



# StoneRidge PMG Advisors, LLC

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September 29, 2017

FORM ADV Part 2A

This Brochure describes the qualifications and business practices of StoneRidge PMG Advisors, LLC ["SRPMGA"]. If you have any questions about the contents of this Brochure, please contact us at 484-254-5400 or [adler@srpmga.com](mailto:adler@srpmga.com). This Brochure and its contents have not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

SRPMGA is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of SRPMGA should be considered carefully in your decision to hire or retain us to provide advisory services. Additional information about SRPMGA is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 2 – Material Changes**

StoneRidge PMG Advisors (“SRPMGA”) reports the following material changes to Form ADV Part 2 since our last annual amended filing on March 28, 2017.

On October 1, 2017, StoneRidge PMG Advisors, LLC will be changing locations. StoneRidge PMG Advisors, LLC will be moving from, 100 Four Falls Corporate Center, Suite 600, West Conshohocken, PA 19428 to:

201 King of Prussia Road  
Suite 200  
Radnor PA 19087

The new phone number is 484-254-5400. The fax number remains unchanged at 610-260-6241. Effective October 1, 2017, SRPMGA direct phone numbers have changed, email addresses remain the same; see Form ADV Part 2B for more information.

During the month of September 2017, StoneRidge PMG Advisors, LLC amended the Code of Ethics with a more stringent personal trading policy, and a requirement to report gifts and entertainment above certain thresholds. This new Code is consistent to the Code of Ethics in place at our affiliate, StoneRidge Investment Partners, also owned by Beltraith Capital.

### **Material Changes Reported on March 28, 2017**

In September 2016, the parent company of StoneRidge PMG Advisors, Beltraith Capital LLC, formed a new affiliated entity, Beltraith DSCP Management (“Beltraith DSCP”) to provide investment advisory services to private pooled venture capital vehicles that seek investment opportunities in technology and tech-enabled growth stage companies. Items 4 and 10 of this Brochure have been updated accordingly.

The firm’s official website is now [www.srpmga.com](http://www.srpmga.com).

### **Past Material Changes we still consider important**

On July 24, 2015, StoneRidge Investment Partners LLC merged the fixed income division of its money management business into our firm. As a result, PMG Advisors became StoneRidge PMG Advisors LLC.

PMG Advisors founding employee shareholders retain 38% ownership of the firm and will remain on the Investment Committee. Additionally, Beltraith Capital, headed by Steve Sanders and Wayne Leevy, acquired the remaining ownership in the firm. Beltraith Capital is also an owner of StoneRidge Investment Partners LLC and EmStone Advisers, LLC.

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With the merger, the fixed income professionals of Stoneridge Investment Partners LLC joined our investment committee and portfolios managed by them were reassigned to StoneRidge PMG Advisors.

StoneRidge PMG Advisors will provide clients with a summary of any material changes to this Brochure since its last annual update within 120 days of our fiscal year end. SRPMGA may provide additional interim disclosure about material changes, if warranted. Current or prospective clients of SRPMGA may request a copy of the current Brochure at any time by contacting Natalie Adler, Chief Compliance Officer at 484-254-5400 or [adler@srpmga.com](mailto:adler@srpmga.com). Additional information about SRPMGA is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Item 4 – Advisory Business

### Who We Are

StoneRidge PMG Advisors, LLC (“SRPMGA”) is an investment management and advisory firm specializing in U.S. dollar-denominated fixed income portfolios. We have provided discretionary advisory services to institutional clients and high net-worth individuals since 1996. On July 24, 2015, Stoneridge Investment Partners (“SRIP”) merged the fixed income division of its money management business into our firm. After the merger, SRPMGA assets under management became \$1.432 billion.

We apply a conservative, disciplined investment approach and seek to outperform benchmark indices through a combination of ‘quantitative’ and ‘fundamental’ tools. Our investment programs include:

- ◆ Fixed Income Core-Government/Credit
- ◆ Fixed Income Core-Aggregate
- ◆ Fixed Income Intermediate
- ◆ Fixed Income Low Duration

With the addition of the professionals from StoneRidge we are offering the suite of products that they have managed which include:

- ◆ Limited Maturity
- ◆ Restricted Securities
- ◆ Tax Efficient Strategy

We also use a number of other strategies that stem from the primary strategies listed above including inflation-protected portfolios, custom portfolios, liability driven portfolios, enhanced strategies, and balanced portfolios utilizing ETFs as the equity component. Some members of our portfolio management team have worked together for more than 24 years serving institutional investors.

Please refer to Item 8 which describes our investment philosophy and portfolio strategies in greater detail.

### Ownership History

In 1996, the portfolio management team of Anthony “Buck” Basile, Richard Zackroff, Gail Habecker and Natalie Adler formed PMG Advisors (“PMGA”). At that time, PMGA was affiliated with PMG Group Ltd and Pennsylvania Merchant Group, a broker and investment bank based in suburban Philadelphia. In July 2001, Investec Group acquired PMG Advisors from PMG Group Ltd to form an independent asset management subsidiary of Investec USA Holdings known as Investec PMG Advisors (“IPMGA”). In January 2003, IPMGA’s management purchased 100% ownership from Investec and changed the name of the firm back to PMG Advisors (“PMGA”). Throughout all periods, the staff and decision process have remained intact and independent. From 2003 through July 24, 2015, PMG Advisors was 100% employee owned.

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On July 24, 2015, Stoneridge Investment Partners LLC, a money management firm based in Malvern, PA merged the fixed income division of its money management business into our firm. As a result, PMGA became StoneRidge PMG Advisors LLC. Additionally, Beltraith Capital, LLC headed by Steve Sanders and Wayne Leevy, acquired the remaining ownership in the firm. The founding partners of PMG Advisors continue to have an ownership stake in the merged entity, through Advisors Holding, LLC. StoneRidge PMG Advisors, LLC is an emerging and minority owned investment advisor, the breakdown in ownership follows:

Beltraith Capital, LLC	62%	Minority Ownership	54%
Advisors Holding, LLC	<u>38%</u>	Female Ownership	<u>8%</u>
Total	100%	Total Minority/female	62%

Beltraith Capital, LLC is also an owner of StoneRidge Investment Partners LLC and EmStone Advisers, LLC. Steve Sanders, owns 55.25% of Beltraith Capital, LLC and ultimately owns slightly over 34% of StoneRidge PMG Advisors, LLC.

In September 2016, Beltraith Capital LLC formed a new affiliated entity, Beltraith DSCP Management, LLC ("Beltraith DSCP"). Beltraith DSCP will provide investment advisory services to private pooled venture capital vehicles that seek investment opportunities in technology and tech-enabled growth stage companies. Mr. Sanders is one of the principal owners of Beltraith DSCP.

## Item 5 – Fees and Compensation

### Our Fees

SRPMGA fees are based on the market value of assets under management and are billed quarterly for services performed in the previous quarter. Asset-based fees represent the sole form of compensation we receive.

The standard annual fee schedule for Core-Aggregate, Core-Government/Credit, Intermediate and Intermediate-Aggregate, and Low Duration Fixed Income is as follows:

0.375% on the first \$10million  
 0.325% on the next \$25 million  
 0.30% on the next \$50 million

The standard annual fee schedule for Limited Maturity 2 (LM2)

0.25 on the first \$25 million  
 0.20 on the next \$25 million  
 Negotiable on the Balance

The standard annual fee schedule for Limited Maturity 3 (LM3) and Restricted Securities

0.25 on the first \$25 million  
 0.20 on the next \$25 million  
 0.15 on the Balance

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### **Account Minimums and Fee Variation**

The minimum account size is \$20 million for Aggregate portfolios, and \$5 million for all other strategies. The higher minimum for Aggregate portfolios is to ensure proper diversification of assets which include mortgage-backed securities. We do make exceptions and accept new accounts with assets below the stated minimum; in these cases, fees are subject to negotiation. We also negotiate fees for accounts that meet stated account minimums based on special circumstances.

Negotiated fees must be approved by the CIO or Co-CIO of SRPMGA. Factors that we consider in the negotiation process include client service requirements, complexity of investment strategy, and initial or potential size of the account. Fee variances may also reflect account inception dates or the entirety of the client's relationship with SRPMGA and its investment partners. In all cases, we strive to charge fair and market competitive fees.

### **Sub-advisory Fees**

SRPMGA serves as a sub-advisor to certain Taft-Hartley Pension Plans through Sierra Investment Partners (The Advisor). Under the terms of the sub-advisory agreement, the Advisor is responsible to set fees and other terms guiding the client relationship. SRPMGA does not directly negotiate fees as a sub-advisor, but does approve all fee arrangements at the time of account inception. All Sierra client assets are managed under the sub-advisory agreement to ensure that all terms of client services are equitable.

SRPMGA has a sub-advisor agreement executed with StoneRidge Investment Partners LLC ("SRIP") and currently manages the fixed portion of balanced accounts for SRIP. SRPMGA has full investment discretion, consistent with client guidelines, as to the investment management of the fixed income portion of the accounts. The SRIP fee schedule may vary from the standard SRPMGA fee schedule. There is a fee sharing arrangement between SRIP and SRPMGA based on assets under management.

As of October 1, 2015, SRPMGA no longer serves as a sub-advisor to Piper Jaffray Investment Management (PJIM), instead SRPMGA became the direct investment manager of each of the previous sub-advised accounts.

Ownership changes at Emerald Fixed Income Advisers, LLC ("EMFINC") resulted in a name change where Emerald Fixed Income Advisers, LLC became EmStone Advisers, LLC ("EMSTONE"). EMSTONE is owned by Beltraith Capital and Emerald Advisers. Under the contractual terms of this relationship, certain employees of SRPMGA provide investment management services to EMSTONE and their fixed income clients, which are predominately public funds and municipalities. SRPMGA management fees are based on a percentage of the fees charged by EMSTONE.

Please see Item 10 for more information about our sub-advisory services.



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## **Wrap Fees**

From time to time, SRPMGA is retained under a 'wrap fee' arrangement or broker-sponsored program where the broker charges asset-based fees. Under a wrap fee arrangement, investor funds are placed with one or more money managers and all administrative and management fees, including commissions, are wrapped into one comprehensive fee, which is paid by investors quarterly. Total fees under these arrangements may range from 1% to 3% with SRPMGA receiving a share of the fee.

Under wrap fee arrangements, the broker is generally responsible to: (a) recommend the retention of SRPMGA as an investment adviser, (b) pay our advisory fee on behalf of the client, (c) monitor and evaluate our performance, (d) execute client portfolio transactions without a separate commission charge, (e) provide periodic account statements to clients, (f) in most cases, act as custodian, and (g) provide any combination of these or other services, all for a single fee paid to the broker-dealer by the client. SRPMGA is not owned by or affiliated in any way with wrap sponsors.

Wrap account transactions occur without commission, as a portion of the fee is generally considered to be in lieu of commissions. Trades are generally executed with the broker-dealer directing the wrap fee arrangement, which limits our ability to seek best qualitative execution by placing transactions with other broker-dealers. SRPMGA's fee under wrap fee arrangements may differ from non-wrap clients. Presently, we have wrap fee agreements in place with Morgan Stanley, UBS/Paine Webber.

SRPMGA fees under wrap arrangements are negotiated with each wrap sponsor. Under the Morgan Stanley wrap program, SRPMGA is paid 0.375% on the first \$10 million and 0.325% on the balance. Under the UBS/Paine Webber wrap program, SRPMGA is paid 0.35% on assets under management. Detailed information about these wrap programs is available in each wrap sponsor's ADV Part 2A Appendix 1 which they deliver separately to clients.

## **Brokerage Commissions and Other Account Fees**

In addition to SRPMGA advisory fees, clients may pay brokerage commissions, transaction fees, and other related costs and expenses that may be applicable in certain transactions.

Under certain circumstances, we may use Exchange Traded Funds ("ETFs") for some custom portfolios which may involve additional fees. ETFs are investment funds traded on stock exchanges. An ETF holds assets such as stocks, commodities, or bonds, and trades close to its net asset value over the course of the trading day. Most ETFs track an index, such as the S&P 500. ETFs also charge internal management fees. Such charges, fees and commissions are exclusive of and in addition to SRPMGA advisory fees.

Enhanced Strategies that utilize the Emerald Managed Yield Plus Collective Investment Trust ("CIT") will have other related costs. The trustee is compensated for its management and custody services provided to the trust, known as the trustee fee. The investment and administrative cost of the CIT may be higher than those of other collective investment funds. This factor may reduce the return of the CIT.

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Clients may also incur certain charges imposed by their custodians such as custodial fees, transfer taxes, wire transfer and electronic fund fees, among other fees and taxes. These charges and fees are in addition to SRPMGA's fee, and are not controlled by or paid to SRPMGA.

See Item 12 – Brokerage Practices for more information about brokerage expenses.

### **Account Billing Terms**

Fees are generally billed on a quarterly basis in arrears; in some cases, fees are billed one quarter in advance. Fees are prorated for each capital contribution and withdrawal made during the calendar quarter (with the exception of de minimis contributions and withdrawals). All fees are billed directly to the client; under no circumstances is SRPMGA authorized to deduct fees directly from client accounts.

Each written client advisory agreement describes fee arrangements. If fees are payable in advance, a pro-rated portion is returned if the advisory agreement between SRPMGA and the client is terminated before the expiration of the current quarter. The advisory agreement may be terminated by either party at any time with 30 days advanced notice. Clients may terminate our services without fee or penalty within five business days of the execution of the advisory agreement.

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

### **Performance-Based Fees**

Performance-based fees are based on a share of capital gains on or capital appreciation of the assets held within a client account. SRPMGA does not charge any performance-based fees; all fees are based on the market value of assets under management.

### **Side-by-Side Management**

All SRPMGA client portfolios are separately managed accounts. We do not offer mutual fund or hedge fund investment programs.

## **Item 7 – Types of Clients**

### **Clients We Serve**

We provide fixed income asset management services to institutional clients and high net-worth individuals. Institutional clients include, but are not limited to, pension and profit sharing plans, public funds, charitable institutions, hospitals, municipalities, government agencies, unregistered pooled investment vehicles (i.e., Collective Investment Trusts) and insurance companies. SRPMGA also serves other investment advisers under sub-advisory arrangements.

### **Ongoing Client Service**

Our fixed income products are managed by the Investment Committee, however each client portfolio is assigned to a Managing Director and/or Senior Portfolio Manager to ensure adherence

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to specific client guidelines. Ongoing communication is vital to successful, long-term client relationships and our ability to discharge our fiduciary duties. All clients receive written reports quarterly and we meet with clients on a regular basis to ensure that we adhere to their objectives.

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

### **Investment Strategies**

Traditionally, the firm managed four primary investment strategies. Each strategy was guided by a unique duration target range and performance benchmark. Duration is the “length” of a fixed income security best explained as a weighted-average measurement to maturity of the bond’s cash flows. Each interest payment on the bond is assigned a present value which in total comprises a percentage of the bond’s full price.

Years ago, Salomon Brothers first explained duration using a see-saw analogy. Picture a series of tin cans equally spaced on a see-saw; each can represents a scheduled interest payment for a bond while the contents of each can represents the cash flow associated with the payment. Duration would be the distance to the fulcrum that would balance the see-saw. In general, the weighted average distance from the fulcrum (duration) increases as the stated maturity of a security is extended on the yield curve. Duration, as a measure of risk, decreases as coupon payments are increased and/or the yield of the bond rises.

The primary investment strategies include:

- ◆ **Fixed Income Core-Government/Credit** - highly liquid, investment grade portfolios benchmarked against the Bloomberg Barclays Government/Credit Index. Duration ranges from 4 to 6 years and sector allocations are based on technical analysis and relative performance models.
- ◆ **Fixed Income Core-Aggregate** - highly liquid, investment grade portfolios benchmarked against the Bloomberg Barclays Aggregate Index. Duration ranges from 3.5 to 5.5 years and sector allocations are based on technical analysis and relative performance models.
- ◆ **Fixed Income Intermediate** - highly liquid, investment grade portfolios benchmarked against the Bloomberg Barclays Intermediate Government/Credit Index. Duration ranges from 3 to 4.5 years and sector allocations are rotated based on technical and relative performance models.
- ◆ **Fixed Income Low Duration** - U.S. Treasury and U.S. Agency portfolios benchmarked against the Bloomberg Barclays 1-3 Year A+ Government/Credit Index. Duration ranges from 1 to 3 years and maximum maturity of individual securities is typically under five years.

We also developed a number of other strategies that stem from the primary strategies listed above that include custom portfolios, liability driven portfolios, and balanced portfolios utilizing ETFs as the equity component. Details of these strategies follow:

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- ◆ **Fixed Income Intermediate Broad Market:** highly liquid, investment grade portfolios benchmarked against the Bloomberg Barclays Intermediate Aggregate Index. Duration ranges from 2.5 to 4.5 years and sector allocations are rotated based on technical and relative performance analysis.
  - ◆ **Fixed Income Intermediate High Grade:** highly liquid, investment grade portfolios benchmarked against the Bloomberg Barclays Intermediate A+ Government/Credit Index. Duration ranges from 2.5 to 4.5 years and sector allocations are rotated based on technical and relative performance analysis.
  - ◆ **Fixed Income Short Government:** U.S. Treasury and U.S. Agency portfolios benchmarked against the Bloomberg Barclays 1-3 Year Government Index. Duration ranges from 1 to 3 years with maximum maturity of individual securities typically under 5 years.
  - ◆ **Liability Driven Investments:** Portfolios are constructed to provide desired liability matching. Portfolios are actively managed to add value by rotating sector allocations based on technical and relative performance analysis. Benchmarks are custom indices constructed by Ryan Labs matching each client's specific liability stream.
  - ◆ **Balanced:** the fixed income portion of portfolios is comprised of highly liquid, investment grade securities benchmarked against the Bloomberg Barclays Intermediate Government/Credit Index. Duration ranges from 3 to 4.5 years and sector allocations are rotated based on technical and relative performance analysis. The equity portion of portfolios is comprised of I shares of the Russell 1000 ETF.

In 2010, the name of the Core Fixed Income strategy was changed to the Core-Government/Credit Fixed Income strategy, and the name of the Broad Fixed Income strategy was changed to the Core-Aggregate Fixed Income strategy. The purpose of these product name changes was to allow easy comparison to competitive offerings in the marketplace. We made no changes to the strategy, benchmarks, or risk profiles. Our investment team has experience managing inflation protected and intermediate government strategies, and may offer them again in the future.

With the addition of the StoneRidge fixed income team, SRPMGA will also offer their suite of fixed income investment solutions. These products include:

- ◆ **Limited Maturity (LM2)-** An actively managed short-term fixed income strategy emphasizing current return, liquidity, quality and stability of principal using a wide array of short-term obligations. Individual bonds generally mature in less than 5 years and the average duration of the portfolio is 2 years.
- ◆ **Limited Maturity (LM3)-** An actively managed short-term fixed income strategy emphasizing current return, liquidity, quality and stability of principal using short and intermediate term investments. Individual bonds generally mature in less than 10 years, and the average duration of the portfolio is 3 years.
- ◆ **Restricted Security (RS) -** An actively managed short-term fixed income strategy emphasizing current return, the highest liquidity, high quality and safety of principal using only U.S. Government issues and collateralized issues.

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Other strategies were developed that stem from these primary strategies based on individual client needs. These include Tax Efficient Fixed Income, Enhanced Restricted Securities, Enhanced LM2 and Enhanced LM3. For the Enhanced Strategies SRPMGA utilizes the Emerald Managed Yield Plus Collective Investment Trust ("CIT"). The CIT invests in a diversified portfolio of higher grade consumer and other term notes and/or loans generated by U.S. domiciled banks, financial institutions and online "marketplace" lending platforms which have been approved by the trustee. Client investment policy statements would set the parameters for the amount of the portfolio allocated to the CIT.

### **Our Investment Philosophy**

Our goal is to continue to offer our clients custom based investment solutions in the fixed income space.

We believe that the role of a fixed income portfolio in an asset allocation model is to act as an "anchor" to the overall risk profile, provide a deflation hedge, and achieve returns above the benchmark index with similar volatility. We have developed a conservative, disciplined approach to managing fixed income investments which meets those needs. We base investment decisions on proprietary analysis of trends in the fixed income markets. We avoid extreme duration bets, complex derivative securities, and non-investment grade securities. All SRPMGA investment strategies are considered "long only" which means that we do not engage in the practice of selling securities short. We do not use margin or derivatives.

### **Active Management**

SRPMGA is an active fixed income manager which means that we may buy and sell securities frequently if necessary to adjust the risk profile of each client portfolio. Although each portfolio maintains core investments held longer than one year, we do actively trade a portion of most client portfolios in line with the parameters of client mandates. Average annual portfolio turnover for actively managed client accounts typically exceeds 100%. Frequent trading may detract from investment returns in the short run by increasing transaction-based fees. We believe these short-term costs are more than offset by long-term principal protection.

### **Our Investment Process - Methods of Analysis**

We use a conservative, disciplined investment approach and seek to outperform benchmark indices through a combination of 'fundamental' and 'quantitative' tools. We apply fundamental analysis to determine the most favorable portfolio structure. Fundamental analysis is a function of monetary and fiscal policy as exercised by the Federal Reserve Bank and Congress, respectively. Together they influence the level of interest rates in the capital markets over time. We also use fundamental analysis to determine a sector or security's value by focusing on underlying factors that affect a sector or company's business and future prospects. We then identify quantitative trends in the marketplace to guide interest rate and sector allocation decisions. Quantitative or technical analysis is based upon extensive statistical study of market data over time, primarily price and volume patterns. This is a dynamic process and portfolios are actively re-balanced to leverage changing market trends.

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Portfolio strategy is based on current market conditions, not forecasts. We utilize economic and price momentum models and relative performance analysis of the fixed income markets together with fundamental analysis of the global economy, domestic/foreign monetary policy, and inflation expectations to determine:

1. **Portfolio interest rate risk** - We normally vary the portfolio's duration within a year of the benchmark index.
2. **Sector weightings** - We over/under weight sectors (U.S. Treasury, U.S. Agency, Agency mortgage-backed, Corporate, etc.) in the portfolio versus the benchmark based on the relative value of each sector.
3. **Security selection** - We utilize only investment grade securities and perform our own internal credit review in selecting specific issuers and security structures.
4. **Yield curve positioning** - We utilize 'bullet', 'barbell', and 'ladder' maturity structures to capture relative changes in the yield curve. More information about these strategies is available upon request.

All of the above tools allow us to actively manage client portfolios to achieve above-benchmark returns with limited swings in portfolio prices. Although the Investment Committee manages all investment strategies, each client portfolio is assigned to a Managing Director to ensure adherence to specific client guidelines. Each client portfolio is structured to meet unique client objectives associated with risk tolerance, investment time horizon, liquidity requirements, and other client-directed portfolio guidelines.

### **Cash Management**

SRPMGA generally holds a cash position of less than 5% in client portfolios. Idle cash is swept overnight into a money market fund selected by the client at the time they enter into an agreement with the custodian.

Cash or cash equivalents may be used as part of a duration strategy. In cases of an inverted yield curve, or extremely low or negative real interest rates, cash (or a U.S. Treasury Bill) may be used as a part of a barbell strategy. Normally, the shortest securities held in the Core-Government/Credit, Core-Aggregate, and Intermediate strategies are one year maturities.

With the additional products from StoneRidge, and other custom portfolios that permit investments in cash equivalents and other money market investments we may invest in securities that have less than a one year maturity. These money market investments include U.S. Treasury Bills, U.S. Agency, Corporate securities, and commercial paper. SRPMGA does not utilize repurchase agreements in client portfolios.

### **How SRPMGA Helps Clients Manage Risk**

We recognize that our clients have a wide array of investment managers to choose from. Our goal is to consistently deliver positive relative investment returns and minimize risk while helping our clients achieve their investment objectives.



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The following factors help us manage risk in client portfolios:

- 1) **We are specialists** –our primary focus is managing fixed income portfolios;
- 2) **Quality focus** – our investment portfolios are concentrated in high quality, highly liquid securities;
- 3) **Diversification** – we rely on tested asset allocation models and proven security selection processes to achieve diversification;
- 4) **Self-reliance** – we maintain singular focus upon our clients and rely predominantly on internal research and proprietary technology to make investment decisions;
- 5) **Team approach** – we have collaborated as an investment team for more than 20 years to deliver our very best thinking;
- 6) **Long history** – our key investment professionals have been managing client portfolios for an average of 35 years during diverse economic environments over many business cycles;
- 7) **Relationship driven** – we communicate regularly with clients to ensure ongoing need awareness;
- 8) **Constant attention** – we monitor client portfolios on a continuous basis;
- 9) **Conservative** – we take a cautious approach to all aspects of our business from investment management to operations and compliance.

### **Risk of Loss**

We believe that clients face three primary levels of risk when investing in the capital markets:

- ◆ **Resource selection** – risks associated with investment manager selection
- ◆ **General market risk** – risks of participating in the capital markets
- ◆ **Specific risk** – risks associated with selecting asset classes, sectors, and security types

Despite our risk management experience, investing in securities involves risk of loss. Below we highlight the primary risks of investing in the capital markets in general and fixed income securities in particular. There may be other investment risks not mentioned below.

- ◆ *Risk of Loss* - Investing in securities involves risk of loss that clients should be prepared to bear.
- ◆ *No guarantee* - Performance of any investment is not guaranteed. There is a risk of loss of the assets we manage that may be out of our control.
- ◆ *Market Fluctuation* - Financial markets and the value of investments vary substantially over time, which may lead to realized and unrealized losses in the value of client portfolios, especially in the short run.
- ◆ *Fixed Income Securities* - Investments in fixed income (debt or bond) securities typically decrease in value when interest rates rise. This risk is usually greater for longer-maturity debt securities. Investments in debt securities with lower credit ratings (and non-rated credits) are subject to a greater risk of loss to principal and interest than those with higher credit ratings.
- ◆ *Credit Risk* - Also called default risk, credit risk quantifies the likelihood of non-repayment of principal and/or interest as scheduled by the bond issuer.
- ◆ *Income Risk* - Risk that an investment strategy designed to generate a sufficient income stream fails to produce adequate income, resulting in the inability to sustain a desired cash flow and/or the need to sell assets to produce desired income.

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- ◆ *Liquidity Risk* - Risk that investors may not have full access to their funds if assets cannot be converted into cash according to normal market settlement standards. Liquidity risk is generally higher for small capitalization stocks, alternative assets, and private placement securities.
  - ◆ *Prepayment Risk* - Risk associated with early payment of principal and interest by the issuer. This risk may be reflected in mortgage-backed securities wherein the owner of underlying assets may prepay principal and interest, thereby shortening its duration or stated maturity. For callable bonds, if interest rates fall, a bond issuer may decide to pay off (or "call") outstanding bonds and issue new bonds that pay a lower rate.
  - ◆ *Mortgage-backed Securities* - A mortgage-backed security (MBS) is an asset-backed security or debt obligation that represents a claim on the cash flows from mortgage loans through a process known as securitization. The monthly cash flow of an MBS is not known in advance, and therefore presents risk to MBS investors of early prepayment.
  - ◆ *Company Risk* - Risk that the business plan of a company in whose securities we invest is poorly conceived or poorly executed by senior management, or that the company fraudulently misleads the investment community as to its financial condition, either historically or prospectively.
  - ◆ *Exchange Traded Funds ("ETFs")* - The market price of an ETF's shares may trade at a discount to net asset value, an active secondary trading market may not exist, or trading may be halted by the exchange on which it trades. These factors may hinder our ability to timely sell an ETF at a fair price. ETFs also have embedded fees and expenses which are borne by the investor. ETFs may be used in balanced portfolios.
  - ◆ *Emerald Managed Yield Plus Collective Investment Trust ("CIT")* - The CIT invests in a pool of higher grade consumer and other term notes, loans and/or other fixed income securities ("Notes"). The CIT is maintained by Alta Trust. In its capacity as trustee, Alta Trust provides trust and custody services to the CIT. The Notes are illiquid and may be subject to a high risk of default and resulting loss to investors. The inability of the CIT to readily dispose of the Notes may increase the risk of loss. The market for the Notes is new and unproven and there is a limited secondary market for the Notes. The CIT may be subject to interest rate risk, since the interest rates on the Notes are fixed. In a rising interest rate environment, the Fund may decrease in value based on the duration of the notes at lower rates. Due to the limited secondary market for the Notes and illiquid nature of the Notes held by the CIT, the CIT will be valued on a monthly basis using a discounted cash flow methodology. This approach may not reflect the true value of the CIT on any given day. The CIT will only facilitate purchases and sales on a monthly basis which may subject the CIT to losses incurred prior to the next redemption date. The investment and administrative cost of the fund may be higher than those of other collective investment funds. This factor may reduce the return of the CIT. Because the CIT is illiquid, the participants are required to provide a 90 day notice of their intention to liquidate their interest, and the CIT may take up to 360 days to return the participant the net investment in the CIT.



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## Item 9 – Disciplinary Information

As an SEC-registered investment adviser, we are required to disclose all material facts about any legal or disciplinary events that would be material to your evaluation of SRPMGA or the integrity of our management team. SRPMGA has no disciplinary information to report.

## Item 10 – Other Financial Industry Activities and Affiliations

### Arrangements with Other Advisers

As noted in Item 5, Ownership changes at Emerald Fixed Income Advisers, LLC (“EMFINC”) resulted in a name change where Emerald Fixed Income Advisers, LLC became EmStone Advisers, LLC (“EMSTONE”). EMSTONE is owned by Beltraith Capital and Emerald Advisers. Under the contractual terms of this relationship, certain employees of SRPMGA provide investment management services to EMSTONE and their fixed income clients, who are predominately public funds and municipalities. SRPMGA management fees will be based on a percentage of the fees charged by EMSTONE.

As noted in Item 5, SRPMGA has a sub-advisory agreement executed with StoneRidge Investment Partners LLC (“SRIP”) and currently manages the fixed portion of balanced accounts for SRIP. SRPMGA has full investment discretion, consistent with client guidelines, as to the investment management of the fixed income portion of the accounts. The SRIP fee schedule may vary from the standard SRPMGA fee schedule. There is a fee sharing arrangement between SRIP and SRPMGA based on assets under management.

### Sub-advisory Relationships

(As noted in Item 5)

SRPMGA has a sub-advisory agreement with Sierra Investment Partners, Inc. (“Sierra”) whereby SRPMGA serves as a sub-advisor to certain Taft-Hartley Pension Plans (the “Plans”). SRPMGA has full investment discretion as to the investment management of the fixed income portion of the Plans. The Sierra fee schedule may vary from the standard SRPMGA fee schedule. Sierra will generally bill their Taft-Hartley clients on the first day of each quarter, for services which will be provided for the upcoming calendar quarter. In some cases, fees are billed one quarter in advance. There is a fee sharing arrangement between Sierra and SRPMGA based on Plan assets under management.

### Affiliations

(As noted in item 4)

In September 2016, the parent company of StoneRidge PMG Advisors, Beltraith Capital LLC, formed a new affiliated entity, Beltraith DSCP Management (“Beltraith DSCP”) to provide investment advisory services to private pooled venture capital vehicles that seek investment opportunities in technology and tech-enabled growth stage companies.

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## **Wrap Fee Arrangements**

As noted in Item 5, SRPMGA is a wrap manager in wrap programs sponsored by Morgan Stanley-Smith Barney and UBS/Paine Webber. When evaluating a wrap arrangement, clients should consider the full array of fees and services (aside from those associated with RPMGA's role as a manager in the program) in determining the overall value of the wrap program. Clients should also consider whether the wrap fee could exceed the cost of such services if provided separately and the effect on the account if SRPMGA as the manager was free in all cases to choose broker-dealers to execute portfolio transactions. Specific information about these wrap-fee programs is available in each wrap-fee sponsor's ADV Part 2A Appendix 1. See Item 5 for details about wrap fees and Item 12 for details about brokerage arrangements under wrap programs.

## **Conflicts of Interest**

SRPMGA receives an economic benefit (fees) due to our affiliation with the third party advisers and broker-dealers noted above. Upon disclosing these conflicts of interest to you, we manage them by: (1) where we have control over fees, applying a standard fee schedule to ensure that client fees are fair across all channels; (2) using a trade allocation process so clients managed under the same investment strategy receive equal percentage allocations of securities regardless of channel; (3) employing a portfolio review and client service model which treats all clients individually and fairly across all channels; and (4) following a rigorous compliance program to meet our fiduciary duties for all client accounts.

## **Item 11 – Code of Ethics**

### **Ethical Standards of Conduct**

We value client trust and place our fiduciary responsibilities to each client first and foremost in all aspects of our business. The SRPMGA Code of Ethics includes provisions for maintaining confidentiality of client information, prohibitions on insider trading and spreading rumors, restrictions on the acceptance of material gifts, requirements to report certain gifts and business entertainment items, and procedures for personal securities trading, among others. In September 2017, SRPMGA adopted a revised Code of Ethics for all employees which is consistent with the Code of Ethics of SRIP.

### **Fiduciary Duty**

SRPMGA has adopted a Code of Ethics that sets forth standard of conduct that are expected of employees and addresses conflicts that may arise from personal trading conducted by "access persons," as that term is defined in Rule 204A-1 under the Advisers Act. The Code of Ethics defines the expectation and requirement of professional and ethical conduct by all employees in accordance with the firm's fiduciary duty. The Code of Ethics is designed to ensure that the SRPMGA and its employees and officers conduct their personal investment activities in such a manner as to place the interests of the clients first and to prevent conflicts of interest in fact or in appearance.

The Code of Ethics contains policies and procedures relating to: (a) general standards of conduct including outside business activities; (b) personal trading; (c) insider trading prevention; (d) political contributions; and (e) gifts and entertainment. Employees must affirmatively agree to

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abide by the terms of the Code of Ethics. Employees who fail to honor the Code of Ethics will be in violation of SEC Rule 204A-1 and subject to disciplinary sanctions which may include termination of employment.

### **Personal Trading**

Upon adoption of the New Code of Ethics, all employees and officers of SRPMGA are prohibited from purchasing individual securities. However, when an employee or household member wish to sell existing securities currently owned, the individual must follow the trading restriction of the Code of Ethics.

The Code of Ethics includes restrictions on the type and timing of transactions, as well as requirements for pre-approval of IPOs, limited offerings, and private placements, as well as quarterly self-reporting of all transactions, and are required to send duplicate confirms and statements directly to the compliance department. On an annual basis, SRPMGA requires all employees and officers to complete Annual Holdings Reports and certify that they have read, understood and complied with SRPMGA's code of Ethics.

### **Insider Trading Prevention**

SRPMGA prohibits all employees from illegally acting on, misusing or disclosing any material nonpublic information, also known as "inside information." SRPMGA monitors risks associated with inside information by:

- Providing periodic employee education and training
- Monitoring employee service on boards of public companies
- Monitoring trading of personal accounts
- Maintaining a compliance program to monitor employee activity and control information

### **Gift and Entertainment**

As a fiduciary, SRPMGA strives to place client interests first and foremost. SRPMGA compliance policies and procedures are designed to ensure that the fiduciary standard of care is evident in all interactions with and on behalf of clients. SRPMGA compliance policies implement internal controls which include the following:

- Requiring employees to report gifts and entertainment above certain thresholds
- Limiting the dollar value of gifts
- Monitoring of entertainment activities.

### **Charitable Contributions**

Charitable contributions made by the firm to a charitable organization in recognition of a client or affiliated with a client may represent a conflict of interest. To avoid potential conflicts, the firm has established strict guidelines for handling charitable contributions.

### **Related Accounts**

SRPMGA does not manage 'related accounts' for the benefit of the firm or any of our employees.

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To receive a copy of our Code of Ethics, contact Natalie Adler by phone at 484-254-5418 or e-mail [adler@srpmga.com](mailto:adler@srpmga.com).

## **Item 12 – Brokerage Practices**

### **Broker Selection**

For most client portfolio transactions, we have discretion to select brokers and negotiate commissions. Exceptions do apply under directed brokerage arrangements and for accounts managed under broker-sponsored investment programs.

SRPMGA maintains a list of approved broker-dealers with whom the Trading Desk and Portfolio Managers may transact business across all trading venues, including electronic platforms. All changes to the broker-dealer list must be approved in advance of trade execution by a Managing Director or the Chief Compliance Officer. Each year, SRPMGA completes an internal review of broker-dealers to evaluate their best execution capabilities. This review considers:

- ◆ Financial statements
- ◆ Public reports
- ◆ Historical SRPMGA trade volume reports
- ◆ Perceived contribution to successful implementation of SRPMGA's investment strategy
- ◆ Regulatory trade execution reports
- ◆ SRPMGA's operational settlement and clearance experience

### **Electronic Trading**

For corporate fixed income trade execution, we use the MarketAxess trade platform. This electronic system is comprised of more than 20 dealers who simultaneously respond to SRPMGA trade inquiries. In seeking best execution, we submit transaction inquiries directly into the system and separately contact a select group of regional brokers who do not participate on the MarketAxess platform. Our Trading Desk also uses Bloomberg BondTrader, an electronic multi-dealer system for government and agency trading. Market conditions and transaction type (block size, sector, and security type) influence trade execution decisions on a day-to-day basis. The Trading Desk follows a written trade policy to ensure that we consistently do what is best for our clients.

### **Trade Aggregation and Rotation**

SRPMGA trades all accounts managed to the same style as a 'bunched' trade whenever possible. Trades are allocated pro-rata based on a target percentage, which allows all accounts, both large and small, to benefit equally. In most cases, trade aggregation improves transaction prices and lowers commission rates. We seek the best combination of price and execution for each transaction. To determine the broker's overall best qualitative execution capabilities we consider, among other things: (1) order size; (2) broker's ability to effect and settle trades promptly and efficiently; and (3) broker's reliability, integrity, and financial condition.

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Where possible, we aggregate wrap and non-wrap client trades to achieve best execution, in which case wrap accounts may not always pay commissions. When trading corporate bonds, we generally ‘step out’ wrap transactions (meaning we trade away from the wrap sponsor), allowing us to aggregate wrap and non-wrap transactions to achieve best execution. If aggregation is not possible, we strive to trade wrap and non-wrap transactions simultaneously to achieve equitable pricing and minimize performance differences across accounts.

We generally execute trades on an ‘all-or-none’ basis so that no account is disadvantaged in the trade allocation process. If necessary, however, the Managing Director is authorized to reallocate an original trade order to protect the best interests of clients. Trade aggregation does not interfere with SRPMGA’s ability to comply with client account restrictions.

There may be circumstances in which trade aggregation is not possible, or not deemed to be in the best interest of clients trading at a point in time. In these situations, SRPMGA seeks to achieve best execution for all participating clients and to minimize overall trading costs to participating clients.

### **Soft Dollars**

In allocating trades and commission dollars to brokers, SRPMGA also considers their research services. We are permitted by law and with certain restrictions to cause a client to pay a broker or dealer providing us with brokerage and research services, commission fees in excess of the amount other brokers would charge for the same transaction. Sometimes we use brokers who provide useful research services even though a lower commission may be charged by another broker who does not offer research. Therefore, transactions will not always be executed at the lowest available price or commission when we consider these other qualitative factors. These excess commissions are known as ‘soft dollar commissions.’ We only use soft dollars if we determine in good faith that the greater commission is warranted in terms of either a particular transaction or our overall responsibility to clients.

A combination of hard and soft dollars is used to pay for research services that directly benefit our clients. As measured over the course of a year, we execute approximately 20% of trades on a soft dollar basis. We currently use the following soft dollar research services: Moody’s Investors Service Corporate Credit Rating Services, Standard & Poor’s Ratings Direct, Stone & McCarthy Research Associates Market Focus, Bloomberg, Elliot Wave International, and Gimme Credit Publications High Grade Credit information and CreditSights. Soft dollar research services are subject to change as we refine portfolio construction tools over time to best serve our clients.

Furthermore, it is possible that SRPMGA soft dollar payments may benefit the clients of our affiliate EMSTONE, to the extent that research secured through soft dollars is relevant to securities purchased on behalf of EMSTONE clients.

We have adopted strict compliance policies to ensure that our use of soft dollars is consistent with our duty to obtain the best available execution and that research services represent fair and measurable value for our clients. Some, but not all soft dollar research services benefit the accounts which pay the commission to the broker providing such services. SRPMGA does not attempt to direct a transaction in a particular account; instead, research services are obtained from brokers

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that we believe add value to a broad range of accounts, although perhaps not useful to every account in every case.

Our use of soft dollar commissions represents a conflict of interest to the extent that we might otherwise pay for such research services out of pocket with fee revenues rather than with client commissions. To minimize this conflict of interest, the Investment Policy Committee and Chief Compliance Officer regularly review commission rates to affirm their reasonableness.

### **Directed Brokerage**

Certain clients may instruct us to trade all or a portion of their portfolio transactions with a designated broker-dealer. This practice is known as 'directed brokerage.' SRPMGA accepts client directed brokerage as long as this arrangement does not materially undermine our ability to provide best qualitative execution for these clients. SRPMGA does not negotiate commissions or volume discounts for clients under directed brokerage arrangements, and therefore clients must negotiate commission rates on their own behalf. These arrangements may disadvantage clients to the extent they pay a higher commission rate or receive less favorable execution than they would if SRPMGA had full discretion to select brokers.

Under our trade policy, directed brokerage trades are executed after all discretionary trades are completed in the same security. During volatile markets, this delay in the timing of trade execution will result in trade price disparities versus aggregated client trades. At the present time, only a small percentage of SRPMGA clients request that we direct their business to a specific broker. Directed brokerage represents a conflict of interest to the extent that the broker directs clients to use SRPMGA services in exchange for the client's brokerage commissions. To fulfill our fiduciary duty for directed brokerage accounts, we compare trade execution prices and commission rates to all other SRPMGA accounts to evaluate fair treatment. Circumstances which put directed brokerage clients in a disadvantaged position are discussed with clients.

### **Principal and Cross Agency Transactions**

In keeping with our mission to deliver unbiased advice, we do not trade for our own account, otherwise known as principal trading. It is SRPMGA's policy to refrain from engaging in agency cross transactions. An agency cross transaction occurs when the investment adviser acts as broker for the advisory client and the other party to the trade. SRPMGA does not cross trades between client accounts or with our affiliate's accounts. Agency cross transactions may also arise if an adviser is or affiliates with a broker-dealer. SRPMGA is not a broker-dealer and has no broker-dealer affiliates.

### **Other Trading Practices**

As noted in Item 10, SRPMGA is an investment manager in wrap sponsor programs. Wrap relationships would present a conflict of interest were SRPMGA to direct non-wrap trades to these broker-dealers to attract more assets under their wrap programs. To reduce this conflict of interest, we follow strict best execution policies to ensure that we seek best overall qualitative execution for clients. The Investment Policy Committee and Chief Compliance Officer also periodically monitor trade allocations and commission rates to assure best execution.



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## **Trade Error Policy**

SRPMGA has a written Trade Error Policy. In the event of a trade error caused by SRPMGA resulting in a loss to a client, the client will be reimbursed where appropriate. If the error generates a gain in a client portfolio, the gain is retained by the client. If a broker causes an error, it is detected through the normal affirmation and reconciliation process and corrected by the broker and/or client custodian.

## **Item 13 – Review of Accounts**

### **Account Reviews**

We review client portfolios on a daily basis for appropriateness of individual securities. Diversification and asset allocation reviews are conducted monthly, or more often as dictated by market events. We review client portfolios if there is a significant change to client investment guidelines or significant cash flow.

### **Account Review Responsibilities**

Our fixed income products are managed by the Investment Committee. Each client is assigned to a portfolio team comprised of a Managing Director and/or Senior Portfolio Manager and an associate with primary responsibility for account reviews and maintenance. Portfolio teams rely on experienced support personnel to help fulfill these oversight duties. Managing Directors are available by telephone at any time to discuss investment strategies, portfolio construction, and client needs. Accounts are reviewed formally with clients in person on an agreed schedule.

### **Client Reports**

SRPMGA issues written quarterly client reports which include portfolio holdings, performance, and investment strategy summaries. Asset Listings show current portfolio holdings by asset class and asset prices at market and cost. Performance reports compare client investment returns to recognized market performance Indices (e.g., Bloomberg Barclays Government/Credit Intermediate Bond Index, etc.). Clients may receive special SRPMGA reports on request. In addition to our reports, clients receive custodial reports from their custodians.

### **Portfolio Valuation**

We review portfolio security prices on an ongoing basis to ensure accuracy. Portfolio security valuations directly impact our ability to meet client guidelines (such as those that limit exposure to a single security, sector, or asset class), fee calculations, tax liabilities, and buy and sell price points. Portfolio valuation represents a conflict of interest to the extent that SRPMGA asset-based fees rise when valuations rise. To ensure accuracy and minimize conflicts of interest, we follow written procedures for portfolio valuation, which include the use of multiple independent pricing sources, and separate price reviews by the SRPMGA Performance Analyst, Managing Director, and Chief Compliance Officer. More information about our valuation procedures is available upon request.

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## **Item 14 – Client Referrals and Other Compensation**

### **Use of Solicitors**

We may periodically compensate third parties for referring investment advisory clients to our firm. The SEC has adopted strict rules for advisers when accepting third party referrals. We follow strict policies to ensure compliance with all aspects of these rules, including those governing compensation and written client disclosure. As permitted, we pay a portion of the management fee generated by the referred account for a period of time which tends to vary on a case by case basis. The referral fee is not paid by the client and does not impact the overall fee paid by referred clients.

SRPMGA has a revenue sharing agreement with Piper Jaffray Investment Management (PJIM) and shares a portion of its money management fee from accounts referred by PJIM. Through this arrangement, SRPMGA has full investment discretion, consistent with client guidelines, as to the investment management of the account. This arrangement is fully disclosed to all clients under this program, pursuant to applicable laws and regulations.

### **Broker-Dealer Referred Accounts**

Clients are referred to us by broker-dealers wherein SRPMGA receives written client approval to place brokerage transactions through the referring broker. In these cases, clients must negotiate brokerage commission rates with the broker as SRPMGA will not negotiate these rates on behalf of clients. As with other client directed brokerage arrangements, these practices present inherent conflicts of interest. Clients referred by broker-dealers may pay higher commissions and receive less favorable execution than otherwise might be the case; these practices may result in our inability to obtain volume discounts on certain transactions and may cause differences in charges among accounts.

To fulfill our fiduciary duty for broker-dealer referred accounts, we compare trade prices and commissions to other accounts to evaluate fair treatment. Circumstances which put directed brokerage clients in a disadvantaged position are discussed with clients.

## **Item 15 – Custody**

Custody occurs when an adviser or related person directly or indirectly holds client funds or securities, or has the ability to obtain possession of them. SRPMGA does not maintain custody over client funds or securities. Clients are responsible for selecting custodians to hold funds and securities within investment accounts managed on their behalf. Our clients work with various banks, broker-dealers, and other qualified custodians who provide monthly or quarterly statements of all securities and funds held.

SRPMGA prepares quarterly client account reports showing holdings, portfolio characteristics, and performance figures. We urge clients to carefully review and compare our quarterly reports to the account statements provided by their custodian, as custodial account statements are considered the



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official record for client accounts. SRPMGA client reports may vary from custodial statements due to factors such as accounting procedures, reporting dates, and/or security valuation methods.

## **Item 16 – Investment Discretion**

Clients generally delegate discretionary authority for investment decisions to SRPMGA at the outset of an advisory relationship. In all cases, we exercise discretion in line with our high standards of fiduciary duty.

Client advisory agreements specify the level of discretion delegated to SRPMGA. Most accounts are managed on a fully discretionary basis where we retain full decision making authority for investment decisions within the parameters outlined in the written client advisory agreement and the designated investment strategy. Client investment objectives, policies, limitations, and restrictions must be provided to us in writing.

We manage a small subset of accounts on a non-discretionary basis where SRPMGA does not retain complete authority over all investment decisions. The details of client discretion are outlined in written client advisory agreements. For example, due to certain accounting regulations, insurance company clients may list investments as “held to maturity” and not available for sale. Also, under directed brokerage arrangements, clients instruct SRPMGA to execute their portfolio trades with specific counterparties. Methods of obtaining client approval under non-discretionary arrangements vary by client.

When clients impose limits on our investment discretion, trade timing, prices, and performance results may deviate from other SRPMGA accounts. To lessen these risks, we work closely with clients at the inception of the relationship and on an ongoing basis to accommodate their decision making involvement without negative impact on performance returns. We discuss with clients any circumstance in which we believe client discretion puts them at a disadvantage.

## **Item 17 – Voting Client Securities**

At the present time, SRPMGA does not buy or sell equity securities (other than ETFs in customized strategies). Therefore, we do not have any authority to vote, nor do we vote proxies on behalf of our clients. Furthermore, we do not handle class actions on behalf of clients, but may assist in providing information on the filing process.

## **Item 18 – Financial Information**

As an SEC-registered investment adviser, we are required to disclose information about SRPMGA’s financial condition. We are pleased to report that SRPMGA has no financial obligation that impairs

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the firm's capacity to meet contractual and fiduciary commitments to our clients, nor has the firm been the subject of a bankruptcy proceeding. An independent accounting firm prepares our financial statements and conducts account performance audits to comply with Global Investment Performance Standards.

## **Item 19 – Requirements for State Registered Advisers**

The requirements for State-Registered Advisers are not applicable to SRPMGA.

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## StoneRidge PMG Advisors Privacy Notice

At StoneRidge PMG Advisors (SRPMGA), we place a high priority on the sensitive personal information we receive about our clients and are committed to protecting this information to the best of our ability. We are providing this notice to our clients as required by regulations adopted under Title V of the Gramm-Leach-Bliley Act. This notice informs you about our practices for collecting, safeguarding, and disclosing your non-public personal information to affiliated and nonaffiliated third parties.

### **We take great care to safeguard and limit access to investor information.**

- We limit employee access to non-public personal information to those who need to know this information in order to serve investors. Employees are educated about the importance of privacy in accordance with our Code of Ethics.
- We maintain physical, electronic and procedural safeguards in compliance with applicable regulatory standards to guard your non-public personal information.

### **We collect client information so we are better able to serve your needs.**

In connection with providing advisory services, we collect and maintain non-public personal information about clients from the following sources:

- Information we receive from you during the onboarding process, such as client profiles or other form.
- Information about your transactions with us or others.

### **We share information with affiliated and nonaffiliated third parties.**

Information is shared with third parties only when those parties are acting on our behalf, or as required or permitted by law. These third parties may include:

- Affiliates, only when client permission is granted to do so. As a general rule, we do not share client information with affiliates for marketing purposes.
- Unaffiliated service providers who help us administer our services including auditors and consultants. These companies are legally obligated to maintain the confidentiality of the information we provide to them, and are restricted from using this information for any reason beyond the performance of specified services on our behalf.
- Other parties as permitted or required by applicable law. These may include, for example, government agencies in response to subpoenas and other legal processes, or those with whom you have authorized us to share information.

We will maintain non-public personal information with respect to our former clients and apply the same policies that apply to current clients. If you have any questions or concerns about our privacy policy, please contact Natalie Adler at [adler@srpmga.com](mailto:adler@srpmga.com).