

Disclosure

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We offer discretionary portfolio management services. As a manager, ITG serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Manager owes a duty of loyalty, fairness, and good faith towards each Client and seeks to disclose and/or mitigate potential conflicts of interest. ITG's fiduciary commitment is further described in the firm’s Code of Ethics.

ITG currently offers different investment strategies to Clients, with some strategies focusing on enhancing various indices and others creating custom indices. These strategies are designed for investors with varying degrees of risk tolerance, ranging from a more aggressive investment strategy to a more conservative investment approach. Clients whose assets are invested in one of our strategies may not set restrictions on the specific holdings or allocations within the model, nor the types of securities that can be purchased in the model. Nonetheless, Clients can impose restrictions on investing in certain securities or types of securities in their account. We provide Clients with a checklist, which is used to indicate if there are certain types of securities they do not want included (i.e., faith and values-based exclusions, as well as individual industry groups like carbon, cannabis, tobacco, etc.). Any restrictions or guidelines must be in writing and agreed to by both parties before investing is undertaken.

Our custom index investment strategies limit the types and number of investment opportunities available to the investor and as a result, the investor’s portfolio may underperform other investment strategies that do not have a values screen. Our custom index investment strategies may result in investments in securities or industry sectors that underperform the market as a whole or underperform other strategies that do not have restrictions. ITG’s assessment of such performance may change over time, which could cause the investor to temporarily hold securities that do not comply with the investor’s responsible investment criteria. In evaluating an investment, the investment adviser is dependent upon information and data that may be incomplete, inaccurate, or unavailable, which could adversely affect the analysis of the material relevant to a particular investment. Successful application of the investor’s responsible investment strategy will depend on the investment adviser’s skill in properly identifying and analyzing material issues.

Our strategies are focused exclusively on publicly traded companies and offered through separately managed accounts, where clients hold the securities directly. Our process is to evaluate all publicly available data on the stocks in each category for our proprietary criteria, expressed through different algorithms. Stock selection is based on measured levels of desirability,

first on our financial and business metrics, then on any applicable values preferences or requirements. Stocks are researched, selected, and rebalanced in quarterly intervals. The construction of the strategies from those stocks initially selected varies by strategy, but generally relies upon our interpretation of the fundamentals and optimization, rather than a standard formula, such as equal or cap-weighted. We offer seven enhanced indices, which refers to our process of modifying an existing index. We also offer seven custom indices, which are indices that we have curated, developed, and created ourselves. However, ITG reserves the right to remove, modify, and retire strategies at its sole discretion.

Our current strategies include:

- **SuperDex**
ITG offers enhanced and custom indices derived from proprietary algorithms applied to the available data of the constituents of each index. The stocks are screened and sorted based on our criteria, then selected for investment in a separate account format and rebalanced every quarter.
- **MultiDex**
ITG offers rules-based screening and composition of exchange-traded funds that are focused on various asset classes as an alternative to a single fund or manager. Our strategies are offered in separately managed accounts, rescreened, and rebalanced quarterly. In a typical quarter, an investor would own five to ten exchange-traded funds in their approach to a specific asset class.

Each of our strategies has a specific mandate and proprietary formula that allow clients to invest for exposure to a specific asset class, sector, or area of the market. All of our strategies are discretionary, which is defined as the ability to buy, sell, and hold individual securities in a managed portfolio that are in line with our defined strategy and resulting model, which are assembled into separate composites. Our strategies are focused exclusively on publicly traded companies and offered through separately managed accounts, where clients hold the securities directly. Some of our strategies include mandated restrictions and selection criteria that follow a proprietary objective. Occasionally, clients may request additional restrictions, which are considered on a case-by-case basis. All such requests must be made and approved in writing in advance of the client's inception of any chosen strategy.

The information on this website is solely to report on investment strategies and opportunities identified by ITG. Opinions and estimates offered constitute our judgment and are subject to change without notice, as are statements of financial market trends, which are based on current market conditions. We believe the information provided on this website is reliable but do not warrant its accuracy or completeness. Information on this website is not intended as an offer or solicitation for the purchase or sale of any financial instrument. The views and strategies described may not be suitable for all investors. Investing entails risks and there can be no assurance that ITG will achieve profits or avoid incurring losses. ITG does not provide legal, tax, or accounting advice or services. Investors should consult with their own tax or legal advisor prior to entering into any transaction or strategy described herein.

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All investment and trading activities risk the loss of capital, and no assurance can be given that the investment activities of a client's account will achieve the investment objectives of such an account or avoid losses. Direct and indirect investing in securities involves the risk of loss that clients should be prepared to bear.

There is no assurance that a separately managed account ("SMA") will achieve its investment objective. SMAs are subject to market risk, which is the possibility that the market values of the securities in an account will decline and that the value of the securities may therefore be less than what you paid for them. Market values can change daily due to economic and other events (e.g., natural disasters, health crises, terrorism, conflicts, and social unrest) that affect markets, countries, companies, or governments. It is difficult to predict the timing, duration, and potential adverse effects (e.g., portfolio liquidity) of events. Accordingly, you can lose money investing in an SMA.

Investment strategies that seek to enhance after-tax performance may be unable to fully realize strategic gains or harvest losses due to various factors. Market conditions may limit the ability to generate tax losses. Tax-loss harvesting involves the risks that the new investment could perform worse than the original investment and that transaction costs could offset the tax benefit. Also, a tax-managed strategy may cause a client portfolio to hold a security in order to achieve more favorable tax treatment or to sell a security in order to create tax losses. Prospective investors should consult with a tax or legal advisor before making any investment decision.

Global market investing, including developed, emerging, and frontier markets, carries additional risks or costs including but not limited to: political, economic, financial market, currency exchange, liquidity, accounting, and trading capability risks.

The value of commodities investments will generally be affected by overall market movements and factors specific to a particular industry or commodity, which may include weather, embargoes, tariffs, health, and political, international, and regulatory developments. Economic events and other events, whether real or perceived, can reduce the demand for commodities, which may reduce market prices and cause their value to fall. The use of derivatives can lead to losses or adverse movements in the price or value of the asset, index, rate, or instrument underlying a derivative due to the failure of a counterparty or due to tax or regulatory constraints.

The Russell indexes, including the Russell 1000 and Russell 2000, are owned and maintained by FTSE Russell, a subsidiary of the London Stock Exchange Group (LSEG). FTSE Russell is a global provider of benchmarks, analytics, and data solutions for investors worldwide. The Russell

indexes are some of the most widely used equity benchmarks, particularly in the U.S., and they serve as the basis for a variety of financial products, including mutual funds, ETFs, and derivatives.

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Equal Employment Opportunity Policy Statement



Download the Equal Employment Opportunity Policy

An Equal Employment Opportunity (EEO) policy statement serves as a formal commitment by an organization to provide all employees and job applicants with equal opportunities, regardless of race, gender, age, religion, disability, or other protected characteristics. A policy demonstrates the organization's dedication to ethical practices and social responsibility. An EEO policy helps reduce the risk of discriminatory practices, promotes accountability, and builds trust among employees, stakeholders, and the broader community.

Member Resource: [What Is the EEO-1 Component 1 Data Report? - \(https://www.shrm.org/topics-tools/tools/hr-answers/filing-requirements-eeo-1-form \)](https://www.shrm.org/topics-tools/tools/hr-answers/filing-requirements-eeo-1-form)

Customize this policy template to conform to your organization's own specific needs.

[Company Name] provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state, or local laws.

Harassment includes, but is not limited to, offensive remarks, jokes, slurs, visual displays, physical conduct, or any other behavior that creates an intimidating, hostile, or offensive work environment.

This policy applies to all employees and applicants, as well as contractors, interns, volunteers, and any others conducting business with or on behalf of *[Company Name]*. It applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, and training.

This policy prohibits all forms of harassment and retaliation for reporting or participating in EEO-related investigations or complaints. Any employee who violates this policy may be subject to disciplinary action up to and including termination.

[Company Name] encourages employees to report all incidents of harassment to a member of management, HR department, and/or anonymous hotline or web portal. All reports are treated seriously, handled confidentially to the extent possible, and investigated promptly and fairly. When necessary, corrective action will be taken to stop the conduct and prevent its recurrence.

Managers and supervisors are expected to model inclusive behavior, promptly address inappropriate conduct, and report concerns to HR. They are instrumental to ensure that the work environment remains free of discrimination and harassment.

All employees are expected to read, understand, and comply with this EEO Policy. Acknowledgment of this policy may be required during onboarding and periodically throughout employment.

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