securities and Exchange Commission.

In addition to the advisory fees described above, each Client pays its own brokerage fees, administration, custodian and other charges and or expenses (together with any value added, goods and services, sales or other tax applicable) or reimburses SiM for such expenses it incurs on the Client's behalf. Item 12 further describes the factors that SiM considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

Clients generally do not pay fees in advance. However, if a particular Client and SiM adopt a fee arrangement that calls for payment of fees in advance, upon redemption or termination of the advisory relationship or upon investment other than at the beginning of the normal investment cycle, SiM will refund fees for the period of time that SiM did not provide advisory services and/or charge that Client only for the actual period of time that SiM provided advisory services.

Multi Manager Funds and Institutional Separate Accounts. Some mutual funds use several different managers to manage different strategies within the same fund. Institutional separate account fees, including those applicable in multi-manager mutual funds, are negotiated directly with each account holder or fund manager, and vary depending upon the account size and strategy pursued.

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

SiM does not charge performance-based fees for the Registered Fund, the UCITS Fund, or the Separate Accounts. To the extent that SiM charges a performance-based fee in the future, any actual or potential conflicts or interest are addressed by SiM's aggregation and allocation policies which are designed to provide fair and equitable treatment for all of SiM's clients over time.

Please refer to Items 11 and 12 for a more detailed discussion of SiM's allocation and aggregation policies and procedures.

Item 7 – Types of Clients

SiM currently provides high yield fixed income portfolio management services, as sub adviser, to the Registered Fund and the UCITS Fund, and to the Separate Accounts as a separate account manager. In the future, SiM may also provide portfolio management services to corporate pension and profit-sharing plans, Taft-Hartley plans, charitable institutions, endowments, municipalities, and other U.S. and international institutions.

The minimum account size for institutional high yield clients is $15 million. The minimums may be waived or reduced by SiM in its sole discretion.

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

SiM focuses its investment management in high yield fixed income.

High Yield Portfolio Management Philosophy

We believe understanding industries and their long-term trends is more than half of the investment process. In our experience, many managers get obsessed with quarterly earnings calls, forgetting that, if a company is in a bad industry, it may be pulled down with that industry no matter how good the company may appear to have been at the last quarterly earnings call. Getting the industry right usually means gaining a solid understanding of the supply/demand drivers in that industry.

We are active managers. We are not surreptitious index managers who circle around an index, making minor percentage changes to industry weightings. Our industry focus tells us that high leverage is usually inappropriate for companies in industries with high capital intensity or volatile revenue streams. There are several industries where our portfolio is very underweight or has no representation at all, but overall our portfolio has a heavier weighting in non-cyclical industries than an index.

We build a core portfolio around long-term secular trends. Some examples of these are demographics, technological developments, globalization, regulatory trends, and fiscal and monetary policy. We believe that companies aligned with these trends will have the support of a good tailwind and that this, in combination with our industry focus, leads to a more robust portfolio.

We supplement this portfolio by investing in out-of-favor sectors and non-traditional high-yield instruments. When investing in out-of-favor sectors, we are not simply contrarians. We invest in out-of-favor sectors that we believe have long-term viability and where our analysis tells us that supply and demand are on a path to rebalancing, usually through a cleansing of excess supply.

When we invest in these out-of-favor sectors we do not buy the cheapest companies. Buying bonds of a distressed company trading at 25 cents on the dollar in a distressed sector requires that the investor precisely time the turnaround of that sector, and time it to the very near future. However, thirty years of experience has taught us that the process of rebalancing in a sector is difficult to time. Therefore we invest in companies that we believe have the management, balance sheet and cash flow to make it through the next two to three years that may be required for a successful restructuring of the industry.

Some examples of non-traditional high-yield instruments we may invest in are real estate investment trusts ("REITs"), preferred stocks, convertible bonds, and EM debt. These sectors have select groups of natural buyers that periodically abandon them. When those sectors of the capital market lose their natural buyers, their yields can become very competitive to high yield. The advantage of these sectors is that they not only offer competitive yields, but their lower correlation to traditional high yield serves to reduce overall risk of the portfolio.

Towards the end of the business cycle when spreads become very compressed, there are no out-of-favor industries or sectors. With no opportunities in the market, our strategy pulls the investments back into the core positions, which are based upon longer term trends and which tend to be less cyclical. Thus, at the end of the cycle, the portfolio is well positioned for when the market tends to "fall apart" and a new variety of out-of-favor sectors and instruments appear.

We also tend to manage a relatively concentrated portfolio, and invest in a higher percentage of "small cap" names (issuers with $500 million or less in outstanding debt) than would an index-driven manager.

ESG/Principles for Responsible Investment

SiM is a signatory of the United Nations' Principles for Responsible Investment ("UNPRI"), and as such, where consistent with our fiduciary responsibilities to each of our clients and applicable law, we integrate environmental, social and governance ("ESG") information into our investment analysis and decision-making process. Commitments made as a signatory to the UNPRI are voluntary, aspirational, and not legally binding. ESG considerations are only one factor that informs our research to find attractive investments and manage risks.

SiM believes ESG factors can be material business issues that can affect client performance, so understanding them enables more informed investment decisions. Generally, we evaluate ESG issues in connection with our credit research process; however, ESG information is not solely determinative to our investment decisions, which are affected only to the extent we believe that ESG issues are material to the credit-worthiness of a particular issuer. ESG factors may include, but are not limited to, matters regarding board diversity, climate change policies, and supply chain and human rights policies. Incorporating ESG criteria and making investment decisions based on certain ESG characteristics carries the risk that a client account may perform differently, including underperforming, other accounts that do not utilize ESG criteria, or that utilize different ESG criteria. In addition, the ESG characteristics utilized in SiM's investment process may change over time, and different ESG characteristics may be relevant to different client accounts. The portion of our investments for which we consider these ESG factors may vary, and could increase or decrease over time.

ESG factors are one of many considerations we use as part of our advisory strategy, and we may nonetheless include companies with low ESG scores or exclude companies with high ESG scores in a client account's investments. We do not intend to invest exclusively in issuers that actively pursue ESG-related goals, unless that is stated as the investment objective of a client account.

The regulatory landscape with respect to ESG investing in the United States is evolving and any future rules or regulations may require us to change our investment process with respect to ESG integration.

Investment Risks. Our High Yield investment strategy entails risk of loss that clients should be prepared to bear. Some of these risks are inherent in any investment strategy, while others are more specific to a particular strategy.

Below we have summarized some of the general and specific risks that you should consider when deciding to invest in SiM's high yield strategy. A more detailed description of the risks of our strategy can be found in the prospectus and SAI of the Registered Fund.

Principal Risks

There is no assurance that a client account will achieve its investment objective and such account could lose part or all of its money. Our strategy is designed for institutional investors seeking current income from a strategy that typically invests mainly in a variety of domestic and foreign high yield, high-risk debt securities. Investors should be willing to assume the credit risks of a strategy that typically invests a significant amount of its assets in below investment-grade debt securities and the price changes in those securities that can occur when interest rates change. For example, during periods of heightened market volatility or reduced liquidity, governments, their agencies, or other regulatory bodies, both within the United States and abroad, may take steps to intervene. These actions, which could include legislative, regulatory, or economic initiatives, might have unforeseeable consequences and could adversely affect a client account's performance or otherwise constrain SiM's ability to achieve a client's investment objective.

SiM's strategy is not designed for investors who need an assured level of current income. Investment with SiM is intendedto be a long-term prospect. SiM does not provide a complete investment program and may not be appropriate for all investors. Investors should carefully consider their own investment goals and risktolerance before investing with SiM. The principal risks associated with SiM's strategy are:

Allocation and Correlation Risk

Our judgments about, and allocations between, asset classes and market exposures may adversely affect a client account's performance. This risk may be increased by the use of derivatives to increase allocations to various market exposures.

Asset-Backed and Mortgage-Related Securities Risk

Investments in asset-backed and mortgage related securities are subject to market risks for fixed-income securities which include, but are not limited to, interest rate risk, extension risk and prepayment risk. Factors that impact the value of these securities include interest rate changes, the reliability of available information, credit quality or enhancement, and market perception.

Mortgage-backed securities are issued by lenders, such as mortgage bankers, commercial banks, and savings and loan associations. Such securities differ from conventional debt securities, which provide for the periodic payment of interest in fixed amounts (usually semiannually) with principal payments at maturity or on specified dates. When interest rates fall, homeowners are more likely to prepay their mortgage loans. An increased rate of prepayments on a client account's mortgage-backed securities will result in an unforeseen loss of interest income to the client account as the client account may be required to reinvest assets at a lower interest rate. When interest rates rise, homeowners are less likely to prepay their mortgage loans. A decreased rate of prepayments lengthens the expected maturity of a mortgage-backed security. Therefore, the prices of mortgage-backed securities may decrease more than prices of other fixed-income securities when interest rates rise.

Asset-backed securities include interests in pools of debt securities, commercial or consumer loans, or other receivables. The value of these securities depends on many factors, including changes in interest rates, the availability of information concerning the pool and its structure, the credit quality of the underlying assets, the market's perception of the servicer of the pool, and any credit enhancement provided. In addition, asset-backed securities have prepayment risks similar to mortgage-backed securities.

Bank Loans and Senior Loans Risk

Bank loans and senior loans are subject to credit risk, interest rate risk and liquidity risk. In addition, bank loans and senior loans are subject to the risk that the value of the collateral, if any, securing the loanmay decline, be insufficient to meet the obligations of the borrower, or be difficult to liquidate. In theevent of a default, a client account may have difficulty collecting on any collateral and would not havethe ability to collect on any collateral for an uncollateralized loan.

Convertible Securities Risk

The value of a convertible security (''convertible'') is influenced by both the yield of non-convertible securities of comparable issuers and by the value of the underlying common stock. The investment value of a convertible is based on its yield and tends to decline as interest rates increase and to increase as interest rates decline. The conversion value of a convertible is the market value that would be received if the convertible were converted to its underlying common stock. The conversion value will decrease as the price of the underlying common stock decreases. When conversion value is substantially below investment value, the convertible's price tends to be influenced more by its yield, so changes in the price of the underlying common stock may not have as much of an impact. Conversely, the convertible's price tends to be influenced more by the price of the underlying common stock when conversion value is comparable to or exceeds investment value. Convertible securities may be subject to market risk, credit risk and interest rate risk.

Counterparty Risk

A client account is subject to the risk that a party or participant to a transaction, such as a broker or derivative counterparty, will be unwilling or unable to satisfy its obligation to make timely principal, interest or settlement payments or to otherwise honor its obligations to a client account. If the counterparty defaults there is no assurance that the counterparty will be able to meet its contractual obligations or that, in the event of default, such contractual obligations will be successfully enforced.

Credit Risk

A client account is subject to the risk that the issuer or guarantor of a debt security, or the counterparty to a derivatives contract or a loan will fail to make timely payment of interest or principal or otherwise honor its obligations or default completely. Credit risk is typically greater for securities with ratings that are below investment grade (commonly referred to as "junk bonds"). The sovereign debt of many foreign governments, including their subdivisions and instrumentalities, falls into this category.

Below-investment-grade securities offer the potential for higher investment returns than higher-rated securities, but they carry greater credit risk: their issuers' continuing ability to meet principal

and interest payments is considered speculative, they are more susceptible to real or perceived adverse economic and competitive industry conditions, and they may be less liquid than higher-rated securities. Since a client account can invest significantly in lower-quality debt securities considered speculative in nature, this risk will be substantial.

Currency Risk

A client account may have exposure to foreign currencies by purchasing or selling forward currency contracts in non-U.S. currencies, non-U.S. currency futures contracts and in securities denominated in non-U.S. currencies. Currency rates in foreign countries may fluctuate significantly for a number of reasons, including the forces of supply and demand in the foreign exchange markets, actual or perceived changes in interest rates, intervention (or the failure to intervene) by U.S. or foreign governments or central banks, or currency controls or political developments in the United States or abroad. In addition, foreign currencies may decline in value relative to the U.S. dollar and affect a client account's investments in foreign (non-U.S.) currencies or in securities that trade in, and receive revenues in, or in derivatives that provide exposure to foreign (non-U.S.) currencies.

Derivatives Risk

Derivatives may involve significant risk. Derivatives are financial contracts with a value that depends on, or is derived from, the value of underlying assets, reference rates, or indexes. Derivatives may relate to stocks, bonds, interest rates, currencies or currency exchange rates, and related indexes. The use of derivative instruments may expose a client account to additional risks that it would not be subject to if it invested directly in the securities underlying those derivatives. Some derivatives have the potential for unlimited loss, regardless of the size of a client account's initial investment. Derivatives may be illiquid and may be more volatile than other types of investments. On behalf of a client account, SiM may buy or sell derivatives not traded on an exchange and which may be subject to heightened liquidity and valuation risk. Derivative investments can increase portfolio turnover and transaction costs. Derivatives also are subject to counterparty risk. As a result, a client account may obtain no recovery of its investment or may only obtain a limitedrecovery, and any recovery may be delayed. Not all derivative transactions require a counterparty topost collateral, which may expose a client account to greater losses in the event of a default by a counterparty. In addition, a client account's investments in derivatives are subject to the following risks:

Futures and Forward Contracts

Futures and forward contracts are derivative instruments pursuant to a contract where one party pays a fixed price for an agreed amount of securities or other underlying assets at an agreed date or to buy or sell a specific currency at a future date at a price set at the time of the contract. There may be an imperfect correlation between the changes in market value of the securities held by a client account and the prices of futures contracts that are intended to hedge those security positions, which will increase the volatility of a client account. There can be no assurance that any strategy used will succeed. Not all forward contracts require a counterparty to post collateral, which may expose a client account to greater losses in the event of a default by a counterparty. There may not be a liquid secondary market for the futures contracts. Forward currency transactions include the risks associated with fluctuations in currency. Interest rate and treasury futures contracts expose a client account to price fluctuations resulting from changes in interest rates. A client account could suffer a

loss if interest rates rise after a client account has purchased an interest rate futures contract or fall after a client account has sold an interest rate futures contract. Similarly, treasury futures contracts expose a client account to potential losses if interest rates do not move as expected.

Options.

There may be an imperfect correlation between the prices of options and movements in the price of the securities (or indices) hedged which may cause a given hedge not to achieve its objective. If a client account's portfolio managers apply a strategy at an inappropriate time or judge market conditions or trends incorrectly, options may lower a client account's return. Counterparty risk does not apply to exchange-traded options, as those options are usually freely tradeable on the open market.

Structured Notes.

Structured notes are subject to interest rate risk and credit risk. The price of structured notes may be very volatile and they may have a limited trading market, making it difficult to value them or sell them at an acceptable price.

Swap Agreements.

Swaps are subject to counterparty risk. Credit default swaps, including credit default swaps on baskets of securities (such as the CDX indices), are subject to credit risk on the underlying investment. Interest rate swaps are subject to interest rate and credit risk. Total return swaps may be subject to credit risk and market risk. Regulations enacted by the CFTC under the Dodd-Frank Act require the clearing of certain swap contracts through a clearing house or central counterparty. Central clearing is presently required only for certain interest rate and credit default swaps; the CFTC may impose amandatory central clearing requirement for additional derivative instruments over time. In addition, many derivative market participants are now regulated as swap dealers and are subject to certain minimum capital and margin requirements and business conduct standards. Similar regulatory requirements have been adopted by the SEC.

Payment obligations arising in connection with derivative contracts are frequently required to be secured with collateral (in the case of over the counter ("OTC") contracts) or margin (in the case of exchange-traded contracts). The CFTC and prudential regulators' variation and initial margin requirements for uncleared swaps increase the amount of margin necessary to conduct uncleared swap transactions and limit the types of assets that can be used as collateral for such transactions. These margin requirements may affect the ability of a client account to use swap agreements to implement its investment strategies and may substantially increase regulatory and compliance costs. These requirements could further adversely affect our abilityto enter into swaps in the OTC market or could cause the termination of new or existing swap agreements at an inopportune time.

Dividend Risk

As a result of market, interest rate and other circumstances, an issuer of stock held by a client account may choose not to declare a dividend or the dividend rate might not remain at current levels. Dividend paying stocks might not experience the same level of earnings growth or capital appreciation as non-dividend paying stocks.

Emerging Markets Risk

When investing in emerging markets, the risks of investing in foreign securities discussed below are heightened. Emerging markets are generally smaller, less developed, less liquid and more volatile than the securities markets of the U.S. and other developed markets. These risks include high currency exchange-rate fluctuations; increased risk of default (including both government and private issuers); greater social, economic, and political uncertainty and instability (including the risk of war); more substantial governmental involvement in the economy; less governmental supervision and regulation of the securities markets and participants in those markets; controls on foreign investment and limitations on repatriation of invested capital and on a client account's ability to exchange local currencies for U.S. dollars; unavailability of currency hedging techniques in certain emerging-market countries; the fact that companies in emerging-market countries may be newly organized, smaller, and less seasoned; the difference in, or lack of, auditing and financial reporting requirements or standards, which may result in the unavailability of material information about issuers; different clearance and settlement procedures, which may be unable to keep pace with the volume of securities transactions or otherwise make it difficult to engage in such transactions; difficulties in obtaining and/or enforcing legal judgments against non-U.S. companies and non-U.S. persons, including company directors and officers, in foreign jurisdictions; and significantly smaller market capitalizations of emerging-market issuers.

Equity Investments Risk
Equity securities are subject to market risk. The price of equity securities fluctuates based on changes in a company's financial condition and overall market and economic conditions. The value of equity securities purchased by a client account could decline if the financial condition of the companies in which the client account is invested declines, or if overall market and economic conditions deteriorate. An issuer's financial condition could decline as a result of poor management decisions, competitive pressures, technological obsolescence, undue reliance on suppliers, labor issues, shortages, corporate restructurings, fraudulent disclosures, irregular and/or unexpected trading activity among retail investors, or other factors. Changes in the financial condition of a single issuer can impact the market as a whole.

A client account's investments in equity securities may include common stocks, preferred stocks, securities convertible into or exchangeable for common stocks, depositary receipts, REITs, master limited partnerships ("MLPs"), income trusts and income deposit securities ("IDSs"). Such investments may expose a client account to additional risks. Commonstock generally is subordinate to preferred stock upon the liquidation or bankruptcy of the issuing company. Preferred stocks and convertible securities are sensitive to movements in interest rates. Inaddition, convertible securities are subject to the risk that the credit standing of the issuer may have an effect on the convertible securities' investment value. Depositary receipts are subject to certain of the risks associated with investing directly in foreign securities. Investments in REITs are subject to the risks associated with investing in the real estate industry such as adverse developments affectingthe real estate industry and real property values. Holders of units in MLPs have more limited rights and may be required to sell their common units at an undesirable time or price. A client account's investments in MLPs may also make it more difficult for a client account to meet the requirements necessary to qualify as a regulated investment company under the Internal Revenue Code of 1986, asamended. Income trusts and IDSs are subject to credit risk, interest rate risk and dividend risk.

Foreign Investing Risk
Non-U.S. investments carry potential risks not associated with U.S. investments. Such risks include, but are not limited to: (1) currency exchange rate fluctuations, (2) political and financial instability, (3) less liquidity and greater volatility, (4) lack of uniform accounting, auditing and financial reporting standards, (5) increased price volatility, (6) less government regulation and supervision of foreign stock exchanges, brokers and listed companies; and (7) delays in transaction settlement in some foreign markets. In addition, there are generally higher commission rates on foreign portfolio transactions, transfer taxes, higher custodial costs, and the possibility that foreign taxes will be charged on dividends and interest payable on foreign securities, some or all of which may not be reclaimable. In the event of nationalization, expropriation, confiscatory taxation, or other confiscation, a client account could lose a substantial portion of, or its entire investment in, a foreign security.

Hedging Risk
If a hedging instrument is used at the wrong time, the market conditions are judged incorrectly, or the hedged instrument does not correlate to the risk sought to be hedged, the hedge might be unsuccessful, reduce a client account's return, or create a loss. The skills required to utilize hedging and other strategic transactions are different from those needed to select securities or bonds. Even if SiM only uses hedging and other strategic transactions primarily for hedging purposes or to gain exposure to a particular securities market, if the transaction does not have the desired outcome, it could result in a significant loss to a client account. The amount of loss could be more than the principal amount invested. These transactions may also increase the volatility of a client account and may involve a small investment of cash relative to the magnitude of the risks assumed, thereby magnifying the impact of any resulting gain or loss.

High Yield Securities Risk
Investing in high yield, below investment-grade securities (commonly referred to as "junk bonds") generally involves significantly greater risks of loss of your money than an investment in investment grade securities. Investing in lower-rated fixed-income securities is considered speculative. While these securities generally provide greater income potential than investments in higher-rated securities, there is a greater risk that principal and interest payments will not be made. Rising interest rates may compound these difficulties and reduce an issuer's ability to repay principal and interest obligations. Issuers of lower-rated securities also have a greater risk ofdefault or bankruptcy. Below investment grade securities may experience greater price volatility andless liquidity than investment grade securities. In addition, while SiM may rely on ratings by established credit rating agencies, it will also supplement such ratings with its own independent review of the credit quality of the issuer. Therefore, the assessment of the credit risk of lower-rated fixed-income securities is more dependent on SiM's evaluation than the assessment of the credit risk of higher-rated securities.

Illiquid and Restricted Securities Risk
Certain securities are considered illiquid or restricted due to a limited trading market, legal or contractual restrictions on resale or transfer, or are otherwise illiquid because they cannot be sold or disposed of in seven calendar days or less without the sale or disposition significantly changing the market value of the investment. A client account may not be able to sell a restricted security when the adviser considers it desirable to do so and/or may have to sell the security at a lower price. In addition,

transaction costs may be higher for restricted securities than for more liquid securities. A client account may have to bear the expense of registering restricted securities for resale and the risk of substantial delays in effecting the registration.

Interest Rate Risk

Fixed-income securities are affected by changes in interest rates. A client account is subject to the risk that the market value of fixed income securities or derivatives it holds, particularly mortgage backed and other asset backed securities, will decline due to rising interest rates. Conversely, when interest rates decline, the market value of fixed-income securities generally can be expected to rise.

The prices of fixed income securities or derivatives are also affected by their duration. Duration is a measure of the price sensitivity of a debt security to changes in interest rates. Fixed income securities or derivatives with longer duration generally have greater sensitivity to changes in interest rates. For example, if a bond has a duration of four years, a 1% increase in interest rates could be expected to result in a 4% decrease in the value of the bond.

Recent and potential future changes in government monetary policy may affect interest rates. As the Fed "tapers" or reduces the amount of securities it purchases pursuant to its quantitative easing program, and/or if the Fed raises the federal funds rate, there is a risk that interest rates will rise, which could expose fixed-income and related markets to heightened volatility and could cause the value of a client's investments to decline, potentially suddenly and significantly, which may negatively impact the client's performance.

Issuer Risk

The value of a security may decline for a number of reasons which directly relate to the issuer, such as management performance, financial leverage, competitive pressures, technological obsolescence, undue reliance on suppliers, labor issues, shortages, corporate restructurings, fraudulent disclosures, and reduced demand for the issuer's goods or services, as well as the historical and prospective earnings of the issuer and the value of its assets.

Leveraging Risk

A client account's use of futures, forward contracts, swaps, structured notes, other derivative instruments and selling securities short will have the economic effect of financial leverage. Financial leverage magnifies the exposure to the swings in prices of an asset or class of assets underlying a derivative instrument and results in increased volatility, which means that a client account will have the potential for greater losses than if a client account does not use the derivative instruments that have a leveraging effect. Leveraging tends to magnify, sometimes significantly, the effect of any increase or decrease in a client account's exposure to an asset or class of assets and may cause a client account's net asset value to be volatile.

LIBOR Risk

LIBOR is a measure of the average interest rate at which major global banks can borrow from one another. It is quoted in multiple currencies and tenors using data reported by a panel of private-sector banks. Following allegations of rate manipulation in 2012 and concerns regarding its thin liquidity, the use of LIBOR came under increasing pressure, and in July 2017, the U.K. Financial Conduct

Authority, which regulates LIBOR, announced that it will stop encouraging banks to provide the quotations needed to sustain LIBOR. The ICE Benchmark Administration Limited, the administrator of LIBOR, is expected to cease publishing most LIBOR tenors, including some USD LIBOR tenors, on December 31, 2021, and the remaining and most liquid USD LIBOR tenors no later than June 30, 2023. Before the end of 2021, it is expected that market participants will transition to the use of alternative reference or benchmark rates. However, there is currently no definitive information regarding the future utilization of LIBOR or of any particular replacement rate. Regulators have encouraged the development and adoption of alternative reference rates, but global consensus is lacking and the process for amending existing contracts or instruments to transition away from LIBOR remains unclear.

The transition process away from LIBOR has become increasingly well-defined in advance of the anticipated discontinuation of LIBOR, and it is expected that market participants will amend financial instruments referencing LIBOR to include fallback provisions and other measures that contemplate the discontinuation of LIBOR or other similar market disruption events. However, neither the effect of the transition process nor the viability of such measures is known. To facilitate the transition of legacy derivatives contracts referencing LIBOR, the International Swaps and Derivatives Association, Inc. launched a protocol to incorporate fallback provisions. However, there are obstacles to converting certain longer term securities and transactions to a new benchmark or benchmarks. For example, certain proposed replacement rates to LIBOR, such as the Secured Overnight Financing Rate ("SOFR"), which is a broad measure of secured overnight U.S. Treasury repo rates, are materially different from LIBOR, and changes in the applicable spread for financial instruments transitioning away from LIBOR will need to be made to accommodate the differences. In addition, regulators in foreign jurisdictions have proposed alternative replacement rates. Furthermore, the risks associated with the expected discontinuation of LIBOR and transition to alternative rates may be exacerbated if an orderly transition to an alternative reference rate is not completed in a timely manner.

The effectiveness of multiple alternative reference rates as compared to one primary reference rate has not beendetermined. The effectiveness of alternative reference rates used in new or existing financial instruments and products has also not yet been determined. As market participants transition away from LIBOR, LIBOR's usefulness may deteriorate. The transition process may lead to increased volatility and illiquidity in markets that currently rely on LIBOR to determine interest rates. LIBOR's deterioration may adversely affect the liquidity and/or market value of securities that use LIBOR as a benchmark interest rate, including securities and other financial instruments in which SiM invests.

Alteration of the terms of a debt instrument or a modification of the terms of other types of contracts to replace LIBOR or another interbank offered rate (IBOR) with a new reference rate could result in a taxable exchange and the realization of income and gain/loss for U.S. federal income tax purposes. The IRS has issued final regulations regarding the tax consequences of the transition from IBOR to a new reference rate in debt instruments and non-debt contracts. Under the final regulations, alteration or modification of the terms of a debt instrument to replace an operative rate that uses a discontinued IBOR with a qualified rate (as defined in the final regulations) including true up payments equalizing the fair market value of contracts before and after such IBOR transition, to add a qualified rate as a fallback rate to a contract whose operative rate uses a discontinued IBOR, or to replace a fallback rate that uses a discontinued IBOR with a qualified rate would not be taxable. The IRS may provide

additional guidance, with potential retroactive effect.

Liquidity Risk

Client accounts are susceptible to the risk that certain investments held by a client account may have limited marketability or have restrictions on sale, and may be difficult to sell at favorable times or prices. Exposure to liquidity risk may be heightened for client accounts that invest in securities of emerging markets and related derivatives that are not widely traded, and that may be subject to purchase and sale restrictions. In addition, the capacity of traditional dealers to engage in fixed-income trading has not kept pace with the bond market's growth. A lack of market-makers in the bond market could lead to decreased liquidity and increased volatility, which may become exacerbated during periods of economic or political stress and rising interest rates. A client account could lose money if it is unable to dispose of an investment at a time that is most beneficial.

Loan Participation Interests Risk

Loan participation interests may be collateralized, uncollateralized, or undercollateralized and are subject to the credit riskof the servicing agent as well as the credit risk of the borrower. Even with secured loans, there is no assurance that the collateral securing the loan will be sufficient to protect a client account against losses in value or a decline in income in the event of a borrower's nonpayment of principal or interest. In addition, the value of any such collateral may decline and may be difficult to liquidate. The amount of public information available with respect to loans may be less extensive than that available for registered or exchange-listed securities. As a result, the decision to invest in a particular loan or loan participation could depend exclusively on SiM's credit analysis of the borrower. Furthermore, if a client account purchases a participation interest, it may be only able to enforce its rights through the lender.

Market Risk

Market risks, including political, regulatory, market and economic developments, and developments that impact specific economic sectors, industries or segments of the market, can affect the value of a client account's shares. A client account's fixed-income investments are subject to the risk that the lack of liquidity or other adverse credit market conditions may hamper a client account's ability to purchase and sell the debt securities. A client account's equity investments are subject to stock market risk, which involves the possibility that the value of a client account's investments in stocks will decline due to drops in any of the many individual country or global financial markets. Turbulence in financial markets and reduced liquidity in credit, fixed-income, or equity markets may negatively affect many issuers worldwide which could adversely affect a client account. A widespread health crisis such as a global pandemic could cause uncertainty in themarkets and may adversely affect the performance of the global economy. For example, the outbreak of respiratory disease caused by the novel coronavirus ("COVID-19") resulted and may continue to result in significant disruptions to global business activity and market volatility due to disruptions in market access, resource availability, facilities operations, imposition of tariffs, export controls, and supply chain disruptions, among other things. The impact of this outbreak, andother epidemics and pandemics that may arise in the future, could continue to negatively affect the worldwide economy, as well as the economies of individual countries, individual companies, including certain service providers and issuers, and the market in general in significant and unforeseen ways. Any such impact could adversely affect client account performance, the performance of the securities in which an account invests, or otherwise cause business disruptions including to SiM's business, and may lead

to losses. SiM has policies and procedures to address known situations, but because a large epidemic may create significant market and business uncertainties and disruptions, not all events that could affect SiM's business and/or the markets can be determined and addressed inadvance.

In addition, political and military events or crises, including those in Ukraine, North Korea, Russia, Venezuela, Iran, Syria, and other areas of the Middle East, along with nationalist unrest in Europe and South America, also may cause market disruptions.

Municipal Securities Risk

Municipal securities are subject to credit risk where a municipal issuer of a security might not make interest and principal payments on a security as they become due. The yields or returns of municipal bonds depend on a variety of factors, including general market conditions, effective marginal tax rates, the financial condition of the issuer, general conditions of the municipal bond market, the size of a particular offering, the maturity of the obligation, and the rating (if any) of the issue. A downgrade in the issuer's or security's credit rating can reduce the market value of the security.

Prepayment and Extension Risk

Prepayments tend to increase during periods of falling interest rates, while during periods of rising interest rates, prepayments are likely to decline. A client account's investments in asset-backed and mortgage-backed securities are subject to the risk that the principal amount of the underlying collateral may be repaid prior to the bond's maturity date.If this occurs, no additional interest will be paid on the investment and a client account may have to invest at a lower rate. Conversely, a decrease in expected prepayments may result in the extension of a security's effective maturity and a decline in its price.

Sector Risk

Sector risk is the risk associated with a client account holding a significant amount of investments in similar businesses, which could be affected by the same economic or market conditions. When a client account's investments are focused in one or more sectors of the economy, they are less broadly invested across industries or sectors than other client accounts. This means that client accounts whose holdings are focused tend to be more volatile than other accounts, and the values of their investments tend to go up and down more rapidly.

Segregated Assets Risk

In connection with certain transactions that may give rise to future payment obligations, including many types of derivatives, a client account may be required to maintain a segregated amount of, or otherwise earmark, cash or liquid securities to cover the position, which cannot be sold while the position they are covering is outstanding, unless they are replaced with other securities of equal value.

Unrated Securities Risk

Investing in unrated securities involves the risk that the sub-advisor may not accurately evaluate the security's comparative credit rating. To the extent that the a client account invests in unrated securities, a client account's success in achieving its investment objective may depend more heavily on our credit analysis than if the account invested exclusively in rated securities.

U.S. Government Securities and Government Sponsored Enterprises Risk

U.S. government securities include securities issued or guaranteed by the U.S. government or by an agency or instrumentality of the U.S. government. Not all U.S. government securities are backed by the full faith and credit of the United States. Some are supported only by the credit of the issuing agency or instrumentality, which depends entirely on its own resources to repay the debt. These include securities held by a clientaccount that are issued by government-sponsored enterprises, such as the Federal National MortgageAssociation (''Fannie Mae''), the Federal Home Loan Mortgage Corporation (''Freddie Mac''), Federal Home Loan Banks, Federal Farm Credit Banks, and the Tennessee Valley Authority, among others. U.S. Government securities are also subject to credit risk and interest rate risk.

Valuation Risk

A client account may value certain assets at a price different from the price at which they can be sold. This risk may be especially pronounced for investments, such as certain derivatives, which may be illiquid or which may become illiquid.

Risk of Investments at Different Levels of an Issuer's Capital Structure

We may invest client assets in the same issuer, but at different levels in the issuer's capital structure. For instance, we may invest client assets in loans of an issuer and invest the assets of other clients in publicly traded securities of the same issuer. These different securities may have different voting rights, dividend or repayment priorities, rights in bankruptcy or other features that conflict with one another. For some of these securities, we may have input regarding the characteristics and the relative rights and priorities of the various classes or tranches.

When we invest client assets in different levels of an issuer's capital structure, we may take actions with respect to the assets held by one client (including affiliated clients) that are potentially adverse to other clients, for example, by foreclosing on loans or by putting an issuer into default. In negotiating the terms and conditions of any such investments, or any subsequent amendments or waivers, we may find that the interests of a client and the interests of one or more other clients (including affiliated clients) could conflict.

In these situations, decisions over proxy voting, corporate reorganizations, how to exit an investment, bankruptcy matters (including, for example, whether to trigger an event of default or the terms of any workout) or other actions or inactions may result in conflicts of interest. Similarly, if an issuer in which a client and one or more other clients directly or indirectly hold different classes of securities encounters financial problems, decisions over the terms of any workout will raise conflicts of interests (including potential conflicts over proposed waivers and amendments to debt covenants). This could potentially disadvantage the clients on whose behalf the actions are not taken, investments are not made, or investments are sold. Conversely, in other cases, we will not refrain from taking actions or making investments on behalf of some clients (including affiliated clients), which could potentially disadvantage other clients. Any of the foregoing conflicts of interest will be resolved on a case-by-case basis. Any such resolution will take into consideration the interests of the relevant clients, the circumstances giving rise to the conflict and applicable laws.

Certain Risks Related to Cybersecurity and Technology

Investment advisers, including SiM, must rely in part on digital and network technologies to conduct their businesses and to maintain substantial computerized data relating to client account activities. These technologies include those owned or managed by ourselves as well as those owned or managed by others, such as custodians, financial intermediaries, transfer agents, and other parties to which we or they outsource the provision of services or business operations. Like all businesses that use computerized data, we and the systems we use may, under some circumstances, be subject to a variety of cybersecurity incidents or similar events.

We have implemented and maintain an information technology security policy and program that includes certain technical and physical safeguards intended to protect the integrity, availability and confidentiality of the data we have and the systems that store it. We take other reasonable precautions to limit the potential for cybersecurity incidents, and to protect data from inadvertent disclosure or wrongful misappropriation or destruction.

Nevertheless, despite reasonable precautions, cybersecurity incidents could occur, and might in some circumstances result in unauthorized access to sensitive information about us or our clients. In addition, such incidents might cause damage to client accounts, data or systems or affect account management. Furthermore, these systems may fail to operate properly or become disabled as a result of events or circumstances wholly or partly beyond our or others' control. A cybersecurity breach or similar event could result in the loss or theft of customer data or funds, loss or theft of proprietary information or corporate data, physical damage to a computer or network system, or costs associated with system repairs, any of which could have a substantial impact on a client account. For example, in a denial of service attack, clients could lose access to their electronic accounts indefinitely, and SiM or other service providers may not be able to access electronic systems to perform critical duties, such as trading, NAV calculation, or accounting.

Operations Risk

We rely heavily on our portfolio management, trading, financial, accounting and other data processing systems. Operational risks arising from failed processes and systems, human error or external events, as part of the trading lifecycle (execution, confirmation, and settlement) as well as other activities in support of our clients, may cause financial loss, disruption to our business, liability to clients or third parties, regulatory action, or reputational harm. An increase in the volume or complexity of client transactions could increase these risks. In addition, other disruptive events, including (but not limited to) natural disasters and public health crises (such as the coronavirus (COVID-19) pandemic), may adversely affect SiM's ability to conduct business, in particular if SiM's employees or the employees of its service providers are unable or unwilling to perform their responsibilities as a result of any such event.

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 SiM or the integrity of SiM's management. Neither SiM nor any of its employees has been the subject of any legal or disciplinary events that require disclosure under this Item.

Item 10 – Other Financial Industry Activities and Affiliations

SiM has registered as an exempt foreign investment adviser with the Netherlands Authority for the Financial Markets ("AFM"), in order to market SiM's high yield investment management services to institutional clients in Europe.

SiM has engaged a Netherlands-based third party marketing firm, Candoris BV, to market SiM's high yield investment management services to institutional clients in Europe. Candoris is compensated by receiving a portion of SiM's management fee.

SiM has engaged American Beacon Advisors, Inc. as a third party marketing agent in connection with certain potential institutional clients.

SiM has no other activities or arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, accounting firm, law firm, and or insurance company or agency, or any other type of financial entity.

Item 11 – Code of Ethics

SiM has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at SiM must acknowledge the terms of the Code of Ethics annually, or whenever it is amended.

SiM's employees and persons associated with SiM are required to follow SiM's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of SiM and its affiliates may trade for their own accounts in securities which are purchased for SiM's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of SiM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of SiM's clients. In addition, the Code of Ethics requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities that SiM invests in on behalf of its Clients, there is a possibility that employees might benefit from market activity by a Client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between SiM and its clients.

SiM's employees are also permitted, subject to pre-clearance approval, to invest in the Registered Fund. This could create a conflict of interest whereby SiM's employees endeavor to allocate those securities and trades that appear to be most beneficial to the Registered Fund in which SiM employees have invested. SiM does not believe that permitting employees to invest in the Registered Fund presents an actual material conflict of interest. All of SiM's accounts are managed to similar target percentagesfor all holdings, subject to specific client restrictions. Purchases and sales of the same securities for all accounts may be aggregated and allocated among multiple accounts in accordance with SIM's aggregation and allocation policies which are designed to provide consistent and fair treatment for all of SiM's clients. SiM retains records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Absent unusual unforeseen circumstances, completed orders are allocated as specified in the initial trade order. Subject to exceptions noted in SiM's aggregation and allocation policies, partially filled orders are allocated using SIM's Standard Allocation Methods (see Item 12 – Trade Allocation). Any exceptions are noted in SiM's Order Management System.

Please refer to Items 11 and 12 for a more detailed discussion of SiM's allocation and aggregation policies and procedures.

SiM's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Tim Black at tblack@sim-llc.com or (206) 529-3247.

Item 12 – Brokerage Practices

SiM endeavors to seek best execution for client transactions. SiM will execute securities transactions for clients in such a manner that is consistent with the best interests of its clients and to employ a trading process that attempts to maximize the value of a client's portfolio within the client's stated directives and constraints. In carrying out this duty, SiM will consider the full range and quality of a broker's services in placing brokerage including, among other things, execution capability, price, financial responsibility, and responsiveness. SiM will periodically and systematically evaluate the execution performance of broker-dealers executing transactions for client accounts.

In choosing broker-dealers, SiM is not required to consider any particular criteria. SiM seeks "best execution" of securities transactions for all client accounts. In evaluating whether a broker-dealer will provide best execution, SiM may consider such relevant factors as (1) trading expertise of the broker, (2) the broker's infrastructure, (3) the broker's ability to minimize trading costs, (4) the broker's ability to provide research, and (5) the broker's ability to accommodate special transaction needs. 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, SiM 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. SiM 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.

SiM does not currently intend to use soft dollar arrangements with brokers. In selecting brokers, SiM does not consider client referrals from a broker or related party.

Trade Execution Evaluation

SiM conducts periodic reviews of its brokerage and best execution practices, evaluates services, and documents these reviews. On a quarterly basis, SiM reviews the quality of executions and the value of other services received from brokers. The Chief Compliance Officer has the responsibility for the implementation and monitoring of SiM's best execution policy, practices, disclosures and recordkeeping. The Portfolio Manager is responsible for conveying information to SiM's traders if there is any change to SiM's policies for directing brokerage orders.

Directed Brokerage

A client may not direct SiM to execute some or all of the transactions on behalf of the client's account through a specific broker unless the client gives such direction in writing. The client's written direction must identify the directed brokers, the target percentage of brokerage that should be directed to the brokers, and contain a statement that the direction will only benefit the client's account. Before

accepting a client directed brokerage arrangement, unless such acknowledgements are contained in the client's investment management agreement or investment guidelines, SiM shall inform the client that:

- although the client has selected a directed broker, SiM will not be required to effect any transaction through the directed broker if SiM reasonably believes that to do so may result in a breach of its duties to the client;
- by instructing SiM to execute all transactions through the directed broker, the client may not obtain execution as favorable as would be the case if SiM was able to place transactions with other broker-dealers; and
- the client may forego benefits that SiM may be able to obtain for its other clients through, for example, negotiating volume discounts or aggregating or bunching trades.

Principal and Agency Cross Transactions

It is SiM's policy not to affect any principal or agency cross securities transactions for client accounts.Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactionsmay arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer. SiM is not affiliated with a broker-dealer.

Trade Allocation

SiM has adopted trade allocation procedures that treat all clients in a fair and equitable manner over time. Client orders are generally processed on a first-in, first-executed basis. When there are multiple orders for the same security, SiM may aggregate the orders in a block execution to achieve optimal execution and lower transaction costs. SiM will typically allocate transactions before execution of a block order based on SIM's "Standard Allocation Methods," which are generally based either on percentage allocations or pro rata allocations based on the net asset value of each client account participating. Sometimes certain client accounts in an investment strategy will not be allocated a security or will be allocated a lower or higher amount of a security than the Standard Allocation Method dictates because of:

(i) such client's particular investment restrictions, leverage limits, account objectives, risk tolerance, time horizon, tax sensitivity, transactions costs, nature and size, suitability, tolerance for portfolio turnover, liquidity and size limitations, availability of cash or buying power, eligibility to participate in a trade pursuant to compliance regulations, asset compositions, industry concentrations or specific overriding instructions;

(ii) the need to restore appropriate weightings of the portfolio held by certain client accounts;

(iii) a partial fill of trade order;

(iv) common sense adjustments or equitable adjustments that lead to cost savings or other transactional efficiencies;

(v) avoidance of de minimis allocations;

(vi) directed brokerage requirements for all or a portion of a given client account's trades;

(vii) Client accounts holding different securities. It is not always possible to buy a security held in existing accounts for a new account because, for example, it is no longer available;

(viii) Client accounts holding different position sizes. This occurs because accounts have cash flows. Withdrawals may require a partial sale of a bond, reducing the position percentage relative to other accounts. Withdrawals that are satisfied without partially selling a bond result in increased position size relative to other accounts. Deposits reduce the position percentage of current holdings relative to other holders;

(ix) Cash flows resulting in a Client account's sector weights and/or duration varying versus the composite. A Client account may be excluded from a trade if the trade would increase that variance; or

(x) Trades executed to bring accounts that show a variance from the desired composite duration and/or sector weight, or other criteria back in-line. Only those Client accounts affected will be included.

If an aggregated order is not completely filled during the day on which the order is entered, then the aggregated order shall be allocated among participating clients based on the relative allocations that would have resulted from application of the Standard Allocation Method had the order been completely filled. Exceptions to this policy may occur as detailed in (i)-(x), above. For example, SiM may deviate from the partial fill allocation formula set forth above in order to avoid a de minimis allocation or to maintain round lots.

Instances in which client orders will not be aggregated include, but are not limited to, the following: (1) clients directing SiM to use certain broker-dealers, in which case orders shall be separately effected; (2) the use of limit orders; (3) traders and/or the portfolio managers determine that the aggregation is not an efficient method of executing the trade.

Certain investments may be appropriate for more than one client advised by SiM. Investment decisions for a client and for such other clients are made with a view to achieving their respective investment objectives and after consideration of such factors as their current holdings, availability of cash for investment and the size of their investments generally. A particular security may be bought or sold by SiM for only one client or in different amounts and at different times for more than one but less than all clients. Likewise, a particular investment may be bought by SiM for one or more clients while at the same time SiM is selling the investment for one or more other clients. Sometimes it is not possible or advisable to aggregate trades of the same securities for unaffiliatedclients. For these situations, SiM has adopted a policy to rotate which client account trades first among

unaffiliated client accounts.

Investments will be allocated among Clients in a manner believed by SiM to be fair and equitable to each Client over time. In effecting transactions, it may not always be possible, or consistent with the investment objectives of the various Clients described above, to take or liquidate the same investment positions at the same time or at the same prices.

Item 13 – Review of Accounts

Accounts are monitored on a regular basis, at least monthly but usually more frequently, by the portfolio manager for the account and/or his or her staff. All accounts are subjected to a detailed formal review every quarter at SiM's firm-wide quarterly meeting, which includes all of SiM's employees, including portfolio managers as well as SiM's Compliance Officer. More frequent reviews may also be triggered by: a change in a client's investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or changes in macro-economic climate.

SiM provides monthly and/or quarterly reports to clients that summarize current portfolio holdings and performance over the prior month/quarter. SiM urges you to carefully review these reports and compare them to statements and other information you may have received from your account custodian. Information provided by SiM may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 14 – Client Referrals and Other Compensation

SiM has engaged a Netherlands based third party marketing firm, Candoris BV, to market SiM's high yield investment management services to institutional clients in the Nordics and other EU countries. Candoris is compensated by receiving a portion of SiM's management fee.

The Registered Fund is marketed and distributed by American Beacon Funds, Inc. and its affiliates. The fees payable to American Beacon, and all other fees associated with this fund are described in the prospectus for the fund. In addition, SiM has engaged American Beacon Advisors, Inc. as a third-party marketing agent in connection with certain potential institutional clients.

In the future, SiM may engage other marketing and distribution firms to market and distribute SiM's investment management services. We expect that these firms will be compensated by receiving a portion of SiM's management fee, or in the case of a mutual fund, other fees associated with the particular mutual fund, all of which will be described in the prospectus for the respective fund(s).

Item 15 – Custody

While SiM does not take direct custody of Clients' funds or securities, SiM may be deemed to have custody where SiM deducts its investment management fees directly from a Client account. SiM does not currently deduct its investment management fees directly from any of SiM's Client accounts.

Clients should receive at least quarterly statements from their broker-dealer, bank or qualified custodian that holds and maintains Client's investment assets. SiM urges each Client to carefully review such statements and compare such official custodial records to information that we may provide to you. Information provided by us may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

SiM usually 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. Discretionary authority is granted through the Client Investment Management Agreement.

When selecting securities and determining amounts, SiM observes the investment policies, limitations and restrictions of its clients. For registered investment companies, SiM's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

If a client desires to provide specific investment guidelines and restrictions these must be provided to, and approved by, SiM in writing.

Item 17 – Voting Client Securities

In accordance with Rule 206(4)-6 of the Investment Advisers Act of 1940, SiM has adopted proxy voting policies and procedures to fulfill its fiduciary obligation of voting in the best interest of the clients. In its capacity as an investment adviser for each of its clients, SiM generally does not vote client proxies except where SiM and the client have otherwise agreed.

In such circumstances, SiM will vote (by proxy or otherwise) on all matters for which a shareholder vote is solicited by, or with respect to, issuers of securities beneficially held in client accounts in a manner consistent with its fiduciary duties and in accordance with its written policies and procedures. These policies and procedures set forth guidelines for voting many typical proxy proposals. In certain instances, SiM may determine that it is in its clients' best interests to deviate from the guidelines or the proxy issue may require individual case-by-case consideration under the guidelines. The Chief Compliance Officer or designee is ultimately responsible for monitoring corporate developments and voting proxies in the best interests of clients.

Where a proxy proposal raises a material conflict of interest between the interests of SiM and its clients, or between SiM's clients, SiM will obtain voting direction from an independent third party or disclose the conflict of interest to the clients and abstain from voting or obtain client consent prior to voting the securities. There may also be a variety of corporate actions or other matters for which shareholder action is required or solicited and with respect to which SiM may take action that it deems appropriate in its best judgment, except to the extent otherwise required by agreement with the client. These actions may include, for example and without limitation, tender offers or exchanges, bankruptcy proceedings and class actions.

A Client may obtain a copy of SiM's proxy voting policies and procedures and/or information on how SiM voted proxies related to securities held in the Client's account by written request to SiM's Chief Compliance Officer at tblack@sim-llc.com.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about SiM's financial condition. SiM 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.

Brochure Supplement - Supervised Persons

Gary J. Pokrzywinski

Strategic Income Management, LLC

1200 Westlake Ave N, Suite 713

Seattle, WA 98109

(206) 971-3773

Dated: March 1, 2022

This Brochure Supplement provides information about Gary Pokrzywinski that supplements the Strategic Income Management, LLC ("SiM") Brochure. You should have received a copy of that Brochure. Please contact Tim Black at (206) 529-3247 or tblack@sim-llc.com if you did not receive SiM's Brochure or if you have any questions about the contents of this supplement.

Additional information about Gary Pokrzywinski is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Mr. Pokrzywinski is the Lead Portfolio Manager and President of SiM. Prior, he has served as Portfolio Manager, Chief Investment Officer and as a Member of the Management Committee of SiM since co-founding SiM in September 2010. Before starting SiM, from 1998 until May of 2009, Mr. Pokrzywinski was employed at Edge Asset Management, LLC ("Edge") and its predecessor WM Advisors, an affiliate of Principal Financial Group, and from January of 2008 until May of 2009, was the Managing Director – Head of Fixed Income for Edge. At Edge Mr. Pokrzywinski managed the Principal High Yield Mutual Fund from its inception in April 1998 to May 2009. Mr. Pokrzywinski received a bachelor's degree in Finance and Management Information Systems from the University of Wisconsin - Milwaukee. Mr. Pokrzywinski has earned the right to use the Chartered Financial Analyst* designation in 1989 and isa member of the CFA Society of Seattle. Mr. Pokrzywinski was born in 1961.

*The Chartered Financial Analyst ("CFA") charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals. There are currently more than 90,000 CFA charter holders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.
To learn more about the CFA charter, visit www.cfainstitute.org.

Item 3- 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 each supervised person providing investment advice. Mr. Pokrzywinski has not been the subject of any legal or disciplinary events that require disclosure under this Item.

Item 4- Other Business Activities

None

Item 5- Additional Compensation

None

Item 6 - Supervision

SiM has comprehensive compliance policies and procedures in place to govern and monitor the activities of all of its supervised persons, including Mr. Pokrzywinski. SiM has a three person Management Committee that reviews periodically SiM's operational and compliance activities. Mr. Pokrzywinski is a member of this committee. In addition, all of SiM's employees, including Mr. Pokrzywinski, meet on a quarterly basis to review all investment decisions, trading, and compliance matters of the preceding quarter. SiM employs a Chief Compliance Officer who monitors adherence to the firm's compliance policies and procedures. SiM's Chief Compliance Officer is Tim Black, (206) 529-3247; tblack@sim-llc.com. Mr. Black is a member of the Management Committee.

Ryan C. Larson

Strategic Income Management, LLC

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(206) 971-3773

Dated: March 1, 2022

This Brochure Supplement provides information about Ryan L. Larson that supplements the Strategic Income Management, LLC ("SiM") Brochure. You should have received a copy of that Brochure. Please contact Tim Black at (206) 529-3247 or tblack@sim-llc.com if you did not receive SiM's Brochure or if you have any questions about the contents of this supplement.

Additional information about Ryan C. Larson is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Mr. Larson is a Portfolio Manager for SiM. Prior, he has served as SiM's Junior Portfolio Manager, Senior Analyst, high yield trader and investment analyst. Prior to joining SiM in 2010, from 2009 to 2010 Mr. Larson was a research analyst at Caelum Capital, a Los Angeles based equity long-short hedge fund. Prior to Caelum Capital, from 2008 to 2009 Mr. Larson trained as a research analyst at Wells Fargo Advisors in Seattle, Washington. Mr. Larson graduated with honors from Brown University in May 2008 and has a B.A. in Commerce, Organizations and Entrepreneurship(business track). Mr. Larson holds the Chartered Financial Analyst* designation, and is a member of the Chartered Alternative Investment Analyst Association (CAIA).

*The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals. There are currently more than 90,000 CFA charter holders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.
To learn more about the CFA charter, visit www.cfainstitute.org.

Item 3- 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 each supervised person providing investment advice. Mr. Larson has not been the subject of any legal or disciplinary events that require disclosure under this Item.

Item 4- Other Business Activities

None

Item 5- Additional Compensation

None

Item 6 - Supervision

SiM has comprehensive compliance policies and procedures in place to govern and monitor the activities of all of its supervised persons, including Mr. Larson. SiM has a three person Management Committee that reviews periodically SiM's operational and compliance activities. In addition, all of SiM's employees, including Mr. Larson, meet on a quarterly basis to review all investment decisions, trading, and compliance matters of the preceding quarter. SiM employs a Chief Compliance Officer who monitors adherence to the firm's compliance policies and procedures. SiM's Chief Compliance Officer is Tim Black, (206) 529-3247; tblack@sim-llc.com. Mr. Black is a member of the Management Committee.