

Brochure Form ADV-2

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This brochure provides information about the qualifications and business practices of Corporate Knights Capital Inc. If you have any questions about the contents of this brochure, please contact us at 416-203-4674. 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 Corporate Knights Capital Inc. also is available on the SEC's website at www.adviserinfo.sec.gov

Item 2

Material Changes

Not Applicable.

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Item 4: Advisory Business

Introduction

Corporate Knights Capital Inc. (hereafter CKC) is an investment advisor that offers a variety of services including but not limited to *Portfolio Management, Asset Allocation, Strategy Construction, and Research*. These services incorporate traditional financial data and high quality corporate sustainability data.

CKC was established in 2014 as a wholly owned subsidiary of Corporate Knights Inc. (established in 2002).

Principal Owners

CKC is a wholly owned subsidiary of Corporate Knights Inc. whose principal owner is Tobit Heaps.

Types of Services

Portfolio Management

CKC aims to provide investment management services to clients to manage portfolios according to algorithms. This includes but is not limited to trading, reporting, research and execution.

Asset Allocation & Strategy Construction

CKC aims to provide systematic and quantitative portfolio construction services; this entails creating customized algorithms or implementing existing proprietary algorithms to meet client needs. CKC aims to provide these services in the listed equity and fixed income spaces.

Research

CKC has a research platform at <http://www.corporateknightscapital.com/> and CKC will assist clients to select among the listed strategies, provided that the strategy is suitable for them. This platform is a library of pre-built algorithms that incorporate high quality corporate sustainability data. CKC also offers customized research services clients.

CKC intends to provide these services to individual and institutional clients, including but not limited to foundations, endowments, platforms, and other funds.

All of CKC's models are researched and developed in house by leveraging existing academic and industry research.

Tailoring of Services

CKC will tailor services to meet the individual investment objectives of clients, including selecting the appropriate algorithm from our existing library of algorithms or creating new algorithms, where clients are seeking to manage a specific risk-to-return objective. We specialize in integrating quantitative Environmental, Social and Governance data into portfolio

construction. Clients may impose restrictions on certain securities or types of securities conditional that they accept the potential risks involved.

Item 5: Fees and Compensation

Standard Practice

CKC generally charges a management fee ranging from (0.01% to 2.00%) depending on the complexity of the services required and the level of service required. Generally fees are negotiable and decrease as the assets increase. Strategies that require substantial customization and additional research will be priced higher than those already built. Accordingly, clients using algorithms from our prebuilt platform (sustainable beta) will be charged a fee proportional to assets that is generally lower than customized services.

For “qualified clients,” as defined under the Investment Advisers Act of 1940, and institutional investors undertaking certain types of strategies performance fees may be charged.

TIMING AND PAYMENT OF ADVISORY FEES

Fees are payable in advance of the next quarter and deducted directly from clients’ accounts in the third party custodian bank on the last trading day of the previous quarter. Should a client terminate the advisory contract early they will be refunded their proportion of the fee for the remainder of the quarter (e.g. if 60 days are left in the quarter $60/90 \times \text{fee}$ will be refunded).

Generally, CKC will not directly deduct fees for clients to which CKC is acting as a sub-adviser. Instead CKC will be paid by the adviser to such clients as set forth in the advisory contracts or, in the case of fund clients, as set forth in the limited partnership agreement and other governing documents.

Additional Fees and expenses

Clients may also incur custodial, brokerage and other transaction costs in addition to the fees charged by CKC. Commissions charged to clients will be sent directly to the transacting broker dealer; which may be in certain cases the account’s custodian.

Please refer to item 12 for more information on brokerage fees and practices.

Neither CKC nor any of its supervised persons accepts compensation for the sale of securities or other investment products.

Sub-Advisory

CKC may sub-advise funds or separately managed accounts, the fees charged will be proportional to the assets and the level of research required for the advisory services.

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

As described in item 5, CKC will charge asset-based management fees to all clients. For qualified investors who have certain risk-to-return mandates that require the use of complex mathematical and statistical strategies a performance fee will be charged as set forth in the advisory contract, having been negotiated with and agreed to by the client.

To address the conflict of interest between management fee based strategies and performance fee based strategies CKC uses algorithmic models that decide all allocation and investment decisions.

Algorithmic rules-based models are designed to remove human interference and conflicts of interest from the investment process as all security selection is systematic and driven by mathematical rules CKC cannot attempt to over or under allocate care to various accounts., this removes the potential conflict of interest as each client knows they are receiving a service that systematically maximizes variables representing their goals.

Item 7: Types of Clients

As described previously CKC will provide advisory services to individuals, institutions, registered investment advisors, trusts, endowments and foundations, corporations and retirement plans, including 401(k) profit sharing plans and IRAs.

The minimum to open an account with CKC is \$25,000.

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

CKC prides itself on being able to use mathematical/statistical analysis on both financial data and environmental social and governance data. CKC can then construct algorithms to process this data and produce analysis that can be then implemented into algorithmic portfolio construction to meet client's financial and non-financial objectives. Due to the fact CKC is a company that relies on writing computer algorithms; all strategies/analysis are objective and rules-based. CKC frequently leverages and implements existing academic research in order to give clients' algorithms that are current with academic and industry research. We use these algorithms to potentially enhance the risk to return profile of client portfolios.

Products and Services

Sustainable Beta

The Sustainable Beta platform used by CKC allows clients to build their own strategies off a “standard” large cap benchmark. As all products are rules based and systematic this allows clients to gain comfort and understand the moving parts in investment decision making. CKC aims to empower clients to profit through a superior allocation of risk by using proprietary algorithms to control risk.

The Sustainable Beta Platform consists of over 1000 strategies where investors can choose a market in the world to invest in, an environmental social or governance factor and way to normalize the factor for comparability, portfolio weighting method (derived from academic and proprietary research) and rebalancing frequency.

In terms of selecting an algorithm, the client’s risk-to-return profile will be considered to choose the algorithm that is most suitable with their investment needs and constraints.

Integrated Alpha

The Integrated Alpha strategy is a strategy that uses a subset of the S&P500 index that has passed a series of Environmental Social and Governance tests. This subset is then refined by a proprietary algorithm that uses fundamental (balance sheet, income statement valuation) and market (volatility, momentum, historical returns) factors to select securities that can potentially generate risk adjusted returns. This model automatically refines itself on an annual basis, based off machine learning research. Finally the securities are weighted in order to minimize the correlation between securities and avoid tail risk (expected shortfall).

Customized Portfolios

Customized construction services start by establishing a quantitative variable to be maximized or minimized, identifying potential constraints and limitations and then building algorithms or employing existing algorithms to implement the aforementioned policy on the clients’ investable universe.

The customization process generally follows three steps:

1. The process first includes modeling client needs and client constraints in a clear rules based objective manner, then identifying the client goal as a mathematical function.
2. CKC then creates mathematical models to estimate the parameters required to maximize the client’s objective within their constraints.
3. Finally CKC upon approval of the client will implement the trades using the model and monitor it to ensure performance is within specified parameters.

Investment Risk(s)

Risks applicable to accounts advised by CKC will depend on the specifications of the client account and its risk tolerance.

For our Sustainable Beta platform the following risks (not comprehensive) are present:

- Limited Operating History
- Loss of Principal
- Asset Class Risk
- Concentration Risk
- Market Risk
- Equity Securities Risk
- Management Risk
- Liquidity Risk
- Developed Countries Risk (if applicable)
- Portfolio Turnover Risk
- Emerging Markets Risk (if applicable)
- Currency Risk(if applicable)
- Non-US Securities Risk (if applicable)
- Quantitative Risk

A non-comprehensive list of the potential risk factors in a custom portfolio is listed:

Limited Operating History – CKC was incorporated in 2014 and has a limited operating history.

Loss of Principal – Any investment may experience a loss of principal due to any of the listed risk factors.

Asset Class Risk - Securities in a portfolio may underperform in comparison to the general securities markets, a particular securities market, or other asset classes.

Concentration Risk - Concentrating investments in an issuer or issuers, in a particular country, group of countries, region, market, industry, group of industries, sector or asset class means that performance will be more susceptible to loss due to adverse occurrences affecting that issuer or issuers, particular country, group of countries, region, market, industry, group of industries, sector or asset class than a more diversified mix of investments.

Counterparty Risk - Transaction, including certain derivative transactions, entered into directly with a counterparty is subject to the risk that the counterparty will fail to perform its obligations in accordance with the agreed terms and conditions of the transaction. A counterparty may become bankrupt or otherwise fail to perform its obligations due to financial difficulties, resulting in significant delays in obtaining any recovery in a bankruptcy or other reorganization proceeding or no recovery in such circumstances.

Credit/Default Risk - Debt issuers and other counterparties of fixed income securities or instruments may default on their obligation to pay interest, repay principal or make a margin payment, or default on any other obligation. Additionally, the credit quality of securities or instruments may deteriorate (e.g., be downgraded by ratings agencies), which may impair a security's or instruments liquidity and decrease its value.

Currency Risk - Currencies may be purchased or sold for a portfolio through the use of forward contracts or other instruments. A portfolio that seeks to trade in foreign currencies may have limited access to certain currency markets due to a variety of factors including government regulations, adverse tax treatment, exchange controls, and currency convertibility issues. A portfolio may hold investments denominated in currencies other than the currency in which the portfolio is denominated. Currency exchange rates can be volatile, particularly during times of political or economic unrest or as a result of actions taken by central banks. A change in the exchange rates may produce significant losses to a portfolio.

Cyber Security Risk - With the increased use of technologies such as the Internet to conduct business, a portfolio is susceptible to operational, information security and related risks. In general, cyber incidents can result from deliberate attacks or unintentional events and are not limited to, gaining unauthorized access to digital systems, and misappropriating assets or sensitive information, corrupting data, or causing operational disruption, including the denial-of-service attacks on websites. Cyber security failures or breaches by a third party service provider and the issuers of securities in which the portfolio invests, have the ability to cause disruptions and impact business operations, potentially resulting in financial losses, the inability to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, and/or additional compliance costs, including the cost to prevent cyber incidents.

Derivative Risk - Investments in derivatives, including but not limited to, options, futures, options on futures, forwards, participatory notes, swaps, structured securities, tender-option bonds and derivatives relating to foreign currency transactions, which can be used to hedge a portfolio's investments or to seek to enhance returns, entail specific risks relating to liquidity, leverage and credit that may reduce returns and/or increase volatility. Losses in a portfolio from investments in derivative instruments can result from the potential illiquidity of the markets for derivative instruments, the failure of the counterparty to fulfill its contractual obligations, the portfolio receiving cash collateral under the transactions and some or all of that collateral being invested in the market, or the risks arising from margin requirements and related leverage factors associated with such transactions. In addition, subject to jurisdictional limits, the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, as amended, established a new regulatory framework for oversight of over-the-counter derivatives transactions by the CFTC and the SEC and heightens the existing regulation of futures markets. The extent and impact of the regulation is not yet known and may not be known for some time. New regulation may make derivatives more costly, may limit the availability of derivatives, or may otherwise adversely affect the value or performance of derivatives.

Emerging Markets Risk - Investments in emerging markets may be subject to a greater risk of loss than investments in more developed markets, as they are more likely to experience inflation risk, political turmoil and rapid changes in economic conditions. Investing in the securities of emerging markets involves certain considerations not typically associated with investing in more developed markets, including but not limited to, the small size of such securities markets and the low volume of trading (possibly resulting in potential lack of liquidity and in price volatility), political risks of emerging markets which may include unstable governments, government

intervention in securities or currency markets, nationalization, restrictions on foreign ownership and investment, laws preventing repatriation of assets and legal systems that do not adequately protect property rights. Further, emerging markets may be adversely affected by changes to the economic health of certain key trading partners, such as the US, regional and global conflicts and terrorism and war. Emerging markets often have less uniformity in accounting and reporting requirements, unreliable securities valuation and greater risk associated with custody of securities.

Equity Securities Risk - Equity securities are subject to changes in value and their values may be more volatile than other asset classes. The value of equity securities varies in response to many factors. These factors include, without limitation, factors specific to an issuer and the industry in which the issuer securities are subject to stock risk. Historically, U.S. and non-U.S stock markets have experienced periods of substantial price volatility and may do so again in the future.

Execution Risk – There is no assurance by CKC that the purchase and sale of securities/investments will be made on a best price and best execution basis, although CKC will seek to achieve best execution. CKC may cause accounts to pay brokerage commissions in excess of the lowest rates available to brokers who execute transactions for the benefit of the account or who otherwise provide research and brokerage services to CKC, solely if the services received from that broker are deemed to add a net benefit or are essential to the client.

Hedging Risk - Hedging techniques could involve a variety of derivatives, including futures contracts, exchange listed and over-the-counter put and call options on securities, financial indices, forward foreign currency contracts, and various interest rate transactions. A transaction used as a hedge to reduce or eliminate losses associated with a portfolio holding or particular market that a portfolio has exposure, including currency exposure, can also reduce or eliminate gains. Hedges are sometimes subject to imperfect matching between the hedging transaction and its reference portfolio holding or market (correlation risk), and there can be no assurance that a portfolio's hedging transaction will be effective. In particular, the variable degree of correlation between price movements of hedging instruments and price movements in the position being hedged creates the possibility that losses on the hedge may be greater than gains in the value of the positions of the portfolio. Increased volatility will generally reduce the effectiveness of the portfolio's currency hedging strategy. Hedging techniques involve costs, which could be significant, whether or not the hedging strategy is successful. Hedging transactions, to the extent they are implemented, may not be completely effective in insulating portfolios from currency risks.

Income Risk - A portfolio's income may decline when interest rates decrease. During periods of falling interest rates an issuer may be able to repay principal prior to the security's maturity ("prepayment"), causing the portfolio to have to reinvest in securities with a lower yield, resulting in a decline in the portfolio's income.

Index-Related Risk - Index strategies are passively managed and do not take defensive positions in declining markets. There is no guarantee that a portfolio managed to an index strategy ("index portfolio") will achieve a high degree of correlation to its underlying index and therefore achieve its investment objective. Market disruptions and regulatory restrictions could have an adverse effect on the index portfolio's ability to adjust its exposure to the required levels in order to track its underlying index. Errors in index data may occur from time to time and may not be identified and corrected for a period of time, and may have an adverse impact on a portfolio managed to the index. The index provider does not provide any warranty or accept any liability in relation to the quality, accuracy or completeness of data in respect of their indices, and does not guarantee that the Index will be in line with its described index methodology. Errors and rebalances carried out by the index provider to the underlying index may increase the costs and market exposure risk of a portfolio.

Interest Rate Risk - When interest rates increase, fixed income securities or instruments will generally decline in value. Long-term fixed income securities or instruments will normally have more price volatility because of this risk than short-term fixed income securities or instruments.

Liquidity Risk - Liquidity risk exists when particular investments are difficult to purchase or sell (e.g., not publicly traded and/or no market is currently available or may become less liquid in response to market developments). This can reduce a portfolio's returns because the portfolio may be unable to transact at advantageous times or prices. Investments that are illiquid or that trade in lower volumes may be more difficult to value.

Long/Short Strategy Risk - There is no guarantee that returns on a portfolio's long or short positions will produce high, or even positive, returns and the portfolio could lose money if either or both the portfolio's long and short positions produce negative returns.

Management Risk - A portfolio is subject to management risk, which is the risk that the investment process, techniques and analyses applied will not produce the desired results, and those securities or other financial instruments selected for a portfolio may result in returns that are inconsistent with the portfolio's investment objective. Portfolios advised by CKC may become subject to threshold limitations on aggregate ownership interests in certain companies arising from statutory regulatory or self-regulatory organization requirements or company ownership restrictions (e.g., poison pills or other restrictions in organizational documents). In addition, legislative, regulatory, or tax developments may affect the investment techniques or opportunities, available in connection with managing the portfolio and may also adversely affect the ability of the portfolio to achieve its investment objective (e.g., where aggregate ownership thresholds or limitations must be observed, a portfolio may become subject to investment limitations in certain companies arising from statutory regulatory or self-regulatory organization requirements or company ownership restrictions).

Market Risk - The market value of the instruments in which a portfolio invests may go up or down in response to the prospects of individual companies, particular sectors or governments and/or general economic conditions throughout the world due to increasingly interconnected global economies and financial markets.

Non-US Exchange Risk Exposure - Portfolios that are denominated in US dollars, but invest in securities denominated, and may receive a portion of their income and gains, in currencies other than the US dollar, may experience a reduction in the value of such other currencies relative to the US dollar prior to conversion into US dollars. This may adversely affect the net asset values of the portfolio.

Non-US Securities Risk - Investments in the securities of non-US issuers are subject to the risks associated with non-US markets in which those non-US issuers are organized and operate, including but not limited to, risks related to foreign currency, limited liquidity, less government regulation, privatization, and the possibility of substantial volatility due to adverse political, economic, geographic events, or other developments, differences in accounting, auditing and financial reporting standards, the possibility of repatriation, expropriation or confiscatory taxation, adverse changes in investment or exchange controls or other regulations and potential restrictions on the flow of international capital. These risks are often heightened for investments in smaller capital markets, emerging markets, developing markets or frontier markets.

Offshore Investor Risk - A portfolio, seeking to trade in foreign currencies may have limited access to certain currency markets due to a variety of factors including government regulations, adverse tax treatment, exchange controls, and currency convertibility issues. These limitations and restrictions may impact the availability, liquidity and pricing of the financial instruments that are necessary for the portfolio to gain exposure to the currency markets, impairing the portfolio's ability to achieve its investment objective.

Operational Risk - The risk that a portfolio may suffer a loss arising from shortcomings or failures in internal processes, people or systems, or from external events. Operational risk can arise from many factors ranging from routine processing errors to potentially costly incidents related to, for example, major systems failures.

Portfolio Turnover Risk - Active and frequent trading of securities and financial instruments in a portfolio may result in increased transaction costs, including potentially substantial brokerage commissions, fees and other transaction costs. In addition, frequent trading is likely to result in short-term capital gains tax treatment. As a result of portfolio turnover, the performance of a portfolio may be adversely effected.

Quantitative Model Risk - When executing an investment strategy using various proprietary quantitative or investment models, securities or other financial instruments selected may perform differently than expected, or from the market as a whole, as a result of a model's component factors, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction, implementation and maintenance of the models (e.g., data problems, software issues, etc.). There can be no assurance that a model will achieve its objective.

Short Selling Risk - Short sales in securities that it does not own exposes a portfolio to speculative exposure risks. If a portfolio makes short sales in securities that increase in value, the portfolio will lose value. Certain securities may not be available or eligible for short sales. Short selling involves the risks of: increased leverage, and its accompanying potential for

losses; the potential inability to reacquire a security in a timely manner, or at an acceptable price; the possibility of the lender terminating the loan at any time, forcing the portfolio to close the transaction under unfavorable conditions; the additional costs that may be incurred; and the potential loss of investment flexibility caused by the obligation to provide collateral to the lender and set aside assets to cover the open position. There can be no assurance that a portfolio will be able to close out a short sale position at any particular time or at an acceptable price. Any loss on short positions may or may not be offset by investing short-sale proceeds in other investments.

Valuation Risks - The net asset value of a portfolio as of a particular date may be materially greater than or less than its net asset value that would be determined if a portfolio's investments were to be liquidated as of such date. For example, if a portfolio was required to sell a certain asset or all or a substantial portion of its assets on a particular date, the actual price that a portfolio would realize upon the disposition of such asset or assets could be materially less than the value of such asset or assets as reflected in the net asset value of a portfolio. Volatile market conditions could also cause reduced liquidity in the market for certain assets, which could result in liquidation values that are materially less than the values of such assets as reflected in the net asset value of a portfolio.

Volatility Risk - The prices of a portfolio's investments can be highly volatile. Price movements of assets are influenced by, among other things, interest rates, general economic conditions, the condition of the financial markets, developments or trends in any particular industry, the financial condition of the issuers of such assets, changing supply and demand relationships, programs and policies of governments, and national and international political and economic events and policies.

Item 9: Disciplinary Information

Not Applicable

Item 10: Other Financial Industry Activities and Affiliations

CKC publishes a newsletter which is available to clients free of charge.

Item 11: Code of ethics

Pursuant to SEC Rule 204A-1 CKC has adopted a code of ethics.

This code of ethics includes topics such as fair dealing, confidentiality, material non public information, loyalty, prudence, care and conflicts of interest.

In order to uphold standards of conducts and excellence CKC has adopted the CFA Institute code of ethics and standard of professional conduct with the exception of standards VII (Responsibilities towards the CFA Institute) which can be found here (<http://www.cfapubs.org/doi/pdf/10.2469/ccb.v2010.n14.1>).

CKC employees are prohibited from knowingly trading against clients (front-running/scalping). CKC employees may only trade on a CKC recommendation after all clients have been notified or accounts have been traded.

CKC employees that have the ability to control an accounts asset allocation must submit a quarterly holdings report, no later than 30 days after the close of the calendar quarter, with the exception of automated investment plans.

CKC will provide a copy of its code of ethics to any client or prospective client upon request.

Item 12: Brokerage Practices

Execution Practices and Selection of Brokers

CKC seeks to obtain best execution for its clients. In reviewing which broker-dealer to use for client orders, CKC will consider, among other factors, price, quality of execution, speed, services provided, research provided, data provided, ability to execute, track record of execution.

Research and Other Soft-Dollar Benefits

CKC may use broker-provided products and services to assist in maximizing client value. In cases where CKC obtains a service or benefit with soft-dollars that is inconsistent with maximizing client value (for that specific client), CKC will make a reasonable allocation of the cost of the product or service and that portion will be paid by CKC in hard dollars.

Where the soft-dollars obtained are in the best interest of the client CKC will disclose to the client the services received and the soft-dollar cost.

CKC may use soft dollar benefits to procure services that benefit all accounts and these items will be disclosed to clients as well the cost of these services.

CKC will not recommend, request or require that a client direct us to execute transactions through a specified broker-dealer. However should a client request this, CKC may permit this with the client's understanding that this may adversely affect it.

Aggregation of orders CKC may aggregate orders for the purchase and sale of securities for client portfolios if it is deemed to deliver cost benefits to clients. Aggregated purchased securities, proceeds and costs will be allocated pro rata among the participating accounts. Clients buying or selling the same security on the same day may have their orders aggregated and passed on to the executing broker. Fills will then be allocated pro-rata.

Item 13: Review of accounts

CKC will conduct a quarterly review of all client accounts and strategies to ensure that they are in accordance with reaching their objectives. Clients will electronically receive a monthly report

containing performance. All reviews will be performed by the Director of Quantitative Strategy and a Quantitative Analyst. Our review includes calculating performance, risk to return metrics of the portfolio and its benchmark and to verify that the portfolio is performing within a range of its target parameters. CKC will provide a monthly performance factsheet to clients whose assets are directly managed by CKC.

Item 14: Client Referrals and Other Compensation

Not applicable.

Item 15: Custody

All client funds and client assets will be held in custody with a third party qualified custodian. CKC will require clients to accept a clause in the advisory contract that allows fees to be deducted directly from client accounts.

CKC does not have and does not accept physical care or custody of any assets of any client.

Clients will receive monthly statements from the third party custodian bank and are to verify that the valuations in these statements matches the valuations received from CKC.

CKC may not have authority to deduct fees from client accounts for which it serves as a subadviser.

Item 16: Investment Discretion

CKC may have discretionary authority to manage client accounts. All clients must enter into an advisory contract outlining the scope and nature of CKC's discretionary authority. Limitations may be placed on CKC discretionary authority, which will be hard-coded in client specific algorithms.

Item 17: Voting Client Securities

CKC has the fiduciary responsibility to determine how to vote proxies on behalf of all clients whose accounts are directly by managed CKC. CKC will seek to ensure that all votes are in the best long term interests of clients. CKC will seek to vote proxies in a uniform manner in adherence with these policies unless specified to do otherwise by a client.

In order to eliminate a conflict of interest between CKC and clients the analytical framework and analysis used to determine proxy votes will be made available on client requests.

Voting Guidelines

CKC seeks to vote all proxies in accordance with making a best-effort to maximize client value. To evaluate proposals we will consult with academic/industry best practices. CKC will disclose

all votes made to clients and the rationale for how the vote was determined, and also the relevant evaluation framework.

Should a client demand that proxies for a separately managed account are voted in a certain way CKC will accommodate that client with the understanding that the client is responsible for the risks taken and consents to taking those risks.

Clients may obtain a history of proxy votes, policies and procedures from CKC by written or electronically mailed request.

Item 18: Financial Information

Not applicable

Item 19: Requirements for State-Registered Advisers

Not applicable