

FORTIS INVESTMENTS

CLIENT PRIVACY STATEMENT

GUIDING PRINCIPLES

The relationship between Fortis Investment Management USA, Inc. (“Fortis Investments”) and our clients is the most important asset of our firm. We strive to maintain your trust and confidence in our firm, an essential aspect of which is our commitment to protect your personal information to the best of our ability. We believe that all of our clients value their privacy, so we will not disclose your personal information to anyone unless it is required by law, at your direction, or is necessary to provide you with investment management services. We have not and will not sell your personal information to anyone.

PERSONAL INFORMATION THAT WE COLLECT, MAINTAIN, AND COMMUNICATE

Fortis Investments collects and maintains your personal information so we can provide investment management services to you. The types and categories of information we collect and maintain about you include:

- Information we receive from you to open an account or provide investment advice to you (such as your home address, telephone number, marital status, social security number and financial information including any information contained in the account application);
- Information that we generate to service your account (such as trade tickets and account statements); and
- Information that we may receive from third parties with respect to your account (such as trade confirmations from brokerage firms).

In order for us to provide investment management services to you, we do disclose your personal information in very limited instances, which include:

- Disclosures to companies – subject to strict confidentiality agreements – that perform services on our behalf (such as our technology consultants who assist us in maintaining our computer systems); and
- Disclosures to companies as permitted by law, including those necessary to service your account (such as providing account information to brokers and custodians); and
- Disclosures to regulatory agencies as permitted by law, including the Securities and Exchange Commission and state securities commissions. These agencies may make official requests from time to time regarding client accounts and trading activity, to which we are obligated to respond.

HOW WE PROTECT YOUR PERSONAL INFORMATION

All Fortis Investments employees are aware of the importance of maintaining and respecting customer privacy and to recognize the importance of confidentiality. Those employees who violate our privacy policies are subject to disciplinary action. To fulfill our privacy commitment at Fortis Investments we have instituted firm-wide practices to safeguard the information that we maintain about you. These include:

- Adopting policies and procedures that put in place physical, electronic, and other safeguards to keep your personal information safe.
- Limiting access to personal information to those employees who need it to perform their job duties.
- Requiring third parties that perform services for us to agree by contract to keep your information strictly confidential.
- Protecting information of our former clients to the same extent as our current clients.

As a direct, wholly owned subsidiary of Fortis Investment Management SA and a related person of Fortis Bank SA/NV, Fortis Investments may share with these entities information about our experience or transactions with customers or their accounts and certain other information. These entities abide by a “No Share” policy whereby this information is not shared with other investment advisers in the Fortis group or with non-affiliated third parties.