

**Item 1 – COVER PAGE**

**ADV Part 2A Appendix 1**

**Wrap Fee Investment Management**

**CAPITAL INSIGHT PARTNERS, LLC  
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**January 1, 2024**

**This wrap fee program brochure provides information about the qualifications and business practices of Capital Insight Partners' portfolio management advisory services. If you have any questions about the contents of this brochure, please contact us at (480) 295-7070. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Capital Insight Partners is also available on the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Although a Registered Investment Advisor with the Securities and Exchange Commission, such registration does not imply a certain level of skill or training.**

**Item 2**

**MATERIAL CHANGES SINCE LAST UPDATING AMENDMENT  
FILED:**

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#### Item 4 – SERVICES, FEES, AND COMPENSATION

Capital Insight Partners, LLC (“**Capital Insight**”), offers the following services where appropriate to individuals, families, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. While providing these services, Capital Insight charges advisory fees which include the cost of transaction commissions. The firm can offer “non-wrap” advisory services, which include financial planning, consulting and investment management. These services are described in a separate brochure. We also offer sub-advisory services to a series of a registered investment company as well as investment consulting and management for retirement plans, each of which is also described in a separate brochure. Capital Insight has been in business since August 15, 2008. Principal owners are Steven T. Nelson, CFA and Susan C. Anastasiadis. The firm is not affiliated with any other firm.

Capital Insight provides discretionary and non-discretionary Portfolio Management services which involve giving continuous advice to a client and making investments for a client based on the individual needs of that client. Through personal discussions in which goals and objectives based on a client’s particular circumstances are established, Capital Insight develops a client’s personal investment policy and then creates and manages a portfolio based on that policy. Capital Insight manages advisory accounts on a discretionary or non-discretionary basis based upon the level of authority granted by the client. If discretion is granted, this means that Capital Insight will buy and sell securities, at the times and prices that it deems appropriate without first consulting with the client based on the client's needs and objectives. All account supervision is guided by the stated objectives of the client.

Capital Insight will create a portfolio consisting of the various following investments as appropriate for the client: individual stocks, bonds, annuities, mutual funds, exchange traded funds, alternative investments and other investment products, including private placement securities. Capital Insight will allocate the client’s assets among various investments taking into consideration the overall management style selected by the client and a client’s investment restrictions. The mutual funds and annuities will be selected on the basis of any or all of the following criteria: the fund/annuity performance history; the industry sector in which the fund/annuity invests; the track record of the fund/annuity manager; the fund/annuity investment objectives; the fund/annuity management style and philosophy; and the fund/annuity management fee structure. Portfolio weighting between funds/annuities and market sectors will be determined by each client’s individual needs and circumstances. Capital Insight may also hire and terminate third-party managers to manage all or a portion of a client’s account. Clients are free to contact their Capital Insight advisor at any time.

When appropriate to the needs of the client, Capital Insight may recommend the use of trading (securities sold within 30 days), short sales, margin transactions or option trading. Because these investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the client’s stated tolerance for risk.

Capital Insight does not have the discretionary authority to determine the broker-dealer to be used, thus clients must direct Capital Insight as to the broker-dealer to be used, except in those instances where a transaction is placed with a third-party brokerage firm and settled through the client’s selected brokerage firm. For clients receiving investment management services Capital Insight will recommend that clients establish brokerage accounts with qualified custodians. Capital Insight may recommend various custodians, depending on the types of services and size of the account, the custodians may include, but are not limited to, Schwab Institutional division of Charles Schwab & Co., Inc. , a registered broker- dealer, member FINRA/SIPC, Pershing, Inc., AssetMark Trust, or MidAtlantic Trust Company for custodial services (all collectively known as "Custodians"). Capital Insight is independently owned and operated and not affiliated with Custodians. In some cases, Custodians provide Capital Insight with access to their institutional trading and custody services, which are typically not available to retail investors. For Schwab Institutional, these services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor’s clients’ assets are maintained in accounts at Schwab Institutional. It is not otherwise contingent

upon Capital Insight committing to Schwab Institutional any specific amount of business (assets in custody or trading). Custodian services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

When transferring accounts to Custodians, they may pay transfer costs imposed by other firms on customers making the transfers. These payments also create a conflict of interest when recommending their custodial services.

Custodians also may make available to Capital Insight other products and services that benefit Capital Insight but may not benefit its clients' accounts. Some of these other products and services assist Capital Insight in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of Capital Insight fees from its clients' accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Capital Insight accounts, including accounts not maintained at Custodians. Custodians also make available to Capital Insight other services intended to help Capital Insight manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Custodians may make available, arrange and/or pay for these types of services provided to Capital Insight by independent third parties. Custodians may discount or waive fees they would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Capital Insight. While as a fiduciary, Capital Insight endeavors to act in its clients' best interests, Capital Insight's recommendation that clients maintain their assets in accounts at Custodian may be based in part on the benefit to Capital Insight of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Custodian, which may create a potential conflict of interest.

Capital Insight Managers may "block" (combine) similar client orders in the same security to obtain an average price. The Capital Insight manager may include the manager's or other employee's own transaction in the block. When doing so, a conflict of interest exists because the manager, the originator of the block, or another employee, will also obtain an average price if the block trade is executed.

Some representatives of the firm are separately licensed as registered representatives of M. S. Howells & Co., a FINRA registered broker-dealer. As such, they will be able to effect securities transactions for Capital Insight clients, in their capacity as registered representatives of M.S. Howells & Co. For doing so, they will be able to receive customary brokerage compensation, which is separate and distinct from Capital Insight's advisory fees.

M.S. Howells & Co. is required to supervise the securities trading activities of its representatives. Clients may request that brokerage transactions be directed to a particular broker-dealer, other than M.S. Howells & Co. or Schwab. However, if M.S. Howells & Co. or Custodian believes that the use of that broker-dealer would hinder M.S. Howells & Co. or Custodian in meeting its supervisory obligations, Capital Insight will not be able to accept the account. Also, the designation of a specific broker-dealer may limit Capital Insight's ability to receive research, negotiate commissions and to batch client orders with those of other clients to obtain an average price on investments purchased or sold. Thus, by designating a specific broker, these and other benefits may be lost.

For some clients, Capital Insight portfolio managers may open "omnibus" accounts at certain broker-dealers when they believe such firms can better facilitate certain transactions for the clients. The brokerage firms opening such accounts do not name the client on the account but instead use the account to facilitate purchase and sale transactions for Capital Insight and then send transaction information to the client's brokerage firm which does have custody of the client's account. Capital Insight portfolio managers review the confirmations after such transactions occur to be sure proper execution and delivery of securities and

funds are made to the client's account custodian.

**Fee Schedule:** The annual fee for Portfolio Management services is charged as a percentage of assets under management, paid quarterly in advance. Capital Insight's fee generally follows the following schedule:

<u>Assets Under Management</u>	<u>Annual Percentage</u>
First \$3,000,000	1.60%
\$3,000,001 to \$5,000,000	1.50%
\$5,000,001 to \$7,500,000	1.25%
Over \$7,500,000	1.00%

If a non-Capital Insight financial advisor is involved in the relationship, they may also be compensated. In this case, their fee combined with Capital Insight's will not exceed 2.50% per annum. All fees are negotiable, this may vary depending on the nature of the client's individual needs, account dollar size and the particular management services requested by the client. There is generally a minimum annual fee of \$20,000, with the prorate portion payable quarterly, unless waived. Fees are based upon the quarter-end value of the client's account. The value of related accounts may, at the firm's discretion, be combined for fee calculation purposes. The firm may amend its fee upon written notice to the client.

The fee includes all fees and charges for services, as applicable, of Capital Insight, third-party managers and certain brokerage commissions. The fee does not include the following: (a) charges for services provided by Capital Insight, its affiliates or third parties which are outside the scope of the agreement (e.g., retirement plan administration fees, trustee fees, wire transfer fees, account fees and charges incidental to brokerage and custodial services, etc.); (b) any taxes or fees imposed by exchanges or regulatory bodies; (c) mark-ups and mark downs charged on principal trades; (d) brokerage commissions and other fees and charges imposed because Capital Insight or a third-party manager chooses to effect securities transactions for the account with or through a broker-dealer other than a custodian recommended by Capital Insight; (e) commissions on transactions occurring after notice of agreement termination is given by one party to the other; and (f) unless accepted by Capital Insight, commissions on transactions ordered by the Client. Clients agree that each of these additional commissions and charges may be separately charged to the account or reflected in the price paid or received for a given security transaction.

Clients typically authorize Capital Insight to withdraw Capital Insight's advisory fees directly from their accounts as the fees become due. However, fees can be paid by invoice if requested. If the relationship is terminated before quarter end, advisory fees will be rebated to the client on a per day pro-rata basis.

Capital Insight's "wrap" fee may be more or less than that charged by Capital Insight to another client for similar services, and by other advisers for similar services. Also, Capital Insight's "wrap" fee, i.e., the fee covering both advisory services and certain transaction commissions, may be more or less than two fees charged separately for management and transaction brokerage services. The factors that bear upon the cost of services are the size of the account, number of transactions, strategies employed, type of securities within an account, and whether trades are placed through a brokerage firm other than the custodian resulting in per trade commissions being charged to the account.

Not all transaction-related expenses are covered by the "wrap" fee schedule shown above. In the event that exchange-traded funds or mutual funds are part of a client's portfolio, the mutual funds charge additional and separate internal fees as described in the fund's prospectus. Thus, when these funds are in a client's account, two advisory fees are imposed: one internally by the fund, the other by Capital Insight. Where a client has invested in FIS Biblically Responsible Risk Managed ETF ("PRAY"), which is a series of the SHP ETF Trust sub-advised by Capital Insight, shares held by the client in the PRAY ETF are not included as assets under management of the client for purposes of calculating the fees paid to Capital Insight for investment advisory services. There may also be costs to the client from mark-ups and mark-downs or spreads paid to market makers. Certain account charges by the custodian, commissions and costs for transactions not placed through the custodian,

commissions on transactions occurring after termination of Capital Insight's services agreement, and client-ordered trading commissions are not covered. See the "Fees" section above.

Because Capital Insight absorbs transaction costs, its representatives giving advice have a financial incentive not to place transaction orders frequently since doing so increases the transaction costs to Capital Insight and thereby reducing its revenue which the Representative may share. Thus, an incentive exists in a wrap services program to place trades less frequently.

Capital Insight Managers may "block" (combine) similar client orders in the same security to obtain an average price. The Capital Insight manager may include the manager's or other employee's own transaction in the block. When doing so, a conflict of interest exists because the manager, the originator of the block, or another employee, will also obtain an average price if the block trade is executed.

**Order Errors:** Should an error occur in any Client's account as a result of Capital Insight's actions, the Client is made whole. Any losses or gains are assumed by Capital Insight.

**No Guarantee.** Capital Insight does not guarantee the results of 1) investment management or consulting advice it gives, including the performance of any investment model, or 2) the advice given and actions taken by any third-party manager. Thus, losses can occur by using Capital Insight's services.

All fees are negotiable, depending on the nature of the client's individual needs, account dollar size and the particular management services requested by the client. There is generally a minimum annual fee of \$20,000, with the pro-rata portion payable quarterly in advance, unless waived.

#### **Item 5 – ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS**

Capital Insight offers advisory services, where appropriate, to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. Capital Insight generally accepts discretionary relationships over \$2 million minimum.

Capital Insight offers advisory services, where appropriate, to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, ETFs registered as open-end investment companies under the Investment Company Act of 1940 and other business entities.

#### **Item 6 – PORTFOLIO MANAGER SELECTION AND EVALUATION**

Capital Insight Partners is one manager available through our wrap fee program. When Capital Insight provides the advice, it does so through its investment adviser representatives who earn compensation from the advice they provide. Therefore, when recommending this service, representatives have a conflict of interest. When selecting a third-party manager, Capital Insight itself will not conduct a broad search for such managers and may only use managers it is familiar with. Therefore, managers having better or worse performance may not be considered as candidates to recommend to Clients. Clients should be aware that when a third-party manager is used, Capital Insight will not evaluate the method by which the manager calculates its account management performance results. Capital Insight will provide third-party managers investment objective and background information about the client at account inception, and thereafter as changes to such information is provided to Capital Insight by a client. Capital Insight monitors third-party manager performance on a regular basis, receives quarterly account statements, and has access to each manager at will to discuss issues about a client's account deemed appropriate by Capital Insight. Clients may contact the third-party manager directly if they wish to do so as often as needed. Also, the performance results of managers, including Capital Insight, are not audited by a third party. The results may also not be prepared on a uniform basis.

The firm tailors advisory services to the individual needs of clients. For example, if a client has a concentrated position in one industry, that may limit our adding to that sector even though other clients own a particular stock. We never forget it is the client's money and so clients may impose restrictions on investing in certain securities or types of securities. Clients may also direct us to retain concentrated or



other risky positions even though it may not be prudent. Clients have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

We provide discretionary Portfolio Management to client assets held in defined plan participant accounts [401(k) plans, 403(b) plans, etc.]. In order to avoid being considered to have custody of client assets, since we do not have direct access to client log-in credentials to affect trades, we use the Pontera Order Management System ("Pontera"). Pontera allows us to view and manage these assets. We are not affiliated with Pontera in any way and receive no compensation from them for using their platform. A link will be provided to the client allowing them to connect an account(s) to the Pontera platform. Once the client account(s) is connected to the platform we will manage the assets in accordance with the client's Investment Policy Statement subject to the investment options made available by the plan.

Capital Insight may offer management service under a non-wrap fee program. There is no difference in the management approach regarding wrap fee accounts versus those which do not participate in the wrap fee program. Capital Insight receives a portion of the wrap fee for our services.

The firm has the ability to, but in its history has not had any performance-based fee arrangements. If we manage accounts with a performance-based fee in the future, that would represent a conflict of interest with accounts paying fees under different arrangements e.g., hourly or flat fees and percentage of asset methods. Capital Insight will seek to be equitable in its work on behalf of clients, but our firm and supervised persons would have an incentive to favor accounts for which we receive performance-based fees.

**RISK** - Investing in securities involves **RISK OF LOSS. CLIENTS** should be prepared to bear such loss. Capital Insight does not guarantee the results of any service and losses can occur from receiving any of the firm's services.

**STRATEGIES** - Capital Insight uses both technical and fundamental analysis in managing assets. The company uses financial newspapers and magazines, inspections of corporate activities, third party research materials, corporate rating services, annual filings with the Securities and Exchange Commission as well as company press releases. Again, *clients* should understand that *investing involves risk* and the **client must bear that risk**.

Capital Insight uses a number of investment strategies. Where appropriate, they utilize long term purchasing (securities held at least a year). Short term purchasing (securities sold within a year) also is used but the short-term tax issues are considered before sales. Trading is used where appropriate. Short sales, margin transactions, and option writing is used but only where suitable in a client by client basis.

**INVESTMENTS** - Investment advice may be provided on investments such as limited partnerships, private placement partnerships, and hedge funds.

Investment advice may be offered on any investments held by a client at the start of the advisory relationship. Recommendations for new investments will typically be equity securities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities, US Government securities, options contracts, futures contracts, and interests in partnerships involving real estate.

**PROXY VOTING** - Capital Insight's Policies and Procedures relating to voting proxies are designed to ensure that proxies are voted in the best interests of the clients. The Policies and Procedures do not apply to those situations where the client has retained voting discretion. In those situations, Capital Insight will cooperate with the client to ensure proxies are voted as directed by the client. In addition, Capital Insight will abide by specific voting guidelines on certain policy issues as requested by particular clients on a case-by-case basis.

Primary Objective. In general, proxies will be voted in a manner designed to maximize the value of client investments. In evaluating a particular proxy proposal, Capital Insight will take into consideration, among other things, the period of time over which the voting shares of the company are

expected to be held, the size of the position, the costs involved in the proxy proposal and the existing governance documents of the affected company, as well as its management and operations. Proxy proposals that change the existing status of a company will be reviewed to evaluate the desirability of the change, and to determine the benefits to the company and its shareholders, but Capital Insight's primary objective is always to protect and enhance the economic interests of its clients.

Generally, it is Capital Insight's policy to vote in accordance with management's recommendations on most issues since the capability of management is one of the criteria used by Capital Insight in selecting stocks.

Exceptions. When Capital Insight believes management is acting on its own behalf, instead of on behalf of the well-being of the company and its shareholders, or when Capital Insight believes that management is acting in a manner that is adverse to the rights of the company's shareholders, Capital Insight will take steps to represent the interests of its clients and, as a result, may elect to vote against management's recommendations.

In situations where Capital Insight is extremely displeased with management's performance, it may withhold votes or vote against management's slate of directors and other management proposals as a means of communicating its dissatisfaction. This occasion most often develops when Capital Insight believes that management has displayed a consistent inability or lack of interest in moving the company toward achieving its potential and that a message needs to be sent that the company's shareholders are not satisfied with the status quo.

Other Factors Capital Insight Considers. Capital Insight recognizes that the activity or inactivity of a company with respect to matters of social, political or environmental concern may have an effect upon the economic success of the company and the value of its securities. However, Capital Insight does not consider it appropriate, or in the interests of its clients, to impose its own moral standards on others.

Therefore, it normally supports management's position on matters of social, political or environmental concern, except where it believes that a different position would be in the economic interests of company shareholders.

Capital Insight has engaged ProxyEdge, a Broadridge Financial Solutions product ("Broadridge"), to vote proxies in accordance with the Shareholder Value Template ("Template") developed by ProxyEdge (Attached as Exhibit IV). For the proxy issues covered by the Template, the Firm's voting position will generally be in accordance with the Template, unless a portfolio manager of the Firm believes that voting a particular proxy in accordance with the Template would not be in the best interests of a client account, in which case that person shall bring the matter to the attention of the Designated Voter who will refer the matter to the Investment Committee.

The policy for proxy voting on behalf of the FIS Biblically Responsible Risk Managed ETF ("PRAY") for which Capital Insight is the subadvisor and has proxy voting responsibilities is that the Template shall not be used and the proxies shall be voted manually in accordance with Christian Value Investing principles.

Conflicts. In evaluating a proxy proposal, the Chief Compliance Officer is ultimately responsible for considering whether there are any circumstances that may give rise to a conflict of interest in connection with voting client proxies either because of a business relationship between Capital Insight and the company or otherwise.

Voting Procedures. All proxy proposals are voted on an individual basis. In general, when a conflict exists, the Chief Compliance Officer determines whether the proxy may be voted by Capital Insight or whether it should be referred to the client (or another fiduciary of the client) for voting purposes.

Alternatively, Capital Insight may consult directly with a client to obtain the client's consent before voting the proxies. Capital Insight will not refrain from voting proxies just because a conflict exists because Capital Insight has a fiduciary duty to take action on all proxies.

How To Obtain More Information. For additional information regarding Capital Insight's proxy voting policies and procedures and history, clients should contact us by writing to 7328 East Deer Valley Road, Ste. 105, Scottsdale, Arizona 85255, or calling (480) 295-7070.

In cases where clients retain proxy voting authority for themselves, the custodian or transfer agent will provide them with the proxy material.

#### **Item 7 – CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS**

Information regarding such client receiving third party manager services is provided to the manager as requested. It is the client's responsibility to alert our firm to changes as they occur.

#### **Item 8 – CLIENT CONTACT WITH PORTFOLIO MANAGERS**

There are no restrictions on a client's ability to contact and consult with portfolio managers from Capital Insight Partners. Clients are not able to contact or consult with portfolio managers from other firms within our wrap fee program.

#### **Item 9 – ADDITIONAL INFORMATION**

##### *Disciplinary Information*

Neither the firm, nor any management person has a disciplinary disclosure to report.

##### *Other Financial Industry Activities and Affiliations*

Susan C. Anastasiadis is a registered representative with broker dealer M. S. Howells & Co. ("M.S. Howells"). The same relationship with M.S. Howells may exist for other supervised people in our firm.

Capital Insight Partners, LLC (CIP) and Faith Investor Services, LLC (FIS); an SEC registered investment advisor; are under common control and therefore are affiliated investment advisors.

##### *Other potential conflicts of interest with our clients are as follows:*

Capital Insight has relationships with other entities and firms that we believe are helpful to serving our clients. Examples include broker-dealers including M.S. Howells but others as well, banks, accountants, attorneys, insurance companies, consultants on pensions and other matters, real estate brokers and dealers and the sponsors and syndicators of limited partnerships. These relationships can give rise to conflicts of interest where our firm or supervised persons would benefit in addition to the client's benefit. We disclose this to the client and work to act in the client's best interest.

Capital Insight may also have relationships with other investment advisers who manage money or advise on our client's funds, or support our firm in other ways. This can create a direct or indirect material conflict of interest. We disclose this to the client and work to act in the client's best interest.

Capital Insight serves as a sub-adviser to the PRAY ETF, which is a series of SHP ETF Trust, an open-end management investment company. Capital Insight receives fees from the investment adviser to the PRAY ETF for providing investment advice. Capital Insight expects that it will from time-to-time recommend that its clients invest in the PRAY ETF, which creates a conflict of interest because the sub-advisory fees paid to Capital Insight increase as assets of the PRAY ETF increase. Capital Insight believes that this conflict has largely been mitigated by not including any shares of the PRAY ETF held by a client as assets under management of the client for purposes of calculating the fees paid to Capital Insight for investment advisory services. However, Capital Insight will nevertheless benefit from a client's investment in the PRAY ETF because it will result in higher levels of assets for the ETF, which increases the likelihood that the ETF will reach and maintain a viable size and allows its operating expenses to be shared more broadly. Capital Insight only recommends that its clients invest in the PRAY ETF where it has determined that investing in the PRAY ETF is appropriate for the

client's account. Clients are encouraged to review the PRAY ETF's prospectus for additional information.

Capital Insight expects from time to time that it will recommend that its clients invest in series of the SHP ETF Trust other than the PRAY ETF. In these circumstances clients will bear both the fees and expenses of these other series as well as the fees paid to Capital Insight for investment advisory services relating to the clients' assets invested in these other series. Although Capital Insight does not receive any fees from these other series or their investment adviser, Capital Insight nevertheless faces a conflict of interest in recommending them because it will indirectly benefit from a client's investment in these other series. Such an investment will result in higher levels of assets for the SHP ETF Trust, which allows the operating expenses of the SHP ETF Trust to be shared more broadly across investors in its various series. This is expected to help lower the expense ratio of the PRAY ETF, which may in turn increase the likelihood that the PRAY ETF will reach and maintain a viable size. In addition, if Capital Insight directs significant client assets to these other series, the Board of Trustees of the SHP ETF Trust may be more inclined to continue Capital Insight's engagement as sub-adviser to the PRAY ETF. Capital Insight only recommends that its clients invest in these other series where it has determined that investing in these series is appropriate for the client's account.

FIS serves as adviser to the Christian Value Fund ETF ("PRAY") and has engaged CIP as subadvisor to PRAY. PRAY is a SHP ETF Trust, an open-end management investment company. Advisory fees paid to FIS, and subsequently to CIP will increase as assets of PRAY increase. This creates an incentive for principals at CIP who are also principals at FIS to recommend that clients of CIP invest in PRAY. CIP will also benefit from a client's investment in PRAY because it will result in higher levels of assets for the ETFs which increases the likelihood that the ETF will reach and maintain a viable size and allows their operating expenses to be shared more broadly. CIP only recommends that its clients invest in PRAY where it has determined that the investment is appropriate for the client's account. Clients are encouraged to review the PRAY prospectus for additional information.

### *Code of Ethics, Participation or Interest in Client Transactions and Personal Trading*

Capital Insight has established a Code of Ethics applicable to all persons at the firm who have access to confidential client records or to recommendations being made for client accounts. It is designed to prevent conflicts of interest between the financial interests of clients and the interests of the firm's staff. The Code requires such "access persons" to obtain preapproval of certain securities transactions, to report transactions quarterly and to report all securities positions in which they have a beneficial interest at least annually. These reporting requirements allow supervisors at the firm to determine whether to allow or prohibit certain employee securities purchases and sales based on transactions made, or anticipated to be made, in the same securities for client accounts. The Code also establishes certain bookkeeping requirements relating to the new federal reporting rules. The Code is required to be reviewed annually and updated as necessary. A complete copy of the firm's Code is available upon request.

Capital Insight may recommend securities that an employee or related party has a material financial interest. As conflicts like this arise, Capital Insight fully discloses to the client that conflict.

Capital Insight or individuals associated with Capital Insight may buy or sell securities identical to, or different from, those recommended to clients for their personal accounts. To eliminate the conflict of interest, employees may not trade within 24 hours of a client block trade unless included in that block. Additionally, all trading done by employees must be preapproved by the Chief Compliance Officer.

Our staff or related parties may own the same securities as clients. To eliminate the conflict of interest, employees may not trade within 24 hours of a client block trade unless included in that block. Additionally, all trading done by employees must be preapproved by the Chief Compliance Officer.

Our staff or related parties may trade securities with an exception to the 24-hour rule cited above. This exception is when our staff's accounts participate in a "block trade" along with other clients at the same time.

In instances where Capital Insight Partners determines a specific investment needs to be bought or sold in multiple client accounts, the trades may be aggregated into a single transaction known as a block trade. Each client account included in the block trade will receive the same price. Access persons of Capital Insight Partners may be included in the block trade and, if so, will receive the same price as the clients included in the block trade. If a block trade is partially executed, it will be re-entered unless other instructions are provided by the portfolio manager(s). Partially executed block trades will be allocated across all participating accounts proportionally.

Capital Insight is the sub-advisor for the FIS Biblically Responsible Risk Managed ETF (NYSE: PRAY) "PRAY". Employees of Capital Insight may invest in shares of PRAY and the securities of companies held by PRAY. Employees of Capital Insight may purchase promissory notes issued by Faith Investor Services, LLC, the advisor for PRAY.

### ***REVIEW OF ACCOUNTS***

**Portfolio Management Review:** While the underlying securities within Portfolio Management Service accounts are continuously monitored, these accounts are reviewed at least quarterly by a portfolio manager of Capital Insight. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

**Portfolio Management Reports:** Clients may receive monthly and/or quarterly statements and confirmations of transactions from their respective broker-dealer and/or custodian. Clients should carefully review those reports. Capital Insight will not provide any additional regular reports.

### ***CLIENT REFERRALS AND OTHER COMPENSATION***

Representatives of Capital Insight may be separately licensed as registered representatives of M.S. Howells, a FINRA registered broker-dealer. As such, they will be able to effect securities transactions for Capital Insight clients, in their capacity as registered representatives of M.S. Howells. For doing so, they will be able to receive customary brokerage compensation (including 12b-1 distribution fees) in connection with the placement of clients' funds into investment companies, which is separate and distinct from Capital Insight's advisory fees.

Capital Insight has entered into referral arrangements where entities or individual making the referral to Capital Insight receive a portion of the advisory fee on accounts referred to Capital Insight that become clients. Each referred client is provided with a written disclosure document describing the fee arrangement before the client signs Capital Insight's services agreement.

Support services provided by Custodians constitute a form of indirect compensation; see Item 4 above for additional details.

### ***FINANCIAL INFORMATION***

Capital Insight does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

We have never been the subject of a bankruptcy petition.