



Firm Brochure

Cougar Global Investments LP

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This brochure provides information about the qualifications and business practices of Cougar Global Investments LP. If you have any questions about the contents of this brochure, please contact us at 1-800-387-3779 or info@cougarglobal.com. 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 Cougar Global Investments LP is also available on the SEC's website at www.adviserinfo.sec.gov.



Material Disclosure

The following is a list of material changes since the previous annual brochure dated March 31, 2011.

Asset Management Style

Cougar Global's product names have been updated to MAR 6, MAR 8, MAR 10, and MAR 12 for US Dollar denominated strategies and MAR 6 CDN, MAR 8 CDN, MAR 10 CDN, and MAR 12 CDN for Canadian Dollar denominated strategies.

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Advisory Business

Firm Description

Founded in 1993 by Dr. James Breech, Cougar Global provides investment supervisory services for high-net-worth individuals, families, foundations, trusts, and corporations in North America and Europe. It operates out of Toronto, Canada and employs sixteen investment professionals. Cougar Global is registered and regulated by the Ontario Securities Commission since its founding and registered as a “non-resident” advisor with the Securities and Exchange Commission since April, 1998.

Ownership

Cougar Global Investments is a Limited Partnership owned 58% by the General Partner, Cougar Global Investments Ltd, and the remaining 42% by a number of limited partnership unit holders, the largest of these representing 12%.

Types of Services

Cougar Global provides advisory services and manages client assets on a discretionary basis in accordance with the client’s investment objectives. Cougar Global offers integrated financial planning with investment management.

Asset Management Style

Since its founding in 1993, Cougar Global has specialized in global asset allocation and adheres to a strict discipline of downside risk management (Postmodern Portfolio Theory). A key concept in Postmodern Portfolio Theory is that only returns that fall below one’s target rate of return are risky. Losing money inflicts the greatest harm on the compound growth of wealth. Therefore, the goal is to continuously generate compound growth for clients by participating in bull markets and avoiding bear markets. This exercise establishes us as global tactical asset allocators.

Since each investor has specific investment objectives, the asset mix must be customized to fit the particular situation. The discipline of downside risk management enables us to customize mandates to suit specific needs of individual investors, including risk and return objectives, income requirements, and time horizon.

Four mandates are available, each in Canadian Dollars and US Dollars. MAR 6, MAR 8, MAR 10, and MAR 12 in US Dollars and MAR 6 CDN, MAR 8 CDN, MAR 10 CDN, and MAR 12 CDN in Canadian Dollars. The “MAR” stands for “Minimum Acceptable Return,” a concept which is in keeping with the investment discipline of “downside risk management.” Since the founding, Cougar Global gained considerable experience in advising clients on a suitable mandate.



Assets Under Management

As of December 31, 2011, the following represents assets under management for clients managed on a discretionary basis:

As of December 31, 2011:

Canadian Dollar Composites

Product	Product AUM	High-Net-Worth	Institutional
MAR 6 CDN	18,773,414.87	18,773,414.87	-
MAR 8 CDN	55,933,917.43	51,204,597.46	4,729,319.97
MAR 10 CDN	61,085,056.64	58,208,077.15	2,876,979.49
MAR 12 CDN	7,317,293.33	7,317,293.33	-
Total	143,109,682.27	135,503,382.81	7,606,299.46

US Dollar Composites

Product	Product AUM	High-Net-Worth	Institutional
MAR 6	1,715,496.23	1,715,496.23	-
MAR 8	6,139,479.93	6,139,479.93	-
MAR 10	17,723,060.22	274,663.82	17,448,396.40
MAR 12	-	-	-
Total	25,578,036.38	8,129,639.98	7,448,396.40

All amounts for Canadian and US composites are reflected in US Dollars.

Fees and Compensation

Management Fees

The compensation payable by the Investor to Cougar Global for services rendered is defined by the following non-negotiable schedule:

Portfolio Assets	Management Fee
\$250,000 - \$500,000	1.95%
Next \$1,500,000	1.20%
Next \$3,000,000	1.00%
Next \$5,000,000	0.80%
Over \$10,000,000	0.60%

The above annual fees are calculated and billed in the currency in which the account is managed. Fees are calculated quarterly based on the Average Month End Market Values of the assets in the account. Fees are charged on a quarterly basis, with an option to



deduct directly from the client's account or from the client's personal bank account. Exceptions are made for Individual Pension Plans (IPPs), as they can only pay fees by cheque.

In the event that an account comes under management during a calendar quarter, the percentages set out in the above fee schedule will be based on the average month-end portfolio value for the months the account was open, pro-rated for the number of days the account was open.

The Fees are subject to applicable taxes and fees levied by any applicable government or regulatory authority or agency, including, without limitation, goods and services taxes and fees levied by the securities regulatory authorities in the applicable province or territory.

Other Fees

An annual custody fee of 0.16% is charged quarterly by RBC Dexia Investor Services, provider of custodial services. These fees are absorbed by Cougar Global for accounts over \$5 million. In the case of an individual, the minimum of \$5 million applies to the family of accounts.

Cougar Global does not charge any additional termination fees.

Performance-based Fees

Performance-based Fees

Cougar Global does not have on staff any supervised persons who accept performance based fees. There are no other fees charged to client accounts other than the ones described under **Fees and Compensation**.

Types of Clients

Description

Cougar Global's client base consists of high-net-worth individuals and families, foundations, endowments, trusts, corporations and Individual Pension Plans (IPPs).

Minimum Requirements

The published minimum account size requirement is \$250,000 for Canadian Dollar denominated accounts and \$500,000 for US Dollar denominated accounts.

Methods of Analysis, Investment Strategies and Risk of Loss

Investment Strategy

The goal of investing is to generate the compound annualized growth rate that achieves the client's investment objectives. The primary means of achieving adequate compound growth rates is to avoid losing money.

Cougar Global's approach to dealing with uncertainty is based on important empirical research on both capital market behaviour and on the true nature of risk. The behaviour of capital markets over the forecast horizon of one year will be determined by the beliefs of investors is what Cougar Global believes. The true risk faced by investors is the risk of failing to achieve their investment objectives. Consequently, Cougar Global is averse to downside risk, but quite willing to accept volatility to the upside. When seeking the optimal combination of asset classes for each portfolio, Cougar Global looks for the highest possible returns while constraining the mix to a pre-determined probability of downside risk given the Multiple Economic Scenario analysis.

Cougar Global has developed a proprietary global macroeconomic scenario forecasting process to deal with the challenge of investing in an uncertain future. Every month the global multiple economic scenarios are updated using a one-year forecast horizon. Probabilities are developed for five macroeconomic scenarios (MES) that could happen over the next year—growth, stagnation, recession, inflation, and chaos ("black swans"). Research, analysis, and modeling of the probabilities are conducted such that the consensus attaches to each scenario (the "rational beliefs" in the market). Then, using independent macroeconomic and capital market research such as, RGE Monitor, BCA Research, SED, Capital Economics, Economap, and STRATFOR, Cougar Global's probabilities for each scenario (Cougar Global's MES) is developed.

Quantitative Step

Cougar Global's uses an advanced historical statistical sampling technique to estimate what could happen in the future to the capital markets. Currently, over twenty global asset classes are modeled, but fewer than ten typically enter the portfolios. On a monthly basis, Cougar Global will:

- Store the historical monthly return data and the correlations for each asset class according to the five macroeconomic scenarios.
- Weight the historical return data using the current forward-looking MES.
- "Bootstrap" data to generate the probability distributions for the returns of each asset class.
- Probability weight the correlations for each asset class using the current forward-looking MES.

- Enter the probability distributions and correlations into the proprietary portfolio optimizer.

Optimization

- Constrain each mandate to have exposure to a specific level of downside risk.
- Relax the constraint on downside risk in order to position a mandate to achieve a higher return.
- Use ETFs to implement each mandate's asset mix in a globally diversified portfolio.

Risk of Loss

The following table lists the four available mandates in both Canadian and US Dollar denominations and the downside risk tolerance constraint applied to each:

Investment Objective	Downside Risk Tolerance	Mandate
Income with Moderate Growth	Optimized for maximum expected return with no greater than a 5% probability of negative returns	MAR 6
Growth with Income	Optimized for maximum expected return with no greater than a 10% probability of negative returns	MAR 8
Growth	Optimized for maximum expected return with no greater than a 15% probability of negative returns	MAR 10
Aggressive Growth	Optimized for maximum expected return with no greater than a 20% probability of negative returns	MAR 12

Disciplinary Information

Disciplinary Information

Cougar Global was not involved in any criminal or civil action, administrative proceeding before the SEC or any other federal regulatory agency or a self-regulatory organization (SRO) proceeding over the last ten years.



Other Financial Industry activities and Affiliations

Activities and Affiliations

Cougar Global does not have a relationship or arrangement with any related person, including securities broker-dealers, other advisors or planners or financial institutions that would create a material conflict of interest.

Code of Ethics and Personal Trading

Code of Ethics

Cougar Global maintains a Code of Ethics which establishes rules of conduct for employees, officers and directors of Cougar Global. The Code of Ethics governs conduct with respect to conflicts of interest, and employee personal trading. The Code of Ethics is available for review by clients and prospective clients upon request.

Personal Trading

Every employee and director of Cougar Global is considered an Access Person, someone who has access to non-public information concerning portfolio holdings, trading activity or ongoing investment programs managed by Cougar Global. Consequently, all employees must request approval from the Chief Compliance Officer (CCO) before trading in a security on a personal account. The CCO maintains a Restricted List of securities which are restricted from being traded on a personal account. All personal trade requests are crosschecked with the Restricted List and any approval provided is valid for one week.

On a quarterly basis, a Quarterly Personal Trading Report must be submitted by all access persons regardless of whether there has been any personal trading in the quarter.

However, because Cougar Global only purchases broad-index ETFs for their mandates and not single company stock, there is very low risk of a restricted personal trade.

Brokerage Practices

Trading Policy

The Cougar Global Trading Policy and Procedures covers trading activities conducted on behalf of the Investment Products advised by Cougar Global. In particular, this policy addresses procedures for trade order entry, allocations among investment products, other trading related issues, and the reporting and settlement process.



The Chief Investment Officer and Chief Compliance Officer of Cougar Global are responsible for ensuring that all regulatory requirements are adhered to on a company-wide level. This may be accomplished through the direct or indirect oversight of all compliance-related business activities. Where appropriate, implementation of specific compliance controls may be delegated. Delegation of these duties will only take place when it is determined that such individuals have the necessary expertise and authority to properly supervise and employ the required controls. The delegation is subject to approval by the Chief Investment Officer and Chief Compliance Officer.

Broker Selection

The criteria used by Cougar Global for selecting a broker in order of importance are:

- Commission Rate
- Execution
- Market Intelligence
- Operational Efficiency
- Client Service
- Research

The brokerage industry is highly competitive, particularly for the liquid ETFs traded by Cougar Global, and commission rates are low. Some brokers are willing to trade for little or no commission, but the price that could be obtained by Cougar Global for the securities it trades on behalf of clients might be less than optimal if using those brokers. A combination of best price and lowest commission from a reputable broker is the best gauge for assessing a broker.

Market intelligence is another factor to consider. When executing a trade in volatile markets, the broker should provide details on the market in terms of bid/offer spread and volumes appearing on both sides of the market. Operational efficiency and responsiveness to resolve settlement issues are critical criteria when assessing a broker.

Trade confirmations should be forwarded within 30 minutes of a trade occurring. In the event the custodian informs the portfolio manager of a failed trade on settlement date, the broker should begin to take corrective action immediately upon being informed. A final consideration is the availability and quality of the research provided by the broker.

Annual Broker Review

During the course of a year, the portfolio manager will record any deficiencies experienced with the broker. Deficiencies may include failure to execute an order within a specified time period, trading prices that deviate materially from the market price, failure to provide trade confirmations on a timely basis or lack of responsiveness when resolving a failed trade.



The portfolio manager will record on the trade instruction form the nature of the issue and the actions taken by the broker to correct it. If the broker is concluded to be unresponsive or has failed to provide bids price and execution a search will be initiated for a new supplier of brokerage services.

Best Execution

Best execution refers to a trader's obligation to execute securities in a manner most beneficial to Cougar Global's investors. A precise definition of best execution is elusive, as it is difficult to quantify all the factors, both qualitative and quantitative, that constitute best execution. Lowest available commission is not the only determining factor. Other factors include the ability of the broker to obtain a fair price in a volatile market, prompt and accurate execution, and a willingness to communicate with the portfolio manager to give information on market conditions that may affect trading. In view of principal amounts traded by Cougar Global, and that it trades exclusively in ETFs, which are securities that typically trade in large volumes and the trading of which does not affect the price of a single issuer, obtaining best execution in trading is relatively easy to monitor.

Research and Soft Dollars

Cougar Global does not use any soft dollar benefits and all research is independent.

Review of Accounts

Account Reviews

All positions are reconciled on a daily basis with the custodian. Cash and securities positions are reviewed separately by two Portfolio Administrators. In the event of a discrepancy, further investigation is conducted until the matter is resolved. All account asset allocations are reviewed regularly on a monthly basis and again at time of rebalancing.

Client Statements

Statements are mailed to clients on a quarterly basis by Cougar Global. Statements include a Contribution and Withdrawal Schedule, Annual and Quarterly Account Reconciliation, Portfolio Appraisal, Asset Allocation, Performance Summary, Quarterly Statement of Fees and a Letter from the President. These documents are generated by portfolio management, reporting and accounting software.



Client Referrals and Other Compensation

Referrals

A person, who is not an affiliate of Cougar Global, may enter into a Solicitation Agreement with Cougar Global. Upon entry, the solicitor may solicit US residents to become clients of Cougar Global. A referral contact must be an accredited investor. This arrangement entitles the solicitor to a referral fee for the referral of a client to Cougar Global.

The solicitor must disclose to the potential client as to the nature of the referral agreement with Cougar Global and any compensation that is received. The solicitor's activities shall be limited to:

- Delivery of Cougar Global approved brochures or other marketing materials to prospective clients.
- Bringing prospective clients to Cougar Global seminars or meetings.
- Introduction of prospective clients to the Cougar Global website.
- Providing Cougar Global with the names and contact information for prospective clients with 10 days of making initial contact.

A similar arrangement is in place in Canada, where entrants into the agreement, or Ambassadors, may refer Canadian residents to become clients of Cougar Global.

Compensation

The referral fee is paid solely by Cougar Global and is not charged to the client's account. Cougar Global will pay a referral fee equal to 20% of the net fee revenue received for each client referred by the solicitor, to a maximum amount of \$500,000 per account per year. The referral fees will be paid quarterly for 5 years upon account opening date. The solicitor will receive a Summary Report of Referred Clients from Cougar Global each quarter that lists the net quarterly fees received by Cougar Global for each referred client, and the amount that constitutes the referral fee.

Referral Fees will stop accruing on the effective termination date of the investment management relationship with the referred client.

Cougar Global will not charge referred clients a higher fee or any additional amount as a result of Cougar Global's obligation to pay the solicitor.



Custody

Custody

All client assets have been held in safekeeping by RBC Dexia. Cougar Global and RBC Dexia both provide clients with quarterly statements. Clients should expect that statements from Cougar Global and RBC Dexia would be consistent.

Investment Discretion

Discretionary Management

Cougar Global manages client assets on a discretionary basis. Upon signing of an agreement with Cougar Global, the account holder appoints Cougar Global as agent and attorney-in-fact with respect to the account. Once authorized, Cougar Global may, in its sole discretion and at the Investor's risk, purchase, sell, exchange, convert and otherwise trade the securities and other investments comprising the account, and act on behalf of the Investor in all other matters necessary or incidental to the handling of the account.

Voting Clients Securities

Voting

Since Cougar Global participates exclusively in broad-index based Exchange-Traded Funds, voting on behalf of the client is not required.

Financial Information

Prepayment

Cougar Global does not require or solicit any prepayments from clients in advance or maintain custody of client funds or securities.

Bankruptcy

Cougar Global has not been the subject of a bankruptcy petition at any time since its founding.