

Form ADV Part 2A

March 30, 2012

Westpeak Global Advisors, LLC
1470 Walnut Street
Boulder, Colorado 80302
(303) 786-7700
www.westpeak.com

This brochure provides information about the qualifications and business practices of Westpeak Global Advisors, LLC (“Westpeak”). If you have any questions about the contents of this brochure, please contact us at (303) 786-7700. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Westpeak also is available on the SEC’s website at www.adviserinfo.sec.gov.

Material Changes

The following is a list of only **material changes** to this Brochure since the last amendment on July 1, 2011:

Advisory Business

1. An update of the assets under management as of February 29, 2012

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Advisory Business

Westpeak Global Advisors, LLC (“Westpeak”), founded in 1991, is an investment adviser offering equity strategies for institutional investors.

Westpeak’s members are Khalid Ghayur, Chief Executive Officer and Chief Investment Officer; Ronan G. Heaney, Director of Research; Stephen C. Platt, Director of Portfolio Management; Eric D. Krawetz, Director of Finance & Operations; and Ingrid C. Hanson, Director of Compliance.

Westpeak offers U.S., non-U.S and global equity strategies, which use a quantitative investment process. We collect a large amount of data across a broad universe of stocks and use this data to systematically assess the attractiveness of each stock in the applicable investment universe on a relative basis.

We tailor our advisory services to individual client needs, structuring each portfolio to reflect specific objectives and risk tolerances. Clients may impose restrictions on investing in certain securities or types of securities and may define other investment guidelines, such as benchmark relative limitations associated with tracking error, or country, industry or stock weight.

Westpeak provides investment advisory services

- on a separate account management basis to institutional clients such as private and public sector retirement programs, insurance companies, trusts, and corporations; and
- as an adviser or subadviser to public and private investment pools established by Westpeak or by entities unaffiliated with Westpeak.

We provide investment advisory services on either a discretionary or non-discretionary basis.

Although Westpeak offers U.S., non-U.S. and global equity strategies, Westpeak’s investment advice is not limited to equity securities. Westpeak may, from time to time, provide investment advice with respect to instruments including, but not limited to, debt instruments, futures, foreign currency forward contracts, convertible securities, repurchase agreements, depositary receipts, exchange-traded funds, options and other derivative products.

Assets Under Management (approx.)	
As of February 29, 2012	
Discretionary:	\$24,400,000
Non-Discretionary:	\$80,200,000
Total:	\$104,600,000

Fees and Compensation

Generally, we charge fees for our investment advisory services as a specified percentage of the assets under management.

Standard Annual Fee Schedules		
	ActiveBeta Signal-Weighted Implementation	ActiveBeta Cap-Weighted Implementation
Developed Markets Large Cap		
First US\$100 Million	0.25%	0.20%
Next US\$150 Million	0.20%	0.18%
Over US\$250 Million	0.15%	0.15%
Minimum Account Size	US\$25 Million	US\$50 Million
Developed Markets Small Cap		
First US\$50 Million	0.40%	0.25%
Next US\$100 Million	0.35%	0.23%
Over US\$150 Million	0.30%	0.20%
Minimum Account Size	US\$15 Million	US\$30 Million
Emerging Markets		
First US\$50 Million	0.50%	0.30%
Next US\$100 Million	0.45%	0.28%
Over US\$150 Million	0.40%	0.25%
Minimum Account Size	US\$15 Million	US\$30 Million

Advisory fee and minimum account size may vary from the applicable schedule shown above due to the particular circumstances of the client or as otherwise negotiated with particular clients.

Westpeak bills clients for fees incurred on either a monthly or quarterly basis, in arrears. However, if a client chooses to prepay fees, we will refund any prepaid fees to the client in the event of termination of the investment advisory contract during the fee period. We will determine the amount of the refund by prorating any unearned portion as of the date of termination. Either party may terminate Westpeak's advisory service, upon written notification in accordance with the investment advisory contract's notice provision. Westpeak does not require prepayment of more than \$1,200 in fees per client, six months or more in advance.

Westpeak's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians and other third-party service providers. Clients may also be subject to transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. See also the "Brokerage Practices" section of this Brochure.

Performance-Based Fees and Side-By-Side Management

In addition to Westpeak's standard practice of receiving a fee based on a specified percentage of assets under management, we may receive, at the request of certain institutional clients, a performance-based advisory fee. Performance-based advisory fees are negotiable, and any performance fee will conform to all applicable U.S. federal securities laws, including Rule 205-3 under the Investment Advisers Act of 1940.

No supervised person manages both accounts that are charged a performance-based fee and accounts that are charged an asset-based fee.

Types of Clients

Generally, Westpeak provides investment advice to institutional investors, such as investment companies, pension and profit sharing plans, insurance companies, trusts, foundations, endowments, and corporations.

Westpeak considers minimum account size as a condition in accepting and maintaining client accounts. We have established standard minimum account sizes, as described in the “Fees and Compensation” section of this Brochure, which vary by strategy. The minimum account size for a client may vary from the standard shown for a strategy due to the particular circumstances of the client or as otherwise negotiated with the client.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Westpeak uses primarily a fundamental security analysis method, combined with an analysis of shorter-term price data, to construct a diversified portfolio of stocks with low valuation multiples and stocks with positive price momentum. Fundamental analysis methods are dependent on the accuracy of historical and current financial data. The quality of information available to Westpeak may affect Westpeak’s ability to implement its analysis, and there is no guarantee that Westpeak’s methodology will achieve the desired results.

Investment Strategies

The investment strategy used to implement Westpeak’s investment advice typically involves purchases that range from short-term (stocks sold within a year) to long-term (stocks held at least a year). Generally, portfolios are rebalanced monthly. Westpeak’s assessment of the appropriate holding period may be inaccurate, and there is no guarantee that the time period for which Westpeak determines to hold a given stock will not coincide with a decline in price.

Risk of Loss

Investing in securities involves risk of loss of capital that clients should be prepared to bear. Generally speaking, stocks are more volatile than bonds or short-term instruments. Stock values fluctuate and are subject to unpredictable declines due to the activities of individual companies, economic conditions and general market conditions. Investment decisions may result in losses or poor performance, even in a rising market. Stock of companies with relatively small market capitalizations may be more volatile than stock of larger, more established companies and the broad equity market indices. Foreign stocks are subject to greater investment risk, such as political, economic, credit and information risks, as well as the risk of currency fluctuations.

Investment Committee

The general investment advice to be given clients is determined by Westpeak’s Investment Committee (the “Committee”). The members of the Committee are Khalid Ghayur, Ronan G. Heaney, and Stephen C. Platt. This Committee designs, monitors, and reviews the investment process and products, and develops investment process enhancements and new investment

strategies. This Committee cultivates the firm's investment insights by developing the unique set of signals used in our investment process. The Committee typically meets on a monthly basis or more frequently as needed.

Disciplinary Information

Neither the firm nor any of our management persons has been the subject of any legal or disciplinary event that would be material to a client's or a prospective client's evaluation of Westpeak's advisory business or the integrity of Westpeak's management.

Other Financial Industry Activities and Affiliations

As an independent, employee-owned firm, Westpeak has no affiliates related to our advisory business.

In addition to providing investment advisory services, Westpeak participates in the calculation and maintenance of the FTSE ActiveBeta Index Series. Each of the Westpeak staff members involved in the calculation and maintenance of these indices spends approximately 5%-10% of his time in this activity.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

Westpeak maintains and enforces a written Code of Ethics (the "Code"), which sets forth standards of conduct expected of all personnel. The governing principle of the Code is that the interests of Westpeak's clients come first and under no circumstance may an employee take advantage for his personal benefit of his position with Westpeak or of his knowledge of an investment being made by the firm for a particular client. The Code was written and is administered with the intent that it meet or exceed the provisions of both Rule 17j-1 of the Investment Company Act of 1940 and Rule 204A-1 under the Investment Advisers Act of 1940. A copy of Westpeak's Code of Ethics is available to clients or prospective clients upon request.

Participation or Interest in Client Transactions

We may recommend to our clients various investment companies or other specialized pooled portfolios in which we have an interest by virtue of serving as subadviser. Clients, along with other shareholders in such investment companies or pooled portfolios, may bear a proportionate share of the expenses of those vehicles, including, to the extent permitted by law, fees paid or allocations made to Westpeak.

Additionally, we may, from time to time, buy or sell securities for our own account that we also recommend to clients. We may do so in connection with pursuing a strategy that is also available to other clients, or that involves the purchase and sale of certain securities purchased and sold in client accounts pursuing other Westpeak strategies.

Each of the situations described above presents a potential conflict of interest. In order to mitigate such conflicts, Westpeak has adopted policies and procedures that seek to reasonably

assure that all accounts are treated fairly in rebalancing, trade aggregation, trade allocation, and related administration. These policies and procedures include, but are not limited to, procedures that require periodic review of accounts for consistency with Westpeak's fiduciary obligations and applicable laws.

Personal Trading by Employees

Westpeak employees can buy or sell securities that the firm recommends to clients, subject to the restrictions in Westpeak's Code of Ethics. The Code addresses conflicts that might arise from personal trading by officers and employees. Subject to certain exceptions, all "access persons" under the Code are required to preclear their personal securities trades with Westpeak's Chief Compliance Officer. Also, "access persons" cannot make personal trades within a certain period of time before and after trades of the same security for any client account. In addition, all "access persons" are required to report their personal securities trades on a quarterly basis to the Chief Compliance Officer, who then monitors such reports to ensure compliance with the Code.

Brokerage Practices

Westpeak typically uses large name brokerage firms, as well as third market firms, smaller regional firms, and two-dollar brokers. In maintaining the Approved Broker List, Westpeak's Best Execution Committee considers the following factors:

- Sophistication of broker's trading facilities
- Trading style
- Reputation and integrity
- Financial stability
- Efficient operations and trade settlement
- Willingness to commit capital
- Area of expertise
- Ability to follow instructions
- Electronic interface and access to alternative sources of liquidity
- Commission rate
- Liquidity and order flow
- Registration in various non-U.S. markets

Research and Other Soft Dollar Benefits

Westpeak may receive research, statistical, and quotation services, including databases and computer models, from brokers with which Westpeak places clients' portfolio transactions. These services, which in some instances could also be purchased for cash, may include, but need not be limited to, general economic and security market reviews, industry and company reviews, computer software programs designed to facilitate the selection of optimal execution venues and trading strategies, evaluations of securities, and recommendations as to the purchase and sale of securities, including research and services produced and/or provided by third parties. Westpeak receives a benefit because we do not have to produce or pay for these services. This may create an incentive to select a broker based on the research provided rather than the client's interest in best execution.

As a general matter, these services are of value to Westpeak in advising all clients for whom Westpeak exercises investment discretion, although not each of these services are necessarily

useful and valuable in managing a particular client's account. Westpeak makes no specific attempt to associate any particular account with any service. The management fee paid by a client is not reduced because Westpeak receives these services. To mitigate and address any conflicts of interest that may arise, Westpeak has adopted policies and procedures to evaluate, on an ongoing basis, the value of a broker's research and the reasonableness of any commissions charged.

In certain instances, as permitted by Section 28(e) of the Securities Exchange Act of 1934, we may cause our advisory accounts to pay a broker that provides brokerage and research databases to us a higher commission for effecting a securities trade for an account than another broker would have charged for effecting that trade. This practice is permissible if Westpeak determines, in good faith, that the greater commission is reasonable in relation to the value of the brokerage and research databases provided by the executing broker, viewed in terms of the particular transaction or our overall responsibilities to each advisory client.

During Westpeak's last fiscal year, we acquired the following services with client brokerage commissions:

- equity index data
- company fundamentals data

When determining which client transactions to direct to a particular broker in return for receiving soft dollar benefits, we first sort transactions based on market impact and then distribute low market impact transactions to soft dollar brokers, typically targeting 25% of total transactions annually.

Brokerage for Client Referrals

In selecting brokers, we do not consider whether we or a related person receive client referrals from the broker or a third party.

Directed Brokerage

In some circumstances, a client may designate a particular broker through which trades are to be effected or introduced, typically under terms the client negotiates with the particular broker. Where a client has directed the use of a particular broker, Westpeak generally will not be in a position to negotiate commission rates or spreads with the broker or, depending on the circumstances, to select brokers based on best execution.

Additionally, trades that are to be effected through a particular broker according to client direction may not be combined (or "aggregated") for execution with orders for the same securities for other managed accounts, unless the broker is the executing broker for the aggregated order. Where the above exception is not applicable, trades that are to be effected through a particular broker according to client direction may be placed at the end of aggregated trading activity for a particular security. Accordingly, these trades may be subject to price movements, particularly in volatile markets, that may result in the client receiving a price that is less favorable than the price obtained for the aggregated order.

Under these circumstances, the direction by a client of a particular broker to execute trades may result in higher commissions, greater spreads, or less favorable net prices than might be the case if Westpeak were able to negotiate commission rates or spreads freely, or to select brokers based on best execution. Although a client directing the use of a particular broker may be subject to

these disadvantages, the client may also receive benefits as a result of this arrangement, including the possible recapture of a portion of the negotiated commissions.

Aggregation of Orders

Where we determine that an investment purchase or sale opportunity is appropriate and desirable for more than one account, we may execute purchase and sale orders separately or, more commonly, we may combine (or “aggregate”) them and, to the extent practicable, allocate them to the participating accounts. The ability of the accounts to participate in larger volume transactions in this manner will in some cases produce better executions for each of them. However, in some cases, this procedure could have a detrimental effect on the price and amount of a security available to a particular account or the price at which a security may be sold.

As described in the “Other Financial Industry Activities and Affiliations” section of this Brochure, Westpeak may manage accounts for itself. It is standard practice for these accounts to be included in aggregated orders with other Westpeak client accounts.

Whenever Westpeak aggregates an order for two or more accounts, including its own accounts, Westpeak takes steps to ensure that each account is treated fairly (that is, no account is either advantaged or disadvantaged) and that the trade is subject to the overall standard of seeking best execution for all client transactions. Where an aggregated order is filled in its entirety in a single business day, each account that is participating in the order will participate at the average share price for the aggregated order, and transaction costs will be shared pro rata based on each account’s participation in the aggregated order. In cases where the aggregated order is filled in its entirety over the course of more than one day, each account will participate pro rata in each day’s transaction at the average share price on that day, and transaction costs will be shared based on each account’s participation on that day. If the total amount of securities purchased is less than the amount requested in an aggregated order, then securities will be allocated on a pro rata basis to each account participating in the aggregated order, based upon the initial amount requested for the account, with certain permitted exceptions. One permitted exception would be where this approach would result in the allocation of a *de minimis* number of shares to a client account, in which case the portfolio manager may determine to allocate no securities to that account.

Allocation of Limited Investment or Trading Opportunities

Westpeak may have responsibility for portfolio management of two or more accounts that may invest in the same securities. Where accounts have competing interests in a limited investment or trading opportunity, it is Westpeak’s standard practice to allocate investment or trading opportunities *pro rata* based on the amount each account would have purchased or sold if the investment or trading opportunity was unlimited.

Review of Accounts

Westpeak’s investment personnel seek to continuously monitor all advisory accounts, using an internally developed enterprise application that allows them to assess the composition of each portfolio. Additionally, before each monthly rebalance, the portfolio manager reviews data relevant to each investment strategy and each of the client accounts managed under each strategy. The portfolio manager is Stephen C. Platt, Director of Portfolio Management.

Westpeak generally reviews account assets, transactions, and performance and furnishes written reports to advisory clients on schedules developed with each client, but no less often than semi-

annually in any case. More frequent reviews with clients may take place or reports may be supplied more often, as agreed upon between Westpeak and the client.

Client Referrals and Other Compensation

Westpeak may pay compensation to Natixis Distributors, L.P. or Natixis Global Associates, or their employees, for referrals of clients to Westpeak. In exchange for such referrals, the referring party may typically receive a percentage of the advisory fees received by Westpeak from the referred client. In these cases, the terms of any arrangement between Westpeak and the referring party will be disclosed to the prospective client at or before the time of referral in accordance with Rule 206(4)-3 under the Investment Advisers Act of 1940. The referred clients are not assessed additional fees as a result of these arrangements, and the referring party does not provide any investment advisory services to the referred clients.

Custody

Westpeak does not have custody of any client funds or securities.

Investment Discretion

Westpeak will typically accept discretionary authority to manage securities accounts on behalf of a client after execution of an advisory or subadvisory agreement with the client. We will seek to purchase only securities or other investments that are consistent with the investment objectives and restrictions determined by the client. Unless otherwise provided by a client under the advisory or subadvisory agreement, Westpeak will ordinarily have authority to determine, without obtaining prior client consent, the specific securities to be bought or sold to meet the investment objectives of a particular account, the amounts of such securities to be bought or sold, the broker to be used to effect each transaction, and the commission rates to be paid to the broker.

Voting Client Securities

Unless otherwise directed by a client, it is Westpeak's policy to vote proxies for all of its client accounts. We have adopted and implemented policies and procedures to reasonably assure that proxies are voted in the best interest of our clients, in accordance with our fiduciary duties and Rule 206(4)-6 under the Investment Advisers Act of 1940.

As a result of our quantitative investment models, Westpeak may have investments in the securities of a large number of different issuers for client accounts. We typically will not be actively involved in corporate governance issues and, with limited exceptions, will vote proxies in accordance with a comprehensive set of proxy voting guidelines maintained and implemented by our proxy voting agent.

Westpeak has engaged an independent third-party service provider, Institutional Shareholder Services Inc. (ISS), as our proxy voting agent. Westpeak's Proxy Committee has determined that, except as described below, proxies will be voted in accordance with the voting recommendations contained in the applicable U.S. or International ISS Proxy Voting Guidelines (the "Proxy Voting Guidelines").

The Proxy Committee may determine to vote shares contrary to the Proxy Voting Guidelines, but will only do so at a client's specific direction or if it believes that voting in such manner is in the best interest of Westpeak's clients.

It is possible that actual or apparent conflicts may arise between Westpeak's interests and those of Westpeak's clients in connection with the voting of proxies. To help ensure that all proxies are voted in the best interest of our clients, Westpeak's Chief Compliance Officer reviews each case where the Proxy Committee exercises discretion on a case-by-case basis (e.g., where the Proxy Committee determines to vote contrary to the Proxy Voting Guidelines) for material conflicts of interest. To facilitate this process, in the rare case in which the Proxy Committee exercises discretion on a case-by-case basis, the Proxy Committee members with voting authority are directed to disclose to the Chief Compliance Officer if they have knowledge of any actual or apparent conflict of interest involving Westpeak, or its officers or employees, in connection with the proxy.

If Westpeak's Chief Compliance Officer determines that a material conflict of interest exists with respect to a proxy, Westpeak may (i) notify the affected client of the conflict and seek the client's proxy voting directions on the matter, (ii) seek voting instructions from an independent third party, or (iii) vote the proxy without seeking instructions from the client or an independent third party, provided that we document in writing the basis for our conclusion that the proxy was voted in the best interest of the client.

Upon request, we will provide clients with reports on how their proxies have been voted. In addition, upon request, we will provide clients a copy of our proxy voting policies and procedures.

Class Action Notices

From time to time, Westpeak may receive unsolicited notices of potential or actual class action lawsuits or recoveries in which current or former clients of Westpeak may be invited or entitled to participate. It is Westpeak's policy to take no action with respect to any such notices.

Financial Information

We believe that our financial condition is unlikely to impair our ability to meet contractual commitments to our clients.

Form ADV Part 2B

March 30, 2012

Westpeak Global Advisors, LLC
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Brochure Supplements:

1. Khalid Ghayur
2. Ronan G. Heaney
3. Stephen C. Platt

These brochure supplements provide information about Khalid Ghayur, Ronan G. Heaney, and Stephen C. Platt that supplements the Westpeak Global Advisors, LLC ("Westpeak") brochure. You should have received a copy of that brochure. Please contact us at (303) 786-7700 if you did not receive Westpeak's brochure or if you have any questions about the contents of these supplements.

Khalid Ghayur

Chief Executive Officer & Chief Investment Officer

Year of Birth: 1961

Educational Background and Business Experience

Educational Background

Mr. Ghayur received an M.B.A. in Finance and International Business from the École Nationale des Ponts et Chaussées, Paris, and an M.A. and B.A. in Economics from the University of Karachi.

Business Experience

Prior to joining Westpeak in 2007, Mr. Ghayur was employed by Morgan Stanley Capital International (MSCI) Barra, in New York, where he was a member of its Global Executive Committee and Chairman of the MSCI Index Policy Committee. As Director of Research Policy, he was responsible for MSCI Barra's global markets and benchmarking research, and new product development. From 1994 to 2000, Mr. Ghayur was Global Head of Quantitative Research and Strategy for HSBC Asset Management, in London, where he was responsible for supervising and coordinating the development and application of all quantitative research efforts globally. These research efforts concentrated in the areas of strategic and tactical asset allocation, fixed income modeling, stock selection techniques, portfolio construction and analysis, and risk management. From 1992 to 1994, he was a Senior Quantitative Analyst at Credit Lyonnais Asset Management, in Paris, and from 1987 to 1991, he held the position of Portfolio Manager at Union National Bank in Abu Dhabi, where he was responsible for managing the bank's U.K. and U.S. investment portfolios.

Mr. Ghayur has served on the Board of Governors of the CFA Institute, the Board's Nominating Committee, and as Chairman of the Board's External Relations and Volunteer Involvement Committee. He is also a former trustee of the CFA Institute Research Foundation. Mr. Ghayur was a member of the Editorial Board of the *Financial Analysts Journal* and was the Founding President of the U.K. Society of Investment Professionals.

Professional Designations

Mr. Ghayur is a CFA charterholder. The minimum qualifications required for the Chartered Financial Analyst designation, which is offered by the CFA Institute, are an undergraduate degree and four years of professional experience involving investment decision-making, or four years of qualified work experience. A candidate must pass three course exams in order to earn the CFA charter.

Disciplinary Information

Mr. Ghayur has not been the subject of any legal or disciplinary events that would be material to a client's or a prospective client's evaluation of Mr. Ghayur.

Other Business Activities

Mr. Ghayur is not actively engaged in any other investment-related business or occupation, or any other business or occupation for compensation that provides a substantial source of his income or that involves a substantial amount of his time.

In addition to providing investment advisory services, Mr. Ghayur participates in the research, marketing, and promotion of the FTSE ActiveBeta Index Series. Mr. Ghayur devotes approximately 5%-10% of his time in this activity.

Additional Compensation

Mr. Ghayur does not receive any economic benefit, such as a sales award or other prize, for providing advisory services from someone who is not a Westpeak client. That is, he does not receive any bonus based, at least in part, on the number or amount of sales, client referrals, or new accounts acquired for Westpeak.

Supervision

Westpeak's supervised persons, that is, employees who provide investment advice, use a structured, disciplined process in the management of client portfolios. Our internal monitoring and control systems ensure portfolios adhere to client-specific investment guidelines, as well as regulatory requirements and our investment strategy parameters.

As Chief Executive Officer, Mr. Ghayur is responsible for supervising all supervised persons' advisory activities on behalf of the firm. Westpeak's Chief Compliance Officer, Ms. Ingrid C. Hanson, oversees the firm's operations, including Mr. Ghayur's investment advisory activities, strictly from a compliance perspective. Any questions, concerns or complaints about Mr. Ghayur can be addressed to Ms. Hanson at (303) 786-7700.

Ronan G. Heaney

Director of Research

Year of Birth: 1968

Educational Background and Business Experience**Educational Background**

Mr. Heaney received an M.S. in Computer Science from Purdue University, where he was awarded a Fulbright Fellowship, and a B.S. in Applied Physics from Dublin City University, Ireland.

Business Experience

Before joining Westpeak in 1998, Mr. Heaney was employed by Multum Information Services, in Denver, as a Software Architect. From 1992 to 1996, he held the position of Senior Software Developer at Swiss Bank Corporation, in Chicago, where he developed and supported a global equity options/futures trading system.

Disciplinary Information

Mr. Heaney has not been the subject of any legal or disciplinary events that would be material to a client's or a prospective client's evaluation of Mr. Heaney.

Other Business Activities

Mr. Heaney is not actively engaged in any other investment-related business or occupation, or any other business or occupation for compensation that provides a substantial source of his income or that involves a substantial amount of his time.

In addition to providing investment advisory services, Mr. Heaney participates in the research, calculation, and maintenance of the FTSE ActiveBeta Index Series. Mr. Heaney devotes approximately 5%-10% of his time in this activity.

Additional Compensation

Mr. Heaney does not receive any economic benefit, such as a sales award or other prize, for providing advisory services from someone who is not a Westpeak client. That is, he does not receive any bonus based, at least in part, on the number or amount of sales, client referrals, or new accounts acquired for Westpeak.

Supervision

Westpeak's supervised persons, that is, employees who provide investment advice, use a structured, disciplined process in the management of client portfolios. Our internal monitoring and control systems ensure portfolios adhere to client-specific investment guidelines, as well as regulatory requirements and our investment strategy parameters.

Mr. Ghayur, Chief Executive Officer, is responsible for supervising all supervised persons' advisory activities on behalf of the firm. In addition, Westpeak's Chief Compliance Officer, Ms. Ingrid C. Hanson, oversees the firm's operations, including Mr. Heaney's investment advisory activities, strictly from a compliance perspective. Mr. Ghayur and Ms. Hanson can be reached at (303) 786-7700.

Stephen C. Platt

Director of Portfolio Management

Year of Birth: 1965

Educational Background and Business Experience**Educational Background**

Mr. Platt received a B.S. in Finance from the University of Colorado.

Business Experience

Prior to joining Westpeak in 1999, Mr. Platt was a Senior Vice President of Cordillera Asset Management, in Denver. While at Cordillera, his responsibilities included portfolio management, research, and marketing. He codeveloped and implemented the quantitative investment process, and was responsible for performance attribution analysis and backtesting. He also gained experience in trading technology. From 1990 to 1992, he worked as a Senior Research/Marketing Associate at Vogelzang & Associates, in Denver.

Professional Designations

Mr. Platt is a CFA charterholder. The minimum qualifications required for the Chartered Financial Analyst designation, which is offered by the CFA Institute, are an undergraduate degree and four years of professional experience involving investment decision-making, or four years of qualified work experience. A candidate must pass three course exams in order to earn the CFA charter.

Disciplinary Information

Mr. Platt has not been the subject of any legal or disciplinary events that would be material to a client's or a prospective client's evaluation of Mr. Platt.

Other Business Activities

Mr. Platt is not actively engaged in any other investment-related business or occupation, or any other business or occupation for compensation that provides a substantial source of his income or that involves a substantial amount of his time.

In addition to providing investment advisory services, Mr. Platt participates in the research, marketing, and promotion of the FTSE ActiveBeta Index Series. Mr. Platt devotes approximately 5%-10% of his time in this activity.

Additional Compensation

Mr. Platt does not receive any economic benefit, such as a sales award or other prize, for providing advisory services from someone who is not a Westpeak client. That is, he does not receive any bonus based, at least in part, on the number or amount of sales, client referrals, or new accounts acquired for Westpeak.

Supervision

Westpeak's supervised persons, that is, employees who provide investment advice, use a structured, disciplined process in the management of client portfolios. Our internal monitoring and control systems ensure portfolios adhere to client-specific investment guidelines, as well as regulatory requirements and our investment strategy parameters.

Mr. Ghayur, Chief Executive Officer, is responsible for supervising all supervised persons' advisory activities on behalf of the firm. In addition, Westpeak's Chief Compliance Officer, Ms. Ingrid C. Hanson, oversees the firm's operations, including Mr. Platt's investment advisory activities, strictly from a compliance perspective. Mr. Ghayur and Ms. Hanson can be reached at (303) 786-7700.