



Form ADV Part 2A

March 22, 2017

Item 1 – Cover Page

Renaissance Investment Management

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March 22, 2017

Throughout this document Renaissance Investment Management will be referred to as “Renaissance.”

This Form ADV Part 2A (the “Brochure”) provides information about the qualifications and business practices of Renaissance. If you have any questions about the contents of this Brochure, please contact us at 513-723-4500 and/or compliance@reninv.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about Renaissance and our parent company, Affiliated Managers Group, Inc. (“AMG”), and other affiliated advisers is also available on the SEC’s website at www.adviserinfo.sec.gov. Further information about both AMG and AMG’s Affiliates is provided in Item 10.

Although Renaissance is registered as an investment adviser under the Investment Advisers Act of 1940, this registration does not imply that Renaissance or our personnel have a certain level of skill or training.

Item 2 – Material Changes

The following changes have been made to the Brochure since our last annual filing, March 21, 2016, and are incorporated in this filing effective March 22, 2017:

■ **Item 4 – Advisory Business**

Updated Renaissance's assets under management to reflect December 31, 2016 asset levels.

Subsection: Miscellaneous Sections: Added a miscellaneous section containing the following sections:

- No Financial Planning or Implementation Services;
- Sub-Advisory Engagements;
- Wrap/Separate Managed Account/UMA Program Engagements;
- Introduction from Investment Professional;
- ERISA Plan Engagements;
- Investment Risk;
- Client Obligations; and,
- Directed Brokerage.

■ **Item 5 - Fees and Compensation**

Subsection: Standard Fee Schedules and Fee Calculation Methodology, Standard Fee Schedules: Added the Developed Country International Strategy to the fee schedule chart.

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

Subsection: Material Related Risk,

- *Cybersecurity Risk:* Added a description of Cybersecurity risk and added the risk to the Strategy Risk Chart.
- *Liquidity Risk:* Expanded the description of the risk and how Renaissance minimizes that risk.
- *Investing Risk, Quantitative Investing Risk:* Clarified that quantitative analysis is a screening tool used to narrow our research universe and is not a final determinant in our purchase or sale decisions.

Subsection: Strategy Overview, Developed Country International: Added a description of our Developed Country International Strategy and added the strategy to the Strategy Risk Chart.

■ **Item 12 - Brokerage Practices**

Subsection: Selection Factors for Brokers: Updated the list of broker selection factors.

Subsection: Step-Out Trades: Defined a net trade.

■ **Appendix I - Definitions**

Subsection: Developed Markets: Added a definition for Developed Markets.

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Item 4 – Advisory Business

Renaissance Investment Management is registered as an Investment Advisor under the Investment Advisors Act of 1940 and actively manages portfolios for a variety of institutions and individuals. We are engaged in the business of investment management and our efforts are focused on delivering competitive long-term performance across a variety of asset classes and strategies. Our primary mission is to help our clients achieve their financial and investment objectives through the provision of systematic and disciplined investment strategies.

Renaissance has been in business since 1978 and as of this filing has 21 employees working at our office located in Covington, Kentucky. As of December 31, 2016, we had approximately \$4.4 billion in assets under management, which includes discretionary and non-discretionary UMA assets.

We serve as an investment adviser or sub-adviser to various clients including corporations, charities, employee benefit plans, endowments, foundations, individuals, high net worth clients, retirement plans, public entities, investment companies, Taft Hartley clients, Wrap/SMA programs, and UMA programs. Please see “Item 7 – Types of Clients” for more information regarding our clients.

Principal Ownership

Renaissance’s principal owner is Affiliated Managers Group (“AMG”). The remaining minority interest is owned by our employees (Partners of Renaissance).

AMG holds a majority equity interest in Renaissance and is a publicly-traded asset management company (NYSE: AMG) with equity investments in boutique investment management firms. AMG also holds equity interests in other investment management firms (“AMG Affiliates”). Further information about AMG and AMG’s Affiliates is provided in “Item 10 – Other Financial Industry Activities and Affiliations.”

Types of Advisory Services

Renaissance specializes in domestic equity, international equity, REIT, balanced, asset allocation and fixed income strategies across all market capitalization ranges for institutional clients, Taft Hartley clients, individuals, high net worth clients, ERISA, public clients, banks, Wrap/SMA programs, and model based (UMA) investors.

Our stock portfolio construction process starts by using a system of computer generated screens, which look for companies with favorable characteristics that we believe will lead to further price appreciation. These characteristics include earnings growth rates, attractive valuation and rising estimate revisions. We then use fundamental analysis, which involves looking at company financial statements, company management, strengths and weaknesses of the company, market conditions and competitive advantages to make our final stocks selection.

Our bond portfolios are generally comprised of a diversified mix of holdings including U.S. Treasury and Credit issues, and select fixed income ETFs and mutual funds, including those that invest in international and high yield bonds.

For further information regarding our investment strategies and investment process, please refer to “Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.”

We provide both discretionary and non-discretionary investment management services and products to institutional and individual investors, as well as investment planning services.

Discretionary Services: We provide discretionary services where we have the discretion to purchase and sell the securities in the portfolio. We provide this investment advice to:

- individually managed accounts where we act as an advisor;
- accounts within broker/dealer sponsored wrap/SMA platforms where we act as sub-advisor;
- mutual funds where we act as a sub-advisor; or,
- UMA programs that have given Renaissance discretion over a strategy(s) in their UMA program.

Non-Discretionary Services: We also provide non-discretionary investment advice to Unified Manager Accounts (“UMA”) where we do not purchase or sell securities. Rather, we provide the UMA Program, who is the discretionary investment manager, a list of securities to be traded on an ongoing basis for each individual strategy that is part of the non-discretionary UMA Program. In these instances, the discretionary manager is responsible for monitoring the individual needs of the client. In non-discretionary programs, we amend and update the model portfolios when a model change occurs and provide this information to the discretionary manager. We do not have direct contact with the clients of these programs.

Investment Planning Services: Renaissance can manage its client’s investments within the larger context of the client’s overall investment planning objectives. Specifically, Renaissance offers investment planning advice at no additional charge to the investment management fee, on a range of investment planning issues that complement our management of the client’s investment portfolio. Renaissance can accomplish this through the use of one or more of its own strategies in combination with non-affiliated or affiliated mutual funds, ETF’s and other investments. Renaissance does not prepare tax returns, give tax advice, practice law, give legal advice, prepare estate plans, wills, trusts, sell insurance, sell securities (only provide trading instructions to the broker) or make loans. However, we offer our complimentary objective, unbiased advice to clients on the full range of investment planning topics in order to better serve our clients and help them manage their investment plans. Please refer to “Item 5 – Fees and Compensation” for applicable fees. Renaissance will provide such limited consulting service to the extent specifically requested by a client that directly engages Renaissance’s services per the terms and conditions of our Investment Advisory Agreement.

Definition of Investment Planning: The definition of investment planning is the placing of funds into investment vehicles based on the client’s financial goals, time horizon, risk tolerance, investment restrictions and financial priorities. The investment planning advice also takes into account the liquidity and level of return. Ideally, proper investment planning will allow the client to achieve their investment planning goals over time with an acceptable amount of risk.

Tailoring Advisory Services to Client Needs

As an asset manager for institutional, individual, wrap/SMA and non-discretionary clients, Renaissance recognizes that each client is unique and that individual client needs could be different. Therefore, we can modify our primary investment strategies to meet client specific goals, investment objectives and/or restrictions.

Direct-Managed Clients: All direct-managed clients that are not sub-advised must complete and sign an Investment Advisory Agreement when they open an account. The Investment Advisory Agreement details their investment objectives, the investment strategy and any investment restrictions affecting the management of their account. Direct managed clients can also provide their own Investment Policy Statement to Renaissance but the client is responsible for providing any Investment Policy changes to Renaissance as they occur in order for the Investment Policy changes to be implemented. Renaissance annually requests that clients provide any changes to their investment restrictions, changes to their investment objectives, risk tolerance or financial condition in our annual ADV offer/Privacy Notice delivery letter.

Wrap/SMA Programs/Clients: Wrap arrangements,” “wrap fee programs,” and/or “wrap sponsor accounts” involve individually-managed accounts for individual or institutional clients. These accounts are offered as part of a larger program by a “sponsor,” usually a brokerage, banking or investment advisory firm, and are managed by one or more investment advisers. Renaissance has agreements with wrap fee program sponsors that offer our services as an investment option within the sponsor’s wrap program. We provide investment management services to clients who select us as part of the program. As described in “Item 5 – Fees and Compensation,” the sponsor pays a portion of its program fee to us for our services.

Our management of wrap accounts and other accounts under the same investment strategy is consistent among accounts, unless the account is being managed tax efficiently and/or there are client imposed restrictions.

- *Wrap/SMA Sponsor Clients*”: Wrap/SMA program clients sign an agreement with the Wrap/SMA Sponsor which details their investment objectives, the chosen investment strategy, and any investment restrictions affecting our management of the client’s account. The Wrap/SMA Sponsor provides Renaissance with access to any investment restrictions, Investment Policy Statements, risk tolerances or financial objectives for the underlying client via the Wrap/SMA Sponsor’s platform. The Renaissance contract with the Wrap Sponsor outlines whether it is Renaissance’s or the Wrap Sponsor’s responsibility to code client restrictions in each platform. If Renaissance is responsible for coding client restrictions, it is the Wrap Sponsor/Wrap Client’s responsibility to communicate the client’s initial and updated investment restrictions, Investment Policy Statements, risk tolerances or financial objectives to Renaissance so the account can be updated accordingly. Although we cannot necessarily offer the same level of portfolio customization to Wrap/SMA accounts that we offer to our direct-managed accounts invested in the same strategy, Wrap/SMA clients can customize their portfolios by applying reasonable investment restrictions on their account to the extent that the Wrap/SMA Sponsor is able or allows us to code the restriction on their platform.

UMA Sponsor Clients: The UMA Sponsor is responsible for coding and maintaining all client information (e.g. investment objectives, collecting, updating and monitoring UMA client investment restrictions, etc.).

Customization: We can customize any of our strategies to meet a client’s specific objectives and/or constraints. Direct-managed clients with taxable accounts can be managed to minimize the tax impact of capital gains. Taxable client accounts in the Fixed Income Strategy can be managed to minimize the tax impact of interest income. These modifications of our buy/sell disciplines and other appropriate investment techniques can result in an increase or decrease in a client’s performance as compared to non-taxable/customized accounts invested in the same strategy.

Tax Harvesting Policy

Renaissance can adjust strategy allocations to take advantage of Tax Harvesting opportunities for taxable client accounts that wish to do so.

- **Direct-Managed Clients:** With regard to client-directed tax harvesting, we will endeavor to comply with requests made within a reasonable time period before the end of the calendar year.
- **Wrap/SMA Clients:** Wrap/SMA program clients are usually subject to specific guidelines imposed by the Wrap/SMA program, which can differ on a program-by-program basis.

Renaissance uses the FIFO accounting method for taxable accounts. If a client wants their custodian to use a particular tax lot accounting method, it is the client's responsibility to notify the custodian of their wishes. The custodian is the official 1099 reporter for tax purposes. Proceeds from tax harvesting sales will be temporarily invested in exchange traded funds ("ETFs") for a minimum of 30 days unless a client or their authorized representative directs Renaissance not to invest in ETFs.

Assets Under Management

As of December 31, 2016, we had the following assets under management.

ASSETS	
Discretionary Assets	\$3,368,934,252
Non-Discretionary Assets	\$1,079,159,580
Total Assets	\$4,448,093,833

Non-Discretionary Assets include UMA programs for which Renaissance does not have investment discretion and does not execute the trades, but we do provide each program with an updated securities Buy List every time a change is made to one of our strategies participating in an UMA program. We also instruct the UMA program when their program is next in our trading rotation and what percentage of the UMA portfolio should be invested in each security. The discretionary UMA program manager decides whether to implement our model change recommendation. Please see Renaissance's Form ADV Part 1A – Item 5.F for more information.

Miscellaneous Sections

No Financial Planning or Implementation Services: Renaissance does not provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. **Please Note:** We **do not** serve as an attorney, accountant, or insurance agency, and no portion of our services should be construed as same. Accordingly, we **do not** prepare estate planning documents, tax returns or sell insurance products.

Sub-Advisory Engagements: Renaissance may also serve as a sub-adviser to unaffiliated registered investment advisers per the terms and conditions of a written Sub-Advisory Agreement. With respect to its sub-advisory services, the unaffiliated investment advisers that engage Renaissance's sub-advisory services maintain both the initial and ongoing day-to-day relationship with the underlying client, including initial and ongoing determination of client suitability for Renaissance's designated investment strategies. If the custodian/broker-dealer is directed by the unaffiliated investment adviser and/or client, Renaissance will be unable to negotiate commissions and/or transaction costs, and/or seek better execution. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case through alternative clearing arrangements recommended by Renaissance. Higher transaction costs adversely impact account performance.

Wrap/Separate Managed Account/UMA Program Engagements: In the event that Renaissance is engaged to provide investment advisory services as part of an unaffiliated wrap/SMA-fee program, Renaissance will be unable to negotiate commissions and/or transaction costs. Under a wrap/SMA program, the wrap/SMA program sponsor arranges for the investor participant to receive investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified fee. *Participation in a wrap/SMA program may cost the participant more or less than purchasing such services separately.* In the event that Renaissance is engaged to provide investment advisory services as part of an unaffiliated managed account/UMA program, Renaissance will likewise be unable to negotiate commissions and/or transaction costs.

If the program is offered on a non-wrap basis, the program sponsor will determine the broker-dealer through which transactions must be effected, and the amount of transaction fees and/or commissions to be charged to the participant investor accounts. **Please Note:** Since the custodian/broker-dealer is determined by the unaffiliated program sponsor, Renaissance will be unable to negotiate commissions and/or transaction costs, and/or seek better execution. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case through alternative clearing arrangements recommended by Renaissance. Higher transaction costs adversely impact account performance.

Introduction from Investment Professional: If the client is introduced to Renaissance through the client's Investment Professional (i.e., broker or adviser), the client shall be requested to acknowledge and agree that: (1) at all times, the Investment Professional shall serve as the client's primary investment professional, and shall be responsible for: (a) assisting client in determining the initial and ongoing suitability for the Renaissance's investment portfolios and/or strategies. Renaissance's only obligation shall be to manage the assets consistent with the designated investment strategy; and, (b) for receiving/ascertaining client's directions, notices, and instructions, and forwarding them to Renaissance in writing. Renaissance shall be entitled to rely upon any such direction, notice, or instruction until it has been duly advised in writing of changes therein. Renaissance shall have no responsibility to the client for the failure of the Investment Professional to timely receive/ascertain/forward/communicate any and all such directions, notices, and instructions; (2) Renaissance is permitted to share account-related information with Investment Professional until such time as client notifies Renaissance, in writing, to the contrary; and, (3) if Renaissance is directed to effect account transactions through a specific broker-dealer/custodian, Renaissance will be unable to negotiate commissions and/or transaction costs, and/or seek better execution. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case through alternative brokerage/custody arrangement. Higher transaction costs adversely impact account performance.

ERISA Plan Engagements: Renaissance may be engaged to provide discretionary investment advisory services to ERISA retirement plans, whereby Renaissance shall manage Plan assets consistent with the investment objective designated by the Plan sponsor. In such engagements, Renaissance will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 ("ERISA"). Renaissance will generally provide services on an "assets under management" fee basis per the terms and conditions of an Investment Advisory Agreement between the Plan and Renaissance.

Investment Risk: Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Renaissance) will be profitable or equal any specific performance level(s).

Client Obligations: In performing our services, Renaissance shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify his/her investment professional if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

Directed Brokerage: In the event that the client directs Renaissance to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Renaissance. Higher transaction costs adversely impact account performance. Please review Item 12 for additional information about our brokerage practices.

Item 5 – Fees and Compensation

Standard Fee Schedules and Fee Calculation Methodology

Renaissance receives compensation for our investment advisory services through payments of fees made by clients. The fees include all of our management fees. In addition, the client can incur additional fees and expenses, which are not included in our management fee, such as brokerage commissions for trade executions, custodial fees, ADR depository service conversion fees and other fees or expenses that can be charged by their broker or custodian. These additional fees are not Renaissance fees nor are they received by Renaissance. Other investment advisers may charge higher or lower fees than the fees charged by Renaissance for comparable services.

Standard Fee Schedules: The maximum annual fee schedules for direct managed accounts in our strategies are included below. The fee schedules for any of our services can be modified at any time at our discretion.

<p style="text-align: center;">Balanced Large Cap Core Large Cap Growth Large Cap Value Midcap Growth REIT Three-Way Asset Allocation Two-Way Asset Allocation</p>	<p style="text-align: center;">Developed Country International Emerging Markets Global Growth International Equity International Small Cap Equity Multi Asset Allocation Small Cap Growth Small Cap Value</p>												
<table> <tr> <td>First \$5 million</td><td>0.75%</td></tr> <tr> <td>Next \$5 million</td><td>0.70%</td></tr> <tr> <td>Next \$5 million</td><td>0.65%</td></tr> <tr> <td>Next \$5 million</td><td>0.60%</td></tr> <tr> <td>Amounts over \$20 million</td><td>0.55%</td></tr> </table>	First \$5 million	0.75%	Next \$5 million	0.70%	Next \$5 million	0.65%	Next \$5 million	0.60%	Amounts over \$20 million	0.55%	<table> <tr> <td>All Amounts</td><td>1.00%</td></tr> </table>	All Amounts	1.00%
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Next \$5 million	0.60%												
Amounts over \$20 million	0.55%												
All Amounts	1.00%												
<p style="text-align: center;">Investment Planning Management Fees</p>													
<p>Clients utilizing Investment Planning Services will be charged an investment management fee based on the amount of assets under management. There is no additional charge for Renaissance Investment Planning Services.</p>													

Fee Calculation: We compute the fees charged to clients as a percentage of the value of the assets under management. The fee is based on the asset value of the account at the end of each contractually agreed billing period. Our standard practice is to bill quarterly in advance unless otherwise contractually agreed upon by Renaissance and the client. We can request that the custodian directly deduct our fees from client custodial accounts on an ongoing basis, upon receipt of written consent from the client.

Our standard practice is to invoice clients or their custodians for fees related to management of their portfolio(s) based on the billing period ending market value as of the last business day of the quarter. The majority of invoices are generated by our internal portfolio system. However, based on the client's contractual instructions, some invoices are manually calculated by Renaissance employees after the portfolios have been reconciled with the client's custodial records.

Pricing Securities: We price securities on a daily basis with prices received from a third-party source. This pricing is used to calculate the market value of the security in a client's account and the market value is used to calculate fees for client billing. We may, on rare occasion, be required to "fair value price" a security when a market price for that security is not readily available or when we have reason to believe that the market price is unreliable. When "fair value pricing" a security, we will use various sources of information at our disposal to determine a fair price that the security would obtain in the marketplace if, in fact, a market for the security existed.

- *Equity Securities:* Equity securities listed on a recognized U.S. securities exchange or quoted on the NASDAQ National Market System are priced at the regular trading session's closing price on the exchange or system in which such securities are principally traded. Securities not traded on the valuation date are priced at the most recent quoted bid price. American Depositary Receipts ("ADRs") are priced at the official closing price of the primary exchange on which it trades. If a depositary receipt has low trading volumes or does not trade at all on its primary exchange on a given day, Renaissance's pricing sources may provide either a trade price from an alternate exchange if available, or a fair valuation price determined by the Valuation Committee or Renaissance may calculate the price by obtaining the securities primary exchange closing price in USD and applying related ADR factors, for example how many foreign shares equal one ADR.
- *Fixed Income Securities:* Fixed income securities including short-term instruments are priced based on evaluated prices provided by independent pricing services. Such Evaluated Prices are normally quoted on a "clean" basis (the value of the bond less the accrued interest) and can be determined by factors which include, but are not limited to, market quotations, yields, maturities, call features, ratings, institutional size trading in similar groups of securities and developments related to specific securities. These securities are priced by a pricing vendor on the basis of bid or mid evaluations in accordance to a region's market convention, using factors which include but are not limited to market quotations, yields, maturities, and the bond's terms and conditions. The pricing vendors use proprietary methods to arrive at the evaluated price. These prices represent the price a dealer would pay for a security (typically in an institutional round lot).
- *Fair Valued Securities:* For any fair valued securities, we maintain policies and procedures relating to our pricing process and these policies and procedures will be provided upon client request by emailing compliance@reninv.com.

Note: The custodian, rather than the firm, is the designated valuation agent for client accounts.

New Accounts: When a client opens an account, the client will be charged a prorated fee for the remainder of the current quarter based upon the value of their portfolio on the day the account is opened. After that, the account will be included in our quarterly billing cycle. Contractually negotiated fee structures and calculation methods will be followed when our standard fee procedures have been replaced by alternate language in the Investment Advisory Agreement agreed to by Renaissance and the Client. Accounts are billed based on contractually agreed upon ending periods, market values and fee calculations. Cash flows, cash, accruals for dividends and interest are included in the assets under management used to calculate the fee, unless contractual obligation prohibits their inclusion.

Account Termination: A direct-managed client can terminate their account at any time, with advance notice based on the timeframe outlined in the client's agreement with Renaissance, effective upon written notice to us (if verbal notice is given, the notice must be promptly confirmed in writing). Renaissance can receive written notification from a direct-managed client's authorized representative. Upon receipt of notification from the client's representative, Renaissance will notify the client or authorized representative in writing to confirm the client's desire to close their account. Upon termination, fees for that quarter will be prorated and any prepaid, unearned fees will be refunded. Clients in Wrap/SMA, UMA and sub-advised client programs are subject to the investment management agreement they signed with the Wrap/UMA program sponsor, adviser or mutual fund.

Death/Divorce/Client Incapacity/Depletion of Assets: Renaissance will continue to manage a client's account according to the client's contract until we receive written instruction from the client or client's authorized representative such as a spouse, power of attorney, executor, etc. In the case of a client's death or incapacity, Renaissance will request a death certificate, if applicable, and/or evidence of authorization such as a power of attorney, appointment of executor, etc. Renaissance is not responsible for monitoring the mental capacity of our clients and our clients should appoint a power of attorney to act on their behalf in advance of them losing their mental capacity. Renaissance only manages a portion of our client's assets and we are not privy to a client's rate of depletion of assets. Renaissance does not act as trustee for any client. Due to our lack of holistic knowledge regarding a client's total net worth, it is the client's and/or their financial planner's responsibility to monitor the rate of depletion of a client's assets.

Fee Negotiation: Subject to applicable laws and regulations, we retain control over changes to our fee schedules and reserve the right to waive all or a portion of our management fee and negotiate minimum annual fees.

At our sole discretion, we can negotiate fees based on a client's special circumstances such as asset levels, number of strategies utilized, service/reporting requirements, specialized investment restrictions, etc. In some cases, we can agree to offer clients a fee schedule that is lower than the fee schedule of comparable clients invested in the same investment style. The negotiated fee will be identified in the Investment Advisory Agreement between the client and Renaissance. Renaissance may also negotiate the fact that assets under management may be aggregated across a client's relationship with Renaissance for purposes of determining fees.

The account minimum and the timing of payment and/or billing method may also be negotiable. Examples of these circumstances include whether the client is a charitable organization, an employee or an employee family member, the size of the portfolio, the competition for particular accounts and situations in which a client (e.g.: a municipality) is subject to restrictions regarding the amount of fees it can pay. Finally, there may be historical fee schedules with longstanding clients that differ from the fee schedules applicable to new client relationships.

Investment Planning Fees: There is no additional charge for Renaissance's investment planning services for clients whose assets are managed by Renaissance. Any assets managed utilizing our investment planning services will be charged a management fee based on the client's total assets under management, regardless of where the assets are invested. This fee is in addition to any underlying fees charged by mutual funds, ETFs, REITs or other financial instruments utilized by the investment plan, if applicable.

Potential Conflicts of Interest: If Renaissance provides investment planning advice to a client or potential client, a conflict of interest exists to direct assets toward Renaissance or AMG Affiliated mutual funds or sub-advised mutual funds, which could potentially provide Renaissance and/or AMG with higher compensation than if the client were invested in non-Renaissance/non-AMG Affiliated mutual funds. This conflict has been mitigated by Renaissance discounting its management fee by the amount of the mutual fund fee the client is paying to the Renaissance sub-advised mutual fund/AMG Affiliated mutual fund. The conflict is also mitigated by Renaissance disclosing our asset management fees for Renaissance strategies along with the non-Renaissance and non-affiliated investments, so the client has full access to what is being charged for each type of investment. In addition, the client receives the total returns of each of their portfolios in our periodic statements, if they choose to receive a statement from Renaissance. Renaissance also has an incentive to place investment planning clients in strategies that provide a higher fee to Renaissance. This conflict has been mitigated by Renaissance charging the same management fee to these clients regardless of what investment strategies or mutual funds are utilized.

Employee/Family Fees: Renaissance has established a discounted fee schedule for its employees and their family members. The fee schedule is subject to change at any time and can also change without advance notice due to the acceptance of Most Favored Nation Clause restrictions from clients or potential clients.

Additional Fees and Expenses Payable by Clients

As a client of Renaissance, you could incur additional fees which are not included in the fees charged by Renaissance. These fees could include:

- Brokerage commissions, soft dollar commissions, transaction fees, step-out commissions, service provider fees, and other related costs and expenses.
- Execution of client transactions almost always requires payment of brokerage commissions by clients. “Item 12 – Brokerage Practices” further describes the factors that we consider in selecting or recommending broker/dealers for the execution of transactions and determining the reasonableness of their compensation (e.g., commissions).
- Investment activity may also involve other transaction fees payable by clients, such as sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.
- Charges imposed by custodians, broker/dealers, third-party investment consultants, and other third-parties, such as custodial fees, consulting fees, administrative fees, and transfer agency fees.
- When buying/selling American Depositary Receipts (“ADRs”), if Renaissance trades in foreign markets and converts them to ADRs, there are additional costs that can typically be incurred such as foreign brokerage fees, ADR conversion fees, exchange fees or stamp taxes associated with this conversion process. ADR’s may incur dividend withholding taxes from the country of origin, which are an additional expense and reduce the dividend paid to the client. The client or client’s custodian is responsible for filing the appropriate forms/filings in the foreign country to obtain any dividend tax discount or withholding refund.
- At Renaissance’s discretion, brokerage transactions for any type of client can be stepped out and the client usually incurs an additional brokerage fee and/or soft dollar commissions. Renaissance can receive soft dollar commissions for any direct managed client, mutual fund underlying client, or indirect client, including underlying mutual fund clients or Wrap/SMA program clients, if the Wrap/SMA program agrees to allow the usage of soft dollar commissions for their Wrap/SMA program.

Direct-Managed Clients – Discretionary Trade Arrangements: Some of our clients have given us the discretion to trade with any brokerage firm that we feel will provide best execution. In these cases, the client pays additional costs and/or fees to third-parties, like custodial fees or transactional costs for trading.

Mutual Funds, ETFs and Other Pooled Investment Vehicles: At times, Renaissance can invest client’s assets in money market funds or similar short-term investment funds or other pooled investment vehicles sponsored by third-parties, such as exchange traded funds (“ETFs”). If you are invested in other pooled vehicles, you will also typically pay management and/or other fees to each mutual fund, ETF or other pooled vehicle that are in addition to Renaissance’s fees. These additional fees are described in each pooled vehicles’ offering documents (e.g., prospectus or offering memorandum). These charges, fees and commissions are in addition to our management fee.

Direct-Managed Clients – Individual Client Wrap Fee Arrangements

Some of our clients have arrangements with their brokers under which a bundled fee covers brokerage, custody, and sometimes money management and other services (commonly referred to as a wrap fee arrangement). Under wrap fee arrangements, the client usually pays the broker a single fee to cover all costs in connection with securities transactions that are effected by or through the broker and advisory services provided by the broker and/or by an investment adviser.

Depending on the number of transactions initiated on behalf of the client, the overall costs of a wrap fee program can be higher for the client when compared to our standard management fees plus a negotiated per transaction charge (either with the broker we are directed to trade through or others that we may select).

Wrap/SMA Fee Sponsor Programs

Renaissance has sub-advisory agreements with broker/dealers and/or other facilitators (called Wrap/SMA Sponsors) where our investment products are offered to the third-party Wrap/SMA Sponsor's clients as an investment option. The client signs an agreement with the Wrap/SMA Sponsor allowing us to manage their assets through our direct agreement with that Wrap/SMA Sponsor. The client's relationship in these agreements is with the Wrap/SMA Sponsor and not with Renaissance. These programs are called Wrap/SMA Programs. Due to the structure of most wrap/SMA fee programs, Renaissance does not provide the same level of client relationship services to Wrap/SMA program clients as it does to other clients.

Clients in Wrap/SMA Programs usually pay the Wrap/SMA Program sponsor a single, all-inclusive fee (called a "wrap fee"). This fee covers consulting, brokerage, custodial, portfolio monitoring and investment management services, and is usually up to 3% per annum of the assets under management. The wrap fees paid by the client are set by the Wrap/SMA Sponsor, and are disclosed in the Wrap/SMA Sponsor's contract established with each client or the sponsor's brochure. The Wrap/SMA Sponsor pays us a portion of the wrap fee based on the assets under management that we manage for that Wrap/SMA Program, based on our contractual fee rate. Renaissance does not dictate the Wrap/SMA Program client's overall fee schedule, timing or method of calculation of the Wrap/SMA program fee. Each Wrap/SMA Program Sponsor has prepared a brochure which contains detailed information about its wrap/SMA fee programs, including the Wrap/SMA program fee charged. Copies of each brochure are available from the Wrap/SMA Program Sponsor upon request.

The program fee for Wrap/SMA Program accounts can exceed the total cost of the services provided versus if the services were negotiated and purchased separately, depending on:

- the level of the all-inclusive fee;
- the amount of trading activity in a client's account;
- the value of any other services provided to the client;
- the cost of brokerage commissions (these costs are typically negotiated between the client and the broker/dealer with transactions being effected either by the broker/dealer or a third-party, rather than by us); and,
- other unknown miscellaneous factors, such as other complimentary services the Wrap/SMA sponsor can provide the Wrap/SMA client.

Renaissance is not responsible for evaluating whether the wrap fee paid to the Wrap/SMA Sponsor exceeds the cost for the same services if such services were provided separately. Clients should consider the overall fees and the services received from the Wrap/SMA Sponsor to determine if a wrap product is appropriate for them.

Wrap/SMA Program clients should note that Renaissance will typically execute transactions for their accounts through the Wrap/SMA Program Sponsor and that Renaissance will make an effort to obtain best execution within any constraints that may be set forth by Wrap/SMA Program Sponsor clients and the Wrap/SMA Program Sponsor. Wrap/SMA Program clients should also be aware that Renaissance will not be provided sufficient information by the Wrap/SMA Program Sponsor to perform an assessment as to the suitability of Renaissance's services for the client. Renaissance will rely on the Wrap/SMA Program Sponsor who, within its fiduciary duty, must determine not only the suitability of Renaissance's services for the client, but also the suitability of the wrap/SMA program fee for the client. In addition, Renaissance can trade away from the Wrap/SMA Sponsor and receive soft dollar commissions for any Wrap/SMA Program clients if the Wrap/SMA Program agrees to allow Renaissance to trade away from the Wrap/SMA Sponsor and use soft dollar commissions for their Wrap/SMA Program clients. If Renaissance trades away from the Wrap/SMA Sponsor, the brokerage commissions and/or soft dollar commissions are an additional brokerage transaction cost to the Client that is not included in the Wrap/SMA Sponsor's wrap program fee.

Mutual Fund Sub-Advisory Arrangements

Renaissance has been engaged by other investment advisers (including advisers to registered investment companies) to manage accounts on their behalf. In our capacity as "sub-advisor" to these accounts, our fees and services are determined by contract with the adviser. Information concerning these sub-advised funds, including a description of the services provided and advisory fees, is contained in each fund's prospectus and summary of additional information.

Other Sub-Advisory Arrangements

Renaissance has been engaged by other investment advisers (including advisers to registered investment companies) to manage accounts on their behalf. In our capacity as "sub-advisor" to these accounts, our fees and services are determined by contract with the adviser. Information regarding these sub-advisory arrangements can be accessed by requesting a copy from the Adviser.

Non-Discretionary Programs

In non-discretionary programs, such as UMAs, the client pays the sponsor an all-inclusive fee, a portion of which is paid to Renaissance as compensation for the investment advisory model provision services we provide to the sponsor.

For detailed information on the fees charged by each sponsor, please refer to the sponsor's fee brochure or your agreement with the sponsor.

In evaluating these arrangements, clients should recognize that brokerage commissions for the execution of portfolio transactions executed by the sponsor's delegated broker are not negotiated by Renaissance and Renaissance does not have any responsibility for trading, suitability of the product for the client, investment restriction monitoring or any other responsibility for the sponsored program other than monitoring the holdings in our strategy(s) portion of the program and providing investment recommendations.

Mutual Funds

Fees for mutual fund investments usually include two types: 1) shareholder fees; and, 2) annual fund operating expense fees.

Shareholder fees can include:

- Sales Loads (fees paid to a broker/dealer, which may include front-end sales loads - i.e., sales fees charged upon purchasing shares) and/or back-end sales loads (sales fees charged upon redeeming shares);
- Redemption fees (fees paid to the fund upon the sale of mutual fund shares);
- Exchange fees (fees charged for transferring to another fund within the same fund group); and,
- Account fees (account maintenance fees).

Annual fund operating expense fees include:

- Management fees (fees paid to an adviser or its affiliates for managing the fund);
- Distribution and/or service fees - e.g., 12b-1 (fees for distribution expenses and sometimes shareholder service expenses); and,
- Other expenses (miscellaneous expenses, such as custodial expenses, legal expenses, accounting expenses, transfer agent expenses, and other administrative expenses).

Clients whose assets are invested in mutual funds or ETFs could pay some or all of the above fees. Clients should review the prospectus of any fund in which their assets are invested in order to understand the fees that could be applicable to their investment. The mutual funds that Renaissance purchases for its clients can be purchased directly by the client without using Renaissance as their investment manager.

Renaissance will invest in the lowest cost class of mutual fund shares a client is eligible to invest in unless there is a mitigating factor such as:

- an ERISA account which cannot pay a 12b-1 fee or such investment is prohibited by regulation;
- account size, client direction or other cost savings concerns such as transaction cost savings which would potentially offset the higher share class charges, etc.; or,
- if Renaissance believes it is in the client's benefit to invest in a mutual fund share class that would benefit them for another reason, we can invest their assets in the higher cost class of mutual fund shares.

Renaissance, as of the date of this ADV does not, but in the future, could invest client's funds in affiliated mutual funds or ETFs that are managed by one of our AMG affiliates. Renaissance may or may not sub-advise the mutual fund/ETF. Renaissance will waive its investment management fee charged directly to the client for client assets invested in the affiliated mutual fund/ETF. Renaissance may collect an investment management fee from the manager of the affiliated mutual fund/ETF.

Performance Based Fees

Performance-based fees for certain products are also available, subject to applicable law, and are negotiable. See "Item 6 – Performance-Based Fees and Side-By-Side Management" for further information.

Fees for the Sale of Securities

Neither Renaissance nor our employees receive, directly or indirectly any compensation from the sale of securities or investments that are purchased or sold for an account, other than the benefits Renaissance receives from soft dollar arrangements for research services. We are compensated through the stated management fee agreed upon in the Investment Advisory Agreement.

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

Performance-Based Fees

For some accounts, Renaissance receives performance-based fees for its investment management services. A performance-based fee is an asset manager's fee for managing a client's account in which an asset manager's (e.g. Renaissance) compensation is based upon the net or gross returns of the account being managed compared to a stated benchmark at a point in time or over a period of time. Performance-based fees can be based on absolute or benchmark relative returns on either a net or gross basis. In certain instances, we can negotiate performance-based fees with specific clients. We can have both performance-based fee accounts and asset-based fee accounts within a particular investment strategy.

Side-By-Side Management

Our investment professionals simultaneously manage multiple types of client accounts (including institutional, employee and individual separate accounts, mutual funds, Wrap/SMA programs and model based UMA programs) according to the same, similar or different investment strategy (e.g., side-by-side management).

The simultaneous management of these different types of client accounts, with different fee structures, creates certain conflicts of interest, as the fees for the management of some client types are higher than for others. Nevertheless, when managing the assets of these accounts, we have a duty to treat all accounts fairly and equitably over time.

Portfolios will not necessarily be managed identically at all times. Specifically, it is not required that we use the same investment practices consistently across all portfolios. In general, investment decisions for each client account are made independently from those of other client accounts, and are made based on the individual needs and objectives of each client. Different client guidelines and/or differences within investment strategies could lead to the use of different investment practices for portfolios within a similar investment strategy. In addition, we will not necessarily purchase or sell the same securities at the same time or in the same quantity for all eligible portfolios, particularly if the portfolios have materially different amounts of capital under management or different amounts of investable cash is available. As a result, although we manage numerous portfolios with similar or identical investment objectives, or manage accounts with different objectives that trade in the same securities, the portfolio decisions relating to these accounts and the performance resulting from these decisions, could differ from portfolio to portfolio. Each account's performance could also differ due to differences in investment restrictions, tax considerations, timing of initial investment, cash flows, trade rotation, etc.

Potential Conflicts of Interest: Performance-Based Fees & Side-By-Side Management

Performance-Based: Performance-based fees create certain inherent conflicts of interest with respect to Renaissance's management of assets. Specifically, our entitlement to a performance-based fee in managing one or more accounts creates an incentive for us to take risks in managing those assets that we would not otherwise take in the absence of such arrangements. In addition, since performance-based fees reward us for strong performance in accounts which are subject to such fees, we have an incentive to favor these accounts over accounts that have only asset-based fees (e.g., fees based simply on the amount of assets under management in an account) with respect to areas such as trading opportunities, trade allocation, and allocation of new investment opportunities. This conflict has been reduced or eliminated by all accounts within a particular strategy utilizing the same buy list/model regardless of the fee structure of the account, unless there are client imposed restrictions or it is a taxable account. We also employ a random trading rotation prior to trade execution to ensure all clients in our trading rotation have the same chance of receiving a first or last trade execution.

Side-By-Side Management: Since side-by-side management of various types of portfolios with varying fee structures raises the possibility of favorable or preferential treatment of a portfolio or a group of portfolios, we have implemented the following procedures designed to treat all portfolios fairly and equally over time.

- We employ a random trading rotation prior to trade execution to ensure all directed and non-directed brokerage clients have the same chance of receiving a first or last trade execution.
- Directed brokerage accounts are grouped by broker and all discretionary brokerage accounts are grouped together in one trading block.
- We perform a sample test quarterly to ensure the random trade rotation is being followed. Our Chief Compliance Officer approves any exceptions to the execution order and the exceptions are documented by the trading department.
- We perform a quarterly test to ensure employee accounts are traded at the end of every trading rotation when clients and employees are invested in the same strategy.
- We perform an annual test to ensure employee account returns fall within a reasonable range of client account returns for the same strategy.
- All accounts within a particular strategy utilize the same buy list/model regardless of the fee structure of the account, unless there are client imposed restrictions.
- Our Chief Compliance Officer is responsible for ensuring we comply with all applicable regulations.

By utilizing these procedures, we believe that portfolios that are subject to side-by-side management alongside other products are receiving fair and equitable treatment over time.

Item 7 – Types of Clients

Renaissance provides portfolio management services to retail individuals, high net worth individuals, corporate pension plans, 401(k) and profit-sharing plans, Taft-Hartley clients, public clients, charitable institutions, foundations, endowments, municipalities, registered mutual funds, Wrap/SMA programs, UMA programs, quasi-public, private corporations and other businesses not listed above.

Minimum Account Size

Renaissance's minimum account size is negotiable and will be determined at Renaissance's sole discretion. We can set the minimum depending on the specific strategy selected, the amount of client assets to be invested, or any additional support or service required by the client, the client's consultant or program sponsor, etc.

In circumstances where we serve as an adviser within a Wrap/SMA or UMA fee program or are an adviser or sub-adviser to other funds or accounts, the account minimums are determined by our agreement with the relevant Wrap/SMA/UMA fee program sponsor, fund, or account.

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

Investment Process Overview

Each of our investment strategies is managed by a portfolio manager in a manner consistent with our approach to investing.

The foundation of Renaissance's investment process is our method of blending proprietary quantitative models with qualitative research to build a portfolio for each strategy of companies that exhibit both good growth characteristics and reasonable valuations. Our quantitative process first scores and ranks companies based upon predictive factors which may include, but are not limited to, financial strength, historical growth, future earnings expectations and valuation. The top-ranked stocks are then subjected to qualitative review and analysis considering fundamentals, business momentum, management strategy and other factors. Only the most attractive companies based on this fundamental analysis are eligible for purchase. Companies are sold from the portfolio based on a decline in the quantitative rankings, a fundamental deterioration or a combination of these factors. The investment process and our proprietary models are a direct application of our investment philosophy and incorporate our belief that the utilization of disciplined and systematic methods for identifying attractive growth companies, which have business and earnings momentum and trade at reasonable valuations, can result in excess returns over time.

In evaluating securities, the main sources of information we use include: quantitative and fundamental data provided by third-party vendors; financial periodicals; research materials prepared by third-parties; corporate rating services relating to historical prices of securities, dividends, and earnings; quarterly, semi-annual and annual reports; prospectuses; filings with the SEC and other global government agencies; and, company press releases. Depending on the strategy, client assets may be invested in U.S. traded equity securities including American Depositary Receipts ("ADRs"). Equities may include large capitalization, mid-capitalization, and small capitalization issues. Assets can also be invested in exchange traded funds; mutual funds; U.S. treasury securities; real estate investment trusts (REITs); and money market funds. These securities may trade on listed exchanges or in the Over-the-Counter Market. ADRs may be created/cancelled for a foreign security, if possible, if we feel the lack of U.S. domestic liquidity requires the creation/cancellation of an ADR. Upon the request of a pension-fund client, Renaissance could invest the client's funds in collective investment funds maintained by banks.

Material Related Risks

Our investment strategies carry different levels of risk. In each strategy, all securities include a risk of loss of principal and any gains that have not been realized. The stock and bond markets can fluctuate substantially over time and the performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage and such a loss may be out of our control. We cannot guarantee any level of performance and cannot guarantee that clients will not experience a loss of account assets. All investments carry a certain amount of risk and Renaissance cannot guarantee that the strategy will achieve its investment objective. Each of our strategies has the potential for your assets to decline in value based on market conditions. An investment in any of Renaissance's strategies is not a deposit or obligation of any bank, is not endorsed or guaranteed by any bank, and is not insured by the Federal Deposit Insurance Corporation ("FDIC") or any other government agency, and may lose value. Renaissance does not perform due diligence of any kind on the confidentiality/data security/cybersecurity/business continuity practices of vendors which clients select including, but not limited to: custodians, brokers, consultants, banks, Wrap/SMA programs, UMA programs, and mutual funds, etc. Clients are responsible for performing initial and ongoing due diligence on any party they select to service their needs. Renaissance has a Cybersecurity/Written Information Security Policy, Privacy Policy, and Compliance Manual, which includes policies and procedures for vendor review for high and medium risk Renaissance vendors, but loss of personally identifiable client information is a risk.

Risks include account takeovers, hackers, internal employee risks and social engineering, among other methods that may be used to obtain confidential client information by third parties.

Cybersecurity Risk

With the increased use of technologies to conduct business, Renaissance is susceptible to operational, information security and related risks. In general, cyber incidents can result from deliberate attacks or unintentional events. Cyberattacks include, but are not limited to: gaining unauthorized access to digital systems for purposes of misappropriating assets or sensitive information; corrupting data; account takeovers; hackers; internal theft of information; or causing operational disruption. Cyber incidents impacting Renaissance have the ability to cause disruptions and impact business operations, potentially resulting in the inability to transact business, financial losses, violations of applicable privacy and other laws, regulatory fines, penalties or reputational damage. While Renaissance has established a business continuity plan and risk management systems intended to identify and mitigate cyberattacks, there are inherent limitations in such plans and systems including the possibility that certain risks have not been identified. Furthermore, Renaissance cannot control the cybersecurity plans and systems put in place by third party service providers and issuers in which client portfolios invest. Clients could be negatively impacted as a result.

Market Risk

The market price of securities held by the strategy may fall rapidly or unpredictably due to a variety of factors, including changing economic, political or market conditions. The value of the strategy's investment in any security will fluctuate on a day-to-day basis with movements in the stock market, as well as in response to the activities of individual companies. Renaissance will continue to follow the Renaissance portfolio managers' investment decisions and our strategies' parameters during volatile periods. Renaissance's portfolio managers have the ability to liquidate securities and hold cash during extreme volatile circumstances, but the client should assume Renaissance will maintain the client's investments at all times. If the client would ever wish to liquidate their securities, they would need to provide Renaissance with written direction with specific hold/liquidation instructions.

Interest Rate Risk

When interest rates rise, the market prices of the debt securities will usually decline. When interest rates fall, the prices of these securities usually increase.

Liquidity Risk

Liquidity Risk is the risk that Renaissance may not be able to buy/sell a particular security due to not being able to find a liquid market for a security at a given point in time. Renaissance may not be able to buy/sell its clients' securities in a timely fashion and/or at a favorable price leading to clients' returns being adversely affected. To help minimize liquidity risk, equities are all traded on recognized exchanges or OTC markets and strategy asset levels are consistent with expected product capacity which is based on historical trading volumes.

Vehicle Risks

Bond Risk — The bond portion of a portfolio may be subject to the following risks:

- *Income Risk*: The chance that the portfolio's income will decline due to falling interest rates as newly issued bonds could have lower coupons.
- *Credit Risk*: The risk that an issuer of a debt security will default (fail to make scheduled interest or principal payments), potentially reducing the portfolio's income level and share price. This risk increases when a security is downgraded or the perceived creditworthiness of the issuer deteriorates.

- *Call Risk*: The chance that during periods of falling interest rates, issuers of callable bonds could call (repay) securities with higher coupons or interest rates before their maturity dates.
- *Country/Geopolitical Risk*: The bond portfolio could be subject to risk from political uncertainty in countries/regions where the companies are domiciled or conduct business. Unexpected changes in government regulations, military actions or changes in leadership are among the risks that can negatively affect the valuation of companies in the portfolio.

ETF Risk — Exchange traded funds (“ETFs”) can trade at a discount or premium to the net asset value, and there is always a fundamental risk of declining stock or bond prices in the underlying investments of the ETF, which can result in investment losses.

- *Commodities ETFs*: We only use commodities in ETF based investments. If commodities are utilized by an ETF, the commodity risk refers to the uncertainties in the underlying commodity investments. These commodity risks include uncertainty regarding future market values caused by the fluctuation in the prices of commodities, which include grains, metals, gas, electricity, etc. Events that can affect commodity prices are weather related events (e.g. drought, insect infestations, blight and floods) and government interventions (e.g. embargoes and tariffs).

Growth Stock Risk — Growth stocks could be more sensitive to market movements because their prices tend to reflect future investor expectations rather than just current profits.

Money Market Risk — Refers to the possibility that the value of the underlying investments could decline and cause the value per share of the fund to drop below \$1.00, causing a loss in your investment.

Underlying Fund Risk — The risks associated with investing in a mutual fund are closely related to the risks associated with the underlying securities and investments comprising the fund.

Real-Estate / REIT Risk — REITs must satisfy specific requirements for favorable tax treatment and can involve unique risks in addition to the risks usually affecting the real estate industry. REITs are dependent upon the quality of management, could have limited financial resources and heavy cash flow dependency, and may not be diversified geographically or by property type.

Value Stock Risk — Value stocks can perform differently from the market as a whole and other types of stocks and can continue to be undervalued by the market for a long period of time.

Investing Risks

Government Sponsored Enterprises Risk — Securities held by the Fund that are issued by government-sponsored enterprises, such as the Federal National Mortgage Association (“Fannie Mae”), the Federal Home Loan Mortgage Corporation (“Freddie Mac”), Federal Farm Credit Banks and the Tennessee Valley Authority are not guaranteed by the U.S. Treasury and are not backed by the full faith and credit of the U.S. Government. They are also subject to credit risk and interest rate risk.

Non-Diversification Risk — The risk is incurred by not investing the portfolio in a variety of securities across various sectors, industries or countries.

Quantitative Investing Risk — Securities evaluated using quantitative analysis could perform differently from the market as a whole as a result of the factors used in the analysis, the weights placed on each factor, and changes in the factor's historical trends. Our quantitative models could also contain construction errors, data errors or incomplete data as we rely on third party data vendors when running our quantitative screens. Inaccurate data could provide Renaissance Portfolio Managers/Analysts with an incorrect ranking of securities on which to perform fundamental analysis potentially affecting the returns of the strategy. Renaissance performs a fundamental analysis of all securities prior to purchase and reviews all securities prior to sale. Our quantitative analysis is a screening tool used to narrow our research universe and is not a final determinant in our purchase or sale decisions.

Sector Allocation Risk — The portfolio may be over or under exposed to certain sectors relative to the portfolio's/strategy's benchmark.

Security Selection Risk — The risk that Renaissance may allocate portfolio assets to certain groups (e.g. sectors, industries or countries) that perform well, but the specific stocks in the portfolio do not perform as well as the group.

Capitalization Risks

Large-Capitalization Risk — Large-cap companies are usually more mature and may not be able to reach the same levels of growth as small- or mid-cap companies.

Mid-Capitalization Risk — Mid-cap companies are usually more volatile in price than large-cap stocks and may perform quite differently from the market as a whole.

Small-Capitalization Risk — Small-cap companies are usually more volatile in price than large-cap stocks and may perform quite differently from the market as a whole.

Foreign Investing Risks

Currency Risk — The portfolio may be affected by movements in currencies relative to the U.S. dollar. Currency risk occurs whenever investors or businesses have assets or operations in different countries. In general, if the foreign currency with which a company conducts business depreciates relative to the U.S. dollar, the portfolio may lose money.

Exchange Rate Risk — American Depositary Receipts ("ADRs") are exposed to exchange rate risk when the foreign denominated dividends are converted into U.S. dollars. The creation or cancellation of ADRs may also result in exchange rate risk. Exchange rate risk can create significant losses due to interest rate movements and geopolitical issues.

Emerging Markets Risk — The performance of foreign securities can be affected by the different political, regulatory, and economic environments in countries in which the strategy invests. In addition, emerging markets tend to be more volatile than the U.S. market or developed foreign markets due to increased risks of political, regulatory, market, or economic developments. Fluctuations in foreign currency exchange rates may also adversely affect the value of foreign securities in which the strategy has invested.

Geopolitical Risk — The portfolio could be subject to risk from political uncertainty in countries/regions where the companies are domiciled or conduct business. Unexpected changes in government regulations, military actions, seizure of assets or changes in leadership are among the risks that can negatively affect the valuation of companies in the portfolio.

Foreign Investment Risk — The performance of foreign securities can be affected by the different political, legal, regulatory, reporting and economic environments in countries in which the strategy invests and makes investments in foreign securities more volatile. In addition, emerging markets tend to be even more volatile than the U.S. market or developed foreign markets. Seizure of assets, difficulty in enforcing contractual obligations, less market liquidity, political and social instability also create greater risk for foreign securities than domestic securities. Fluctuations in foreign currency exchange rates may also adversely affect the value of foreign securities in which the strategy has invested.

International Small Cap Equity Risk — Small cap companies are usually more volatile in price than large-cap stocks and often perform quite differently from the market as a whole. The performance of foreign securities can be affected by the different political, regulatory and economic environments in countries in which the strategy invests. In addition, emerging markets tend to be more volatile than the U.S. market or developed foreign markets. Fluctuations in foreign currency exchange rates may also adversely affect the value of foreign securities in which the strategy has invested.

Client assets may be susceptible to some or all of the risks discussed above for each investment strategy that Renaissance offers (please refer to the table below to determine the risks that apply to a particular strategy):

Strategy Risk Chart

TYPES OF RISKS	Balanced Strategy	Developed Country International Strategy	Emerging Markets Strategy	Global Growth	Fixed Income Strategies	International Equity Strategy	International Small Cap Equity Strategy	Large Cap Core Strategy	Large Cap Growth Strategy	Large Cap Value Strategy	Midcap Growth Strategy	Multi-Asset Allocation Strategy	REIT Strategy	Small Cap Growth Strategy	Small Cap Value Strategy	Three Way Asset Allocation Strategy	Two Way Asset Allocation Strategy	Investment Planning Strategies
Cybersecurity Risk	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Market	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Liquidity Risk	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Interest Rate	X				X							X	X			X	X	X
Vehicle																		
Bond	X				X							X				X	X	X
ETFs	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
ETFs Commodity Risk	X				X							X				X	X	X
Growth Stock				X		X	X		X		X	X		X				X
Money Market	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Underlying Fund	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Real-Estate / REIT												X	X					X
Value Stock										X		X			X			X
Investing Risks																		
Government Sponsored Enterprise Risk	X				X							X				X	X	X
Non-Diversification	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Quantitative Investing	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Sector Allocation	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Security Selection	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Capitalization Risk																		
Large-Capitalization	X	X	X	X		X		X	X	X		X	X			X	X	X
Mid-Capitalization	X	X	X	X		X		X		X	X	X	X		X	X	X	X
Small-Capitalization		X	X	X		X	X					X	X	X	X			X
Foreign Investing Risks																		
Country/Geopolitical		X	X	X	X	X	X					X						X
Currency		X	X	X	X	X	X					X						X
Emerging Markets			X	X	X	X	X					X						X
Exchange Rate Risk		X	X	X	X	X	X					X						X
International Equity		X	X	X	X	X	X					X						X
International Small Cap		X	X	X	X	X	X					X						X

Strategy Overview

A list of our strategies, their objectives and investment processes are listed below. Exchange Traded Funds (“ETFs”) could be used as alternative investments for any Renaissance strategy if a recommended investment is precluded by an investment restriction, tax consideration, or for tax harvesting purposes, etc.

Renaissance determines an issuer’s country classification based on company filings and data provided by third-party sources such as Bloomberg or FactSet. Renaissance considers an issuer to be located in an emerging market country if the issuer is domiciled or incorporated in an emerging market country (as defined by the MSCI Emerging Market Index) or exhibits risk characteristics (e.g., economic, geopolitical and regulatory risks) similar to emerging market countries.

Balanced Strategy: The Renaissance Balanced Strategy employs a disciplined decision-making process to determine asset allocations among the principal asset classes of cash equivalents, bonds and stocks. This strategy may use ETFs to invest in the underlying bond securities. At times, portfolio assets may only be invested in two asset classes; at other times, all three are represented. Commitments to cash equivalents, bonds and stocks can range from 10% to 90% of the total portfolio. Equity commitments typically change in increments of 10% and are invested in individual stocks that sell at reasonable valuations supported by what we believe to be above-average corporate profitability and accelerating earnings growth. Each portfolio contains approximately 50-60 individual U.S. common stocks with market capitalizations typically above \$3 billion at the time of purchase. Our Balanced Strategy seeks to provide positive returns in rising markets along with preservation of capital in adverse market environments.

We use a disciplined process that adjusts a portfolio’s asset allocation in response to changing market conditions. The domestic market alternatives of common stocks, bonds and cash equivalents are analyzed in terms of their historic and current valuation relative to one another. Through this relative value analysis, we determine which market alternative offers the best value at particular points in time and adjust the portfolio allocation accordingly. The stock portion of Balanced portfolios is broadly diversified and consists of large-capitalization issues that exhibit a combination of attractive valuation and strong earnings growth potential. Bonds are typically limited to U.S. Treasury issues and high-quality Corporate bonds and/or fixed income/bond ETFs.

Our objective is to outperform a static, balanced mix of stocks and bonds over a complete market cycle.

Developed Country International: The Renaissance Developed Country International Strategy employs a disciplined decision-making process to create and manage developed country portfolios. This strategy seeks to control risk by diversification and systematic analysis of investment opportunities across various countries, regions, sectors and industries. Developed market countries are those with highly developed economies and advanced technological infrastructures. Please refer to the Developed Markets definition in Appendix I – Definitions.

The strategy invests in developed markets outside the United States. Our stock selection process identifies individual stocks that sell at reasonable valuations supported by what we believe to be above-average corporate profitability and accelerating earnings growth. The strategy can purchase large, mid and small cap stocks. Each portfolio contains approximately 45-55 stocks. Investment vehicles utilized are American Depositary Receipts (“ADRs”) and non-ADR U.S.-listed shares of foreign companies.

Our objective is to outperform comparable international stock indices over a full market cycle.

Emerging Markets Strategy: The Renaissance Emerging Markets Strategy employs a disciplined decision-making process to create and manage emerging markets portfolios. This strategy seeks to control risk by diversification and systematic analysis of investment opportunities across various countries, regions, sectors and industries. Emerging markets are nations with social or business activity in the process of rapid growth and industrialization. Please refer to the Emerging Markets definition in Appendix I – Definitions. Our stock selection process identifies individual stocks that sell at reasonable valuations supported by what we believe to be above-average corporate profitability and accelerating earnings growth. The strategy can purchase large, mid and small cap stocks. Each portfolio contains approximately 45-55 stocks. Investment vehicles utilized are American Depositary Receipts (“ADRs”) and non-ADR U.S.-listed shares of foreign companies.

Our objective is to outperform the MSCI Emerging Markets Index over a full market cycle.

Fixed Income Strategies: The Renaissance Fixed Income Strategies invest in fixed income mutual funds, exchange traded funds, and individual government and credit issues. Portfolios are designed to offer an attractive combination of current income, price stability and safety of principal through a diversified mix of holdings which could include exposure to international and high yield bonds. Portfolio positions typically range from 2-5 holdings.

Our objective is to outperform the Barclay’s Aggregate Index over a full market cycle.

Global Growth Strategy: The Renaissance Global Growth Strategy employs a disciplined decision-making process to create and manage a growth portfolio comprised of both domestic large cap and international equities. This strategy seeks to control risk by diversification and systematic analysis of investment opportunities across various countries, regions, sectors and industries. Our stock selection process identifies individual stocks that sell at reasonable valuations supported by what we believe to be above-average corporate profitability and accelerating earnings growth. Each portfolio contains approximately 50-60 stocks. We only invest in shares of U.S. corporations, American Depositary Receipts (“ADR’s”), and non-ADR U.S.-listed shares of foreign companies.

The strategy can purchase large, mid and small cap stocks and invests in both developed markets (including the United States) and emerging markets. Emerging markets are nations with social or business activity in the process of rapid growth and industrialization. Please refer to the Developed and Emerging Markets definition in Appendix I – Definitions. The maximum emerging markets weight is usually 15%, or double the emerging markets weight in the MSCI All Country World Index, whichever is greater.

Our objective is to outperform the MSCI All Country World Index over a full market cycle

International Equity Strategy: The Renaissance International Equity Strategy employs a disciplined decision-making process to create and manage international equity portfolios. This strategy seeks to control risk by diversification and systematic analysis of investment opportunities across various countries, regions, sectors and industries. Our stock selection process identifies individual stocks that sell at reasonable valuations supported by what we believe to be above-average corporate profitability and accelerating earnings growth. The strategy can purchase large, mid and small cap stocks. Each portfolio contains approximately 50-60 stocks. We only invest in American Depositary Receipts (“ADRs”) and non-ADR U.S.-listed shares of foreign companies and do not purchase shares of U.S. corporations.

The strategy invests in both developed markets outside the United States and emerging markets. Emerging markets are nations with social or business activity in the process of rapid growth and industrialization. Please refer to the Developed and Emerging Markets definitions in Appendix I - Definitions. Investments in emerging markets will not exceed 33% of the portfolio at cost.

Our objective is to outperform the MSCI All Country World ex USA Index over a full market cycle.

International Small Cap Equity Strategy: The Renaissance International Small Cap Equity Strategy employs a disciplined decision-making process to create and manage international small cap growth portfolios. This strategy seeks to control risk by diversification and systematic analysis of investment opportunities across various countries, regions, sectors and industries. Our stock selection process identifies individual stocks that sell at reasonable valuations supported by what we believe to be above-average corporate profitability and accelerating earnings growth. Each portfolio contains approximately 45-55 stocks. We only invest in American Depositary Receipts ("ADRs") and non-ADR U.S.-listed shares of foreign companies and do not purchase shares of U.S. corporations.

We choose stocks with market capitalizations of approximately \$3 billion and under at the time of purchase. The strategy invests in both developed markets outside the United States and emerging markets. Emerging markets are nations with social or business activity in the process of rapid growth and industrialization. Please refer to the Developed and Emerging Markets definition in Appendix I – Definitions.

Our objective is to outperform the MSCI All Country World ex US Small Cap Index over a full market cycle.

Large Cap Core Strategy: The Renaissance Large Cap Core Strategy employs a disciplined decision-making process to create and manage large cap portfolios with sector weights similar to the S&P 500 Index. This strategy seeks to control risk by diversification and systematic analysis of investment opportunities across various sectors and industries. Our stock selection process identifies individual stocks that sell at reasonable valuations supported by what we believe to be above-average corporate profitability and accelerating earnings growth. Each portfolio contains approximately 50-60 individual U.S. common stocks with market capitalizations typically above \$3 billion at the time of purchase.

We select attractive stocks from all economic sectors so that a high degree of diversification is maintained at all times.

Our objective is to outperform the S&P 500 Index over a full market cycle.

Large Cap Growth Strategy: The Renaissance Large Cap Growth Strategy employs a disciplined decision-making process to create and manage growth-oriented large cap growth portfolios with market capitalizations typically above \$3 billion at the time of purchase. We define growth stocks as those companies whose earnings are expected to grow at an above-average rate relative to the market. This strategy seeks to control risk by diversification and systematic analysis of investment opportunities across various sectors and industries.

We use a disciplined decision-making process to invest in growth-oriented stocks that are selling at reasonable valuations. Portfolios consist of individual stocks that tend to sell at valuation levels below those of market averages, but which exhibit growth potential and earnings momentum above those of market averages. Each portfolio contains approximately 50-60 individual U.S. common stocks.

Our objective is to outperform the Russell 1000 Growth Index over a full market cycle.

Large Cap Value Strategy: The Renaissance Large Cap Value Strategy employs a disciplined decision-making process to create and manage portfolios of mid- and large-capitalization, value-oriented securities with market capitalizations typically above \$3 billion at the time of purchase. We define a value stock as a stock that tends to trade at a lower price relative to fundamentals (e.g., dividends, earnings, sales, etc.) and thus considered undervalued by a value investor. This strategy seeks to control risk by diversification and systematic analysis of investment opportunities across various sectors and industries. Individual stocks typically sell at price-to-earnings ratios and price-to-sales ratios that are substantially lower than that of the equity markets in general, supported by what we believe to be accelerating earnings trends and strong cash flows. Each portfolio contains approximately 50-60 individual U.S. common stocks.

Our objective is to outperform the Russell 1000 Value Index over a full market cycle.

Midcap Growth Strategy: The Renaissance Midcap Growth Strategy employs a disciplined decision-making process to create and manage growth-oriented midcap growth portfolios. We define growth stocks as those companies whose earnings are expected to grow at an above-average rate relative to the market. This strategy seeks to control risk by diversification and systematic analysis of investment opportunities across various sectors and industries. Our stock selection process identifies individual stocks that sell at reasonable valuations supported by what we believe to be above-average corporate profitability and accelerating earnings growth. Each portfolio contains approximately 50-60 individual U.S. common stocks. We choose stocks with market capitalizations of approximately \$2-20 billion at the time of purchase.

Our objective is to outperform the Russell Midcap Growth Index over a full market cycle.

Multi Asset Allocation Strategy: The Renaissance Multi Asset Allocation Strategy employs a disciplined decision-making process to determine asset allocations among the principal asset classes of U.S. equities, international equities, emerging market equities, REITs, commodities, and cash equivalents. At times, portfolio assets can be heavily invested in cash equivalents and allocations to any specific asset class can range from 0% to 100% of the total portfolio. The number of asset classes may be expanded or reduced in the future and the percentages allocated to each asset class may also change.

We use a disciplined, technically driven decision model that adjusts a portfolio's asset allocation in response to changing market conditions. Each asset class is analyzed using an exponential moving average of price to identify periods when stocks were in positive or negative price trends. Through this analysis we determine which asset class offers the most favorable price trends and adjust the portfolio allocation accordingly. The portfolio is broadly diversified by asset class, although asset class exposure is achieved through concentrated positions of highly liquid exchange traded funds ("ETFs").

Our objective is to outperform a combination of a fixed blend of 20% of the S&P 500 Index, 20% of the MSCI EAFE Index, 20% of the MSCI Emerging Markets Index, 20% of the FTSE NAREIT Index, and 20% of the Dow Jones UBS Commodity Index.

REIT Strategy: The Renaissance REIT Strategy employs a disciplined decision-making process to create and manage REIT portfolios. A Real Estate Investment Trust ("REIT") is an investment trust that owns and manages a pool of commercial properties and mortgages and other real estate assets. Individual issues sell at reasonable valuation levels supported by what we believe to be accelerating earnings growth. Each portfolio contains stocks of approximately 20 Real Estate Investment Trusts.

Our objective is to outperform the FTSE NAREIT Index over a complete market cycle.

Small Cap Growth Strategy: The Renaissance Small Cap Growth Strategy employs a disciplined decision-making process to create and manage growth-oriented small cap growth portfolios. We define growth stocks as those companies whose earnings are expected to grow at an above-average rate relative to the market. This strategy seeks to control risk by diversification and systematic analysis of investment opportunities across various sectors and industries. Our stock selection process identifies individual stocks that sell at reasonable valuations supported by what we believe to be above-average corporate profitability and accelerating earnings growth. Each portfolio contains approximately 50-60 individual U.S. common stocks and U.S.-listed shares of foreign companies. We choose stocks that are constituents of the Russell 2000 Growth (generally between \$500 million and \$4 billion at the time of reconstitution of the index) at the time of purchase.

Our objective is to outperform the Russell 2000 Growth Index over a full market cycle.

Small Cap Value Strategy: The Renaissance Small Cap Value Strategy employs a disciplined decision-making process to create and manage portfolios of small capitalization, value-oriented securities. We define a value stock as a stock that tends to trade at a lower price relative to its fundamentals (i.e., dividends, earnings, sales, etc.) and thus considered undervalued by a value investor. This strategy seeks to control risk by diversification and systematic analysis of investment opportunities across various sectors and industries. Individual stocks typically sell at price-to-earnings ratios and price-to-sales ratios that are substantially lower than that of the equity markets in general, supported by what we believe to be accelerating earnings trends and strong cash flows. Each portfolio contains approximately 50-60 individual U.S. common stocks and U.S.-listed shares of foreign companies. We choose stocks that are constituents of the Russell 2000 Growth (generally between \$500 million and \$4 billion at the time of reconstitution of the index) at the time of purchase.

Our objective is to outperform the Russell 2000 Value Index over a full market cycle.

Three Way Asset Allocation Strategy: The Renaissance Three Way Asset Allocation Strategy employs a disciplined decision-making process to determine asset allocations among the principal asset classes of cash equivalents, bonds and stocks. At times, portfolio assets may be fully invested in a single asset class; at other times, assets may be invested in only two asset classes or potentially all three asset classes. Commitments to cash equivalents, bonds and stocks may range from 0% to 100% of the total portfolio. Asset class allocations typically change in increments of 50% and equities are invested in individual stocks that sell at reasonable valuations supported by what we believe to be above-average corporate profitability and accelerating earnings growth. Each portfolio typically contains approximately 50-60 individual U.S. common stocks with typical market capitalizations above approximately \$3 billion at the time of purchase.

We use a disciplined tactical asset allocation process that adjusts a portfolio's asset allocation in response to changing market conditions. The domestic market alternatives of common stocks, bonds and cash equivalents are analyzed in terms of their historic and current valuations relative to one another. Through this relative value analysis, we determine which market alternative offers the best value and adjust portfolio allocation accordingly. The stock portion is broadly diversified, and consists of large-capitalization issues that exhibit a combination of good valuation and strong earnings growth potential. Bonds are typically limited to U.S. Treasury and high-quality Corporate bonds.

Our objective is to outperform the S&P 500 Index over a complete market cycle.

Two Way Growth Asset Allocation Strategy: The Renaissance Two Way Growth Asset Allocation Strategy consists of a blend of stocks and cash based on an analysis that identifies the asset class or classes offering the most attractive potential return. Cash investments are limited to high quality (typically U.S. Treasury) holdings. Equity commitments are invested in the same stocks as the Renaissance Large Cap Growth Strategy (described above). Changes among these two asset classes are made in 10% increments.

We use a disciplined tactical asset allocation process that adjusts a portfolio's asset allocation in response to changing market conditions. Using quantitative valuation models, the domestic market alternatives of common stocks and cash equivalents are analyzed in terms of their valuation relative to one another. Through this relative value analysis, we determine which market alternative offers the best value and adjust portfolio allocation accordingly. Portfolios may invest up to 100% in any of the two asset classes at any point in time. The stock portion is broadly diversified, and consists of large-capitalization issues that exhibit a combination of good valuation and strong earnings growth potential. Cash investments are typically limited to U.S. Treasury bills.

Our objective is to outperform the Russell 1000 Growth Index over a complete market cycle.

Investment Planning Strategies: Any of our strategies can be customized to meet client specific needs as part of providing clients investment planning services. The customized strategies may include a portion or combination of any of the investment strategies discussed above. For a detailed description of each strategy, please refer to the strategy descriptions provided above. Individually customized strategies can include customized high net worth management for growth and income and balanced strategies, individual cash management, commodities strategies utilizing ETF's, mutual funds, etc. The client should refer to the individual prospectus to receive a detailed description of mutual fund fees, fund managers and investment strategy.

Other: We also manage strategies that are not described here, which are currently incubated and not available to the public or are customized for an individual or specific group of clients.

Item 9 – Disciplinary Information

There are no applicable legal or disciplinary events relating to Renaissance.

Item 10 – Other Financial Industry Activities and Affiliations

Affiliations

Affiliated Managers Group (“AMG”): AMG, a publicly traded asset management company (NYSE: AMG), holds an equity interest in The Renaissance Group LLC (“Renaissance”) DBA “Renaissance Investment Management” through its holding company, (“AMG Renaissance Holdings LLC”). AMG's equity interest in Renaissance is structured so that Renaissance maintains operational autonomy in managing its business. The relationship between AMG, AMG Renaissance Holdings LLC and Renaissance is defined by an operating agreement that provides that neither AMG nor AMG Renaissance Holdings LLC has the authority or the ability to operate or manage Renaissance's business in the normal course. Accordingly, AMG and AMG Renaissance Holdings LLC are not “control persons” of Renaissance. AMG also holds equity interests in certain other investment advisers (“AMG affiliates”).

Each of the AMG affiliates, including Renaissance, operates autonomously and independently of AMG and of each other. Except as described in this Form ADV, Renaissance does not have any business dealings with these AMG affiliates and does not conduct any joint operations with them. Renaissance carries out its asset management activity, including the exercise of investment discretion and voting rights, independent of the AMG affiliates. The AMG affiliates do not formulate advice for Renaissance's clients and do not, in Renaissance's view, present any potential conflict of interest with Renaissance's clients. Consequently, individual information on each AMG affiliate is not listed in Section 7.A. of Schedule D of Part 1A of Form ADV, unless Renaissance has business dealings with certain AMG affiliates, which are listed below. A list of all AMG affiliates is available to Renaissance clients upon request. More information regarding AMG, including its public filings, is available at www.amg.com.

AMG Funds LLC (“AMG Funds”):

Administrative Support/Wrap/SMA and Dual Contract Programs: Renaissance has a servicing agreement(s) with AMG Funds LLC, a wholly-owned subsidiary of AMG, under which AMG Funds LLC provides administrative and/or marketing services to support Renaissance's] provision of advisory services to or through various unaffiliated third-party investment programs, such as Wrap/SMA programs, UMA programs and/or dual contract programs sponsored by unaffiliated broker-dealers, banks, and other financial intermediaries. Renaissance pays AMG Funds LLC a fee for the services provided by AMG Funds LLC under these servicing arrangements. These fees are paid out of the investment advisory fee Renaissance is paid by the client.

Subadvisory Marketing Support: Renaissance has a marketing agreement(s) with AMG Funds LLC, a wholly-owned subsidiary of AMG, under which AMG Funds LLC markets Renaissance's investment management services to unaffiliated third party intermediaries that sponsor sub-advised mutual funds and/or other platforms, such as defined contribution retirement plan platforms. Renaissance pays AMG Funds LLC a fee for these services. These fees are paid out of the investment advisory fee Renaissance is paid by the client.

Mutual Fund Subadvisory Agreement: Renaissance has mutual fund subadvisory agreement(s) with AMG Funds LLC, a wholly-owned subsidiary of AMG, under which Renaissance serves as subadviser to one or more mutual funds in the AMG Funds family of mutual funds, which are sponsored and advised by AMG Funds LLC. As described in each fund's prospectus, the fund pays AMG Funds LLC an advisory fee, and AMG Funds LLC pays Renaissance a sub-advisory fee with respect to the fund.

Other Contractual Relationships: Renaissance can use the services of a vendor or broker and purchase or sell securities of the vendor or broker for our clients. Renaissance can also purchase or sell the publicly traded securities of a client or our parent company Affiliated Managers Group (“AMG”) subject to the AMG Insider Trading Policy restrictions described in Item 11. This creates a **conflict of interest** because we have an incentive to purchase and hold these securities since the company is our parent company, vendor, broker or client. We believe that by using our quantitative screens to create an initial list of eligible securities that can be purchased for a portfolio **mitigates the conflicts** described above. The quantitative screening process also requires Renaissance to review the security for sale if it falls outside of the top two quintiles of our quantitative screening process, which further mitigates this conflict.

Affiliated Mutual Funds/ETFs: Renaissance as of the date of this ADV does not, but in the future may invest client's funds in affiliated mutual funds or ETFs that are managed by one of our AMG affiliates. This presents a **conflict of interest** due to the potential for “double dipping” of investment management fees by Renaissance and the AMG affiliated manager. This **conflict has been mitigated** by Renaissance discounting its management fee by the amount of the mutual fund fee the client is paying to the Renaissance sub-advised mutual fund/AMG Affiliated mutual fund. Renaissance can collect an investment management fee from the manager of the affiliated mutual fund/ETF.

Family Relationships

Renaissance understands that some family members of our partners and employees are employed by broker/dealers, intermediaries or other entities with which we have a business relationship. In establishing or renewing these types of relationships, we will make these business decisions independently and without regard to the family member's employment at the entity. We **mitigate the conflict** these relationships create by tracking the relationships and ensuring that our non-employee account trades are not directed to a family member employed by a broker/dealer.

Other Financial Activities

Neither Renaissance nor any of our management persons are registered, or have an application pending to register, as a broker/dealer, futures commission merchant, and commodity pool operator, commodity trading advisor or an associated person of one of the preceding types of entities.

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

Renaissance has established restrictions, procedures and disclosures designed to address conflicts of interest arising between and among client accounts as well as between client accounts and Renaissance and our personnel. All Renaissance personnel must act in accordance with the fiduciary standard.

Code of Ethics

Renaissance has a fiduciary duty to our clients and accordingly has adopted a Code of Ethics (the "Code") that applies to all employees. The Code describes the standard of conduct we require of our employees and details restrictions on certain activities, including personal trading in accounts owned, managed or beneficially owned by the employee. The Code also includes requirements relating to areas such as gifts and business entertainment and the confidentiality and use of insider information. By detailing the regulatory and ethical standards to which our employees must adhere, the Code supports our efforts to promote a high level of professional ethical conduct in extending our fiduciary duty to our clients.

Personal Trading

The Code limits the personal trading activity of our employees, including members of our employees' households. Our Chief Compliance Officer, or his/her designee, periodically reviews employee transactions to ensure they are complying with the Code. These limits are designed to prevent employees from personally benefiting from the investment decisions we recommend to clients, as well as any short-term market effects resulting from our decisions. Specifically, the Code requires employees and members of their household to "pre-clear" their personal securities transactions with our Compliance Department prior to execution, with some limited exceptions.

The Code also prohibits employees and members of their household from trading in securities during specific time periods referred to as "blackout periods." These blackout periods include:

- During the time the security is on the Restricted Trading List; and,
- 3 trading days after the security is removed from the Restricted Trading List.

Exceptions to our blackout periods for Restricted Trading List securities include:

- Automatic investment plans initiated prior to the security being added to the Restricted Trading List;
- Restricted Trading List securities can be sold up to five times per calendar year. The sale transaction can only be executed if there are no model change transactions being executed in the security being sold and it has been three (3) trading days since the model change transactions in the security have been completed.
- Restricted List Securities owned prior to working for Renaissance;
- Hardship exemption for the purchase of a home, college tuition or other unforeseen circumstances; and,
- Gift of a Restricted Trading List security.

Pre-clearance requirements also exist for employees and members of their household for the participation in private placements. Initial Public Offerings cannot be purchased and are always in a blackout period until they are sold in the secondary market.

On an annual basis, all employees must provide us with a list of their securities holdings and/or brokerage statement(s) showing a list of the holdings, as well as trade confirmations sent directly to the Compliance Department for executed trades in their brokerage accounts that could contain Reportable Securities. All employees also provide a list of all investment related accounts on an annual basis.

These restrictions and requirements of the Code apply to all accounts over which employees have investment discretion, or in which they have a direct or indirect beneficial ownership interest. The Code of Ethics obligates employees to provide an annual acknowledgement in writing of compliance with the Code's terms and the terms of all other policies that are part of the Renaissance Compliance Manual in our Annual Certification Form.

Participation or Interest in Client Transactions

Principal/Employee Investment: Principals and employees of Renaissance are allowed to open accounts and invest their own assets in strategies managed by Renaissance. These accounts can hold, purchase and sell the same securities in which a Client has an interest. These transactions will probably occur at or about the same time that we are purchasing, holding or selling the same or similar securities or investment products for your portfolio(s).

The actions taken by principals/employees on a personal basis could be or be deemed to be, inconsistent with the actions taken by us for our client accounts. We have an incentive to favor principal/employee accounts in the area of trading opportunities, trade rotation, and allocation of investment opportunities. **To mitigate this conflict of interest**, we have implemented the following controls:

- Any orders for principal/employee-owned accounts must be executed after all client orders for that security in the same strategy have been executed.
- We perform a quarterly test to ensure principal/employee accounts are traded at the end of every trading rotation where client accounts are blocked with employee accounts.
- We perform an annual test to ensure principal/employee account returns fall within the range of client account returns for the same strategy.

- We employ a random trade execution allocation to ensure all directed and non-directed brokerage clients have an equal chance of receiving a first or last trade rotation, and that principal/employee accounts are traded last. We perform a sample test quarterly to ensure the random trade rotation is being followed. Any exception to the allocation order is approved by our Chief Compliance Officer and documented by the trading department.
- We do not engage in principal trades with our clients.

Our principals/employees could also invest in mutual funds and other commingled vehicles that are managed by us. This could result in a **conflict of interest** since our principals/employees have knowledge of these vehicle's investment holdings and future transactions, which is non-public information. We have addressed this conflict by requiring that principals/employees pre-clear affiliated fund transactions prior to purchase and that they submit quarterly/annual holdings transaction reports of reportable securities.

Securities Issued by Clients: Due to the nature of our clientele, we could trade in securities issued by our clients, brokers or vendors. In all these instances, we will do so in what we believe to be in the best interest of our clients. We will not, under any circumstance, consider a security issuer's relationship status with our firm when determining to trade in that issuer's security on behalf of other client accounts. We reduce this conflict by using quantitative models which are used to initially assist our Portfolio Manager's select potential securities by providing an initial screen of our investment universe.

Variation in Performance: Although we use the same Buy List of securities for all accounts within a strategy, performance of each account could vary due to differing account restrictions, tax management, cash flows, trade rotation, the inception date of accounts within a time period, etc. As a result, the portfolio of securities held in your account could perform better or worse than the portfolio of securities held in another similarly managed client account.

Variation in Investment Advice: We provide investment advisory services for different types of clients invested in different strategies and may give advice and/or take action in these accounts which could differ from the advice given, the timing or nature of action taken in another account.

In the course of providing advisory services, we may simultaneously recommend the sale of a particular security for one client account, while recommending the purchase of the same or similar security for another account. This could occur for a variety of reasons. For example, in order to raise cash to handle a redemption/withdrawal from a client account, we could be forced to sell a security that is ranked a buy in our model.

Restricted List

Renaissance maintains a "Restricted List" for all non-public information that is received by the Chief Compliance Officer from employees or other sources and determined to potentially be used by employees for the benefit of themselves or Renaissance Clients. The security may only be restricted for the employee/source of the non-public information and the Chief Compliance Officer if the non-public information has not been disseminated further. The Restricted List will be monitored to prevent trading of public securities based on material, non-public information. The Restricted List identifies all securities that cannot be purchased for client, employee, or firm owned accounts because material, non-public information could have been received by an employee of Renaissance.

The securities on this Restricted List are coded as "prohibited" in our pre-clearance system and the Performance & Portfolio Analyst ensures we do not act on this non-public information until it becomes public knowledge. After the information becomes public knowledge, the security is removed from the Restricted List and the security can be freely traded. The Restricted List, when applicable, is maintained by our Chief Compliance Officer or his/her designee.

Insider Trading/Material Non-Public Information

All employees of Renaissance are subject to the Affiliated Managers Group, Inc. Insider Trading Policy and Procedures (the “AMG Insider Trading Policy”). The AMG Insider Trading Policy broadly prohibits the use of material, non-public information, and also imposes restrictions on the trading of AMG’s stock. In addition, our Code of Ethics also includes policies and procedures prohibiting the use of material, non-public information that is designed to prevent insider trading by an officer or employee of Renaissance. Employees are also prohibited from spreading rumors to manipulate the price of securities based on actual or fictitious information.

Gifts and Business Entertainment

Renaissance’s Code includes policies and procedures designed to reduce the conflicts of interest regarding the giving or receiving of gifts and business entertainment between Renaissance, or our employees and third-parties (e.g., vendors, broker/dealers, consultants, clients, etc.).

Gifts: We limit the amount (e.g., value and frequency) of gifts received from any vendor or broker to \$100 per year, per outside entity. Gifts from the firm to a vendor, client or broker are also limited to \$100 per year, per client, vendor or broker. All gifts received by Renaissance employees and given by the Firm are recorded on the Renaissance Gift Log unless the value of the gifts is less than \$10 in value. (e.g. pens, gift cards, coffee cups, etc.) These gifts do not have to be listed on the Renaissance Gift Log and do not count toward the \$100 annual gift limit from a single client, vendor or consultant.

Renaissance may donate to charitable enterprises that are clients, are supported by clients, and/or are supported by an individual employed by one of our clients. In general, we make donations in response to requests from clients and/or their personnel. Members of Renaissance’s management team, including our Chief Compliance Officer, approve charitable contributions made by us which addresses this conflict of interest. Management could take into consideration the importance of the client relationship as one factor in determining whether to approve a charitable contribution. The Chief Compliance Officer and/or his/her designee monitors and approves all charitable giving by Renaissance.

Entertainment: Business entertainment that Renaissance or our employees provide or receive from third-parties is limited by our Code of Ethics to \$250 per event per person and the third-party must attend the event with our employee. No travel or hotel related expenses can be accepted unless the expenses are related to a conference where one of our employees is a speaker/mediator/ panelist/board member or they are attending a conference/seminar that is sponsored by our parent company AMG or an AMG affiliate. Renaissance employees can attend free seminars that vendors sponsor as long as their travel and hotel expenses are not reimbursed by the vendor.

Political Contributions

Renaissance prohibits our employees from making political contributions on our behalf, being reimbursed for personal political contributions, or from making political contributions for the purpose of securing or retaining business. We maintain policies and procedures that have specific limitations as to whom employees can make contributions and the amount of these contributions. We also impose pre-clearance requirements for certain political contributions. We monitor all these contributions in our effort to comply with applicable laws and to prevent any such contributions prohibiting us from being awarded public business.

Distribution of the Code

Renaissance is firmly committed to making our employees and clients (both current and prospective) aware of the requirements within our Code. All of our employees are provided with a copy of our Code at the time of hire and have continuous access to the Code via our intranet system. Each employee must affirm in writing on an annual basis that they have received a copy of the Code and that they have read and understand its provisions and any amendments made to the Code during the year.

In addition, we conduct mandatory periodic compliance training that addresses the requirements of the Code and the other policies described in the ADV Part 2A. A copy of our Code is available upon request and can be obtained by contacting:

Renaissance Investment Management
50 East RiverCenter Blvd., Suite 1200
Covington, KY 41011
Attention: Compliance Department, Code of Ethics Request
Phone: 513-723-4500
E-mail: compliance@reninv.com

Item 12 – Brokerage Practices

Renaissance is retained on a discretionary basis (other than most UMA programs) and is authorized to determine and direct execution of portfolio transactions within your specified investment objectives that are communicated to us through the Investment Objective Questionnaire in the Investment Advisory Agreement or your Investment Policy Statement. Many clients limit our authority in terms of the selection of broker/dealers in favor of their own brokerage arrangements. We have a fiduciary duty to seek best execution and to ensure that trades are executed and allocated fairly and equitably among clients over time. We do not consider referrals in directing brokerage transactions.

Brokerage Relationships

Renaissance's relationships with broker/dealers, particularly those affiliated with large financial service organizations, are complex. We use various broker/dealers to execute trades on your behalf, but we may also have many other relationships with these firms. For example:

- We can invest your assets in securities issued by broker/dealers or their affiliates.
- We can provide investment management services to the same broker/dealers or their affiliates.
- Broker/dealers provide both internally-generated and third-party research to us as part of a bundled service.
- Brokers/dealers can refer clients to us.
- We participate in broker sponsored Wrap/SMA and/or UMA programs.

Despite these relationships, we have a fiduciary duty to you to seek best execution when trading with these firms and we have implemented policies and procedures to monitor our efforts in this regard.

Selection Factors for Brokers

If you authorize Renaissance to select a broker, we will select a broker based on a number of factors, which include but are not limited to the following:

- financially responsible;
- will effectively and efficiently execute, report, clear and settle the order;
- provide valuable research;
- Have access to foreign markets and have the ability to convert local foreign shares into ADR's;
- communicate timely and accurately with Renaissance's trading desk and operations team; and,
- will charge commission rates which, when combined with these services, will produce the most favorable total cost or proceeds for each transaction under the circumstances.
- Recognizing the value of these factors, for accounts which allow soft dollars, we utilize brokerage commissions in excess of that which another broker might have charged for effecting the same transaction.

Liquidity Rebates

In selecting broker/dealers to execute transactions for the accounts Renaissance manages, we do not consider any "liquidity rebates" that might be available to those broker/dealers. Broker/dealers may earn "liquidity rebates" (e.g., a certain cash rebate) when placing orders in certain market centers, while trading on our behalf. We are not entitled to and do not receive liquidity rebates.

Brokerage for Clients

Purchase and sale orders are executed with or through either a broker designated by you or, in absence of your direction, a broker selected by Renaissance. As a prerequisite to establishing an account with us, you must either: 1.) direct us to use a broker/directed broker with whom you have established a relationship and negotiated a commission rate; or, 2.) authorize us to select a broker at commission rates negotiated by us.

If a client has not previously established a customer relationship with a broker and asks our advice in selecting a directed broker, we could recommend one or more brokers taking into consideration the selection factors listed in the "Selection Factors for Brokers" subsection above. Any broker selected by you will be considered by us as a directed broker, in which case you are responsible for negotiating the commission and continuing to monitor that the commission rate is appropriate based on the required services of the broker.

When we have the discretion to select the broker, the services provided by the broker usually include trade execution, clearance and settlement, and confirmation of the trade.

Clients with a previously established relationship with a directed broker usually obtain services from the directed brokers that are not provided to clients whose brokers were selected by us. (e.g., services in addition to execution, confirmation and clearance, and settlement), including but not limited to, tax-planning advice and other financial and administrative services.

Directed Brokerage

Renaissance does not direct or require that our clients use a specified broker/dealer for portfolio transactions. In some cases, clients have directed us to use specified broker/dealers for portfolio transactions in their accounts on either:

- a transactional basis (where a separate commission is charged for each trade);
- a wrap fee basis (where a single periodic fee covers all transactional services in addition to other services, including investment management); or,
- an agreed-upon amount basis (where a single periodic brokerage fee covers transactional, custodial and other agreed-upon services).

In such cases, we will not solicit competitive bids for each transaction or seek the lowest commission rates for the client, since the commission rates have been pre-negotiated between the client and the designated broker/dealer ("directed broker"). We are unable to override the terms of that agreement.

Since we have not negotiated the commission rate and might not be able to obtain volume discounts, the commission rate charged by the directed broker could be higher than what we could receive from another broker/dealer selected by Renaissance. In addition, the client may be unable to obtain the most favorable price on transactions as a result of our inability to aggregate/bunch the trades from this account with other client trades. Accordingly, clients who direct commissions to specified broker/dealers might not generate returns equal to clients that do not direct commissions. Clients who direct brokerage should understand that similar brokerage services might be obtained from other broker/dealers at lower costs and possibly with more favorable execution.

Clients sometimes wish to restrict brokerage to a particular broker in recognition of custodial or other services provided to the client by the broker (including services in connection with manager selection and monitoring). A client's selection of Renaissance may be the result of manager search services provided to clients by their broker. Renaissance has a **conflict of interest** in our incentive to utilize a client's directed broker if the broker refers multiple clients to us and we feel we could obtain best execution at another broker. This **conflict of interest is mitigated** by the fact that:

- the client selected the Broker who helped select Renaissance,
- we do not pay a solicitor fee to the Broker;
- we monitor all discretionary and non-discretionary directed brokers for execution quality on a quarterly basis.
- the conflict and potential to limit the client's best execution has been disclosed in our ADV Part 2A and the investment management agreement;
- we are not affiliated with any of the brokers used to execute our client's trades; and,
- we do not know what other services, such as free retirement consulting, the client may be receiving from the directed broker.

Our ADV Part 2A and our Investment Advisory Agreement also inform our clients that they are responsible for negotiating the commission rates with directed brokers.

Best Execution

Renaissance must always seek to obtain the most favorable execution for our clients but there is no guarantee it will be achieved. To fulfill this duty, we must execute securities transactions for clients in a manner that the client's total cost, or proceeds in each transaction, is the most favorable under the circumstances. "Best Execution" means the best qualitative execution, not necessarily the best possible commission cost. Note that Renaissance is unable to monitor executions for UMA client orders because Renaissance does not execute the trades for these accounts.

Recognizing the value of these factors, we could select broker/dealers that charge commissions in excess of that which another broker/dealer might have charged for effecting the same transaction for accounts that allow Renaissance to select the broker for client transactions. We are not obligated to choose the broker/dealer offering the lowest available commission rate if:

- in our reasonable judgment, the total cost or proceeds from the transaction could be less favorable than what may be obtained elsewhere; or,
- a higher commission is justified by the service and/or research provided by another broker/dealer.

We will employ an evaluation process to monitor brokerage-related matters. The evaluation process by our Brokerage Committee will take place periodically to do the following:

- Oversee all matters relating to our trading and brokerage practices as needed;
- Review directed brokerage/commission recapture commitments;
- Evaluate brokerage records, including commission rates for discretionary brokerage, satisfaction level of execution and services, confidentiality and other brokerage selection factors listed above;
- Review client commission arrangements (including soft dollars and commission sharing arrangements);
- Review trading analytics, monitoring execution quality as well as quarterly trends;
- Review existing brokers and terminate (if applicable);
- Approve new brokers;
- Soft dollar budget preparation/monitoring and adjustment
- Mixed use analysis review; and,
- Address any and all other brokerage-related matters we determine to be appropriate.

Trading Rotation

A model change is the simultaneous sale and/or purchase of one or more securities within a defined strategy. The order for the placement of trades for model changes is systematically randomized for each model change. Trade execution order can be negotiated by Renaissance with an individual client (e.g. asking a client to go after the regular trading rotation). Every client account is included in this randomized trade order process (unless the exclusion is contractually agreed upon by all parties, such as a UMA program; or agreed to by policy and disclosure, such as an employee/family account) regardless of whether a client designates a particular broker or we have discretion to select the broker. Accordingly, non-directed trades and directed trades are subjected to the same random selection process, although we retain authority to make exceptions on a case-by-case basis due to system issues or other extenuating circumstances. Orders for all employee/family accounts managed by us are executed after all client orders have been executed. If a UMA program or other client will not notify Renaissance when they begin and end trading, Renaissance will notify them when they are next in

the trading rotation, then our trader will move on to the next broker in the trading rotation, since Renaissance does not know when that client will trade. This will probably lead to Renaissance competing in the market with the non-disclosing UMA program client. This could adversely affect the price both parties receive for a transaction in a security.

Once the model change is complete, the trader reviews the trading blotter to ensure all trades have been executed. All trades are matched with confirmations the next day and any discrepancies are resolved with the broker/custodian.

Trade Aggregation/Allocation

Random Trade Execution: So as not to favor any one client, the order in which the trades are selected for execution is calculated randomly for all clients using the random function in an Excel spreadsheet. Accordingly, each client or group of clients has an equal chance of being traded first, in the middle or last. All direct-managed clients who trade with the same brokerage firm are typically blocked together. Sub-groups within a brokerage firm will be traded in the most efficient way. Wrap/SMA programs are also included in the random rotation and are usually blocked together by sponsor/brokerage firm. When UMA sponsors are up in the rotation, they are notified of the model change if contractually obligated; otherwise, they will be notified after the regular trading rotation but before employee accounts are traded. If Renaissance does not know when a UMA program will start or stop their trading, we will continue working our way through the execution order after notifying the UMA program they are up in the trading rotation. Orders for all employee/family accounts that are managed by us are executed after all client orders have been executed and UMA sponsors have been notified for that security.

Any deviation from the randomized execution order process must be approved by our Chief Compliance Officer who will ensure there is an acceptable reason documented for the deviation and that appropriate supporting documentation is retained by the Trading Department.

Research, quotes and other market sources are used to analyze market conditions before trades are transmitted. Public information and/or new information are always considered during the trading process. Typically, small orders will be market orders and larger blocks will be worked so as to have minimal market impact. Trades are executed with the intent of not adversely affecting market price and market conditions such as volume, bid/ask spread. Orders are routed to a variety of liquidity sources such as the NYSE and NASDAQ exchanges as well as Alternative Trading Systems.

Dark Pools: are accessed through broker algorithms and are alternative trading venues that attempt to match buyers and sellers of large blocks of stocks. The risks associated with using them are: there is no guarantee of a better price than using an exchange, trade size could be relatively small, and the potential vulnerability to high frequency trading which could negatively affect the stock price obtained. To mitigate these risks our traders continuously monitor orders and executions to reduce the potential for market price manipulation by high frequency traders.

Bunch/Blocked Transactions: The ability of a client account to participate with other accounts in bunched/block transactions can produce better execution for the individual client account. However, in some instances, a client may have designated a specific broker/dealer to whom the client's trades must be directed. (See the "Directed Brokerage" sub-section above.) This designated broker/dealer may not (or, in some cases, will not) execute bunched or block trades, and even if it does, we might not be able to direct the entire block trade to this designated broker/dealer because it would conflict with our duty to obtain best execution. In these cases, since we will place the client's trade with the designated broker/dealer as instructed rather than include the client's order in the block trade, the client may not necessarily get the better price and/or level of execution that those clients who participate in the block could receive.

Partial Allocations

For partial trade executions of direct-managed accounts, we have adopted a policy of pro rata allocation per client account based upon order size with the belief that in most instances a pro rata allocation will assure fairness. The policy recognizes that no rigid formula will always lead to a fair and reasonable result, and that a degree of flexibility to adjust to specific circumstances is necessary. Therefore, under certain circumstances, allocation on a basis other than strictly pro rata or based on order size is permitted if it is believed that the resulting allocation is fair and reasonable. Examples of this include allocating on a random/manual basis if we block a wrap/SMA program trade with direct managed accounts at the same brokerage firm or if we trade a de-minimus amount and allocating on a pro-rata basis would be disadvantageous to our clients. For partial allocations of trades in Wrap/SMA Sponsor programs, the trades are allocated by each Wrap/SMA Sponsor's default allocation method, which typically would be pro-rate or random.

Errors

All errors must be resolved in a timely manner and so as to not negatively impact the client's portfolio. Soft dollar arrangements cannot be used to correct errors made by Renaissance when placing a trade for a client's account. If an error positively impacts a client's custodial account, all gains will be given to the client. If an error negatively impacts a client's custodial account, we will reimburse the account for the amount of the error and in certain situations, the error amount can be deducted from Renaissance's investment management fee. If the error does not affect the client's custodial account (e.g. does not show up on their custodial statement), the gain can be held in an error account at the broker to offset other losses caused by any Renaissance error at a particular broker.

To ensure clients' portfolios are not negatively impacted, our Chief Compliance Officer, or his/her designee, ensures an error log is maintained and error reporting forms are completed to ensure errors are reported, documented and rectified in a timely and accurate manner.

Commission Recapture Monitoring

Our Trading Department monitors the commission recapture requirements for each account using internal reporting functionality and places trades for commission recapture credit as needed. This would require trading directly with the commission recapture broker or stepping-out the commission recapture portion. A step-out is when a brokerage firm executes an order, but gives another brokerage firm credit for the executed trade.

Step-Out Trades

Renaissance can use "step-out trades" when it is determined that it might facilitate better execution for certain client trades, even if the client has directed Renaissance to utilize a particular broker. Step-out trades are transactions which are placed at one broker/dealer and then "given up" or "stepped-out" by that broker/dealer to another broker/dealer for credit. Step-out trades can benefit the client by finding a natural buyer or seller of a particular security so that a larger block of shares can be traded more efficiently. If Renaissance determines it would achieve best execution, we can use step-out trades with soft dollar commissions for any direct-managed client account, unless directed otherwise by the client in writing. Wrap/SMA sponsored programs will be asked if they want to participate in soft dollar brokerage transactions prior to soft dollars being utilized, if it is contractually allowed.

The executing broker/dealer could execute the step-out as a net trade and include a per share charge to the overall cost of the trade. A net trade is when a broker embeds a commission into the execution price of a security. For example, if a broker executes a buy of 100 shares of XYZ at \$10 per share and embeds a commission of 2 cents, then the resulting net price would be \$10.02 per share. In circumstances where we have followed the client's instructions to direct brokerage, there can be no assurance that we will be able to step-out the trades, or, if we are able to step-out the trades, that we will be able to obtain more favorable execution than if we had not stepped-out the trades.

Cross Trades

Renaissance does not engage in cross trades in our client accounts, which means that we do not buy or sell securities internally amongst our accounts, but instead use a broker/dealer for all purchases and sells of securities.

Contra Orders

Due to client directed cash flows such as closed account redemptions, scaling a percentage of portfolio holdings back, the rebalancing of securities and the use of different investment strategies that may hold the same securities, Renaissance periodically has opposing orders in the same security, or "Contra Orders," with a broker. Renaissance sends these orders to the broker to execute and they are executed in the market as they would be if there were no Contra Order. This may be an advantage or disadvantage to a particular client on either side of the order. Renaissance tries to avoid this scenario if at all possible.

ADR Conversion Fees

Please refer to Item 5 – Fees and Compensation/ Additional Fees and Expenses Payable by Clients.

Soft Dollars

Certain brokers selected by Renaissance who effect transactions for our client accounts provide or have agreed to provide us with investment research services of the kind contemplated by Section 28(e) of the Securities Exchange Act of 1934, as amended, commonly referred to as soft dollar arrangements. These research services would otherwise be available to us for a cash payment referred to as hard dollars. Brokers use the cost plus method when determining soft dollar credits. Any amount over our negotiated execution only rate is credited towards Renaissance's soft dollar balance. If a client would like a list of our soft dollar vendors, please contact compliance at compliance@reninv.com.

Soft dollar transactions cause clients to pay a higher commission rate than would be charged for execution only trades. Transactions are effected with or through these service-providing brokers at the best combination of execution and commission rates that we are able to negotiate.

Transactions with these brokers are not per an agreement; however, we:

- identify those brokers who have provided us with research products or services as well as the amount of research products or services provided; and,
- try to direct sufficient commissions to them either through direct trading relationships or through a Commission Sharing Arrangement (described below) in order to ensure we continue to receive the research products and services we deem useful.

A portion of all direct-managed and sub-advised client brokerage trades participate in bunched trade orders and soft dollar commission transactions. Wrap/SMA program clients will also participate in bunched trade orders and can participate in soft dollar commission transactions, if agreed upon in advance by the Wrap/SMA Sponsor. The percentage of soft dollar trades is adjusted on a periodic basis by reviewing the amount of soft dollar commissions generated over a period of time compared to the soft dollar budget for the same time period. Clients can place a maximum limit on the percentage of their trades that are used by Renaissance for soft dollar trading by notifying Renaissance in writing of this restriction.

The research products and services provided by broker/dealers through soft dollar arrangements benefit Renaissance's investment process for client accounts and can be used in formulating investment advice for any and all clients of Renaissance, including accounts other than those that paid commissions to the broker/dealers on a particular transaction. Nonetheless, not all research generated by a particular client's trade will benefit that particular client's account. In some instances, the other accounts benefited can include accounts for which the accounts' owners have directed their portion of brokerage commissions to go to particular broker/dealers other than those that provided the research products/services or clients that have requested Renaissance not to execute soft dollar trades for their account. However, research services obtained through soft dollar transactions can be used in advising all accounts, and not all such services would necessarily be used by Renaissance in connection with the specific account that paid commissions to the broker/dealer providing such services.

Types of Products/Services Received: We receive both proprietary and third-party research services and products. Proprietary research is "in-house" research provided by the brokerage firm, while third-party research consists of products and services that have been generated by an entity other than the broker executing the trade.

The products and services we receive through soft dollar transactions are investment advice (either directly or through publications or writings) as to:

- the value of securities;
- the advisability of investing in, purchasing or selling securities;
- the availability of securities or purchasers or sellers of securities;
- presentation of special situations and trading opportunities;
- advice concerning trading strategy;
- analyses and reports concerning issues, industries, securities, economic factors and trends, portfolio strategy; and,
- the performance of specific strategies.

We also receive benchmark index data, broker estimate data, company fundamental data, real time trading quotation systems, trade allocation software, trade order management software, portfolio analysis software, company analysis software and factor back-testing software. Clients should contact Renaissance at compliance@reninv.com to request a copy of our vendors who are paid with soft dollars. To the extent that we are able to obtain these products and services using clients' commission dollars, it reduces our need to produce the same research internally or use hard dollars to purchase these services and products, thereby providing us with an economic benefit and an incentive to use soft dollars.

Conflict of Interest: Because of the additional benefits we receive from soft dollar arrangements, we could give trading preference to those broker/dealers that provide research products and services, either directly or indirectly, only so long as we believe that the selection of a particular broker/dealer is consistent with our duty to seek best execution. Renaissance does not trade through affiliated brokers to obtain any soft dollar benefits.

General Guidelines for Soft Dollar Arrangements: Our use of soft dollar brokers will result in higher commissions being paid to soft dollar brokers than other brokers. The following are the general guidelines for soft dollar arrangements:

- We cannot enter into any soft dollar arrangements that are not eligible for the safe harbor under Section 28(e) of the Securities Exchange Act of 1934, as amended.
- We will review the addition of any new soft dollar products or services in accordance with Section 28(e) eligibility prior to approving use of these products and services.
- We do not enter into any formal written commitments or agreements requiring us to direct a specified amount of client transactions to a broker/dealer in exchange for the soft dollar services they provide to us.
- We usually do not enter into a soft dollar agreement directly with the product or service provider. Rather, most soft dollar arrangements are typically made with the broker and not the third-party provider. The broker, not us, is usually the party obligated to pay the vendor for the services.
- We will review that a good faith and reasonable soft-to-hard allocation of all “mixed-use” products has been made and documented and will evaluate the rationale for this determination. This allocation will be made based upon a good faith determination of the percent that the product or service was used for research purposes versus non-research functions, such as administrative or marketing. Our policy is that we must pay for the portion of the costs of the product or service attributable to non-brokerage or non-research usage in hard dollars.
- Any commissions paid to a broker/dealer by us in accordance to the soft dollar arrangement must be reasonable in relation to the value of the brokerage and research services received.
- Renaissance can receive research credit for all trades done with proprietary brokers regardless of the commission rate charged.

Internal Soft Dollar Controls/Procedures: We periodically review the past performance of broker/dealers with whom we have placed orders in light of the factors discussed above. We could cease to do business with certain broker/dealers whose performance/service may not have been competitive, or we can demand that these broker/dealers improve their performance/service before receiving any further orders. The overall reasonableness of commissions paid is evaluated by reviewing what competing broker/dealers were willing to charge for similar types of services. The evaluation also considers the timeliness and accuracy of the research received. Reasonableness is evaluated on an ongoing basis.

Conflict of interest: If Renaissance cannot generate enough soft dollars through soft dollar trading during the year to cover soft dollar eligible services, we have an incentive to maximize soft dollar usage to cover our soft dollar budget for soft dollar account(s), which have a negative balance. Negative soft dollar balances might have to be paid with hard dollars if the negative debit balance grows too large and the broker requires that Renaissance payoff or reduce the negative debit balance. This conflict of interest is mitigated by the following internal controls.

As previously noted, we maintain a series of internal controls and procedures relating to our brokerage practices, including our use of soft dollars. The following controls and procedures are designed to reduce the conflicts of interest created by the use of soft dollars.

- Our Chief Compliance Officer and a Managing Partner approve all soft dollar services/products and all relevant details such as cost, number of users and appropriateness based on Section 28(e) are detailed on the Soft Dollar Arrangement Data Sheet.

- We also receive services which, based on their use, are only partially paid for with soft dollars. These services are considered “mixed-use” because we use the service for both research or brokerage and non-research, non-brokerage purposes. In each case, we make a good faith determination of which portion of the service should be paid using soft dollars and which portion should be paid using hard dollars, which is the portion we pay. We retain documentation of the soft dollar to hard dollar allocation and perform an annual review of the allocation between soft dollars and hard dollars, which is presented to our Brokerage Committee.
- Our Brokerage Committee is responsible for monitoring any conflicts of interest as the committee covers all soft dollar and execution related topics including commission rates paid, mixed use analysis and broker execution analysis.
- The soft dollar budget is reviewed quarterly at the Brokerage Committee Meeting.

CFA Institute Soft Dollar Standards: If a client wishes to abide by the CFA Institute Soft Dollar Standards, they must advise us in writing. Soft Dollar trades are not conducted on a principal basis but can be executed by the broker dealer on a riskless principal basis where the securities are bought and sold at the same price. For more information on the CFA Institute Soft Dollar Standards, please refer to Appendix I Definitions, CFA Institute Soft Dollar Standards or the CFA Institute website: <http://www.cfainstitute.org/ethics/codes/softdollar>.

Commission Sharing Arrangements

Renaissance can use commissions to obtain proprietary research provided by broker/dealers, but paid for by third-parties through Commission Sharing Arrangements (“CSA”). In a CSA, we would enter into an agreement with broker/dealers so that commissions from transactions placed by us at that broker/dealer are pooled by the broker/dealer in order to compensate one or more proprietary research providers, which may or may not be a broker/dealer. We can pay for products and services that assist in our investment decision-making process with commissions generated by client accounts to the extent these products and services were used in that process. We would allocate the cost of the product on a basis that we feel is reasonable according to the various uses of the product and would maintain records documenting the allocation process followed.

Only the portion of the cost of the product allocable to research services would be paid using the brokerage commissions generated by client accounts.

We believe CSAs help minimize conflicts of interest with soft dollars as we direct our commissions to the best execution venue and use accumulated commission credits to pay for research. CSAs are also monitored in our Brokerage Committee meetings.

Wrap Fee Arrangements

Renaissance participates in wrap fee programs sponsored by brokerage firms and has direct-managed clients who have wrap fee agreements with their broker. As described in “Item 4 – Advisory Business,” under these arrangements the client typically pays a single fee to cover all brokerage costs in securities trades conducted through the Wrap/SMA program broker, the investment advisory services provided by us, custodial services for the client’s assets, or any combination of these or other additional agreed-upon services. In addition to the wrap fee, clients who hold American Depositary Receipts (“ADRs”) could also be charged Depositary Service Fees by the custodian bank holding the ADRs.

In circumstances where the trades are executed through brokers outside of the wrap fee arrangement, the brokerage costs for step-out trades and soft dollar commissions are not covered by the wrap fee arrangement and are, paid by the client in addition to the wrap fee paid to the Wrap/SMA Sponsor.

From time to time, assets of wrap fee clients utilizing our investment management services can be invested in cash or cash equivalents due to investment decisions or the receipt of interest or dividends, or both. We can use money market funds that may or may not be affiliated with the brokerage firm as temporary investment vehicles or otherwise for the wrap fee accounts. This could result in advisory, distribution or other fees being paid in addition to the wrap fees described here.

UMA and Other Non-Discretionary Programs

Renaissance serves or can serve as a sub-adviser, on a non-discretionary basis, to various Unified Management Accounts (“UMAs”) and other programs where another manager (which could be a related affiliate of Renaissance, such as AMG Funds) serves as the discretionary investment manager. In providing model based investment recommendations for these programs on a non-discretionary basis, we maintain broad authority with respect to the timing of the delivery of recommendations to the adviser, both within a particular investment style and between the various investment styles. The timing of the delivery of model updates is typically contained within the UMA Sponsor’s contract.

Initial Public Offerings (“IPOs”)

Renaissance does not participate in IPO’s.

Item 13 – Review of Accounts

Renaissance’s Portfolio & Performance Analyst and operations team (referred to as Portfolio Administrators) are responsible for the review of the assets of the client accounts under their supervision. The number of reviews and accounts assigned to each varies depending on the nature of the strategy or service being provided. In addition to the Portfolio Administrator review, certain events could trigger additional reviews. For example, if the client provides an updated Investment Policy Statement (IPS), the Portfolio Administrator, Chief Compliance Officer and Portfolio & Performance Analyst will each review the IPS and update all applicable investment restrictions.

The Portfolio & Performance Analyst reviews the assets of each account, usually monthly, when there is a model change for the strategy or when rebalancing the account to the model. The Portfolio & Performance Analyst also periodically reviews all securities to ensure that each holding is appropriate for the client based on our investment strategy models. In addition, investment research analysts review securities maintained on our Buy List. Our investment research analysts are typically responsible for tracking a variety of companies and/or industries or sectors and making recommendations for our portfolios.

Portfolio Administrators reconcile the securities and cash of client accounts against the records of the custodian, the official record keeper, on a monthly basis. If any discrepancies are identified, the Portfolio Administrator works with both our internal team and the custodian to resolve these discrepancies. Since the custodian holds the assets in the account, the custodian statements and records are the official books and records for the account.

During the annual compliance review, Renaissance personnel review a sample of client accounts for adherence to Renaissance internal investment guidelines and client-mandated contractual guidelines. We also compare a sample of individual client accounts against other accounts invested in a similar manner to assess the consistency of performance between client accounts and employee accounts.

Reporting

Clients usually receive quarterly account reports from independent qualified custodians, unless they request these reports more frequently or the custodian provides monthly statements.

The reports typically include:

- A listing of individual holdings, including the number of shares and current market value;
- Quarterly, year-to-date and/or since-inception time-weighted rates of return;
- A statement of historical changes to the account describing the original capital, additions of capital, income earned, and a combination of realized and unrealized appreciation or depreciation; and,
- Purchase and sale transactions occurring during the quarter.

In addition, each direct-managed client also receives quarterly reports from Renaissance, unless the client or their authorized representative declines delivery of the quarterly report. The quarterly reports normally include actual client performance shown against relative benchmarks, along with our comments on the general market and the specific strategy in which the client is invested. Upon request, additional reports can be prepared to meet client needs.

Clients in Wrap/SMA and UMA model-based arrangements only receive quarterly statements from the respective sponsor.

Item 14 – Client Referrals and Other Compensation

Relationships with Consultants

Many of our clients and prospective clients retain investment consultants to advise them on the selection and review of investment managers. Renaissance has client accounts that were introduced to us through consultants. These consultants or their affiliates could, in the ordinary course of their investment consulting business, recommend our investment advisory services, or otherwise place us into searches or other selection processes for a particular client.

We have extensive dealings with investment consultants, both in the consultants' role as adviser for their clients and through independent business relationships. Specifically, we provide consultants with information on portfolios we manage for our mutual clients, as per our clients' directions. We also provide information on our investment styles to consultants who use the information in connection with searches they conduct for their clients. We can also respond to "Requests for Proposals" or "Requests for Information" from consultants representing clients in connection with manager searches conducted on behalf of their clients.

Clients placed with us by consultants can instruct us to direct some or all of their brokerage transactions to these consultants, which could also be a broker/dealer, or to the particular broker/dealers with whom the consultants have relationships. Alternatively, we can simply choose to allocate brokerage to these consultants or broker/dealers.

Other interactions that we can have with consultants include, but are not limited to, the following:

- We can invite consultants to events or other entertainment hosted by us.
- We could purchase software applications, access to databases, and other products or services from consultants.
- We could pay registration or other fees/expenses for the opportunity to participate, along with other investment managers, in consultant-sponsored industry forums or conferences. These conferences or forums provide the opportunity to discuss a broad variety of business topics with consultants, clients and prospective clients.
- We can serve as an investment adviser for the proprietary accounts of consultants or their affiliates, or as adviser or sub-adviser for funds offered by consultants and/or their affiliates.

In the case of a client referral, we rely on each consultant to disclose to their clients any conflict that the consultant may believe to exist due to its relationship with us.

Investment Consultant Databases

Renaissance can pay consultants, or other third-parties, to include information about our investment approaches in databases that they maintain. These databases describe the services provided by investment managers to prospective clients.

Relationships with Solicitors

Renaissance is party to an agreement with AMG Funds, which is an affiliated solicitor. Under these arrangements, and any future solicitation agreements we might enter into, we pay a fee for the services these parties provide on our behalf, such as sales, marketing, client referrals, and client services. We have procedures to provide reasonable assurance that all clients and accounts are treated fairly and equitably and that our relationships with these parties do not result in any inappropriate preferential treatment.

Regarding solicitors (e.g. Whitestone Global Partners) that are not affiliated with Renaissance, we will ensure we comply with all of the current requirements of the Investment Advisers Act regarding solicitor disclosures in section 275-206-4-3 and qualified solicitors in section 275-206-4-5.

Compensation from Third-Parties

Renaissance does not receive any monetary compensation or any other economic benefit from a non-client for providing investment advisory services to a client.

Item 15 – Custody

Renaissance does not act as a custodian over the assets in the accounts we manage for clients except as deemed a “custodian by applicable law”, as discussed in the subsection below. Clients must make their own arrangements for custody of securities in their accounts. Custodians can be broker/dealers, banks, trust companies, or other qualified institutions. The qualified custodian will provide the client with account statements, at least quarterly, relating to the assets held within the account managed by us. Each client should carefully review the qualified custodian’s statement upon receipt to determine that it completely and accurately states all holdings in their account and all account activity over the relevant period. Clients should report any discrepancies to us and the qualified custodian.

In addition to the account statements provided by the qualified custodian to our clients, we also provide a quarterly report to clients, unless the client waives this service in writing. Our reports can vary from custodial statements based on accounting procedures, reporting dates, and/or valuation methodologies of certain securities. However, please note that custodian statements reflect the official books and records for the accounts we manage and should be used for tax reporting, class action filings, etc.

We encourage clients to compare the quarterly report we provide against the statements provided by the qualified custodian, and to promptly report any questions, concerns, or discrepancies to both us and the qualified custodian. Inquiries can be communicated to us by writing, e-mailing or telephoning using the following contact information:

Renaissance Investment Management
50 East RiverCenter Blvd., Suite 1200
Covington, KY 41011
Attention: Compliance Department, Custody Questions
Phone: 513-723-4500
E-mail: compliance@reninv.com

Custodian by Applicable Law: If we have the authority to request payments directly from a client's custodial account or debit a client's account, under federal securities laws, we are considered to have custody of the client's assets. However, the assets in these accounts are maintained by independent, unaffiliated qualified custodians, which deliver quarterly or more frequent statements to their clients.

If your custodian is not providing custodial statements on a quarterly or more frequent basis, you need to contact your consultant or the custodian directly. Renaissance will request that you certify you are obtaining statements from your custodian at least quarterly on our standard Renaissance investment management contract. We further request that you update us if you are not receiving at least quarterly statements from your custodian on your fee bills and quarterly Renaissance statements.

Item 16 – Investment Discretion

Discretionary Authority

When a client opens an account, Renaissance is typically granted discretionary authority to select the type and amount of securities to be bought or sold in the client's account. When selecting securities and determining amounts of securities for purchase or sale, we must observe the investment policies, limitations, and restrictions that are applicable to the client's account(s), as determined by the client. Clients must provide any investment guidelines and restrictions, including amendments, to us in writing. A client will grant us discretionary authority by completing an Investment Advisory Agreement, which includes a statement giving us full authority to invest the assets identified by the client in a manner consistent with the investment objectives and limitations defined by the client, and to engage in transactions on a discretionary basis in the client's account. For registered investment companies, our authority to trade can also be limited by federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Class Action Suits

Renaissance is not obligated to, and does not take any action with regard to class action suits relating to securities purchased by us for client accounts unless the Managing Partners of Renaissance directs us too, which has never happened as of the date of this ADV filing. We provide instructions to custodians and brokers regarding tender offers and rights offerings for securities in client accounts.

However, we do not provide legal advice to clients and, accordingly, do not determine whether a client should join, opt out or otherwise submit a claim with respect to any legal proceedings, including bankruptcies or class actions, involving securities held or previously held by the client. We do not have the authority to submit claims or elections on behalf of clients in legal proceedings. We do not respond to class action plaintiff requests for client information. Class action plaintiffs are directed to contact the custodian directly for assistance with obtaining client contact information.

However, should a client wish to retain legal counsel and/or take action regarding any class action suit proceeding, we will provide the client, or the client's authorized representative, with information that could be needed upon the client's or their representative's reasonable request.

Item 17 – Voting Client Securities

Since client accounts could hold stocks or other securities with voting rights, our clients often have the right to cast votes at the corporate issuers' shareholder meetings. However, since shareholders often do not attend shareholder meetings, they have the right to cast their votes by "proxy." In these cases, Renaissance's clients will either retain proxy-voting authority or contractually delegate it to us. If a client has contractually delegated the authority to us, we will vote proxies for that client. If the client retains proxy voting authority, the client will receive proxy solicitations directly from the custodian, and the client can contact us with any questions about a particular solicitation using the contact information provided at the bottom of this Item. It is the client's responsibility to notify their custodian to send ballots to their address in order for the client to vote them, and the client needs to monitor the receipt of proxies if Renaissance is not contractually responsible for voting the client's proxies.

Where clients have delegated proxy-voting authority to us, as an investment adviser and fiduciary of client assets, we have implemented proxy-voting policies and procedures intended to protect the value of shareholder investments and designed to reasonably ensure that we vote proxies in the best interest of clients. In voting proxies, we seek to both maximize the long-term value of clients' assets and to cast votes that we believe to be fair and in the best financial interest of the affected client(s).

If a client has delegated proxy voting authority to us, but would nevertheless like to direct our vote on a particular proxy solicitation, the client needs to give us written or e-mailed instructions at least 10 business days before the voting deadline date. If a request is received less than 10 business days from the voting deadline date, we will vote the proxy according to the client's instructions on a best efforts basis, but Renaissance cannot guarantee the vote will be able to be amended.

When an account transitions to Renaissance, we usually liquidate some or all of the securities held in the account based upon the selected strategy and/or tax consequences, unless the client or their authorized representative directs us not to. We do not vote proxies for securities bought or sold during an account transition, unless they are received by our Proxy Agent from the client's custodian during that time period.

We do not recall proxy ballots to vote them if the client has lent the shares out for securities lending purposes.

Voting Agent

Renaissance has contracted with an independent third-party agent (hereafter "Proxy Agent") for proxy voting system usage/record retention and corporate governance services, which specializes in providing a variety of services related to proxy voting. The Proxy Agent has retained, with Renaissance's approval, a third-party proxy recommendation service (hereafter "Proxy Recommendation Service").

Specifically, we have retained the Proxy Agent to:

- (i) execute proxy votes using the proxy voting recommendations provided by the Proxy Recommendation Service; and,
- (ii) maintain the records necessary to track proxy voting materials, the research used to make proxy voting decisions, as well as the proxy voting actions taken for each client account.

Specifically, we have retained the Proxy Recommendation Service to:

- (i) research and provide proxy voting recommendations to the Proxy Agent to enable them to execute the proxy vote in a timely manner.

We have adopted the current proxy voting policy guidelines available through our Proxy Recommendation Service as our own and will vote proxies for clients who have given us proxy-voting authority according to those policy guidelines. Three sets of proxy guidelines are available to clients through our Proxy Recommendation Service:

- (i) the Standard Detailed Policy guidelines, overlaid by the Investment Manager Policy;
- (ii) a Taft Hartley Policy, that is in compliance with the AFL-CIO guidelines, which overlays the Standard Detailed Policy guidelines; and,
- (iii) a policy incorporating the MacBride principles, which overlays the Standard Detailed Policy guidelines in conjunction with the Investment Manager Policy.

Standard Detailed Policy: Renaissance uses the Standard Detailed proxy voting guidelines provided by the Proxy Recommendation Service in conjunction with the Investment Manager Policy, unless the client provides written direction to the contrary or the client is a direct-managed Taft Hartley client. This proxy policy focuses on voting proxy ballots with the goal of ensuring the corporate stock price is maximized.

Taft-Hartley Policy: Renaissance maintains and utilizes a Taft-Hartley voting policy provided by the Proxy Recommendation Service for direct-managed Taft-Hartley clients, unless Renaissance is provided with written direction to the contrary. Renaissance considers direct-managed Municipal Police and Firefighter clients Taft-Hartley clients for proxy-voting guideline purposes and their proxies will be voted using Taft Hartley guidelines which is an overlay to the Standard Detailed Policy, unless the client or their agent provides written direction to the contrary. Non-Taft Hartley direct-managed clients can request that the Taft Hartley Policy be used for their account(s), upon written instruction to Renaissance. Otherwise, their proxies will be voted using the Standard Detailed Policy in conjunction with the Investment Manager Policy overlay.

MacBride Principles: Renaissance also can utilize the MacBride Principles for direct-managed clients upon written client request. The MacBride Principles objective requires employers in Northern Ireland to not discriminate in their hiring, promotion or termination practices based on religion or ethnicity. The MacBride Principles policy is an overlay to the Standard Detailed Policy in conjunction with the Investment Manager Policy, which is also an overlay to the Standard Detailed Policy.

Clients with Customized Proxy Policies: Clients who wish to provide Renaissance with a customized proxy policy to utilize for their proxy voting ballots usually are charged an additional fee to cover the cost of voting a customized policy. This is negotiable and may depend on the total assets under management of the client account(s).

Wrap/UMA Program Sponsored Clients: The Standard Detailed Policy (profit maximization policy), in conjunction with the Investment Manager Policy, will be used for all Wrap/UMA Sponsor clients, unless Renaissance receives written instruction from an individual wrap sponsor client, the Sponsor of the Wrap/UMA Program, or the client's agent on their behalf, the Standard Detailed Policy (profit maximization policy) will be used for all wrap/UMA sponsor clients with the Investment Manager overlay policy.

Employee/Family Accounts: Renaissance will not be contractually obligated to vote proxies for employee/family accounts that receive the employee discounted fee rate unless it is stated in their Investment Advisory Agreement.

Proxy/Share Blocking

In general, unless otherwise directed by the client, Renaissance will make reasonable efforts to vote client proxies in accordance with the proxy-voting recommendations of our Proxy Recommendation Service. We will almost always decline to vote proxies if doing so would cause a restriction being placed on our ability to trade securities held in client accounts in "share blocking" countries. Accordingly, we can abstain from votes in a share blocking country in favor of preserving our ability to trade any particular security at any time.

Custodian Responsibility/Proxies Not Received

If the client's custodian does not redirect the client's proxies upon our direction, Renaissance will not be able to vote our client's proxies until this occurs. If the client's custodian forwards the proxy ballot after our Proxy Agent's voting cutoff, we will not be able to vote that client's proxy ballot.

Abstention from Vote

If it is an option on the proxy ballot, we have the right to abstain from a vote or not vote if no recommendations are available from the Proxy Recommendation Service and we feel we do not have adequate information to make a decision in the best interest of our clients.

Voting Proxies Without a Recommendation

Renaissance has a Proxy Voting Committee, which meets on an as needed basis to review any material conflicts of interest or any special factors or circumstances regarding the voting of proxies, if the Proxy Recommendation Service has a conflict of interest and the Chief Compliance Officer decides Renaissance has enough information to make an informed decision.

In the event that the Proxy Recommendation Service does not provide a recommendation, the issue is not a technical question, and abstaining from the vote is not an option on the ballot, our Chief Compliance Officer can decide to not cast a vote due to a lack of information/research or can convene our Proxy Voting Committee if the Chief Compliance Officer decides there is enough information available to allow the Proxy Voting Committee to make an informed decision in the best interest of our clients. If the Proxy Voting Committee is convened, the Chief Compliance Officer will screen the committee members for any personal conflicts of interest by having them complete a Material Conflicts Form. Proxy Voting Committee members with a conflict of interest will be excluded from the vote. The Chief Compliance Officer will tally the Proxy Voting Committee votes. If all of the Proxy Voting Committee members have a conflict, Renaissance will not cast a vote for that ballot due to the lack of unbiased Proxy Voting Committee members and will document this fact.

Technical Questions

We will answer any technical questions listed on a proxy ballot that do not require research, on a case-by-case basis without convening our Proxy Voting Committee, if a recommendation is not available from the Proxy Recommendation Service (e.g.: Does the Firm hold a controlling interest in the company?).

Conflicts of Interest

- (1) Presently, Renaissance is not aware of any material corporate conflicts of interest by us or Affiliated Managers Group (“AMG”), our parent company, other than potentially voting a proxy for a company who is also a client. Renaissance is not a publicly traded company and currently we do not invest in AMG stock or vote their proxy ballots. We utilize the recommendations from a third party Proxy Recommendation Service to vote all proxies unless there is no recommendation provided by the Proxy Recommendation Service or they have a conflict of interest. However, should such conflicts arise, we will identify the conflicts that exist between the interests of Renaissance/AMG/AMG Affiliates and our clients. This examination will include a review of the relationship of Renaissance/AMG/AMG Affiliates with the issuer of each security (and any of the issuer’s affiliates) to determine if the issuer is a client of Renaissance or has some other relationship with Renaissance, AMG, an AMG Affiliate or a client of Renaissance.
- (2) If the Proxy Recommendation Service determines it has a material conflict of interest regarding a vote, we will be notified of the conflict by the Proxy Agent who reviews the research reports containing the voting recommendation service’s conflicts of interest. If necessary, we will then convene a meeting of our Proxy Voting Committee, screen for any Renaissance corporate and Proxy Voting Committee member conflicts of interest and instruct the Proxy Agent of the voting decision of the Proxy Voting Committee via their electronic interface. If we determine we do not have enough information to make a voting recommendation, we will either abstain or not vote the proxy if abstention is not an option. We will document any such Renaissance conflict(s) or Proxy Voting Committee member conflict(s) and exclude any member(s) from the Renaissance Proxy Voting Committee that could have personal conflicts of interest. Renaissance’s Chief Compliance Officer will chair the committee.
- (3) Annually, Renaissance will request a copy of the Proxy Recommendation Service’s current conflict of interest avoidance procedures, conflict of interest statement and statement of compliance to verify:
 - They do not currently have any business relationships which would constitute a conflict of interest that would affect Renaissance’s clients that we need to disclose to our clients; and,
 - Ensure they have adequate personnel experience and systems to ensure accurate recommendations are made to Renaissance.

Currently, the Proxy Recommendation Service has the following conflicts of interest:

- Proxy Recommendation Service’s parent companies, Ontario Teachers’ Pension Plan (“OTPP”) and Alberta Investment Management Company (“AIMCo”), have a significant, reportable stake in a company or Glass Lewis becomes aware through public disclosure of OTPP’s or AIMCo’s ownership stake in a company we are covering.
- Proxy Recommendation Service’s employee, or relative of an employee of the Proxy Recommendation Service, or any of its subsidiaries, a member of the Research Advisory Council, or a member of the Proxy Recommendation Service Strategic Committee, which includes representatives of OTPP and AIMCo, serves as an executive or director of a public company.

- Investment manager customer is a public company or a division of a public company.
 - Proxy Recommendation Service Customer submits a shareholder proposal or is a dissident shareholder in a proxy contest.
 - Proxy Recommendation Service has a business relationship with a public company, such as a partner or vendor relationship.
 - Public company buys a Proxy Paper from the Proxy Recommendation Service prior to publication of the report.
 - The Proxy Recommendation Service engaged with the public company during the solicitation period, but the company did not purchase the Proxy Paper.
- (4) The Proxy Agent does not provide voting recommendations to Renaissance. Rather, they only provide the system used to vote proxies and retain all proxy records so it is not possible for them to have a conflict of interest that would influence the proxy vote. The Proxy Agent will notify Renaissance of any Proxy Recommendation Service conflicts of interest listed on their research reports.

Summary of Renaissance's Proxy Voting Policy and Procedures

Renaissance Investment Management (hereafter "Renaissance") has a responsibility to vote proxies of client securities under its management solely in the best interest of its clients if Renaissance has been delegated proxy voting responsibility by the client. Renaissance votes all proxies with respect to client securities unless Renaissance's proxy recommendation service (hereafter "Proxy Recommendation Service") does not provide a recommendation or we do not have adequate information to make a decision in the best interest of our clients. We will not vote the client's proxies if the client has retained that responsibility itself and has so notified Renaissance via contract or in writing.

Renaissance has contracted with a third party proxy voting agent ("Proxy Agent") to use their proxy voting system who has retained, with Renaissance's approval, a third party Proxy Recommendation Service who provides research on corporate governance issues and corporate actions, makes proxy vote recommendations, and handles the administrative functions associated with the voting of client proxies. While the Proxy Recommendation Service provides the proxy vote recommendations, Renaissance retains the ultimate authority on deciding how to vote. It is Renaissance's policy to vote in accordance with the Proxy Recommendation Service's recommendations. However, in the event that Renaissance disagrees with the Proxy Recommendation Service's proxy voting recommendations or if the Proxy Recommendation Service has a conflict of interest and Renaissance decides not to vote in accordance to the Proxy Recommendation Service's recommendation, Renaissance's Proxy Voting Committee's rationale and ultimate decision will be internally documented.

When clients have delegated proxy voting responsibility to Renaissance, Renaissance will identify any material corporate conflicts that exist between the interests of Renaissance and its clients in addition to any material Proxy Recommendation Service conflicts of interest. This examination will include a review of the relationship of Renaissance with the issuer of each security (and any of the issuer's affiliates) to determine if the issuer is a client of Renaissance or has some other relationship with Renaissance or a client of Renaissance.

Renaissance is not presently aware of any material Renaissance corporate conflicts other than potentially voting proxy issues relating to a company who might also be a client. This conflict is mitigated by utilizing the Proxy Recommendation Service. Renaissance is not aware of any Proxy Recommendation Service provider conflicts of interest that are not disclosed to Renaissance by the Proxy Agent and mitigated through our Proxy Voting Committee. However, should other material conflicts arise, Renaissance will examine the scope of the conflict and implement procedures to ensure that the final voting decision is unbiased.

If a client has instructed Renaissance to vote its proxies and would like: a copy of our Proxy Voting Policy; a copy of the Proxy Recommendation Service's proxy voting policy guidelines; to review how Renaissance voted on a particular security in your account; or would like to direct a written request instructing Renaissance how to vote your proxies; please submit written requests to:

Renaissance Investment Management
Attn: Compliance Dept.
50 East RiverCenter Blvd., Suite 1200
Covington, KY 41011
E-mail: compliance@reninv.com
Phone: 513-723-4582

Item 18 – Financial Information

Renaissance is not under a financial condition that impairs our ability to meet our contractual and fiduciary commitments to our clients, and we have not been the subject of a bankruptcy proceeding.

ANY QUESTIONS: Renaissance's Chief Compliance Officer, Kevin Patton, IACCP, AIF, remains available to address any questions regarding this Part 2A.

Supplemental Information

Appendix I – Definitions

Affiliate: A company in which our parent company Affiliated Managers Group Inc. has a majority or minority interest.

American Depositary Receipts (“ADRs”): A negotiable certificate issued by a U.S. bank representing a specified number of shares (or one share) in a foreign stock that is traded on a U.S. exchange. ADRs are denominated in U.S. dollars, with the underlying security held by a U.S. financial institution overseas. ADRs help to reduce administration and duty costs that would otherwise be levied on each transaction.

CFA Institute Soft Dollar Standards: CFA Institute Soft Dollar Standards seeks to provide ethical standards for soft dollar practices as well as emphasize the paramount duty of the investment manager to place the interests of clients before those of the investment manager. In particular, the Soft Dollar Standards focus on six key areas: 1) Definitions; 2) Research; 3) Mixed-Use Products; 4) Disclosure; 5) Record Keeping; and, 6) Client-Directed Brokerage. For more information, please refer to the CFA Institute’s website <http://www.cfainstitute.org/ethics/codes/softdollar>.

Commission Sharing Arrangements (“CSA”): In a CSA, Renaissance enters into an agreement with a broker/dealer so that a portion of the commissions from trades placed by Renaissance with them are pooled to compensate one or more research providers who produce their own research, which is used by Renaissance in its investment process. The research providers may or may not be the broker/dealers who generated the transactions.

Cross Trades: Buying and selling a security internally within a firm among client accounts. i.e., the trade is not recorded through a securities exchange.

Developed Markets: At the time of this ADV’s publication, we consider an issuer to be located in a developed market country if it is incorporated or domiciled in one of the following countries: Australia, Austria, Belgium, Bermuda, Canada, Denmark, Finland, France, Germany, Ireland, Israel, Italy, Japan, Luxembourg, Netherlands, New Zealand, Norway, Portugal, Singapore, Spain, Sweden, Switzerland, United Kingdom, or the United States.

Discretionary Investment Manager: An investment manager who has the authority to make the buy and sell decisions in a client’s account without obtaining approval from the client or a Program Sponsor. The investment manager, however, must operate within the agreed upon limits stipulated in the Investment Advisory Agreement.

Emerging Markets: At the time of this ADV’s publication we consider an issuer to be located in an emerging market country if it is incorporated or domiciled in one of the following countries: Brazil, Chile, China, Colombia, Czech Republic, Egypt, Greece, Hong Kong, Hungary, India, Indonesia, South Korea, Malaysia, Mexico, Panama, Peru, Philippines, Poland, Qatar, Russia, South Africa, Taiwan, Thailand, Turkey or the United Arab Emirates.

Hard Dollars: Hard dollars are cash payments made by an investment manager to pay for research or services provided by a brokerage firm or third-party.

High Net Worth Client: An individual client that has \$1 million or more in assets managed by Renaissance.

Initial Public Offering (“IPO”): The first sale of stock by a private company to the public.

Institutional Client: Organizations (such as banks, brokerage firms, insurance companies, public funds, labor union funds, mutual funds or unit trusts, foundations, endowments, municipalities, states, 401(k)’s, pension funds, profit sharing plans and other tax exempt entities), which are not individually owned accounts.

Investment Consultant: An advisor who helps investors (typically trustees of corporate and public retirement plans, university endowments, foundations, healthcare systems, not-for-profit organizations, and high-net-worth individuals) with their long-term investment planning. An investment consultant, unlike a broker, does more in-depth work on formulating clients' investment strategies, helping them fulfill their needs and goals.

MacBride Principles: The MacBride Principles objective requires employers in Northern Ireland to not discriminate in their hiring, promotion or termination practices based on religion or ethnicity.

Model Change: The direction given by a Portfolio Manager for the sale and/or purchase of one or more securities within one of Renaissance’s investment strategies.

Mutual Fund: An investment vehicle that is comprised of a pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets.

Non-Discretionary Programs: A UMA program in which Manager A has the discretionary investment relationship with the UMA program client and is responsible for all client related needs and Manager B (Renaissance) has no direct contact with the client and is only responsible for amending/updating the UMA model portfolios on an ongoing basis and providing the updated model information regarding securities recommendation changes to Manager A and the timing of the trades. Renaissance has a non-discretionary investment management relationship with the underlying UMA program clients.

Performance-Based Fees: The fees that advisers or managers receive based on investors’ returns/performance.

Proxy Voting: A written authorization given by a shareholder or authorized representative for someone else to cast their vote at a shareholder meeting or at another time.

Side-By-Side Management: The simultaneous management of multiple types of client accounts (e.g., institutional accounts, individual accounts, mutual funds, Wrap/SMA programs, UMA programs) according to the same, similar or different investment strategy.

Soft Dollars: A soft dollar represents the value of research or services (other than trade execution) obtained by Renaissance from or through a broker/dealer in exchange for Renaissance directing trades to the broker/dealer. These services would otherwise be available to Renaissance for a cash payment (hard dollars).

Step-Out Trades: Step-out trades are transactions, which are placed at one broker/dealer and then “given up” or “stepped-out” by that broker/dealer to another broker/dealer for brokerage credit/payment.

Sub-Advisory Arrangements: An arrangement where Renaissance is hired by a third-party (i.e., mutual fund company) to manage the third-party client’s assets.


Tax Harvesting: The process of selling securities at a gain/loss to offset the taxable gains from another investment and/or create carryover losses to offset potential gains realized in future years.

Unified Management Account (“UMA”): A program where a brokerage firm helps an investor find a money manager in exchange for a flat quarterly or annual fee, which covers all administrative, brokerage, custodial and management expenses. Investment accounts can encompass every investment vehicle (e.g., mutual funds, stocks, bonds and exchange traded funds) all in a single account. Model based investment recommendations from multiple investment companies are offered by the brokerage firm as investment options to investors.

Wrap/SMA Program: A program where a brokerage firm helps an investor find a money manager in exchange for a flat quarterly or annual fee, which covers all administrative, brokerage, custodial and management expenses incurred through the program sponsor. Products from multiple investment companies are offered by the brokerage firm as investment options to investors. These programs are referred to as: Wrap Arrangements, Wrap Fee Programs, and/or Wrap Sponsor Accounts.

Appendix II – Privacy Notice

Rev. 03/2015

FACTS	WHAT DOES RENAISSANCE INVESTMENT MANAGEMENT (RENAISSANCE) DO WITH YOUR PERSONAL INFORMATION?	
Why?	<p>Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.</p>	
What?	<p>The types of personal information we collect and share depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ■ Social Security number and home address. ■ Telephone number and financial information. ■ Custodial statements and trade confirmations. <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>	
How?	<p>All financial companies need to share client's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their client's personal information; the reasons Renaissance chooses to share; and whether you can limit this sharing.</p>	

Reasons we can share your personal information	Does Renaissance share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes— information about your transactions and experiences	No	N/A
For our affiliates' everyday business purposes— information about your creditworthiness	No	N/A
For non-affiliates to market to you	No	N/A

QUESTIONS	Call 513-723-4582 or e-mail COMPLIANCE@RENINV.COM
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Who	
Who is providing this notice?	Renaissance Investment Management
What we do	
How does Renaissance protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Renaissance collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ Open an account or reconcile our records with your custodial account ■ Close an account or trade securities in your account ■ Make material changes to your account
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ■ Sharing for affiliates' everyday business purposes — information about your creditworthiness ■ Affiliates from using your information to market to you ■ Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Affiliated Managers Group</i> ■ <i>AMG Funds LLC</i>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.
Other important information	