



# The Brown Capital Management International All Company Strategy

Management Discussion of Strategy Performance  
Second Quarter 2025



## International All Company Strategy

The second quarter of 2025 kicked off with Liberation Day on April 2, which implemented new tariffs by the Trump administration on imports into the U.S. and caused a broad global stock market selloff. The market decline reversed just seven days later when a 90-day tariff reprieve was announced, sending stocks soaring. This euphoria generally persisted for the rest of the quarter. International stocks in particular skyrocketed, with the MSCI ACWI ex US index up 12.30% and the MSCI EAFE index up 12.07%. That is despite the potential impact of tariffs on global economic growth and inflation, the outbreak of military conflict between Israel and Iran, as well as the ongoing Russia-Ukraine war, among other concerns. The International All Company strategy outperformed both international equity indexes this quarter.

What is most remarkable is the outperformance of non-U.S. markets vs. U.S. equities this year. Year to date, the MSCI ACWI ex US and the MSCI EAFE indexes are up 18.32% and 19.92%, respectively. The returns of the international equity indexes dwarf the S&P 500's year-to-date return of 6.20%. Should this performance difference hold for the rest of the year, it will represent only the fourth time in the last 15 years that the international equity indexes have outperformed the S&P 500. (The other years were 2012, 2017 and 2022.) It will mark a welcomed tailwind for our clients who have capital allocated to non-U.S. markets.

### The power of the market(place)

As notable as these macro-oriented observations are, we are bottom-up, fundamental investors in what we call Exceptional Growth Companies (EGCs). During the quarter, one of the management teams we met with was that of **REA Group**. REA Group owns and manages Australia's leading real estate online portal, a marketplace model for buying and selling homes. This was a routine business update with CEO Owen J. Wilson, who will be retiring later in the calendar year, and CFO Janelle Hopkins. Reflecting on REA and the industry, Wilson shared that there are more than 120 real estate marketplace models around the world, and that he has not found one example of a model in a mature market that lost its leadership position. This does not mean that hard work is no longer required once a company gains the pole position as a marketplace. A commitment to innovation and growth through investments in sales and marketing, new product offerings and R&D is still essential. However, when the market leader protects its franchise with these investments, it becomes extremely difficult to be overtaken by second-tier competitors, or new market entrants.

After that conversation, the International Team discussed what makes marketplace models attractive to us as investors. First, let's define what a marketplace model is. They are companies that provide either a physical or digital space for market participants to buy and sell goods or services in transactions of mutual benefit. The marketplace charges a fee to buyers, sellers or both. The charge may be a flat rate or somehow connected to the value of the transaction or both. The marketplace may also offer additional services surrounding the transaction for buyers and sellers.

At the core, marketplace models have the same characteristics as well functioning (efficient) capital markets. Marketplace models set clear rules and enforce them, having consequences for market participants who do not behave appropriately. This includes establishing some sort of recourse for market participants who feel they were unfairly treated. The marketplace may provide a neutral location to keep transaction proceeds until the transaction is consummated (custody). In extreme cases, rules violators may be banned from the marketplace altogether. Ownership rights must be recognized and protected. There must be a proper record of any transfers in ownership. If rightful owners ever feel deceived, the damage to the marketplace's reputation could be irreparable. Additionally, as with efficient capital markets, information must be fairly disseminated, allowing market participants the opportunity to properly evaluate the item being purchased or sold. Finally, market participants are drawn to a place where the largest number of buyers and sellers are present, helping to ensure the best possible price for the transaction.

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### Our marketplace exposure

In ancient civilizations, marketplace models were always physical spaces, sometimes called bazaars, but they essentially provided what we are describing. Today, from an investment point of view, the most interesting marketplace models are of course virtual ones. In our International All Company investment program we own three marketplace models: **REA Group**, Australia's leading real estate portal; **MercadoLibre**, Latin America's leading online shopping platform; and the most recent addition to the program, **Vend Marketplaces**, the leading online classifieds platform for the Nordic region. Note that MercadoLibre is discussed in the Contributors section below and Vend Marketplaces is discussed in the Additions section below.

We believe that these three marketplace holdings exhibit the four investment criteria for EGCs:

***Durable Revenue Stream:*** Market participants are drawn to these marketplace models because that's where the most activity is. That's the network effect. If buyers and sellers are treated fairly, they tend to return. These transactions of mutual benefit create what we think of as a durable and repeatable revenue stream for the marketplace model.

***Defensible Market Presence:*** Good management teams of marketplace models invest in tools to solve problems for users and become an integral part of user workflows. This creates a sticky relationship. In addition, good stewards spend on advertising and marketing to build their brand in the minds of users. In time, the marketplace can become ingrained and a part of the culture of a country or region. This builds a psychological switching cost in the minds of the market participants even when no real impediment exists. Second-tier players or new entrants must spend heavily to attract traffic away from the market leader. This tends to be a very expensive proposition that produces a low yield, as REA's CEO pointed out.

***Deliverable Growth Plan:*** It takes a highly skilled management team to design and execute on a growth strategy in a dynamic marketplace. The marketplace models we own have long-term track records, but that includes some mistakes. Investing in these companies with patience and tolerance tends to yield attractive results.

***Profitability to Fuel and Sustain Growth:*** Marketplace models are extremely profitable enterprises. The average operating margin of our three holdings is about 25%, with tremendous operating leverage for much higher returns. Smart management teams use some portion of the increased profitability to reinvest in their marketplaces. This could take the form of discounts or rebates for the most intensive users. It could mean higher allocations to research and development for innovations that could save additional headaches, time or money for users. Finally, it could spur additional investments in advertising and marketing to strengthen the brand and defend the model's pole position.

It is important to note that dominant market models like these must operate responsibly. While the pricing flexibility they enjoy is attractive to us as investors, customers cannot feel as though they are being price gouged or they will seek alternatives. Aggressive pricing is also the fastest way to have market regulators move to break up the marketplace model. So while marketplace models can increase prices, there is a greater emphasis on offering innovative products and services that solve more problems for the customers, allowing the marketplace model to increase its share of customer wallet. The net effect on growth and profitability is the same, but customer receptivity is completely different when the growth in average selling price is due to additional services purchased rather than a simple price increase.

We do not know what will ultimately happen with tariffs, what effect they may have on international markets, or whether the international equity rally will continue. Nor do we know what lies ahead in the Middle East or Ukraine. That is why we do not invest based on a top-down forecast. Instead, we focus on the things we can know, such as the fundamentals of the marketplace model companies just discussed. We believe that by assembling a compact portfolio of EGCs like those and having the patience and tolerance to let their growth compound over the long term, we can generate outsized returns for investors.

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### Returns: Contributors and Detractors

Among the largest contributors to performance in the second quarter of 2025 were MercadoLibre and AJ Bell.

**MercadoLibre** is a Uruguay-based marketplace model company that operates the leading e-commerce shopping platform in Latin America (like Amazon) and provides payment and credit services (like PayPal). Although Latin America is a large market with a population of 650 million, it still has low e-commerce penetration compared to most developed markets. We first bought MercadoLibre in our International Small Company portfolio in 2013, and it graduated to the International All Company portfolio in 2020. Currently, about half of MercadoLibre's business is in Brazil and just under a quarter is in each of Mexico and Argentina. Long-term investments in the marketplace and its rapid-shipping solutions provide significant barriers to entry for competitors. MercadoLibre ships about half of its orders with same-day or next-day arrival to more than 67 million unique active buyers. We also like the potential in the company's newer fintech businesses, where 64 million monthly active users benefit from MercadoLibre's payment-processing services, credit cards, loans and savings accounts.

During the quarter, the company reported 37% year-over-year revenue growth to \$5.9 billion (USD) and 44% year-over-year earnings per share growth to \$9.74. These results easily beat consensus expectations, suggesting that MercadoLibre remains a healthy and growing franchise. Note that the company was a leading contributor in the March quarter as well. We believe that MercadoLibre's e-commerce and fintech marketplace model provides a unique competitive advantage, leaving the company with a long runway for growth.

**AJ Bell** is a U.K.-based wealth-management platform, providing both independent financial advisors and do-it-yourself retail investors with tools for planning, integrating and monitoring a variety of stock and fund investments. Think of it as a small Charles Schwab in the U.K. AJ Bell enjoys high profitability (40% operating margins) and returns (45% return on equity), providing the resources necessary to fund long-term revenue and earnings growth of 20%. At March 31, the dual-channel platform serves 593,000 customers and the assets under administration (AUA) are £90.4 billion. The opportunity remains significant, with AJ Bell's assets under administration representing just 9% of a £1 trillion platform market in the U.K. Additionally, we think there is another £2 trillion in retirement assets in the U.K. that may find its way to platforms such as AJ Bell over the long term. We first bought AJ Bell in 2020.

During the quarter, AJ Bell released both a trading statement on the March quarter, and later in the quarter reported first half year earnings ending March. Both reports were strong and well received by the marketplace. The trading statement showed new customer growth of 18% year over year. Net inflows in the quarter were £1.9 billion, up 19% year over year. The company followed this trading update with a strong earnings report. The top line was £153.2 million, 17% year over year growth. Profit margins before taxes were 44.9%, down from 46.8% year over year. Management raised its guidance for profit margins before taxes for the year from over 40% to over 42%, and also announced a new stock buyback plan of £25 million. We continue to like AJ Bell's market position and growth prospects.

Among the largest detractors from performance in the second quarter of 2025 were **ICON** and **AutoStore**.

**ICON** is an Ireland-domiciled global provider of outsourced development and commercialization services to pharmaceutical, biotechnology and medical-device companies. ICON is one of the largest providers of clinical-trial and related services to support the development of new medicines and devices. Services include the management of clinical trials across all phases (I to IV) needed to collect and analyze data, establishing product efficacy and safety for regulatory filings, bioanalytical and clinical lab services, data analytics and technology for trial design, regulatory consulting and marketing strategies. We have owned ICON in the International All Company strategy for more than a decade.

Icon was also a leading detractor in the March quarter. Weak earnings results and an uncertain outlook again drove underperformance in the June quarter. Top-line growth declined 4% year-over-year and earnings per share contracted 15.6%. Management also revised its revenue guidance for the year from flattish growth at the midpoint of the range to -4% at the midpoint. While ICON continues to solidify its position as one of the top three

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contract research organizations (CROs), there is significant near-term uncertainty surrounding the industry. Among the unknowns are the Inflation Reduction Act's impact on ICON's drug company customers, changing U.S. Food and Drug Administration policies, and fluctuating governmental and industry funding. We still believe that the company can return to 7% to 10% revenue growth and 10% to 14% earnings per share growth, but the current industry uncertainty makes it a low probability that it will meet these growth ranges over the next 12 to 24 months.

**AutoStore** is a Norway-based robotic and software company and the pioneer of cubic storage automation. This capability allows customers higher throughput in their physical plants by using one quarter of the original space to store items vs. open-air warehouses. AutoStore is a market leader with more than 1,700 total installations in 58 countries. With a customer payback period of one to three years and costs of labor rising, AutoStore allows its 1,150 customers the ability to efficiently cope with changing logistical and market needs. The market is rapidly adopting automated storage and retrieval systems (ASRS) but the current penetration of ASRS at the company level is just 15% globally. AutoStore's customer base shows the broad appeal of automation as customers span industries including retail, e-commerce, grocery, third-party logistics, industrial, automotive, healthcare and even airlines. The company has built its dominant position and technological advantage by making investments for more than 20 years in people, robots and software.

During the quarter, AutoStore reported first quarter results that were a meaningful disappointment versus consensus estimates. In the two trading days after the earnings release, the share price fell more than 33%. The company reported revenue of \$85.9 million, a 38% decline year-over-year. The consensus estimate was \$141.4 million, a 2.5% year-over-year increase in revenue. Autostore estimates that about half of the revenue decline is attributed to the company's growing adoption of its software-as-a-service (SaaS) model. While SaaS models typically deliver a more durable revenue stream, the transition period to a SaaS model can have a painful impact on revenue growth, as we have seen with other companies like CyberArk. The remainder of the decline is due to ongoing geopolitical and macroeconomic uncertainty that is impacting global commerce as companies are hesitant to spend on automation tools if their sales growth outlook is cloudy. Having said that, order intake was \$141 million, down just 2% from the previous quarter. Also, order backlog stands at \$513 million, up 12% from the previous quarter. Given the challenges facing the company, we are reviewing our investment thesis and are monitoring the company's progress closely.

### Additions/Deletions

During the quarter, we added one company to the portfolio, Vend Marketplaces, and made no eliminations.

Our new position, mentioned earlier, is **Vend Marketplaces**, a Norway-based leading online classifieds platform for the Nordic region. Vend has a family of digital brands that hold number-one positions across major verticals, including mobility (used autos, 42% of marketplace revenue), real estate (23%), jobs (20%), and re-commerce (second-hand goods, 15%). The company operates in Norway, Sweden, Denmark and Finland. The brands with entrenched leadership positions represent the vast majority of Vend's revenue. These platforms connect buyers and sellers and facilitate transactions, from job offers to real estate, cars, and consumer goods. In Norway, the company's *Finn* platform comprises about 55% of marketplace revenue. With more than 4 million unique monthly users in a country of slightly more than 5 million people, *Finn* (which means "find" in Norwegian) is an essential part of daily life in Norway with virtually no serious competition. *Finn* is 100 times larger than its next closest competitor in mobility (in terms of monthly visits), 80 times larger in real estate, 12 times larger in jobs, and #1 in recommerce. Vend's other major brands include *Blocket* in Sweden, *DBA* and *Bilbasen* in Denmark, and *Tori* and *Oikotie* in Finland.

In 2024, Vend generated \$775 million in USD-equivalent revenue. We believe it should grow revenue 15% and earnings 20% to 25% long term, driven by tremendous operating leverage. Vend's current fixed-cost infrastructure can cover further growth and expansion. We believe the company can improve its operating margins from an adjusted mid 20% level to the mid 30% range over the next three to five years.

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### Final Thoughts

We are thrilled by the prospects of the International All Company strategy. As described in our March article [The Case for the International All Company Strategy](#), our portfolio companies have shown impressive fundamental improvement since we repositioned the portfolio to the EGC approach on Dec. 31, 2019. In addition, our universe, which reaches far beyond the indexes, has plenty of compelling companies for us to consider for future investment. Finally, our innovative EGCs are poised to capitalize on the next legs of AI and other disruptive technologies. We look forward to helping investors benefit from these trends for years to come.

Thank you for your support of Brown Capital.

BCM-25-078

Company Name	Percentage Held in Portfolio
MercadoLibre Inc	4.76%
AJ Bell Plc	3.81%
REA Group Ltd	3.52%
Icon Plc Share	1.98%
Vend Marketplaces ASA	0.99%
Autostore Holdings LTD.	0.48%

Top 10 holdings may be accessed on Brown Capital Management's website.

This is not a recommendation to buy or sell a particular security. Holdings are subject to change.

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The table below shows the performance of the International All Company Composite versus the market index:

As of 06/30/2025

	Annualized								
	Since Inception	20 Years	15 Years	10 Years	5 Years	3 Years	1 Year	YTD	3 Months
International All Company Composite - NET	5.99%	6.55%	7.55%	5.73%	5.98%	14.22%	10.85%	11.83%	13.86%
MSCI ACWI ex-US Index	5.66%	6.32%	7.17%	6.64%	10.68%	14.59%	18.37%	18.32%	12.30%
MSCI EAFE Index	5.44%	6.31%	8.02%	7.03%	11.72%	16.57%	18.33%	19.92%	12.07%
Excess Return Over Benchmark	0.34%	0.23%	0.38%	-0.91%	-4.70%	-0.37%	-7.53%	-6.49%	1.57%

Excess Return Over Benchmark is the difference between the return of the Strategy and the Index.

Source: APX

\*Since inception performance is based on Composite creation date of 6/30/1999.

As of 08/01/2022, the International Equity Strategy was renamed the International All Company Strategy. Excess Return Over Benchmark is the difference between the return of the Strategy and the MSCI ACWI Ex-US.

**Past performance does not guarantee future results.** Returns are presented net of investment advisory fees and reflect the reinvestment of interest, capital gains, and dividends net of any withholding tax. Net of fees performance is calculated using actual management fees and are reflective of actual fees as fees paid vary by client. Gross numbers are furnished upon request. Please see disclosures.

Please refer to the attached GIPS Report. It contains additional required disclosures and important information regarding calculation of performance data, including the general effect of fees on returns. Past performance is not a guarantee of future results.

*Note: One may not invest directly in the index.*

The **MSCI EAFE (Europe/ Australia/Asia/Far East) Index** is a free float-adjusted market capitalization index that is designed to measure developed market equity performance, excluding U.S. and Canada. The **MSCI All Country World ex US Index** is a free float-adjusted market capitalization index that is designed to measure equity market performance in the global developed and emerging markets. The volatility (beta) of an account may be greater or less than it's respective benchmark. One may not invest directly into an index.

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**Past performance does not guarantee future results.** Returns are presented net of investment advisory fees. Not every client's account will have these exact characteristics. The actual characteristics with respect to any particular client account will vary based on a number of factors including but not limited to: (i) the size of the account; (ii) investment restrictions applicable to the account, if any; and (iii) market exigencies at the time of investment. BCM reserves the right to modify its current investment strategies and techniques based on changing market dynamics or client needs. It should not be assumed that any of the recommendations or characteristics discussed herein will prove to be profitable, or that the investment recommendations or decisions we make in the future will be profitable. All investments involve risk, including loss of principal and there is no guarantee that investment objectives will be met.



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# Disclosure Requirements

## International All Company Composite As of 12/31/2024

Year	Net of Fees Total Return Composite*	Gross of Fees Total Return Composite*	Gross of Fees Total Return MSCI EAFE Index	Gross of Fees Total Return MSCI ACWI ex-US Index	Gross of Fees Equal Weighted Standard Deviation	3 Year Standard Deviation			# of Accts	Composite Assets (\$ Millions)	Total Firm Year-End Assets (\$ Millions)
						Gross Composite Annualized Ex-Post Standard Deviation	MSCI EAFE Index Annualized Ex-Post Standard Deviation	MSCI ACWI ex-US Index Annualized Ex-Post Standard Deviation			
1999**	12.54%	13.10%	22.27%	22.18%	N.A.***	N.A.****	N.A.****	N.A.****	<5	\$1	\$5,777
2000	0.90%	1.90%	-13.96%	-15.09%	N.A.***	N.A.****	N.A.****	N.A.****	<5	\$3	\$5,881
2001	-15.53%	-14.67%	-21.21%	-19.50%	N.A.***	N.A.****	N.A.****	N.A.****	<5	\$6	\$5,591
2002	-22.89%	-22.07%	-15.66%	-14.67%	N.A.***	19.63%	15.99%	16.38%	<5	\$17	\$4,202
2003	40.59%	42.04%	39.17%	41.40%	N.A.***	21.28%	17.83%	17.94%	<5	\$15	\$5,448
2004	22.93%	24.03%	20.70%	21.36%	N.A.***	18.23%	15.45%	15.30%	<5	\$80	\$5,271
2005	10.37%	10.75%	14.02%	17.11%	N.A.***	12.68%	11.39%	11.63%	<5	\$87	\$2,627
2006	34.47%	34.98%	26.86%	27.16%	N.A.***	10.29%	9.29%	10.18%	<5	\$117	\$2,712
2007	9.22%	9.64%	11.63%	17.12%	N.A.***	9.83%	9.41%	10.61%	<5	\$149	\$1,980
2008	-45.74%	-45.51%	-43.06%	-45.24%	N.A.***	20.44%	19.26%	20.90%	5	\$78	\$1,207
2009	47.55%	48.08%	32.46%	42.14%	2.64%	25.31%	23.65%	25.30%	6	\$149	\$2,346
2010	7.84%	8.40%	8.21%	11.60%	0.58%	27.08%	26.28%	27.33%	7	\$417	\$3,198
2011	-14.66%	-14.20%	-11.73%	-13.33%	0.45%	22.83%	22.46%	22.74%	7	\$400	\$3,724
2012	22.22%	22.86%	17.90%	17.39%	0.54%	18.50%	19.32%	19.22%	8	\$497	\$4,438
2013	30.12%	30.70%	23.29%	15.78%	0.54%	16.22%	16.22%	16.20%	8	\$579	\$7,019
2014	-0.85%	0.08%	-4.48%	-3.44%	0.23%	11.96%	12.99%	12.78%	8	\$534	\$6,682
2015	8.15%	9.15%	-0.39%	-5.25%	0.27%	11.07%	12.47%	12.13%	8	\$592	\$7,350
2016	-5.28%	-4.56%	1.51%	5.01%	0.49%	11.16%	12.48%	12.53%	10	\$980	\$8,060
2017	24.45%	25.28%	25.62%	27.77%	0.37%	10.45%	11.85%	11.88%	10	\$1,195	\$9,702
2018	-11.79%	-11.36%	-13.36%	-13.78%	0.34%	10.75%	11.27%	11.40%	10	\$1,062	\$9,744
2019	23.27%	23.87%	22.66%	22.13%	0.32%	10.45%	10.80%	11.33%	11	\$1,275	\$13,049
2020	23.91%	24.76%	8.28%	11.13%	0.64%	15.21%	17.87%	17.92%	8	\$1,619	\$18,484
2021	8.01%	8.77%	11.78%	8.29%	0.71%	14.58%	16.89%	16.77%	8	\$1,763	\$17,576
2022	-30.95%	-30.59%	-14.01%	-15.57%	0.52%	20.57%	19.95%	19.24%	10	\$1,232	\$10,615
2023	30.76%	31.42%	18.85%	16.21%	0.67%	20.97%	16.60%	16.06%	9	\$1,171	\$10,743
2024	0.75%	1.23%	4.35%	6.09%	0.43%	20.93%	16.61%	16.01%	9	\$1,193	\$8,099



# Disclosure Requirements

## International All Company Composite As of 12/31/2023

\* Past performance does not guarantee future results.

\*\* Partial period beginning June 30, 1999.

\*\*\* N.A.—Information is not statistically meaningful due to an insufficient number of portfolios in the composite for the entire period or for partial year periods.

\*\*\*\* 3-year annualized standard deviation is not presented because the composite does not yet have 36 monthly returns.

### Compliance Statement

Brown Capital Management (BCM) claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. BCM has been independently verified for the periods January 1, 1993 through December 31, 2024. A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards.

Verification provides assurance on whether the firm's policies and procedures related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. The International All Company Composite (formerly International Equity Composite) has had a performance examination for the periods April 1, 2006 through December 31, 2024. The verification and performance examination reports are available upon request.

### The Firm

BCM is defined as an independent investment management firm established in 1983 that is not affiliated with any parent organization and is registered under the Investment Advisers Act of 1940. BCM manages a variety of equity and balanced accounts for domestic and international institutional clients. Policies for valuing investments, calculating performance, and preparing GIPS reports are available upon request. A list of composite descriptions and broadly distributed pooled funds is available upon request.

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### Composite

The International All Company Composite (formerly International Equity Composite) includes all non-restricted discretionary fee-paying accounts including accounts with performance based fees where BCM has sole investment authority. The composite seeks long-term capital appreciation through investing in non-U.S. equity securities. International portfolios can consist of both developed and emerging market equities with no restrictions on market capitalization. Beginning October 1, 2008, this composite no longer has a minimum account size. Beginning April 1, 2007, the minimum account size for this composite was \$3 million. Beginning June 30, 1999, the minimum account size for this composite was \$5 million. No alterations of the composite have occurred because of changes in personnel, or for other reasons at any time. There has been no selectivity of account results for any period. Data for all accounts has been continuous from each account's first full quarter of management through the last full month of management prior to cessation of the account. Investors should be cognizant of the fact that while, there is the potential of gains, there is also the potential of losses. Composite creation date is June 30, 1999, and reflects activity of current managers. Composite inception date is June 30, 1999.

### Benchmark

The composite is measured against the MSCI (Morgan Stanley Capital International) EAFE (Europe/ Australia/Asia/Far East) and the MSCI ACWI (All Country World Index) ex-US. MSCI EAFE Index is a free float-adjusted market capitalization index that is designed to measure developed market equity performance, excluding U.S. and Canada. MSCI ACWI ex-US is a free float-adjusted market capitalization index that is designed to measure equity market performance in the global developed and emerging markets.

### Methodology

The composite is reported in U.S. dollars. BCM has adopted a Valuation of Securities policy which requires that all client portfolios and investments reflect current, fair, and accurate market valuations. For month end pricing, BCM's policy is to use 4:00 p.m. prices for equity securities, where such is available. BCM utilizes, to the fullest extent possible, recognized and independent pricing services and/or qualified custodians for timely valuation information for advisory client securities. Whenever valuation information for specific, illiquid, foreign, private or other investments is not available through pricing services, the Chief Compliance Officer will work with the trader(s) and Portfolio Manager(s) to obtain and document price information from two independent sources if available, whether it be a broker-dealer, bank, pricing service, or other source. Any errors in pricing or valuations are to be resolved as promptly as possible, preferably upon a same day or next day basis, with re-pricing information obtained, reviewed, and approved by the Chief Compliance Officer and the Portfolio Manager(s) for the strategy.

# Disclosure Requirements

## International All Company Composite As of 12/31/2023

Securities without market valuation information (e.g., illiquid securities, or other such situations) are to be reviewed and priced by the Trading Department and Chief Compliance Officer, in conjunction with an appropriate Portfolio Manager in good faith to reflect the security's fair and current market value. Through regular monthly reconciliation with custodian banks, any significant irregularities in prices will be detected and corrected before market values are finalized and performance calculation is done.

### Fees

Investment advisory fees are:

- 0.75% of assets on First \$50 million
- 0.65% of assets between \$50 million and \$100 million
- 0.55% of assets between \$100 million and \$150 million
- 0.50% of assets between \$150 million and \$300 million
- 0.45% of assets over \$300 million

Gross performance figures are presented (a) gross of investment management fees and custodial fees, (b) net of trading expenses, withholding tax, and other fees and reflect the reinvestment of interest, capital gains, and dividends. Net performance figures are presented net of withholdings taxes and all management fees, trading expenses, and other fees. Net of fees performance is calculated using actual management fees. The net return is reflective of actual fees and fees paid vary by client.

### Internal Dispersion

Internal dispersion is calculated using the equal weighted standard deviation of annual gross-of-fees returns of those portfolios that were included in the composite for the entire year. For those years when less than five portfolios were included in the composite for the full year, no dispersion measure is presented.

### Ex-Post Standard Deviation

The 3-year annualized standard deviation measures the variability of the composite gross returns and the benchmark returns over the preceding 36-month period and is not presented for periods where 36 months of composite performance is not available.

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All investments involve risk, including loss of principal and there is no guarantee that investment objectives will be met.