

Nia Global Solutions,
a division of
Domini Social Investments LLC

Discretionary Managed Account
Program Brochure
(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Nia Global Solutions, a division of Domini Social Investments LLC (at times referred to below as the “Nia Global Solutions” or “we”). If you have any questions about the contents of this brochure, please contact us at 1-888-456-0900 or by email at info@niaglobalsolutions.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.

Registration of an investment adviser does not imply a certain level of skill or training.

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

Item 2 – Material Changes

Domini Social Investments LLC (“Domini”) recently launched a new division, Nia Global Solutions, which is responsible for advising a discretionary managed account program as further described in this brochure.

Item 15 (Custody) of this brochure has been updated to reflect that Domini has custody of certain accounts in the Nia Global Solutions discretionary separately managed account program opened on behalf of clients of a related party.

Domini has no other material changes to report regarding this brochure other than the updating of its assets under management.

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THIS BROCHURE RELATES SOLELY TO THE DISCRETIONARY MANAGED ACCOUNT PROGRAM SPONSORED BY NIA GLOBAL SOLUTIONS. A SEPARATE BROCHURE HAS BEEN PREPARED FOR DOMINI. PLEASE SEE ITEM 4 FOR ADDITIONAL INFORMATION.

Item 4 – Advisory Business

Description of the Advisory Firm

Domini was founded in 1997 by Amy Domini, the firm's principal owner, Manager, Chief Executive Officer and Chief Investment Officer. Domini is a majority women owned and managed firm focused exclusively on investment advisory services and products for responsible investors. In September 2013, Domini launched a new division, Nia Global Solutions, to administer a discretionary managed account program.

Nia Global Solutions strives to bring investors a portfolio that harnesses the innovative social purposes of capitalism. Nia Global Solutions seeks only those opportunities that create meaningful outcomes, not only for its investors, but for people and the planet too.

Our investment universe seeks opportunities offering solutions, including:

- Sustainable planet products and services, including renewable, efficient energy and technology and excluding fossil fuel companies
- Affordable housing that is environmentally friendly and promotes community development
- Affordable transportation, with an emphasis on products and systems that eliminate or reduce damaging emissions
- Organic and non-GMO food products with an understanding that these contribute to a healthier planet and people
- Healthcare needs, including access to vision, hearing, family planning and safe water
- Educational technologies that expand opportunities and level the playing field for those with limited access
- Financial services, including basic banking and financial literacy, for traditionally underserved populations

Nia recognizes and celebrates the power of human creativity to bring about a gentle world. We seek companies that promote universal human dignity, whether through products or through corporate management practices, and companies that provide person-to-person commerce, fair trade, and innovative or alternative ways to make products available.

Types of Advisory Services

Nia Global Solutions offers advisory and management services to qualified clients, including high net worth individuals, trusts, estates, charitable organizations, corporations, and other business entities, seeking responsible investments. In addition, Nia Global Solutions offers advisory and management services to other registered investment advisory clients. Nia Global Solutions is currently managing a discretionary separately managed account program that pursues a global equity strategy and provides individuals with the opportunity to invest with purpose ("Nia Equity Portfolio" or "Equity Portfolio").

In addition, Domini currently sponsors and provides investment advisory and management services on a fully discretionary basis to mutual funds registered under the Investment Company Act of 1940, as amended (the "1940 Act"), seeking socially responsible investments. *Please request a copy of the Domini Brochure for additional information on these types of services.*

High Impact Responsible Investing

Nia Global Solutions strives to bring its clients a portfolio that demonstrates the highest social purpose of capitalism. Drawing on the concept of high-impact investing, Nia Global Solutions seeks opportunities that through their existence create meaningful results, not only for its clients, but for people and the planet too.

Our depth and experience differentiate Nia. Our research does not stop at identification of what we believe is a strong product or service. Management practices and leadership composition matter. We include companies that set a strong socially responsible culture at the highest level of the organization with a demonstrated leadership commitment to diversity, transparency, employee and supplier development, and ecological sustainability. A wonderful product array is not enough to merit inclusion in Nia's portfolio; a commitment by the company's management to leave the world a better place is also required.

Nia Global Solutions may, at its discretion, choose to change its social or environmental standards, add additional standards, or modify the application of its standards at any time.

Client Tailored Services and Client Imposed Restrictions

Clients may request that Nia Global Solutions tailor its advisory services for them to include reasonable restrictions and special objectives in accordance with the terms of the client's investment advisory agreement (the "Investment Advisory Agreement"). Typical examples of client requests for their portfolio include:

- Limiting maximum individual position sizes;
- Limiting maximum sector exposure; and
- Maintaining a specific cash position.

Wrap Fee Programs

Nia Global Solutions does not participate in any wrap fee programs.

Amounts Under Management

Domini and Nia Global Solutions, a division of Domini, have the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 1,364,545,775	N/A	February 28, 2014

Item 5 – Fees and Compensation

Investment Advisory Fees

Nia Global Solutions' investment advisory fees are agreed to in advance with each client pursuant to a written Investment Advisory Agreement. All fees are subject to negotiation.

Nia Equity Portfolio

Nia Global Solutions has adopted the following basic advisory fee schedule for its equity strategy:

Generally, the investment advisory fee will be based on a percentage of the average daily net asset value of each account during the preceding quarter and shall be determined in accordance with the following schedule:

- Accounts up to \$5 Million, 1.50% annually
- Accounts over \$5 Million or opened by registered investment advisory clients, 1.00% annually

The investment advisory fee shall be billed quarterly in arrears at the rate of 1/4th the annualized fee times the average daily net asset value during each calendar quarter. When services provided are for less than a complete calendar quarter, the fee will be pro-rated for the number of days the account was open during that quarter.

Payment of Fees

Advisory fees are withdrawn directly from the client's account with client written authorization. Upon termination of any account, any earned, unpaid fees will be due and payable.

Clients are Responsible for Third Party Fees

Fees for Nia Global Solutions separately managed account programs are exclusive of brokerage commissions, transaction fees, and other related costs and expenses, which will be incurred by the client. Clients also may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

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In accordance with the Investment Advisory Agreement, Nia Global Solutions may invest in mutual funds, exchange traded funds and other investment funds. Such funds also charge internal management fees. Such charges, fees and commissions are exclusive of and in addition to the advisory fee received by Nia Global Solutions.

Outside Compensation for the Sale of Securities to Clients

Except for (i) salary and bonus compensation from Domini and (ii) distributions as a result of ownership interests in Domini and its affiliates, neither Nia Global Solutions nor its supervised persons accept any compensation for the sale of securities or other investment products to clients, including asset-based sales charges or service-fees from the sale of mutual funds.

Item 6 – Performance-Based Fees and Side-By-Side Management

Nia Global Solutions does not charge any performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 – Types of Clients

Nia Global Solutions provides investment advisory services to responsible qualified investors, including high net worth individuals, trusts, estates, charitable organizations, corporations, and other business entities. In addition, Nia Global Solutions offers advisory and management services to other registered investment advisory clients.

Minimum Account Size

The minimum account size is generally \$1 million, which may be waived by Nia Global Solutions at its discretion based on the needs of the client and the complexity of the situation. Should the market value of an account fall below \$200,000, Nia Global Solutions may require additional monies to be deposited to bring the account value up to the required minimum or terminate the Investment Advisory Agreement.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Nia Global Solutions sets the high impact social and environmental standards for the separately managed account program, and also has discretionary authority to determine what securities are purchased, sold or exchanged, and what portion of assets are held uninvested in each client account, subject to any client restrictions set forth in the Investment Advisory Agreement.

Investing in securities involves risk. Client accounts are NOT insured by the FDIC and the value of client accounts will fluctuate. Clients may lose money.

Nia Global Solutions Equity Portfolio seeks to earn a competitive rate of return while adding value to society by investing in solution-oriented companies.

Through a bottom-up stock selection of 30-50 carefully selected securities that meet our strictest social and environmental criteria, the portfolio's investment objective is to provide investors with long-term total return. Our opportunistic investment strategy strives to produce equity-like returns over a market cycle without the self-imposed limits or concerns pursued by conventional or balanced investment approaches. Nia's Equity Portfolio does not constrain itself to a specified benchmark, but instead focuses on investing in innovation, which has traditionally been sought by investors in private equity markets.

Portfolio turnover in the Nia Equity Portfolio is expected to be modest as Nia Global Solutions intends to focus on the long-term viability and opportunity that each portfolio company provides, thus providing investors with a tax-advantaged strategy.

The Nia Global Solutions' investment team, led by Amy Domini, looks for companies of all sizes around the world that contain the following characteristics:

- Meet Nia's high-impact, solution-oriented social and environmental standards
- Show strong growth characteristics not fully appreciated by the markets
- Provide products or services that offer unique qualities for assuring long-term trends for growth
- Operate in a manner that makes clear the company's commitment to people, the planet and corporate social responsibility.

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The Nia Equity Portfolio is made up of stocks from companies around the world, with flexibility on market capitalization and location. The investment team, supported by the infrastructure of Domini Social Investments, selects securities from a pool of approximately 100 securities issued by companies determined by Nia Global Solutions to be among the most creative and positively impactful publicly traded companies.

Nia Global Solutions' high-impact, solution-oriented social and environmental standards may limit a client's investment in certain geographic areas due to prevailing political conditions that Nia Global Solutions believes affect the social and environmental performance of companies in those regions. Nia Global Solutions may determine that an investment is consistent with its standards even when the issuer's profile reflects a mixture of positive and negative social and environmental characteristics. Nia Global Solutions' approach recognizes that a company with a mixed record may still be effectively grappling with important issues in its industry and offering solutions towards leaving the world a better place.

In general, the application of Nia Global Solutions' high-impact, solution-oriented social and environmental standards will affect a client's exposure to certain issuers, industries, sectors, regions, and countries and may impact the relative financial performance of an account – positively or negatively – depending on whether such investments are in or out of favor. Nia Global Solutions' interpretation and application of its social and environmental standards is subjective and may evolve over time. In addition, in response to business practices in different regions of the world, Nia Global Solutions may determine that it is necessary to reinterpret or customize its social and environmental standards for a particular region.

There is a risk that information used by Nia Global Solutions to evaluate the social and environmental performance of issuers, industries, markets, sectors, and regions may not be readily available, complete, or accurate, which could negatively impact its ability to apply its social and environmental standards.

Nia Global Solutions may at its discretion choose to change its social and environmental standards, add additional standards, or modify the application of the standards at any time without client approval. This will impact client investments and may cause certain companies, sectors, industries, or countries to be dropped from or added to a client's portfolio. In addition, Nia Global Solutions reserves the right to vary the application of these standards to a client account depending, for example, on the Investment Guidelines set forth in the Investment Advisory Agreement or Client restrictions otherwise provided to Nia Global Solutions.

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Nia Global Solutions will not invest in investment vehicles, including registered investment companies and private investment funds, or subject client accounts to margin debt unless authorized by a client in the Investment Advisory Agreement.

Backed by the infrastructure of Domini Social Investments LLC, Nia Global Solutions encourages its research department and shareholder advocacy personnel to visit and or engage in dialogue with companies in which Nia Global Solutions may have an actual or potential investment or shareholder advocacy interest. In discussions with corporate insiders or others (including suppliers, competitors, and brokers), personnel are expected to direct questions toward customary subjects of interest in connection with the global social and environmental investment standards, such as current and long-range business and industry trends, production, compliance, and marketing policies and programs, supply chain practices, quality and composition of management, corporate governance policies and practices and financial standards, reporting and controls.

While personnel do not actively seek material, non-public information, they may receive it through meetings such as the ones described above. If this occurs, personnel are instructed to promptly notify the Chief Compliance Officer or General Counsel or other applicable reviewer regarding the nature of the information. We may take measures designed to protect Nia Global Solutions and its personnel from unlawful trading or the appearance of unlawful trading based upon such information. Such measures can include the imposition of information barriers or a temporary restriction on evaluation of the applicable security against Nia Global Solutions' high-impact, solution-oriented social and environmental standards. These restrictions may be imposed even in the absence of a legal requirement to do so, based on the decision that our business interests or our clients' interests are served by avoiding even the appearance that the employee is trading or the firm is making investment eligibility determination based on material, non-public information. Such measures might cause certain client accounts to experience a loss or be otherwise disadvantaged.

The Nia Global Solutions' investment standards are designed to seek those companies that, in Nia's opinion, most contribute to bettering our planet through real and tangible solutions to the world's most pressing problems.

Risks

Risk is inherent in investing. The value of your account advised by Nia Global Solutions may fluctuate significantly in the short and long term. You may lose all or part of your account or your account may not perform as well as other investments. The following is a

summary description of the material risks associated with the Nia Equity Portfolio. **Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

- **Country Risk.** Nia Global Solutions expects to diversify account investments among various countries throughout the world but accounts may hold a large number of securities in a single country. Such concentrated investment would increase the risk that economic, political, and social conditions in a country will have a significant impact on account performance.
- **Currency Risk.** Fluctuations between the U.S. dollar and foreign currency exchange rates could negatively affect the value of the account's investments. The accounts investments will benefit when applicable foreign currencies strengthen against the dollar and will be hurt when such foreign currencies weaken against the dollar.
- **Foreign Investing and Emerging Markets Risk.** Investments in foreign regions may be more volatile and less liquid than U.S. investments due to adverse political, social, and economic developments, such as nationalization or expropriation of assets, imposition of currency controls or restrictions, confiscatory taxation, and political or financial instability; regulatory differences, such as accounting, auditing, and financial reporting standards and practices; and the degree of government oversight and supervision. These risks may be heightened in connection with investments in emerging-market countries.
- **Information Risk.** There is a risk that information used by the adviser to evaluate the social and environmental performance of issuers, industries, markets, sectors, and regions may not be readily available, complete, or accurate, which could negatively impact the adviser's ability to apply its social and environmental standards. This may lead an account not to invest in certain issuers, industries, markets, sectors, or regions.
- **Market Risk.** The market prices of account securities may go up or down due to general market conditions, such as real or perceived adverse economic or political conditions, inflation, changes in interest rates, lack of liquidity in the markets, or adverse investor sentiment. When market prices fall, the value of your investment will go down. Financial crises have and may cause significant declines in the value and liquidity of many securities. Legislation recently enacted in the U.S. calls for changes in many aspects of financial regulation. The impact of the legislation on the markets, and the practical implications for market participants, may not be known for some time.
- **Small-, Mid-, and Large-Cap Companies Risk.** The market prices of companies at different capitalization levels may go up or down due to general market conditions and cycles. The value of your account will be affected by its exposure to small-, mid-, and large-cap companies.

- **Sector Concentration Risk.** An account may hold a large percentage of securities in a single sector (e.g., financials). If the account holds a large percentage of securities in a single sector, its performance will be tied closely to and affected by the performance of that sector.
- **Responsible Investing Risk.** The application of our social and environmental standards will affect the account's exposure to certain issuers, industries, sectors, regions, and countries and may impact the relative financial performance of the account — positively or negatively — depending on whether such investments are in or out of favor.
- **Style Risk.** The value of an investment may decrease if our investment approach does not respond well to current market conditions or our judgment regarding the quality, value, or market trends affecting a particular security, industry, sector or region is incorrect.
- **Investment in Other Investment Funds.** To the extent investment in other investment funds is permitted pursuant to the Investment Advisory Agreement, advisory fees will be charged to the client by both Nia Global Solutions and the underlying investment fund. As a result, the client, directly and indirectly as an investor in the underlying investment fund, bears multiple investment management fees, that in the aggregate exceed the fees that would typically be incurred by a direct investment in an investment fund.

Item 9 – Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this adviser or the integrity of our management.

Item 10 – Other Financial Industry Activities and Affiliations

Nia Global Solutions is a division of Domini. Domini has a number of relationships with related persons that are material to its advisory business or its clients.

Broker-Dealer

Domini wholly owns DSIL Investment Services LLC ("DSILD"), a registered broker-dealer. DSILD currently serves as the distributor to the mutual funds for which Domini serves as investment adviser and/or sponsor/administrator. Certain of the mutual funds for which Domini acts as adviser and/or sponsor/administrator have adopted distribution plans under Rule 12b-1 of the 1940 Act pursuant to which payments may be made to DSILD in connection with the offering or sale of shares of such mutual funds. Domini, as the parent company of DSILD, benefits from those payments. Domini also benefits from the sale of mutual fund shares, as its fees for services to mutual fund clients are based on a percentage of assets under management. Domini has an interest in increasing assets of the mutual funds, including in circumstances when that may not be in the mutual funds' or their shareholders' interests.

Mutual Funds

Domini serves as investment adviser and/or sponsor/administrator to the Domini Funds, a family of mutual funds which are investment companies registered under the 1940 Act. Under the 1940 Act, an investment adviser to a mutual fund may be deemed to be an affiliate of such mutual fund.

Investment advisory and management services are rendered to a mutual fund pursuant to a written agreement which, consistent with the 1940 Act, has been approved by the trustees and shareholders of the mutual fund, including a majority of the independent trustees.

Other Business Activities

Domini serves as administrator to one or more mutual funds, including the Domini funds. Domini serves as investment adviser and/or sponsor/administrator. Where Domini also serves as investment adviser and/or sponsor/administrator, the agreement for performing investment advisory services may also provide for the provision of administrative services. Fees for performing administrative services to mutual funds are negotiated depending on the level of services to be performed. Domini may outsource many of the services we would otherwise provide as administrator. Because Domini currently serves as administrator for a number of mutual funds, employees of Domini who perform services for Nia Global Solutions may devote a substantial portion of our time to the provision of fund administration services.

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Domini serves as shareholder servicing agent to one or more mutual funds, including funds for which Domini serves as investment adviser and/or sponsor/administrator. Such services are supplemental to those provided by the mutual fund's transfer agent. Fees for performing shareholder services to mutual funds are negotiated depending on the level of services to be performed. Domini employees (including those that perform services for Nia Global Solutions) may devote a significant portion of their time to the provision of shareholder services.

Domini serves as administrator for an interest-bearing omnibus deposit account offered through an arrangement with a federally regulated bank. Domini acts as an agent for the purpose of making deposits to and withdrawals from the account on behalf of account holders. Domini is the recordkeeper for the account. The rate of interest for the account is determined by the bank and is subject to change. Domini charges account holders a service fee for this account. The account is subject to FDIC coverage limits and conditions. Domini and the Domini Funds are not affiliated with any bank and are not FDIC insured.

Domini may provide research or consulting services to third-parties regarding certain industries, sectors and geographic areas and their consistency with its social and environmental standards. Fees for providing such services vary and are negotiated depending on the level of service to be performed.

Other Related Parties

Amy Domini, the founder and CEO of Domini, is a partner and private trustee with Loring, Wolcott & Coolidge Fiduciary Advisors LLP ("Loring Wolcott"), a registered investment adviser, and Loring Wolcott & Coolidge Trust LLC (Loring Wolcott Trust"), a New Hampshire chartered non-depository trust company, respectively. The partners of Loring Wolcott are primarily engaged in the business of managing fiduciary trust accounts. In most instances the partners are named individually to serve as trustees and subject to customary fiduciary duties. The partners also serve as directors of Loring Wolcott Trust. The Trust Company provides custody and administrative services for accounts on which partners serve as trustees or investment advisers. Certain Loring Wolcott trustee and advisory clients may be invested in the Nia Global Solutions managed account program or in shares of Domini's registered investment company clients. Certain partners of Loring Wolcott have an indirect ownership interest in Domini.

Registration as a Future Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

None of Nia Global Solutions, Domini Social Investments LLC, or their representatives are registered as a FCM, CPO, or CTA.

Item 11 – Code of Ethics; Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

Domini Social Investments LLC has adopted a Code of Ethics pursuant to Rule 204A-1 under the Investment Advisers Act of 1940, as amended, and Rule 17j-1 under the Investment Company Act of 1940, as amended. As a division of Domini, all Nia Global Solutions personnel are subject to the Code of Ethics. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Nia Global Solutions (and Domini) must acknowledge the terms of the Code of Ethics annually, or as amended. Clients may request a copy of the Code of Ethics by calling toll-free 1-888-456-0900 or writing Nia Global Solutions, Attn: Chief Compliance Officer, 532 Broadway, 9th Floor, New York, New York 10012.

Participation of Interest in Client Transactions

Domini Social Investments LLC, Nia Global Solutions, and their employees do not recommend to clients or buy or sell for Client accounts, securities in which they have a material financial interest.

Participation or Interest in Client Transactions – Personal Securities Transactions

Nia Global Solutions and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code of Ethics described above is designed to assure that the personal securities transactions, activities and interests of the employees of Nia Global Solutions will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily unaffiliated mutual funds, have been designated as exempt

transactions, based upon a determination that these would not materially interfere with the best interest of Nia Global Solutions' clients. In addition, the Code requires pre-clearance of many transactions and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is regularly monitored under the Code of Ethics, and designed to reasonably prevent conflicts of interest between Nia Global Solutions and its clients.

Item 12 – Brokerage Practices

Selection of Brokers

Nia Global Solutions generally does not have the discretionary authority to determine the broker-dealer to be used or the commission rates to be paid by a client and will operate under a directed brokerage arrangement. Currently, Nia Global Solutions expects that it will service client accounts established with Fidelity Brokerage Services LLC, or its affiliates and may service accounts established at other broker-dealers as agreed with clients from time to time.

Under a directed brokerage arrangement, Nia Global Solutions will be prevented from seeking and obtaining for the client potentially better overall executions, including more favorable prices and lower commission rates or other charges, than Nia Global Solutions otherwise might be able to obtain by, for example, negotiating better prices or lower commission rates with other broker-dealers. Accordingly, under a directed brokerage arrangement:

- the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices on transactions for its account than otherwise might be the case;
- a disparity in commission charges may exist between the commissions charged to a client engaging in directed brokerage, as compared to other clients; and
- potential conflicts of interest, including but not limited to Nia Global Solutions' fiduciary and best execution responsibilities, may arise from directed brokerage practices

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Nia Global Solutions anticipates that Fidelity Brokerage Services and its affiliates will provide it with technology solutions, including computer software and related systems support. Fidelity Brokerage Services may also provide assistance with marketing activities and investment research. Please see your brokerage account client agreement for additional information on these types of services. In addition to the foregoing, Nia Global Solutions anticipates that it will receive certain trading and administrative services from Fidelity Brokerage Services and its affiliates, including:

- Receipt of duplicate client confirmations and bundled duplicate statements;
- Access to a trading desk that exclusively services its Registered Investment Advisor Group or Separate Account Network participants;
- Access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and
- Access to an electronic communication network for client order entry and account information

In addition, Nia Global Solutions may receive similar benefits from other broker-dealers that custody client accounts. Nia Global Solution's receipt of the benefits described above creates a conflict of interest since these benefits may influence Nia Global Solutions' choice of whether to provide investment advisory and management services to accounts that choose a directed brokerage arrangement with another broker-dealer that does not furnish similar software, systems support, or services.

Aggregating (Block) Trading for Multiple Client Accounts

Generally, Nia Global Solutions does not engage in aggregating buy and sell orders for multiple clients ("bunching orders") unless there is a specific economic benefit expected for doing so. The applicable broker-dealer will allocate the securities purchased or sold in a bunched order among the participating accounts as Nia Global Solutions determines in good faith to be reasonable.

Item 13 – Review of Accounts

Nia Global Solutions will monitor individual client portfolios on a continuous basis. On a quarterly basis, Nia Global Solutions will provide or arrange for each client to receive account statements containing a description of all activity in the account during the

preceding quarter, including all transactions made on behalf of the account, all contributions and withdrawals made by a client, all fees and expenses charged to the account, and the value of the account at the beginning and end of the period.

Item 14 – Client Referrals and Other Compensation

Nia Global Solutions does not currently have any arrangements, oral or in writing, where it is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients.

From time to time Nia Global Solutions may pay fees to persons, some of which fees are payments for client referrals as permitted by Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended.

Item 15 – Custody

With the exception of the Nia Global Solutions discretionary separately managed account program described below, Domini does not ordinarily have custody of client funds or securities.

Certain Nia Global Solutions discretionary managed accounts are opened on behalf of clients of Loring, Wolcott & Coolidge Fiduciary Advisors LLP (Loring Wolcott), a registered investment adviser, and have account assets held by Loring, Wolcott & Coolidge Trust, LLC, a New Hampshire chartered non-depository trust company (Loring Wolcott Trust Company). Each of Loring Wolcott and Loring Wolcott Trust Company are related parties of Domini. As a result of such relationship, Domini has custody with respect to those Nia Global Solutions discretionary managed accounts. In such cases Domini has engaged a PCAOB Accountant to perform surprise annual examinations of the assets in those Nia Global Solutions discretionary managed accounts. In addition, at least once per calendar year Domini receives a written internal control report produced by Loring Wolcott Trust Company's PCAOB Accountant regarding its custody controls over client assets. Investors in the Nia Global Solutions managed account program that are clients of Loring Wolcott should refer to Loring Wolcott's brochure for additional information regarding its custody practices.

In addition, Nia Global Solutions generally has the ability to deduct advisory fees from its discretionary managed accounts.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains a client's investment assets. ***Nia Global Solutions urges you to carefully review such statements, including deductions reflecting the amount of the advisory fee paid, and compare such official custodial records to any account statements that we or our related party may provide to you.*** Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Please request a copy of the Domini Brochure for additional information regarding the custody of assets for other Domini clients.

Item 16 – Investment Discretion

Pursuant to the Investment Advisory Agreement, Nia Global Solutions receives discretionary authority from the client at the outset of an advisory relationship to determine the securities to be bought or sold.

When selecting securities and determining amounts for accounts, Nia Global Solutions follows the investment policies, limitations and restrictions set forth in a client's Investment Advisory Agreement.

Any changes in investment guidelines and restrictions must be provided to Nia Global Solutions in writing as specified in the Investment Advisory Agreement.

Item 17 – Voting Client Securities

As an investment adviser, Nia Global Solutions has an important opportunity to enhance shareholder value and corporate accountability through its proxy voting policies. Nia Global Solutions views the proxy voting process as a critically important avenue through which shareholders can address management on a wide-range of important issues.

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Nia Global Solutions is required to adopt proxy voting policies and procedures that are reasonably designed to ensure that the proxy voting responsibilities that are entrusted to it are exercised in the best interests of clients. Nia Global Solutions has adopted Proxy Voting Guidelines and Procedures which set forth general guidelines for voting proxies which cover a spectrum of corporate governance, social, and environmental issues. Nia Global Solutions may vote proxies in-house or have an unaffiliated proxy voting vendor vote client proxies according to the Proxy Voting Guidelines then in effect for Nia Global Solutions clients. Domini has engaged a proxy voting vendor to vote all Nia Global Solutions client proxies according to these Guidelines. Domini retains oversight responsibility for any proxy voting vendor and the authority to decide the final vote absent a material conflict of interest.

Clients may give Nia Global Solutions discretion to vote proxies as set forth in the applicable Investment Advisory Agreement. In such cases, Nia Global Solutions or the applicable proxy voting vendor shall determine how to vote proxies based on its reasonable judgment and in accordance with its proxy voting procedures and Nia's published Proxy Voting Guidelines as in effect at such time. From time to time, Nia Global Solutions may have a business relationship with an issuer whose securities are held in a client portfolio. The issuer may be a client, investment counterparty, a lender, business partner or a vendor. Nia Global Solutions believes its Proxy Voting Guidelines and Procedures are reasonably designed to manage the conflicts created by those business relationships, as described below.

In most instances, votes are cast according to predetermined Guidelines, and potential conflicts of interests cannot influence the outcome of a Nia Global Solutions' voting decision. Where a proxy voting decision is decided in-house by Nia Global Solutions and a conflict of interest has been identified, the employee with the conflict may not participate in the decision-making process. If the conflict relates to the business of the firm or cannot otherwise be removed, Nia Global Solutions may present the conflict to the client and seek guidance or consent to vote the proxy. Alternatively, Nia Global Solutions may abstain from voting the proxy or delegate the voting decision to its proxy voting agent. Because identifying potential conflicts is a self-reporting process, if the apparent conflict is not raised by someone within the firm, it may not be identified and reviewed.

In certain instances, Nia Global Solutions may be unable to vote, determine not to vote, or abstain from voting a proxy on behalf of one or more clients. In a number of countries, the need to block or re-register shares to vote proxies may make voting undesirable. In addition, proxies may not arrive in a timely fashion or Nia Global Solutions may determine

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a division of Domini Social Investments LLC
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that the cost of executing a proxy is excessive. Finally, Nia Global Solutions may lack sufficient information to cast an appropriate vote.

Unless a client has retained voting authority for its account, client direction or consent with respect to a vote would generally only be sought by Nia Global Solutions in connection with a conflict of interest.

The Nia Global Solutions Proxy Voting Guidelines and Procedures are subject to change without notice. They will be reviewed and updated no less frequently than annually. Clients may obtain a copy of our Proxy Voting Guidelines or information regarding how Nia Global Solutions voted any proxies on behalf of their account(s) upon request by calling toll-free 1-888-456-0900 or writing info@niaglobalsolutions.com or Nia Global Solutions, Attn: Chief Compliance Officer, 532 Broadway, 9th Floor, New York, New York 10012. The policy is also available on our website at www.niaglobalsolutions.com.

Item 18 – Financial Information

Registered investment advisers are required to provide you with certain financial information or disclosures about the adviser's financial condition. Neither Nia Global Solutions nor Domini Social Investments LLC has a financial condition that is reasonably likely to impair its ability to meet its contractual obligations to clients, and has not been the subject of a bankruptcy proceeding.