

Brown Brothers Harriman Mutual Fund Advisory Department Disclosure Document

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THE BROWN BROTHERS HARRIMAN MUTUAL FUND ADVISORY DEPARTMENT

This disclosure document provides an overview of the Brown Brothers Harriman (“BBH”) Mutual Fund Advisory Department’s business, which is limited to the provision of investment advisory and portfolio management services for investment companies that are registered under the Investment Company Act of 1940 (“Registered Investment Companies”).

In its capacity as a bank, BBH is exempt from registering with the U.S. Securities and Exchange Commission (the “SEC”) as an Investment Adviser under the Investment Advisers Act of 1940, as amended. BBH did, however, register a “Separately Identifiable Department” (the “SID”) with the SEC. The SID, also known as the BBH Mutual Fund Advisory Department (the “Investment Adviser”), is an adviser to Registered Investment Companies. The SID’s limited client base is BBH-affiliated funds (“Funds”).

INVESTMENT ADVISORY SERVICES, PRODUCTS & FEES

Overview-----

The Investment Adviser has a disciplined investment process for selecting and monitoring investments for Registered Investment Companies (i.e., the Investment Adviser provides investment supervisory services). The Investment Adviser has a team of experienced securities analysts who follow specific industry sectors and work collaboratively with each other to identify, analyze and monitor portfolio companies. The analysts conduct analysis of industry structure and communicate regularly with knowledgeable industry participants and company management teams to assess whether companies meet the Investment Adviser’s business, management and valuation criteria. They also identify key business risks and any variables outside of management’s control. The Investment Adviser may also obtain third party information and assistance, which may include the hiring of one or more entities to provide non-exclusive sub-advisory and/or other investment-related services. Such entities or individuals may themselves be advisers to other investment advisers or vehicles, including their own proprietary funds. A review process helps ensure that portfolios are being managed in compliance with portfolio policies and objectives as well as the Investment Adviser’s own investment guidelines.

For certain Fund clients, the Investment Adviser will employ a “manager-of-managers” investment approach, whereby it allocates the Fund’s assets among subadvisers. Subject to the supervision of the Fund’s Board of Trustees, the Investment Adviser oversees the subadvisers and evaluates their results. The Investment Adviser reviews portfolio performance, characteristics, departures of key personnel of the subadvisers and any other relevant topics. The Investment Adviser also regularly analyzes and monitors economic trends and monetary policy. The holdings of the Funds and the allocation of assets to subadvisers are regularly reviewed with the objective of enhancing the total rate of return over a market cycle and dampening return volatility.

Below is a discussion of the Investment Adviser’s coverage of the Equity and Fixed Income asset classes. Advisory fees are discussed in the end of this section.

Equity -----

▪ Investment Strategy & Philosophy

The Investment Adviser’s equity investment philosophy centers on active management and fundamental analysis of individual companies. The equity team invests primarily in cash generative businesses that are leading providers of essential products and services. The Investment Adviser believes that purchasing the equity securities of such companies when they are trading at a discount to estimates of intrinsic value is an effective way to enjoy the benefits of equity ownership (namely, higher capital

appreciation over time) while reducing the risk of permanent capital loss. While the Investment Adviser typically takes a long-term investment approach to managing client accounts, the Investment Adviser may at times engage in short-term trading (i.e. holding securities less than 30 days). Most investee companies have market capitalizations greater than \$5 billion and are headquartered or have significant operations in North America.

▪ **Investment Types**

The types of equity securities in which the Investment Adviser may invest on behalf of the Funds include without limitation exchange-listed securities, securities traded over-the-counter, foreign issuers, exchange-traded funds (ETFs) and mutual fund shares. The Investment Adviser may also invest, when appropriate, in portfolios of derivative instruments such as warrants, futures and options, and may trade foreign currencies in connection with purchases and sales of foreign issuers. Please refer to the below section entitled "OTHER IMPORTANT INFORMATION: *Miscellaneous*, "Commodities/Futures Trading" for more information on futures trading. In most cases, such investments will involve greater volatility and liquidity risk than other types of equity securities.

▪ **Methods of Analysis**

The Investment Adviser's investment team consists of securities analysts who follow specific industry sectors and work collaboratively with each other to identify, analyze, and monitor portfolio companies. The analysts conduct analysis of industry structure and communicate with knowledgeable industry participants and, when appropriate, company management teams to assess whether companies meet the Investment Adviser's business, management, and valuation criteria. Where appropriate they also use outside consultants and research materials. For each investee company, the analysts seek to identify the key business risks and variables outside of management's control. Outside research materials/analytical tools used may include:

Research Materials/Analytical Tools
<ul style="list-style-type: none"> • Financial Newspapers • Inspections of Corporate Activities • Research Prepared by Third Parties • Corporate Rating Services • Timing Services • Annual Reports, Prospectuses and SEC Filings • Company Press Releases

A review process helps ensure that the portfolios are being managed in compliance with portfolio policies and objectives.

▪ **Valuation**

The Investment Adviser typically prices securities using readily available market quotations it receives from independent, third-party pricing services. In the event such market quotations are unavailable, or the Investment Adviser determines in good faith that such quotations may be unreliable, or when an active market for a security does not exist (such is the case during periods of extreme market uncertainty), the Investment Adviser may price the securities using an internal methodology. These prices will be estimates of fair value as of the valuation date, and the Investment Adviser makes no representation or warranty that a security can be sold at the estimated price. There may be instances where vendor prices are unavailable or unreliable and the Investment Adviser may determine not to provide an internal estimate of fair value. The Investment Adviser may face a conflict of interest in valuing the securities or assets in a client's portfolio that lack a readily ascertainable market value as the value of the assets held

by the Investment Adviser will affect BBH's compensation. The Investment Adviser will value such securities and other assets in accordance with established valuation policies and procedures.

Fixed Income -----

▪ **Investment Strategy & Philosophy**

The Investment Adviser uses a team approach for the management of its fixed income portfolios. It pools the talents of its portfolio managers and analysts to assemble an appropriate portfolio structure for clients.

The fixed income management philosophy is grounded in the following core beliefs:

- (1) The fixed income markets offer inefficiencies that are best harvested through the balanced application of fundamental and quantitative disciplines.
- (2) Risk-adjusted returns are earned most consistently through a structured approach to portfolio construction and the strategic application of risk control.
- (3) Portfolios should be tailored to provide solutions that satisfy clients' needs and objectives.

▪ **Investment Types**

Fixed-income portfolios may include corporate debt, asset-backed securities, insurance-linked securities, municipal securities, government securities, and non-U.S. dollar denominated fixed income instruments. Fixed-income portfolios may also include foreign currencies and/or derivative/structured products, including swaps, or similar instruments that involve greater volatility and liquidity risk than other types of fixed-income securities. For tax-sensitive clients, the Investment Adviser offers municipal and "crossover" fixed income products to maximize after-tax return.

▪ **Methods of Analysis**

The majority of the Investment Adviser's fixed income analysis and research is performed internally. Both credit and quantitative analysis are fundamental parts of the investment management process. The Investment Adviser has structured its fixed income team to allow for functional specialization in the following areas.

Credit	Quantitative
<ul style="list-style-type: none">• Security Analysis• Monitoring• Industry Trends• Credit Trends	<ul style="list-style-type: none">• Expected Returns• Model Development• Optimization• Risk Quantification• Return Attribution

The fixed income team formulates model structures for fixed income portfolios that embody the preferred collection of active management strategies. Certain elements of portfolio risk, such as yield curve and duration, may be mitigated or expected to generate only a modest contribution to overall return. The total risk budget is kept diversified across a number of individual strategies and exposures in order to strive to reduce over-dependence on any one position.

Outside research materials/analytical tools used may include:

Research Materials/Analytical Tools
<ul style="list-style-type: none">• Financial Newspapers• Inspections• Research Prepared by Third Parties• Rating Services• Collateral Tracking and Data Services• Annual Reports, Prospectuses, and Filings• Company Press Releases

▪ **Valuation**

Typically, the Investment Adviser prices securities using readily available market quotations it receives from independent, third-party pricing services. Broker quotes are not necessarily determinative of fair value if an active market does not exist for the security. In the event such market quotations are unavailable, or the Investment Adviser determines in good faith that such quotations may be unreliable, or when an active market for a security does not exist (such is the case during periods of extreme market uncertainty), the Investment Adviser may price the securities using an internal methodology which can incorporate, where available, observable market and credit inputs. These prices will be estimates of fair value as of the valuation date, and the Investment Adviser makes no representation or warranty that a security can be sold at the estimated price. There may be instances where vendor prices are unavailable or unreliable and the Investment Adviser may determine not to provide an internal estimate of fair value. The Investment Adviser may face a conflict of interest in valuing the securities or assets in a client's portfolio that lack a readily ascertainable market value as the value of the assets held by the Investment Adviser will affect BBH's compensation. The Investment Adviser will value such securities and other assets in accordance with established valuation policies and procedures.

Fees -----

In accordance with the Investment Adviser's agreement with the Funds, the Investment Adviser's fees are based on a percentage of assets under management. Advisory fees are generally billed monthly in arrears. The investment advisory relationship may be terminated by either the Funds or the Investment Adviser on the terms set forth in the investment advisory agreement. In the event of a termination, fees will be pro-rated based on the termination date. See also the below section entitled "ADMINISTRATION OF CLIENT ACCOUNTS, *Closing Accounts*" for additional information on account termination.

The Investment Adviser's annual advisory fees (inclusive of administration fees) range from 20 basis points to 80 basis points, depending upon asset levels and the nature of the services offered.

PRINCIPAL EXECUTIVE OFFICER AND INVESTMENT OVERSIGHT COMMITTEE

The Investment Adviser maintains an investment oversight committee. Below are brief biographies on the Investment Adviser's principal executive officer and key senior officers who are helping determine investment advice.

John A. Gehret

Born: 1959

Education:

1981 – Dartmouth College, B.A.

Business Background:

1981 – Present – Brown Brothers Harriman & Co.

1998 – Present – Partner

2008 – Head of BBH Mutual Fund Advisory Department

Jeffrey A. Schoenfeld

Born: 1958

Education:

1980 – University of California at Berkeley, B.A.

1984 – The Wharton School, University of Pennsylvania, M.B.A.

Business Background:

1984 – Present – Brown Brothers Harriman & Co.

1990 – 1995 – Liquidity Management Department Head

1996 – Present – Partner and Head of Institutional Fixed Income

2003 – 2008 – Head of BBH Mutual Fund Advisory Department

Radford W. Klotz

Born: 1955

Education:

1977 – University of Virginia, B.A.

Business Background:

1977 – Present – Brown Brothers Harriman & Co.

1995 – Present – Partner

2008 – Head of Investment Process Group, Institutional Fixed Income

Richard H. Witmer, Jr.

Born: 1952

Education:

1974 – Brown University, A.B.

1976 – Harvard University Graduate School of Business, M.B.A.

Business Background:

1976 – Present – Brown Brothers Harriman & Co.

1988 – Present – Partner

1989 – 2001 – Head of Mergers & Acquisitions

2001 – Present – Co-Manager of 1818 Partners

2005 – Present – Co-Manager of BBH Core Select

2005 – Present – Co-Head of Equity Investment Process Group

Timothy E. Hartch

Born: 1969

Education:

1992 – Harvard University, A.B.

1996 – University of Michigan Law School, J.D.

1996 – University of Michigan Business School, M.B.A.

Business Background:

1996 – Present – Brown Brothers Harriman & Co.

1996 – 2000 – M&A Advisory and Private Equity

2001 – Present – Co-Manager of 1818 Partners

2005 – Present – Co-Manager of BBH Core Select

2005 – Present – Co-Head of Equity Investment Process Group

2010 – Partner

Gregory S. Steier

Born: 1970

Education:

1992 – New York University, B.S.

1996 – New York University, M.B.A.

Business Background:

1992 – Present – Brown Brothers Harriman & Co.

2000 – Present – Head of Institutional Fixed Income Portfolio Management

Andrew P. Hofer

Born: 1963

Education:

1986 – Yale University, B.A.

1988 – Columbia University, M.I.A. – School of International Affairs

Business Background:

1988 – Present – Brown Brothers Harriman & Co.

1988 – 1997 – BBH Domestic Banking

1998 – 2003 – Head of Institutional Investment Management

2003 – 2007 – Chief Operating Officer -- Investment Management

2007 – 2008 – Head of Insurance Asset Management

2008 – Present – Head of Fixed Income Research

Sub-advisers for the BBH International Equity Fund

More information about the below sub-advisers can be found in the Prospectus of the BBH International Equity Fund.

- ❖ Walter Scott & Partners Limited
- ❖ Mondrian Investment Partners Limited

OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS

The Investment Adviser uses BBH, a New York State chartered private bank, as custodian for the assets of the Funds.

The Investment Adviser utilizes the investment research prepared by unaffiliated brokers or by BBH in the course of managing the investment portfolios of its clients. (See also the below section entitled “Soft Dollar’ or Research/ Execution Arrangements” for a discussion of directed brokerage as compensation for research used to advise clients.)

The Investment Adviser makes decisions for clients in accordance with its fiduciary obligations as an adviser. However, the fees, allocations, compensation and other benefits to BBH (including benefits relating to business relationships of BBH) arising from those decisions may be greater as a result of certain portfolio, investment, service provider or other decisions made by the Investment Adviser for its clients than they would have been had other decisions been made which also might have been appropriate.

ADMINISTRATION OF CLIENT ACCOUNTS

Review of Accounts/Funds-----

Supervisory management (listed above) review Fund portfolios at least annually in accordance with applicable policies and procedures. Generally, reviews will include, where applicable, a:

- Check for portfolio compliance with Fund investment objectives/guidelines (e.g., Prospectus/SAI guidelines, where applicable);
- Check for asset concentrations/diversifications for a particular Fund portfolio; and
- Comparison of portfolio characteristics/performance against account benchmarks.

Client Communications & Reports -----

The Investment Adviser communicates with the Funds in a number of ways: meetings, telephone calls, electronic media, letters and/or portfolio reports. Additionally, the Funds may receive various memoranda relating to economic, market or tax developments, or matters relating to particular industries or securities. Reports and/or presentations to the Board(s) of the Funds are typically done quarterly, but in some cases annually, at the request of a Fund Board.

Investment and Brokerage Discretion -----

▪ **Authority to Exercise Investment Discretion**

The Investment Adviser's agreement with the Funds authorizes the Investment Adviser to make appropriate investment decisions. The Board of Trustees for the Funds monitors the Investment Adviser's activities in accordance with the investment advisory agreement.

▪ **Best Execution**

The Investment Adviser directs orders for the Funds to a list of unaffiliated broker-dealers for execution. The Investment Adviser shall seek to obtain the best execution of such orders. In this regard, trades may be directed to brokers or dealers when deemed advisable based on a number of factors including: the broker's or dealer's ability to execute orders without disturbing the market price; the broker's or dealer's reliability for prompt, accurate confirmations and on-time delivery of securities; the broker's or dealer's financial condition and responsibility; the research and other investment information provided by the broker or dealer, notwithstanding that a particular client's account may not be the direct or exclusive beneficiary of such service; and the commission charged. Accordingly, the commissions charged by any such broker or dealer may be greater than the amount another firm might charge as long as the Investment Adviser determines, in good faith, that the amount of such commissions is reasonable in relation to the value of the brokerage and research information provided. BBH has established a Best Execution and Oversight Committee to monitor the Investment Adviser's efforts to meet best execution obligations. (See also the below section entitled "Aggregation and Allocation of Transactions" for additional information on trade allocation and the section entitled "Soft Dollar or Research/Execution Arrangements" for additional information on allocation of brokerage transactions.).

Generally, neither the Investment Adviser nor BBH provides execution services itself to advisory clients. However, if it or BBH were to provide such services as an accommodation when the client has provided prior written authorization, it would do so only if it determined that "best execution" would be accomplished in accordance with the preceding paragraph and applicable law, and BBH/SID would not charge

commissions on such orders. It should also be noted that the SID advisory personnel do not receive brokerage commission-based compensation.

The Investment Adviser does not generally arrange “agency cross” or “cross transactions” for the Funds. Such securities transactions may be arranged for the Funds through unaffiliated brokers only in compliance with applicable law and SID and BBH policies and procedures.

▪ **Aggregation and Allocation of Transactions to Unaffiliated Brokers**

As discussed above, the Investment Adviser directs order instructions for the Funds to a list of unaffiliated broker-dealers for handling and execution. When it is determined that aggregation (or “batching”) of order instructions is consistent with the Investment Adviser’s duty to seek best execution for the Funds and with operational efficiency, it may, in its discretion, permit outside brokers to combine trades for one Fund account with trades for another Fund or BBH account, including accounts of BBH’s partners and personnel. In the event that trades are combined, no advisory account will be favored over any other advisory account with respect to allocation percentages or execution price over an extended period of time. The allocation of securities purchased in batched trades among accounts is intended to be accomplished fairly and equitably.

Accounts that are eligible to purchase or sell fixed income and/or equity securities that are block-traded, will generally be allocated a pro rata portion of the executed block trade. In the event an order is only partially filled, the executed shares will be allocated on a pro rata basis based on the amount of assets in each order subject to limited exceptions including adjustments for rounding and odd-lots. Allocations for equity and fixed income trades are generally made by the end of the day on which the trade was executed absent extraordinary circumstances.

▪ **Cash Management Services**

The Investment Adviser may invest idle cash remaining in the Funds’ accounts in overnight time deposits with overseas banking institutions for which clients receive a standard rate (the “Overnight Rate”) despite the fact that fluctuating overnight rates may result in the Investment Adviser receiving more or less than the Overnight Rate on invested cash.

▪ **Commission Rates**

The Investment Adviser will not select broker-dealers solely on the basis of commission rates nor will it always seek competitive bidding for the most favorable commission rate in advance of any particular transaction. As a result, the Funds may not necessarily pay the lowest commission. Transactions may involve specialized services on the part of the broker-dealer involved which may call for higher commissions than would be the case with other transactions requiring more routine services. The Investment Adviser will determine in good faith whether the amount of commission is reasonable in relation to the value of research and brokerage services provided. Please also refer to the below section entitled “Soft Dollar or Research/Execution Arrangements.”

▪ **Non-exclusive Management**

In addition to advising/managing the Funds, the Investment Adviser or BBH may render advice to and execute transactions for its own account and/or for the accounts of other persons. The accounts of other persons may include BBH partners and personnel investment advisory accounts including discretionary accounts that are centrally managed as well as privately offered investment funds and other collective investment vehicles for which BBH or its affiliates serve as investment adviser, sponsor or in other capacities.

In order to seek to avoid potential conflicts of interest, the Investment Adviser may preclude clients from making an investment or selling its existing investment in, or taking other actions with respect to, securities of a company where BBH or the Investment Adviser is advising another client or fund who is

making or selling an investment in the securities of the same company. In addition, there may be certain investment opportunities, investment strategies or actions that the Investment Adviser determines not to undertake on behalf of clients in view of BBH's client or firm activities.

▪ **“Soft Dollar” or Research/Execution Arrangements**

Brokerage transactions may be directed to specific brokers or dealers to pay for research or services which can help the Investment Adviser provide investment management services to the Funds. Research and services may include information on the economy, industries, groups of securities, individual companies, statistical information, accounting and tax law interpretations, political developments, legal developments affecting portfolio securities, technical market action, credit analysis, risk measurement analysis, performance analysis, and analysis of corporate responsibility issues.

These arrangements may raise conflicts of interest. For example, to the extent that the Investment Adviser uses client commissions to obtain research, it will not have to pay for research itself. In addition, the use of a broker that provides useful research and securities transaction services may result in a higher commission than that offered by a broker who does not provide research services. The Investment Adviser will determine in good faith if the aggregate amount of the commissions paid is reasonable in relation to the value of the brokerage and research services received. However, the Investment Adviser does not attempt to track the benefits of brokerage and research services to the commissions associated with a particular account or group of accounts. Research services may be useful in servicing the Funds accounts as well as other BBH accounts, including those that do not pay commissions relating to the research arrangements, and not all such research may be useful for the account in which the particular transaction was effected. The Investment Adviser's “soft dollar” practices as described above and its policies and procedures governing this topic are intended to comply with the safe harbor rules of Section 28(e) of the Exchange Act, where applicable.

Proxy Voting Policy -----

The Investment Adviser has adopted a Proxy Voting Policy and Procedures, available to clients upon request, which are designed to prevent conflicts of interest from influencing proxy voting decisions that it makes on behalf of advisory clients. Nevertheless, notwithstanding such proxy voting policies and procedures, actual proxy voting decisions of the Investment Adviser may have the effect of favoring the interests of other clients or businesses of other divisions or units of BBH and/or its affiliates provided that the Investment Adviser believes such voting decisions to be in accordance with its fiduciary obligations. The Investment Adviser will also provide the voting record for a particular client, upon written request by that client. Unless otherwise stated in the investment advisory agreement, the Investment Adviser maintains the right to vote proxies on behalf of the Funds and may utilize the services of a third party proxy agent in making voting decisions.

Closing Accounts -----

Investment advisory contracts may be terminated by either the Funds or the Investment Adviser at any time by written notice given to the other party at least 30 days prior to the date on which such termination is to take place, or as otherwise agreed upon in the investment advisory agreement. The Funds' investment advisory agreements may also contain terms applicable to account termination.

OTHER IMPORTANT INFORMATION

Tax & Legal Matters -----

Prior to investing, it is strongly recommended that clients consult with legal and/or tax advisors to discuss the impact of the Investment Adviser's investment advice on the client's legal and tax situation.

▪ **Code of Ethics**

The Investment Adviser has adopted a code of ethics (the “code”) that includes provisions, among others that (a) personnel of the Investment Adviser and/or of BBH ensure that personal securities transactions are conducted in accordance with the code and with the firm’s Personal Trading and Insider Trading Policies (which include holdings certifications for “Access Persons” as defined therein), and in such a manner as to avoid any actual or potential conflict of interest; (b) personnel comply at all times with applicable laws and regulations; and (c) personnel of the Investment Adviser and/or of BBH must annually provide an acknowledgment of his or her compliance with the code, as amended from time to time. In addition, as part of the firm’s hiring practices, new personnel receive a copy of the code and are required to acknowledge reading and complying with it.

The Investment Adviser will provide a copy of the code to any client or prospective client upon request.

▪ **Trading/Portfolio Management Controls**

From time to time, the Investment Adviser/BBH may come into possession of material, non-public information or other information that could limit the ability of its clients to buy and sell investments, and investment flexibility may be constrained as a consequence. The Investment Adviser/BBH generally is not permitted to obtain or use material non-public information in effecting purchases and sales in public securities transactions for clients. In addition, it is the Investment Adviser’s and BBH’s policy to prohibit personnel from profiting at the expense of its clients. Policies and procedures have been designed to prevent the use of material non-public information, and to enable fair allocation of batched transactions and equitable trade routing and execution.

The Investment Adviser has adopted policies and procedures, including trade allocation procedures, which it believes address the conflicts associated with managing multiple accounts for multiple clients. For example, it is possible that the various accounts managed could have different investment strategies that, at times, might conflict with one another to the possible detriment of a client. Alternatively, to the extent that the same investment opportunities might be desirable for more than one account, possible conflicts could arise in determining how to allocate them, including situations when the advisory fees for certain client accounts/Funds include a sharing in the capital appreciation of the account (also known as performance fees). As a result of allocation issues, the amount, timing, structuring or terms of an investment by clients of the Investment Adviser may differ from, and performance may be lower than, investments and performance of other client accounts. Client accounts that do not receive allocations that perform well may experience lower performance as a result.

▪ **Commodities/Futures Trading**

BBH does not hold itself out as a commodity trading advisor (CTA) and relies on applicable exemptions from registration as such in conducting trading activities. Consistent with such exemptions, when appropriate, BBH and or the Investment Adviser may also trade futures on behalf of clients.

▪ **Partner and Personnel Activities**

BBH partners and personnel, including those affiliated with the SID, do at times purchase and sell securities that BBH as a firm follows for its investment advisory business and/or which BBH purchases and sells for its investment advisory clients. These purchases may be for their own accounts, or accounts in which they have a financial interest or over which they have control. Trading is permitted pursuant to the Investment Adviser’s policies and procedures which include a BBH pre-clearing process for transactions by certain defined insiders. These procedures are designed to prevent and detect any

account activity that may violate policy or applicable laws.

- **Participation or Interest in Client Transactions**

Neither the Investment Adviser nor BBH will knowingly process principal trades of securities for any client where the Investment Adviser or BBH has acted as investment adviser to the client, except when the transaction is conducted in accordance with applicable regulations.

BBH/SID, its personnel and other financial service providers have interests in promoting sales of interests in the BBH Funds. With respect to both BBH/SID and its personnel, the remuneration and profitability relating to services to and sales of interests in the BBH Funds may be greater than the remuneration and profitability relating to services to and sales of other products that might be provided or offered.