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Rareview Capital LLC

Firm Brochure – Form ADV Part 2A

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This Brochure provides information about the qualifications and business practices of Rareview Capital LLC. If you have any questions about the contents of this Brochure, please contact us at 212-475-8664 or info@rareviewcapital.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or any state securities authority.

Rareview Capital LLC is registered with the SEC as an investment adviser. Registration as an investment adviser does not imply that Rareview Capital LLC or any of its principals or employees possess a particular level of skill or training in the investment advisory business or any other business.

Additional information about Rareview Capital LLC is available on the SEC's website at www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with Rareview Capital LLC who are registered or are required to be registered, as investment adviser representatives of Rareview Capital LLC. Rareview Capital LLC's SEC number is 801-108100, its CRD number is 284474, and its NFA Member ID is 0501747.

Item 2: Material Changes

Since our last annual amendment, dated March 31, 2023, we have made the following material changes to our Form ADV:

Item 4: Advisory Business

- Removed reference to a Registered Investment Company ("RIC") that closed
- Outsourced Chief Investment Officer ("OCIO") Services was added as a type of advisory service
- Research was added as a type of advisory service
- Updated Regulatory Assets Under Management ("RAUM") and Assets Under Advisement ("AUA")

Item 5: Fees and Compensation

- Updated fee schedule for Model Portfolio Services
- Updated payment of fees for SMAs
- Updated Conflicts of Interest

Item 7: Types of Clients

- Updated the minimum investment for a separately managed account (SMA)

Item 8: Methods of Analysis, Investment Strategies, Risk of Loss

- Updated information about new investment strategies offered
- Removed references to investment strategies that have been discontinued/closed

Item 14: Client Referrals and Other Compensation

- Updated compensation to non-advisory personnel for client referrals

Item 17: Voting Client Securities

- Restated proxy policy by Client type

Pursuant to SEC Rules, we will ensure you receive a summary of any material changes to this and subsequent Brochures within 30 days of each material change. Our current Brochure may be requested by contacting us at 212-475-8664 or info@rareviewcapital.com.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Rareview Capital LLC ("RVC") is a Limited Liability Company organized in the State of Delaware. RVC's principal place of business is in Las Vegas, Nevada. RVC was formed in June 2016. RVC is registered as an investment adviser with the U.S. Securities and Exchange Commission (the "SEC"). RVC is registered as a Commodity Pool Operator ("CPO") with the Commodity Futures Trading Commission ("CFTC") and is a Member of the National Futures Association ("NFA").

RVC provides investment management and advisory services. RVC's products and services can be accessed through:

- Exchange-Traded Funds ("ETFs")
- Turnkey Asset Management Platforms ("TAMPs")
- Model Portfolios
- Separately Managed Accounts ("SMAs")

Neil Azous, as Trustee of the Neil Azous Revocable Trust, is RVC's sole principal owner (i.e., individuals owning or controlling 25% or more of RVC). Mr. Azous is the Managing Member and is responsible for managing the daily operations. Mr. Azous is the Chief Investment Officer and makes all investment decisions.

B. Types of Advisory Services

Registered Investment Companies ("RICs")

RVC renders advice and services to Registered Investment Companies ("RICs"), including Exchange Traded Funds ("ETFs"). RVC serves as the investment adviser to the Rareview Dynamic Fixed Income ETF (Ticker Symbol: RDFI), Rareview Tax Advantaged Income ETF (Ticker Symbol: RTAI), and Rareview Systematic Equity ETF (Ticker Symbol: RSEE) (collectively, the "Rareview Funds"), each a series of Collaborative Investment Series Trust, an open-end investment management company. RVC manages the ETFs per the investment guidelines outlined in each Fund's respective Prospectus and Statement of Additional Information. For additional information about the Rareview Funds, please see the Funds' Prospectuses and Statements of Additional Information at www.rareviewcapital.com or by calling 1-888-RVFUNDS.

Sub-Advisory / Dual Contract

RVC offers sub-advisory investment management services through a dual contract to third-party SEC and state-registered investment advisers, financial planning firms, broker-dealers, and other financial institutions (the "Primary Adviser") that maintain ongoing client relationships.

For these arrangements, RVC enters into an agreement with the Primary Adviser to provide investment management services to the clients it accepts from those firms (the "Sub-Advisory Clients"). RVC reserves the right, in its sole and absolute discretion, not to accept a client account under a sub-advisory arrangement. All financial institutions, including SEC and state-registered investment advisers, must first execute a dual contract sub-advisory investment management agreement that provides RVC with discretionary authority to invest all or some of the sub-advisory client's assets in one or more of RVC's SMAs. Under the sub-advisory arrangement, RVC will be granted discretionary authority from the Primary Adviser to select securities and execute transactions for the Sub-advisory Client account without permission from the Primary Adviser or the Sub-advisory Client before each transaction. RVC is responsible for the discretionary management of the assets the Primary Adviser has instructed to invest in one or more of RVC's SMAs. Each SMA is designed to achieve particular investment goals. Accordingly, the SMAs are not tailored to

accommodate the needs or objectives of specific clients but rather to enable the Primary Adviser to match their clients with SMAs that are consistent with their investment goals and objectives.

RVC generally receives Sub-advisory Client information through the Primary Adviser and relies on the Primary Adviser to forward current and accurate sub-advisory client information on a timely basis to assist in RVC's day-to-day management of sub-advisory clients' accounts. Sub-advisory clients may also contact RVC directly concerning their accounts. During the dual contract period, the Primary Adviser will remain responsible for determining sub-advisory clients' investment objectives and whether one or more of RVC's SMAs are suitable to meet such investment objectives. This includes performing initial and ongoing client suitability reviews for the sub-advisory client's account(s). The Primary Adviser is responsible for obtaining and evaluating information regarding the identity, circumstances, financial condition, tax situation, regulatory status, and financial needs and goals of the sub-advisory client so that the Primary Adviser can evaluate whether the investment guidelines of the sub-advisory client are appropriate and suitable. The Primary Adviser reviews the investment guidelines outlined in the dual contract investment management agreement between RVC and each shared Sub-advisory Client, as they may be amended from time to time, and informs RVC, and each shared Sub-advisory Client, if any such investment guidelines are not appropriate or suitable for any such shared sub-advisory client. RVC periodically communicates investment performance and portfolio commentary to the Primary Adviser, which employs its own discretion in forwarding such information to Sub-advisory Clients. The Primary Adviser is responsible for determining their methods for maintaining books and records and delivering them to the Sub-advisory Clients, including preparing and sending performance reports and marketing materials.

RVC is responsible for delivering Parts 2A, 2B and Part 3, the Client Relationship Statement ("Form CRS") and its Privacy Policy to the Primary Adviser. The Primary Adviser is responsible for delivering such documents to Sub-advisory Clients. When RVC serves as discretionary sub-advisory account manager, it will include the account assets in RVC's Regulatory Assets Under Management (RAUM).

Outsourced Chief Investment Officer ("OCIO") Services

RVC offers sub-advisory Outsourced Chief Investment Officer (OCIO) services to third-party SEC and state-registered investment advisers, financial planning firms, broker-dealers, and other financial institutions (the "Primary Adviser") that maintain ongoing relationships with clients.

In these instances, RVC is a consultant to the Primary Adviser who selects RVC for OCIO services. RVC, as a consultant, provides investment recommendations, model portfolios, ongoing monitoring of investment strategies, fund and portfolio construction analytics, portfolio optimization, bespoke investment management solutions, outsourced trading, technology, research, and financial support in exchange for a fixed-dollar amount fee or as a percentage of assets under management.

RVC has discretion over client investment portfolios and has access to personal information about clients but does not vote proxies. In these instances, a Primary Adviser selects RVC to provide these services, and for this service, the Primary Adviser is charged a separate fee for OCIO services. The consulting services are disclosed in the Primary Adviser's brochure. The compensation for RVC depends on the negotiated agreement between the Primary Adviser and RVC. RVC's fee varies based on the scope and complexity of supporting the advisor's services.

In these instances, RVC physically manages OCIO clients' portfolios via trading and operational services. Either the Primary Adviser provides trading access to RVC through its technology, or RVC provides the technology. The managed accounts are discretionary and considered Regulatory Assets Under Management (RAUM).

Model Portfolio Services

RVC is a Turnkey Asset Management Platform ("TAMP") strategist and provides non-discretionary investment advice through a model portfolio delivery service. Under such arrangements, RVC provides investment strategies to registered investment advisers, broker-dealers, and TAMP providers. RVC provides these clients with allocations to

its investment models and continuous updates on all model changes. RVC provides continuous and ongoing portfolio research services to these clients on a direct and reverse inquiry basis.

The model portfolios and the recommendations implicit in the model portfolios generally are not tailored to third-party clients' specific needs or circumstances. RVC does not have an advisory relationship with the end-investor under model licensing arrangements. The third party retains the discretion to implement, reject, or adjust such a model, and the third party is responsible for executing any corresponding transactions on behalf of the third party's underlying clients. RVC does not affect or execute transactions for any underlying clients of the third party participating in the model portfolio delivery service. RVC does not consider such underlying clients of the third party to be clients of RVC. In instances where RVC has no discretion to effect trades and no supervisory responsibility over the assets in the program, RVC does not include the assets under management for these accounts in total Regulatory Assets Under Management (RAUM) but categorizes them as Assets Under Advisement (AUA).

Separately Managed Account ("SMAs")

RVC renders advice and services to institutional and non-institutional investors (the "clients") through separately managed accounts ("SMAs"). Clients must first execute an investment management agreement that provides RVC with discretionary authority to invest all or some of the client's assets in one or more of RVC's SMAs. Once discretionary authority from the client is granted, RVC will select securities and execute transactions without the client's permission before each transaction. RVC's advice and services for its clients are subject to each client's investment objectives and guidelines, as outlined in their respective Investment Management Agreement or applicable governing documents.

Consulting

RVC offers consulting services to institutional investors and broker-dealers, including customized analysis and reports on the economy and financial markets, various asset classes, sectors, and investment strategies. These services are provided pursuant to specialized engagements individually negotiated with RVC's clients based upon their specific needs and objectives. In addition to the fixed fee RVC shall receive pursuant to the terms set forth in a consulting agreement, RVC may receive bonus compensation at the discretion of the client. In performing these services, RVC is not required to verify any information received from the client or from the client's other professionals (i.e., attorney, accountant, etc.) and is authorized to rely on such information. RVC may recommend its services, and/or the services of other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if RVC recommends its own services or the services of any of its affiliates (as set forth in Item 10 below). The client is under no obligation to act upon any of the recommendations made by RVC under a consulting engagement or to engage the services of any such recommended professional, including RVC itself. The client retains discretion over all such implementation decisions and is free to accept or reject any of RVC's recommendations. Clients are advised that it remains their responsibility to promptly notify RVC if there is a change in their financial situation or investment objectives.

Research

RVC publishes market research and investment commentary for certain parties, including shareholders of the RICs we manage, investment advisory clients, and prospects. The research publications provide these parties with the basis for the investment strategies we employ in managing registered investment companies or portfolios in which these parties may have invested client funds.

Sight *Beyond Sight*® (the "Newsletter") is a bona fide publication of general and regular circulation offering and is limited to the dissemination of impersonal and objective investment-related information, together with access to additional impersonal investment-related information and links, and does not provide individualized advice or recommendations for any specific reader. Neil Azous is the Editor-in-Chief, and Michael Sedacca is a contributor.

RVC provides complimentary subscriptions of *Sight Beyond Sight*® to investment advisory clients or prospective clients who meet the eligibility requirements as accredited investors as defined under the Securities Act of 1933. RVC may deliver *Sight Beyond Sight*® to non-investment advisory clients for an agreed-upon payment via a subscription service. RVC may market and implement investment strategies and expressions referenced in the newsletter with investment advisory clients or prospective clients.

The commentary, analysis, opinions, advice, and recommendations in the newsletter represent the personal and subjective views of the Editor/Contributors and are subject to change at any time without notice. The information in the newsletter is obtained from sources that the Editor/Contributors believe to be reliable. However, the Editor/Contributors have not independently verified or otherwise investigated all such information. Neither the Publisher, the Editor, nor any of their respective affiliates guarantees the accuracy or completeness of any such information.

The newsletter is not a solicitation or offer to buy or sell any securities. Further, the newsletter is not intended to be a solicitation for investment advisory services offered by RVC. Additionally, readers are not required to utilize the services of any Investment Adviser Representative of RVC in such an individual's capacity.

When at all possible, the Editor/Contributors of the newsletter will avoid making recommendations on securities owned by investment advisory clients of RVC. If conflicts arise, those holdings will be disclosed.

Administrative Services

RVC offers certain administrative services to a limited number of clients. Such administrative services typically include oversight of certain recordkeeping and reporting functions, budget and expense review, and similar administrative functions (collectively, "Administrative Services"). RVC is entitled to receive compensation in connection with the provision of such services, either as a percentage of assets under administration or a fixed fee.

Personal Services

RVC may support our clients beyond traditional portfolio management and financial planning. RVC may coordinate between our clients and their attorneys, tax advisors, insurance advisors, and private bankers. RVC may track clients' entire financial picture, including various trusts, personal and business entities, and investments not held by our custodians.

Retirement Plan Services

RVC may provide advisory services to qualified and non-qualified retirement plans, including 401(k) plans, 403(b) plans, pension plans, profit-sharing plans, defined benefit plans, and deferred compensation plans. Services include both non-fiduciary and fiduciary services to the sponsor of the Plan (the "Plan Sponsor") and the participants of the Plan (the "Plan Participants"), which RVC performs in accordance with the Employee Retirement Income Security Act ("ERISA") rules. For example, RVC may act as either:

- **Non-Fiduciary:** RVC would act as a limited scope ERISA 3(21) non-fiduciary that can advise, help, and assist plan sponsors with their investment decisions. The plan sponsor is still ultimately responsible for the decisions made in their plan, and RVC may assist in mitigating that plan sponsor's liability by following a diligent process. However, the plan sponsor remains liable.
- **Fiduciary:** RVC may act as an ERISA 3(38) Investment Manager in which it has discretionary management and control of a given retirement plan's assets. RVC would then become solely responsible and liable for the selection, monitoring and replacement of the plan's investment options.

Advisory services are negotiated based on the needs of the Plan and the direction and engagement by the Plan Sponsor and are included in the terms of the RVC applicable consulting or investing management agreement.

Currently, RVC does not engage in such retirement-related services but may do so in the future.

Services Limited to Specific Types of Investments

Advice regarding specific types of investments include, but are not limited to, the following:

- Equities
- Open-End Mutual Funds (OEF)
- Closed-End Funds (CEF)
- Exchange-Traded Funds (ETF)
- Government fixed income securities
- Treasury inflation protected/inflation-linked bonds
- Corporate debt securities
- Foreign Exchange
- Commodity Interests
- Futures/Options
- Precious Metals
- Volatility
- Options contracts on securities
- Listed and over-the-counter (OTC) derivatives
- Hedging solutions

RVC may use other securities as well, including derivatives, to speculate, leverage, diversify or hedge a portfolio when applicable.

RVC seeks to ensure that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of RVC's economic, investment, or other financial interests. To meet its fiduciary obligations, RVC attempts to avoid, among other things, conflicts around investment or trading practices that systematically advantage or disadvantage certain client portfolios. Accordingly, RVC's policy is to seek fair and equitable allocation over time with respect to the allocation of investment opportunities among its clients. RVC ensures its trade allocation policies and procedures are followed by all employees and that employees are trained periodically to ensure they understand the conflicts inherent in this space and the controls designed to mitigate such conflicts to ensure they avoid favoring one client over another—particularly those with differing fee structures managed alongside one another (i.e., "side by side management").

C. Client Tailored Services and Client Imposed Restrictions

RVC offers the same suite of services to all its eligible clients. However, specific client investment strategies and their implementation are dependent upon suitability—such that the client's current situation (financial goals, income, tax levels, time horizon, liquidity needs, and risk tolerance levels) is considered. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

RVC then manages that client's assets using a combination of one or more of the following investment solutions:

- Internally managed registered investment companies developed by RVC.
- Internally managed model portfolios developed by RVC.

RVC manages assets primarily on a discretionary basis. RVC has investment control to implement the investment plan RVC has developed with a client without obtaining the client's consent before making a trade or allocation. RVC, in other circumstances, may act on a non-discretionary basis to manage client assets, such as by recommending investment opportunities to clients; however, such clients have the final authority to implement these recommendations.

For Regulated Investment Companies (referred to herein as “fund” or “fund’s”), this generally involves investing a fund’s assets in accordance with its organizational and offering documents. RVC manages a fund on a fully discretionary basis. Investors in a fund cannot restrict how RVC manages the fund or the assets held by the fund because the fund’s Prospectus and Statement of Additional Information govern all the fund’s investments.

For SMAs, this generally involves allocating the client’s assets among the above-described investment solutions. Clients may impose reasonable restrictions on how RVC manages assets in their accounts. The determination as to what a “reasonable restriction” is solely RVC’s. To the extent that a client imposes a restriction that would impact RVC’s ability to implement the strategy for that account, RVC reserves the right to reject, refuse to manage, or liquidate the account.

RVC may recommend investments in RVC’s affiliated ETFs for client accounts, including accounts for owners, officers, and investment advisor representatives associated with RVC. If you have engaged RVC for discretionary management services, RVC may invest a percentage of your assets in the Fund, up to 100%, without your further approval.

Securities held in SMAs, including accounts for owners, officers, and other individuals associated with RVC, may also be the same securities as those purchased by the Rareview Fund(s).

Material Conflict of Interest. In discretionary advisory arrangements, RVC is authorized, without prior consultation with the client, to buy RVC’s affiliated ETFs, in which event, RVC shall receive both a management fee payable by the affiliated ETF and an advisory fee. Because we receive compensation from the ETF, there is a material conflict of interest, as we have a financial incentive to invest your assets in the ETF or to recommend that you invest in the ETF rather than other investments. When you use RVC’s advisory services, RVC can receive two payments from your investment. One payment is for services RVC provides to you, as outlined in the Investment Management Agreement. The second fee is from the payments RVC receives from the ETF itself. However, RVC will only make such investments and/or recommendations where RVC believes it is consistent with RVC’s fiduciary duty and your investment objectives.

RVC will make a reasonable faith effort to determine if an investment in a Rareview ETF is in your best interest after considering such factors as your goals, time horizon, risk tolerance (items contained in the Client Information Form provided to SMA Clients during onboarding); and the strategies, fees, and expenses of other comparable ETFs. Aside from the Client Information Form, RVC provides no formal documentation of this analysis.

You can purchase ETFs directly without RVC’s advisory services. By doing so, you would be declining RVC’s advisory services, which are designed to assist you in determining investments most suitable to your needs, objectives, and risk tolerance. By using RVC’s advisory services and agreeing to the fee associated with these services, you are consenting to the conflict of interest referenced above.

Any questions pertaining to this conflict of interest and the way RVC mitigates its conflicts, and any other issues should be addressed with our Chief Compliance Officer, who may be contacted at 212-475-8664.

RVC does not provide general financial planning, tax, legal and/or insurance advice, unless specifically stated in a signed agreement specifying such services and the fees for these additional services. However, RVC may recommend potentially suitable parties to furnish these services to investors upon request.

D. Wrap Fee Programs

RVC does not sponsor or participate in a wrap fee program.

E. Assets Under Management

As of March 28, 2024, RVC managed \$172,886,688 on a discretionary basis and \$0 on a non-discretionary basis. Total Regulatory Assets Under Management (RAUM) was \$172,886,688.

As of March 28, 2024, RVC oversees \$211,601 in advisory assets which are non-managed strategies powered by RVC's OCIO Services, Model Portfolio Services, or other non-managed investment assignments. Total Assets Under Advisement (AUA) was \$211,601.

As of March 28, 2024, on a combined basis, RAUM and AUA was \$173,098,288.

F. Internet Presence

RVC operates and supervises the following website and social network listings:

Website	LinkedIn	Twitter	YouTube
www.rareviewcapital.com	Rareview Capital LLC	@rareviewcapital	@rareviewcapital

G. Physical Office Locations

Principal Office and Mailing Address: 1980 Festival Plaza Drive, Suite 300, Las Vegas, NV 89135

Places of Business: Norwalk, CT, Woodbury, CT, Hartford, CT

Item 5: Fees and Compensation

The fees applicable to each client are set forth in detail in their respective Investment Management Agreement. For those invested in pooled vehicles, the fees are set forth in each fund's Prospectus and Statement of Additional Information. A summary of such fees is provided below. Generally, clients pay RVC a fee for investment management services (the "Management Fee") and may also be charged a performance-based fee or profit allocation ("Performance Compensation"). In the event of a sub-advisory relationship in which RVC is the primary investment advisor, RVC will adhere to the advisory agreement or other legal document to render payment directly or indirectly to that organization while meeting the specific and agreed-upon terms in all cases.

Certain clients may invest in registered investment companies – open-end mutual funds, closed-end funds, exchange traded funds – or other third-party investment products. In such cases, advisory compensation charged by the applicable third-party investment adviser will be paid by the client in addition to the advisory compensation outlined herein, which is paid to RVC. Full details regarding the services, fees, and other terms applicable to clients are included in their respective Investment Management Agreements and in the relevant pooled vehicles' offering documentation (Prospectuses and Statements of Additional Information).

Performance compensation is charged in compliance with all applicable requirements of Rule 205-3 under the Investment Advisers Act of 1940, as amended (the "Advisers Act"). For the avoidance of doubt, RVC, in its sole discretion, may waive, reduce or rebate any Management Fee or Performance Compensation. In addition, Management Fees and/or Performance Compensation may also be calculated differently with respect to, or may not be charged to, certain separately managed accounts, including affiliate-owned separately managed accounts, if any. As noted above, full details regarding the services, fees, and other terms applicable to clients are included in their respective Investment Management Agreements.

When RVC provides discretionary investment management services to registered investment companies, a limited number of individuals associated with RVC may be registered representatives of an unaffiliated broker-dealer and may be eligible to receive compensation related to the sale of securities. As a result of this arrangement, RVC, by and through these registered representatives acting in their individuals' capacities as agents of the broker-dealer, can distribute materials related to the registered investment company, to prospective investors, which it would not otherwise be permitted to do. Such registered representatives may be eligible to receive compensation related to new fund assets.

A. Fee Schedule

Registered Investment Company (RIC) Fees

As the investment adviser to the Rareview Funds, RVC is entitled to receive an annual advisory fee based on the Funds' average daily net assets but may receive less due to waivers. The ETFs and their respective fee schedules are:

Rareview Fund	Management Fee
Rareview Dynamic Fixed Income ETF	0.97%
Rareview Tax Advantaged Income ETF	0.75%
Rareview Systematic Equity ETF	1.10%

Note: An investor should carefully consider a Fund's investment objectives, risk factors, charges, and expenses before investing. This and additional information can be found in a Fund's Prospectus and Statement of Additional Information, which may be obtained by visiting www.rareviewcapital.com or by calling 1-888-RVFUNDS. Please read the Prospectus and Statement of Additional Information carefully before investing.

Sub-Advisory / Dual Contract Fees

In Dual Contract arrangements, RVC's fee is "unbundled," meaning that sub-advisory clients pay RVC's fee directly to RVC. RVC charges sub-advisory clients an annual fee based upon a percentage of the market value of the assets in an SMA being managed or overseen by RVC. Fees vary based on the type of the SMA, the complexity and level of service provided, the number of different accounts and the total assets under management for that client and related clients, other services provided by the Primary Adviser, other administrative services provided, or other circumstances or factors that RVC deems relevant.

Model Portfolio Services Fees

RVC's fee schedule for model portfolio services may vary depending on assets under management and the type of strategy. The fees are negotiable and may vary from program to program, even among financial intermediaries using the same strategy, but the general range of advisory fees is 0.10% to 0.50% annualized. RVC's fee may include a performance-based management fee for certain strategies and eligible client types.

Licensing fees may be withdrawn from clients' accounts, or the unaffiliated adviser may bill its clients for the total advisory fee, including the licensing fee. In these instances, RVC's models are delivered to the end client in exchange for a fixed fee or a percentage of assets under management. Fees may be collected upfront and are paid via check or wire.

Separately Managed Account (SMA) Fees

RVC's fee schedule for SMA's may vary depending on assets under management and the type of strategy. RVC charges clients an annual fee based upon a percentage of the market value of the assets being managed or overseen by RVC. The fees are negotiable, but the general range of advisory fees is 0.75% to 1.25%. RVC may charge clients a performance-based management fee for certain strategies. RVC negotiates the terms of these performance-based arrangements on a case-by-case basis and includes such terms in the investment Management Agreement RVC enters with the applicable client. RVC may, at its discretion, make exceptions to the foregoing or negotiate special fee arrangements where RVC deems appropriate under the circumstances. RVC reserves the right to adjust the fee schedule for clients based upon the nature of the relationship with the client (i.e., employees of RVC and their relatives, relatives, or others bound by affection to existing clients based on the discretion of RVC). In some cases, this may result in different fees being charged for similar services and may be less than the stated fee schedule. RVC's compensation is exclusively from fees paid directly by clients. RVC receives no commission based on client purchases of any financial product. No commissions in any form are accepted. Clients may terminate the Investment Management Agreement within the provisions of the Agreement. In addition to the fee schedule set forth above, some clients may have fee schedules that differ from the one above.

Consulting Fees

RVC's fee for consulting services is individually negotiated with RVC's clients based upon their specific needs and objectives.

Retirement Plan Related-Service Fees

The annual fees are based on the market value of the included assets and will not exceed 1.00% of the value. The fee is charged in arrears, and the initial fee will be based on the market value of the Plan assets as calculated by the custodian or record keeper of the included assets on the first business day of the initial fee period and will be due on the first business day of the fee period. For services started any time other than the first day of a billing cycle, the fee will be prorated based on the number of days remaining in the initial fee period. Thereafter, the fee will be based on the market value of the plan assets on the last business day of the previous fee period (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets) and will be due within ten (10) business days. If the Agreement is terminated before the end of the fee period, RVC shall be entitled to a prorated fee based on the number of days during which services were provided during the fee period. Any unearned fees shall be refunded to the Plan or Plan Sponsor. The compensation of RVC for the services is described in detail in the ERISA Plan Agreement. The Plan is obligated to pay the fees; however, the Plan Sponsor may elect to pay the fees. RVC does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under the agreement. If additional compensation is received, RVC will disclose this compensation, the services rendered, and the compensation payer. Currently, RVC does not engage in such retirement-related services, but we may do so in the future.

B. Payment of Fees

For RICs managed by RVC, the fees are paid monthly in accordance with the policies set forth in the respective Prospectus and Statement of Additional Information.

For SMAs, the annual fee is billed quarterly in advance. The first payment is due and payable upon execution of an Investment Management Agreement. It will be assessed pro-rata if the Agreement is executed other than the first day of the new calendar quarter. Subsequent payments are calculated on the first day of each calendar quarter based on the value of the account assets under management as of the close of business on the last day of the preceding quarter. Pursuant to an Investment Management Agreement, RVC typically is authorized by the client to direct the custodian to deduct its fee from client accounts held directly through their custodian.

Clients should be aware of their responsibility to verify the accuracy of the fee calculation submitted to the custodian by RVC, as the custodian will not determine whether the fee has been correctly calculated. RVC does not send a copy of the invoice to clients. However, clients may request a separate copy of each invoice from RVC, which sets forth the basis for the calculation. In some cases, clients may remit payments directly to RVC.

C. Client Responsibility for Third Party Fees

RVC's advisory fee excludes other related costs and expenses the client may incur. In certain circumstances, clients may be charged fees, commissions, or expenses in addition to unbundled fees.

Additional fees typically charged directly to the net asset value ("NAV") of a registered investment company (not directly to clients) include management fees, expenses, leverage costs, deferred sales charges, and redemption fees, charged by closed-end funds, open-end mutual funds, and exchange-traded funds. A description of these fees and expenses is available in each fund's Prospectus.

Clients may pay commissions if RVC "trades away" or uses "step-out" transactions in trading on behalf of a client's accounts and for offering concessions and related fees for purchases of registered investment companies and other public offerings of securities. Also, if a broker-dealer executes a trade as a principal, the sub-advisory client may pay "mark-ups" and "mark-downs" on these trades. In some instances, broker-dealers receive no commissions from trades effected on an agency basis. As a result, they may be incentivized to effect trades as principal to obtain "mark ups" and "mark-downs."

Advisory fees charged by RVC are separate and distinct from certain charges imposed by their financial institution or custodian and other third parties, such as commissions, custodial fees, margin interest payments, short-term trading fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, reorganization fees (i.e., for voluntary rights and tender offers), and other fees and taxes on brokerage accounts and securities transactions. **These charges, fees, and commissions are exclusive of and in addition to RVC's fee and the operating expenses for each product.**

D. Outside Compensation for the Sale of Securities to Clients

1. Clients Have the Option to Purchase Recommended Products from Other Brokers

Clients always have the option to purchase RVC-recommended products through other brokers or agents who are not affiliated with RVC.

2. Commissions are not RVC's primary source of compensation for advisory services

RVC is compensated on either management or performance fees. Commissions are not included in any of RVC's primary sources of compensation for advisory services that RVC is entitled to or shall receive as payment.

3. Advisory Fees in Addition to Commissions or Markups

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on investment products recommended to clients.

E. Conflicts of Interest

Client Investments – Rareview Funds: Under normal circumstances and in accordance with the client’s established Investment Policy Statement and risk tolerance, RVC will recommend investments that include RVC Funds. Clients investing in the Funds will be subject to the Fund’s management fees (payable to RVC as adviser to the Funds and set forth above) and RVC’s portfolio management fees. The receipt of additional compensation from the Funds provides an incentive for RVC to invest client assets in the Funds. This potential conflict of interest is disclosed to clients in this Form ADV and the client Investment Management Agreement signed by the client at the outset of a working relationship. The fees charged for portfolio management services and fees paid to RVC indirectly through the Funds may be higher than those charged by other investment advisers for similar investment advisory services. Clients may also independently invest in Fund shares through other financial services firms/broker-dealers.

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

A. Performance-Based Fees

In accordance with RVC’s Investment Management Agreement, RVC may be compensated based on the capital gains of assets under management. A performance fee is only assessed against Separately Managed Accounts who are “Qualified Clients” as such term is defined by Rule 205-3 under the Investment Advisers Act of 1940. To the extent that RVC charges a performance fee for a client account, RVC may be perceived to have an incentive to maximize gains in that account (and, therefore, maximize RVC’s performance fee) by making investments for that account that are riskier or more speculative than would be the case in the absence of a performance fee. RVC may also be perceived to have an incentive to favor accounts for which it charges a performance fee over other types of client accounts, such as by allocating more profitable investments to performance fee accounts or by devoting more resources toward the management of those accounts. RVC seeks to mitigate the conflicts that may arise from managing accounts that bear a performance fee by monitoring and enforcing its policies and procedures, including those related to investment allocations. *As of this filing date, RVC does not have a separately managed account client charged a performance fee.*

B. Side-by-Side Management

“Side-by-side management” refers to the simultaneous management of multiple types of client accounts/investment products with varying fee structures—certain of which are more profitable for investment advisers (such as performance based fees). RVC simultaneously manages the portfolio of registered investment companies, separate accounts, and model portfolios according to the same or similar investment strategy (i.e., side-by-side management). Specifically, the simultaneous management of these different investment products creates certain conflicts of interest, as the fees for the management of certain types of products are higher than others. However, RVC seeks to treat all accounts fairly and reviews performance attribution and dispersion to ensure clients are treated equitably over time. Nonetheless, portfolios will not always be managed the same way as differences among similar strategies may exist, and accounts’ inception may factor into their performance relative to those similarly situated, among other reasons. RVC will not necessarily purchase or sell the same securities simultaneously – perhaps due to cash constraints or other reasons—and trading may not be proportionate for all eligible portfolios, as discussed in RVC’s trade allocation policy and procedures. A client’s performance will not necessarily reflect the performance of a separate account managed using a similar strategy due to various factors, including differences in cash flows and the timing of trading. As a result, although RVC manages multiple portfolios with similar or identical investment objectives or may manage accounts with different objectives that trade in the same securities, the portfolio decisions relating to these accounts, and the performance resulting from such decisions, may differ from portfolio-to-portfolio. RVC will endeavor to aggregate or “bunch”, to the extent possible, transactions that are then affected by RVC for its other clients, if any. Such aggregation or “bunching” of trades may not be possible in some cases. In cases where bunching is possible

and an opportunity receives only a partial fill, the eligible accounts will all participate pro-rata, which are scaled back to the original basis for the allocation. For more information on RVC's brokerage practices, see "Brokerage Practices" below.

Item 7: Types of Clients

RVC primarily provides advisory services to the following types of clients:

- Registered Investment Companies (RIC)
- Turnkey Asset Management Providers (TAMP)
- Registered Investment Advisors (RIA)
- Hedge Funds (HF)/Private Funds (PF)
- Family Offices (FO)
- High-Net-Worth Individuals (HNW)
- Retirement Plan Services

RVC generally imposes a minimum portfolio value for its discretionary and non-discretionary investment management services. The minimum investment for a separately-managed account (SMA) is \$1,000,000. The minimum investment for a model portfolio is \$25,000. RVC, in its sole discretion, may negotiate or waive its stated account minimum, or charge a lesser management fee based upon certain criteria, including anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, pre-existing client, account retention, pro bono activities, etc. RVC may also aggregate the portfolios/accounts of related members to meet the minimum portfolio size. In addition to the stated account minimums set forth above, there may be accounts that are below the stated minimum. Information about investment minimums at Turnkey Asset Management Providers (TAMP) is available through the sponsor firm.

In some cases, RVC may elect not to take on a client if RVC determines we are not best suited to meet their investment needs. Also, RVC may terminate a client relationship if it feels we can no longer meet its investment needs. RVC tries to accommodate a wide range of custodians; however, RVC may refuse a client who does not use a suggested/recommended custodian.

Item 8: Methods of Analysis, Investment Strategies, Risk of Loss

RVC offers model portfolios with a wide range of investment objectives. RVC uses macroeconomic, fundamental, quantitative, and technical analysis to construct model portfolios. RVC's model portfolios are built using objective, empirically based analysis. The methods of analysis used in each model portfolio can vary depending on the objective of the model. Each model portfolio considers a Client's risk tolerance and stated time horizon for meeting their investment goals. RVC constructs proprietary ETF portfolios using strategic and tactical asset allocation techniques. RVC's investment process utilizes macroeconomic research for an active asset allocation strategy. To gain exposure to an asset class, style, or category, RVC primarily uses index-based or sector-specific ETFs.

A. Methods of Analysis

Strategic Asset Allocation: RVC considers an investor's time horizon and the historical interrelationship of asset class prices irrespective of the current macroeconomic environment or the state of the business cycle. RVC uses this historical perspective to create the base upon which our investment thesis and opinions are implemented.

Tactical Asset Allocation: RVC uses tactical asset allocation to implement investment views by adjusting the various asset class weightings in a portfolio upward or downward. RVC uses a top-down approach that considers multiple variables, including relative valuation, economic cycle positioning, yield curve analysis, interest rate spreads, monetary policy, fiscal policy, political factors, and industry/sector valuations. **Risk:** The assumption is that the traditional asset allocation techniques also apply to registered investment companies. Additionally, this strategy demands some discipline, as RVC must first be able to recognize when short-term opportunities have run their course, and then rebalance the portfolio to the long-term asset position. Be aware that allocation approaches that involve anticipating and reacting to market movements require a great deal of expertise. The portfolio's exposure to different asset classes may not be optimal for market conditions at a given time. Asset allocation does not guarantee a profit or protect against a loss in declining markets. Actual performance will depend on the asset class allocations and the performance of the underlying market sectors or sub-sectors. The proportions allocated to each market sector or subsector may cause a portfolio to underperform relevant benchmarks or other investments with a similar objective.

Macroeconomic Analysis: RVC's macroeconomic analysis comprises of economic trend analysis, long-term macroeconomic projections, analysis of alternative trends, impact of fiscal and monetary measures, and counterfactual simulations of the economy.

Fundamental Analysis: RVC measures a company's, industry's, or sector's intrinsic value by examining related economic and financial factors. RVC studies inputs that can affect a company's, industry's, or sector's value, from macroeconomic factors, such as the state of the economy and industry conditions, to microeconomic factors, like the effectiveness of the company's management. The end goal is to arrive at a number that RVC can compare with a security's current price to see whether the security is undervalued or overvalued.

Quantitative Analysis: RVC builds quantitative models that measure factors distinguishable from qualitative considerations and provides insight into the valuation or historic performance of a specific security or market. **Risk:** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models. There can be no assurance that use of a quantitative model will enable your portfolio to achieve positive returns or outperform the market.

Technical Analysis: RVC uses classical patterns and basic shapes to potentially identify security or market direction. **Risk:** The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not consider new patterns that emerge over time.

B. Investment Strategies

Our clients should not assume that portfolio investments will be profitable or that the objectives associated with any strategies described below will be met. The results for individual portfolios will vary depending on market conditions and the portfolio's overall composition. All investments carry a certain degree of risk including the possible loss of principal that clients should be prepared to bear. There can be no assurance that your portfolio will achieve its investment objective or that any investment will provide positive performance over any period. At any time, RVC may add, remove, or modify any of the strategies it employs, and this includes any of the strategies discussed below. Investments in RVC separately managed accounts (SMAs) are not FDIC insured and may lose value. More specific risks associated with RVC's investment strategies and operations are outlined below. **Past performance is no guarantee of future results.**

Registered Investment Companies (i.e., ETFs)

RVC manages the Rareview Funds in accordance with the investment objectives, policies, and restrictions set forth in the respective prospectus. The following section includes a summary of the investment objective and principal investment strategy associated with the Rareview Funds. The summary of the investment objectives and principal investment strategy provided below are necessarily limited and are presented for general informational purposes in

accordance with regulatory requirements. Consequently, in all instances, this summary is qualified and superseded by the prospectuses and statements of additional information of the Funds. Further information about the investment objective, investment strategy, risks, and other terms of the Funds is contained in the prospectus and statement of additional information for these funds, which can be obtained free of charge by contacting Rareview Funds at 1-888-RVFUNDS, or by visiting www.rareviewcapital.com.

Rareview Dynamic Fixed Income ETF (RDFI):

- **Objective:** The Rareview Dynamic Fixed Income ETF (the "Fund") seeks total return with an emphasis on providing current income.
- **Strategy:** The Fund is an actively managed exchange-traded fund. The Fund seeks to achieve its investment objective principally through investments in closed-end funds. Under normal market conditions, the Fund will invest in fixed income closed-end funds trading at a discount or premium to their underlying net asset value and that pay regular periodic cash distributions.

Rareview Tax Advantaged Income ETF (RTAI):

- **Objective:** The Rareview Tax Advantaged Income ETF (the "Fund") seeks total return with an emphasis on providing current income, a substantial portion of which will be exempt from federal income taxes.
- **Strategy:** The Fund is an actively managed exchange-traded fund (ETF). The Fund seeks to achieve its investment objective principally through investments in closed-end funds. Under normal market conditions, the Fund will invest in municipal bond closed-end funds trading at a discount or premium to their underlying net asset value and that pay regular periodic cash distributions.

Rareview Systematic Equity ETF (RSEE):

- **Objective:** The Rareview Systematic Equity ETF (the "Fund") seeks returns that exceed global developed and emerging market equities.
- **Strategy:** The Fund is an actively managed exchange-traded fund that seeks to achieve its investment objective by investing in exchange traded funds that invest in equity securities of domestic, foreign or emerging market issuers of any market capitalization.

Separately Managed Account Strategies

The following portfolios are based on RVC's goal-based investment strategies. Each strategy is constructed using lower-cost, tax-efficient, liquid, and transparent exchange-traded funds (ETFs). Each strategy provides access to both debt and equity exposure. The strategies are presented in order of potential risk and return.

Rareview Aggressive:

- **Objective:** Seeks capital appreciation.
- **Strategy:** Primarily invests in higher-multiple equity themes, sectors, and securities.
- **Risk Overlay (Optional Add-On):** Seeks to limit downside risk through an active risk overlay strategy when warranted by market conditions.

Rareview Moderately Aggressive:

- **Objective:** Seeks capital appreciation.

- **Strategy:** Primarily invests in higher-multiple equity themes, sectors, and securities with a portion that is defensively positioned (i.e., by holding cash or investing in income-producing securities).
- **Risk Overlay (Optional Add-On):** Seeks to limit downside risk through an active risk overlay strategy when warranted by market conditions.

Rareview Balanced:

- **Objective:** Seeks a balance of capital appreciation and current income.
- **Strategy:** Primarily invests in equity themes, sectors, and securities with a portion invested in high-income producing securities.
- **Risk Overlay (Optional Add-On):** Seeks to limit downside risk through an active risk overlay strategy when warranted by market conditions.

Rareview Moderately Conservative:

- **Objective:** Primarily seeks current income. Secondly, seeks capital appreciation.
- **Strategy:** Primarily invests in fixed income securities that produce high income.

Rareview Conservative:

- **Objective:** Primarily seeks capital preservation. Secondly seeks current income.
- **Strategy:** Primarily invests in core fixed income securities with a portion invested in low-volatility equity indices.

RVC seeks to limit downside risk through an active overlay strategy when warranted by market conditions. Generally, RVC will seek to protect principal during periods of severe equity market declines or a cyclical change in interest rates. Preservation strategies include, but are not limited to:

- The reallocation of all or a portion of the portfolio's exposure to fixed income securities.
- The reallocation of all or a portion of the portfolio to equities that historically exhibit less volatility than the broad stock market.
- The reallocation of a portion of the portfolio's exposure to a systematic trend strategy.
- The implementation of an options collar strategy.
- The implementation of a constant options hedge.
- The implementation of yield curve steepener.
- The implementation of an inflation hedge.

Notes: RVC's preservation strategies seek to mitigate declines (peak-to-trough) in the value of an account over a period, not in a one-off circumstance. There is no guarantee that this goal will be achieved. RVC's preservation strategies are not timing strategies, a guarantee, always hedged, and not expected to protect against short-term market gap risk.

RVC offers portfolios that seek a defined income distribution goal between 5% and 8%. These portfolios are designed for investors who are approaching or have entered retirement, having already generated a nest egg, and are seeking to live off the income from their assets.

Rareview Spend:

- **Objective:** Seeks to provide broad exposure to income-producing asset classes using a portfolio of ETFs, with the goal of supporting an annualized target yield.
- **Strategy:** Minimize portfolio risk by optimizing allocations across 11 potential asset classes while attempting to meet its stated yield target.

Rareview Multi-Asset Income:

- **Objective:** Seeks to deliver high current income while providing an opportunity for capital appreciation.
- **Strategy:** Minimize portfolio risk by optimizing allocations across bonds, stocks, and alternative income sources.

RVC offers portfolios that seek tax advantages for investors transferring their assets to the next generation.

Rareview GRAT:

- **Objective:** Minimize Grantor's tax liability associated with annual distributions.
- **Strategy:** Invest in tax-advantaged closed-end funds and large-cap equity securities that do not pay dividends.

The following portfolios primarily invest in closed-end funds (CEFs).

Rareview Tax Advantaged Income:

- **Objective:** Seeks returns in excess of the Bloomberg Barclays Municipal Bond Index.
- **Strategy:** Utilize our proprietary valuation scoring methodology to rotate amongst the cheapest closed-end funds in the municipal bond sector.

Rareview Dynamic Fixed Income:

- **Objective:** Seeks returns in excess of the Morningstar Multi-Asset High Income Index.
- **Strategy:** Utilize our proprietary valuation scoring methodology to rotate amongst the cheapest closed-end funds in fixed income sectors that give the highest relative expected risk-adjusted return.

Aggressive or Defensive: *In addition to the direct closed-end fund investment strategies, RVC offers the following customizations:*

- **Leverage:** *Increase or decrease leverage through running a higher or lower average cash balance.*
- **Sector Exposure:** *Less exposure to a single sector or factor by removing an asset class from the asset allocation, or a specific derivative can be used to isolate the risk from that one sector.*

- **Sector Emphasis:** One sector to be emphasized more than others to produce a higher or lower exposure to market risk or interest rates.
- **Interest Rate Risk:** A more dynamic usage of interest rate derivatives to potentially hedge duration or interest rate risk so that the spread on the underlying sectors can be captured by the closed-end funds.
- **Equity Market Risk:** A more dynamic usage of equity derivatives to potentially hedge market drawdown risk.
- **State-Specific:** Larger allocation to state-specific municipal bond closed-end funds to realize state tax exemption in addition to federal. (For New York or California residents only)

Rareview Best Ideas:

- **Objective:** Seek to outperform the broad equity market over the long term.
- **Strategy:** Implement a series of independent investments across asset classes and themes which we believe to be well positioned to outperform the broad equity market over the longer term.

RVC offers the following alternative strategy in an SMA:

Rareview Global Macro Absolute Return:

- **Objective:** Seek uncorrelated positive returns by investing in global markets.
- **Strategy:** Deploy a discretionary global macro and absolute return strategy. invest across all asset classes with a primary focus on equities, fixed income, foreign exchange, credit, and commodities.
- **Notes:** While RVC's intention is to achieve the investment Objective by investing primarily in the instruments referred to above, RVC may deviate from such portfolio construction guidelines and/or retain a significant portion of the SMA in cash and/or in liquid assets.

C. Risk of Loss

Registered Investment Companies: There are material risks of investing in an ETF managed by RVC.

- **Principal Risks of Investing in an ETF:** The loss of your money is a principal risk of investing in the ETF. Investments in the ETF are subject to investment risks, including the possible loss of some or the entire principal amount invested. There can be no assurance that the ETF will be successful in meeting its investment objective. As a result of the ETF's direct investments in other registered investment companies, the ETF is indirectly exposed to the risks of the investments held and operations conducted by these ETFs.
- **Fund of Funds Risk:** The ETF is a "fund of funds." The term "fund of funds" is typically used to describe investment companies, such as the ETF, whose principal investment strategy involves investing in other investment companies, including closed-end funds and exchange-traded funds. A fund of funds will be subject to substantially the same risks as those associated with the direct ownership of the securities comprising the portfolio of such investment companies, and the value of the ETF's investment will fluctuate in response to the performance of such portfolio. Shareholders in the ETF will indirectly bear fees and expenses charged by the registered investment companies in which the ETF invests in addition to the ETF's direct fees and expenses. The layering of expenses associated with the ETF's investment in such other funds will cost shareholders more than direct investments would have cost. In addition, one underlying fund may

purchase a security that another underlying fund is selling. As such, clients may incur higher and duplicative expenses when investing in closed-end funds and exchange traded funds.

Closed-End Funds (CEFs): Closed-end funds involve investment risks different from those associated with other investment companies.

- **Discount/Premium Risk:** Shares of closed-end funds frequently trade at either a premium or discount relative to their NAV. When an investor purchases shares of a closed-end fund at a discount to its NAV, there can be no assurance that the discount will decrease. In fact, it is possible that this market discount may increase, and the closed-end fund may suffer realized or unrealized capital losses due to further decline in the market price of the securities of such closed-end funds, thereby adversely affecting the NAV of a portfolio. Similarly, there can be no assurance that any shares of a closed-end fund purchased by RVC at a premium will continue to trade at a premium or that the premium will not decrease subsequent to a purchase of such shares by RVC.
- **Market Price Risk:** Closed-end funds trade at market prices but are inherently worth their net asset value. There can be long-term disparity between the NAV performance and the market price performance which could potentially hurt shareholders.
- **Leverage:** Leverage involves the use of loans, preferred shares or other financial instruments in an attempt to increase the yield, or return, of the portfolio. Leverage is a speculative technique that exposes a closed-end fund to greater risk and increased costs than if it were not used. The use of leverage may cause greater volatility in the level of a closed-end fund's NAV, market price and distributions on its Common Shares. Leverage will also result in higher fees due to the closed-end fund manager because the amount of assets under management will be included in the closed-end funds Managed Assets. There can be no assurance that a closed-end fund will use leverage or that its levered strategy will be successful during any period in which it is employed.
- **Liquidity Risk:** Closed-end funds expose a portfolio to illiquidity risks because closed-end funds may have smaller market capitalizations than other exchange-traded investments. Some funds trade with wide bid/ask spreads and limited shares per day. RVC generally avoids funds with less than \$100 million in NAV assets or trading less than \$750K a day in USD.
- **Dividend Cut Risk:** When a closed-end fund significantly reduces its monthly or quarterly dividend payment, the market price of the closed-end fund often suffers a quick and significant pullback. This hurts both principal and income production in the account. RVC monitors fund press releases, closed-end fund discussion groups and income risk data points to reduce this likelihood.
- **Control of Portfolio Funds Risk:** Although RVC will evaluate regularly each closed-end fund in which it invests to determine whether its investment program is consistent with its investment objectives, RVC will not have any control over the investments made by a closed-end fund. The investment advisor to each closed-end fund may change aspects of its investment strategies at any time. RVC will not have the ability to control or otherwise influence the composition of the investment portfolio of a closed-end fund.
- **Derivative Risk:** There is a risk of loss due to the investment practices of the underlying closed-end funds, such as the use of derivatives and leverage.
- **Fixed Income Risk:** To the extent RVC invests in closed-end funds that invest in fixed income securities, investors may be subject to the risks of investing in fixed income securities. The prices of fixed income securities respond to economic developments, particularly interest rate changes, as well as to perceptions about the creditworthiness of individual issuers. Fixed income securities will decrease in value if interest rates rise and vice versa, and the volatility of lower-rated securities is even greater than that of higher-rated securities.

- **High Yield Fixed Income Securities Risk:** Fixed income securities in a closed-end fund that are rated below investment grade (i.e., “high yield fixed income securities” or “junk bonds”) are subject to additional risk factors such as increased possibility of default liquidation of the security, and changes in value based on public perception of the issuer. High yield fixed income securities are considered primarily speculative with respect to the issuer’s continuing ability to make principal and interest payments.
- **Municipal Fixed Income Securities Risk:** Municipal securities are debt obligations issued by or on behalf of the cities, districts, states, territories and other possessions of the United States that pay income exempt from regular federal income tax. To the extent RVC invests in closed-end funds that invest in municipal securities, there is risk that events negatively impact a municipal security, or the municipal bond market in general, may cause the value of such securities to decrease in value. The profitability of these securities depends on the ability of the issuers of the municipal securities, or any entity providing a credit enhancement, to continue to meet their obligations for the payment of interest and principal when due. Any adverse economic conditions or developments affecting the states or municipalities that issue municipal securities in which the closed-end funds invest could negatively impact the funds.
- **Convertible Securities Risk:** To the extent RVC invests in closed-end funds that invest in convertible securities, there is risk that a convertible security may be called for redemption at a time and price unfavorable to the portfolio.
- **Preferred Stocks Risk:** To the extent RVC invests in closed-end funds that invest in preferred securities, there is risk that that preferred stocks may decline in price, fail to pay dividends, or be illiquid.
- **Bank Loan Risk:** RVC’s investments in closed-end funds may indirectly subject investors to the risks associated with bank loans to the extent that the closed-end funds invest in bank loans. Investments in secured and unsecured assignments of (or participations in) bank loans may create substantial risk.
- **Master Limited Partnership (MLP) Risk:** To the extent RVC invests in closed-end funds that invest in MLP’s, there is risk that MLP’s may be adversely impacted by tax law changes, regulation, or factors affecting underlying assets.
- **Mortgage-Backed and Asset-Backed Securities Risk:** To the extent RVC invests in closed-end funds that invest in mortgage- and asset-backed securities, there is risk that changes in interest rates can cause both extension and prepayment risks for mortgage- and asset-backed securities. These securities are also subject to risks associated with the repayment of underlying collateral.
- **REIT Risk:** To the extent RVC invests in closed-end funds that invest in REITs, investors may be subject to the risks in REITs. REITs are companies that own or finance income-producing real estate. Investments in REITs are subject to the risks associated with investing in the real estate industry such as adverse developments affecting the real estate industry and real property values, including losses from casualty or condemnation, and changes in local and general economic conditions, supply and demand, interest rates, zoning laws, regulatory limitations on rents, property taxes and operating expenses.
- **Rights and Warrants Risk.** To the extent RVC invests in closed-end funds that invest in rights and warrants, investors may be exposed to the risks involved in investing in rights and warrants. Rights and warrants are options to purchase common stock at a specified price for a specified period of time. Their prices do not necessarily move parallel to the prices of the underlying securities and expire worthless if not exercised within the specified period of time.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy).

- **Transparency:** Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. The ETFs in which RVC invests may not be able to replicate exactly the performance of the indices they track due to transactions costs and other expenses of the ETFs.
- **NAV and Market Price:** The market value of an ETF's shares may differ from its net asset value ("NAV"). This difference in price may be due to the fact that the supply and demand in the market for ETF shares at any point in time is not always identical to the supply and demand in the market for the underlying basket of securities. Accordingly, there may be times when an ETF trades at a premium (creating the risk that a portfolio pays more than NAV for an ETF when making a purchase) or discount (creating the risks that the portfolio's value is reduced for undervalued ETFs it holds and that the portfolio receives less than NAV when selling an ETF).

Specific Securities Used:

- **Open-End Mutual Funds:** Investing in open-end mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature (higher risk).
- **Equity** investments generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.
- **Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.
- **Commodities:** Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. The risk that events negatively affecting a particular commodity in which the portfolio focuses its investments may cause the value of the fund's shares to decrease, perhaps significantly. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.
- **Foreign Exchange:** There are risks associated with foreign currency investing, including but not limited to the use of leverage, which may accelerate the velocity of potential losses. Foreign currencies are subject to rapid price fluctuations due to adverse political, social and economic developments. These risks are greater for currencies in emerging markets than for those in more developed countries. Clients may lose money investing in such investments. Foreign currency transactions may not be suitable for all investors, depending on their financial sophistication and investment objectives.
- **Derivatives Risk:** An investor may be subject to the risks of investing in derivatives securities. This involves the risk that their value may not move as expected relative to the value of the relevant underlying assets,

rates, or indices. Derivatives can be volatile and illiquid and may entail investment exposure greater than the total value of the derivatives' underlying assets (their "notional amount"). Some investments may not be readily sold at the desired time or price and may be sold at a lower price or may not have a sufficient market to be sold at all. **RVC's use of derivative trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. Please note that the term "Derivatives" is a broad term that includes many underlying investment types such as futures, options, swaps, swaptions, etc. These investments are governed by the CFTC and overseen by the NFA, as discussed above, and are commonly referred to as "Commodity Interests," The definition of Commodity Interests is also broad and includes all derivatives except single stock swaps—which are regulated by the SEC.**

- **Futures:** Futures contracts markets are highly volatile and are influenced by a variety of factors, including national and international political and economic developments. Investing in futures usually exposes investors in a greater degree of leverage than other investments. As a result, a relatively small price movement in a futures contract may result in substantial losses to a portfolio
- **Options:** Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a "naked" or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk. The market values of options may not always move in synch with the market value of the underlying securities. Specific market movements of an option and the instruments underlying an option cannot be predicted. The purchaser of an option is subject to the risk of losing the entire purchase price of the option if the option has not been sold or exercised prior to the option's expiration date.
- **Swaps:** Swaps are agreements to exchange cash flows. Swaps may be difficult to value and may be considered illiquid. Swaps create significant investment leverage such that a relatively small price movement in a swap may result in immediate and substantial loss.

Other Risks:

Key Personnel Risk: The effectiveness of RVC's strategies is largely dependent upon the continued services of its Chief Investment Officer and/or portfolio manager. RVC's Chief Investment Officer and portfolio manager, Neil Azous, is ultimately responsible for all of RVC's strategies. The loss of the services of Neil Azous could have a material adverse effect on RVC's ability to fully and effectively implement its strategies.

Asset Class Risk: Securities in your portfolio(s) or in underlying investments such as registered investment companies may underperform in comparison to the general securities markets or other asset classes.

Management Risk: The performance of your account is subject to the risk that our investment management strategy may not produce the intended results.

Market Risk: Overall equity and fixed income securities market risks affect the value of a client's portfolio. Factors such as domestic and international economic growth and market conditions, interest rate levels, and political events affect the securities markets. Your account could lose money over short periods due to short-term market movements and over longer periods during market downturns. The value of a security may decline due to general market conditions, economic trends, or events that are not specifically related to the issuer of the security or to factors that

affect a particular industry or industries. During a general downturn in the securities markets, multiple asset classes may be negatively affected.

Macroeconomic Risk: Unusual events, such as those resulting from shifts in geo-political, systematic, economic, or social conditions may result in abrupt changes to a security's price, which could upset the model's ability to make accurate exposure recommendations.

Inflation Risk: Inflation risk results from the variation in the value of cash flows from a security due to inflation, as measured in terms of purchasing power. For example, if the Client purchases a 5-year bond in which it can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. For all but inflation-linked bonds, adjustable bonds or floating rate bonds, the Client is exposed to inflation risk because the interest rate the issuer promises to make is fixed for the life of the security. To the extent that interest rates reflect the expected inflation rate, floating rate bonds have a lower level of inflation risk.

Regulatory Risk: Investment management and the securities industry generally are subject to a variety of government rules and regulations. It is possible that regulatory action could impose additional direct or indirect costs or encumbrances on RVC's management of its funds and products, could limit the strategies that RVC may pursue or adversely impact the desirability of certain investments or the anticipated return on certain investments.

Prime Broker Risk: SMA of Fund-related tri-party agreement positions may be held in accounts maintained for RVC by its prime brokers. The prime brokers, as brokerage firms or commercial banks, are subject to various laws and regulations in various jurisdictions that are designed to protect their customers in the event of the prime brokers' insolvency. However, the practical effect of these laws and their application to RVC securities positions are subject to substantial limitations and uncertainties. Because of the large number of entities and jurisdictions involved and the range of possible factual scenarios involving the insolvency of a prime broker, it is impossible to generalize about the effect of a prime broker's insolvency on the limited partnerships and their securities positions. The insolvency of any RVC prime broker could result in the loss of all or a substantial portion of the mutual funds or SMA securities positions held by such prime broker or could result in substantial disruption of the mutual fund or SMA's operations, including withdrawals by investors.

Counterparties Risk: The risk that a third party upon whom the portfolio relies on to complete a transaction will default.

Foreign & Emerging Markets Risk: Investing internationally, especially in emerging markets, involves additional risks such as currency, political, accounting, economic, and market risk.

Leverage Risk: The risk that the value of leveraged portfolios may be more volatile, and all other risks may be compounded.

Short Sales Risk: The risk that portfolios engaging in short sales may experience a loss if the price of a borrowed security increases before the date on which the security can be replaced.

Asset-Linked Risk: The risk that, equity-, fixed income-, currency-, and commodity-linked instruments may experience a return different than the equity, fixed income, currency, or commodity they attempt to track and may also be exposed to counter-party risk.

Data Risk: RVC relies on the cleanliness and accuracy of the underlying data (such as stock or bond prices) that are input into RVC's models to generate exposure recommendation signals. If input data is inaccurate, then the data output will be similarly tainted. As such, live, current data is inherently more reliable than back-tested results.

Cybersecurity Risk: RVC relies extensively on computer programs and systems to implement its strategies and to trade, clear and settle securities transactions, to monitor its investment portfolios, and to generate risk management and other reports that are critical to oversight of its activities. Despite the precautions and security measures RVC

employs, there is a risk that unauthorized outside interference with RVC's technology programming or distribution method could impair its functioning. These programs or systems may be subject to certain defects, failures or interruptions, including, but not limited to, those caused by computer "worms," viruses and power failures. Any defects, failures or interruptions could have a material adverse effect on RVC's activities. For example, such failures could cause settlement of trades to fail, lead to inaccurate accounting, recording or processing of trades, and cause inaccurate reports, which may affect RVC's ability to monitor its investment portfolios and its investment risks. The strategies used by RVC also rely heavily on proprietary trading systems and databases and third-party data sources. As a result, any errors in the underlying data entry, interruption in the data feeds from outside sources or the assumptions underlying the strategies may result in RVC acquiring or selling investments based on incorrect or inaccurate information. Similarly, any hedging based on faulty information or data may prove to be unsuccessful. As a result, RVC's portfolios could incur losses on such investments before the errors are identified and corrected.

Trading Decisions Based on Quantitative and Other Analysis: RVC's investment recommendations are based on quantitative signals, other analyses and the established rules for the particular investment strategy. Any factor that would lessen the prospect of major trends occurring in the future may reduce the prospect that a particular trading method or strategy will be profitable in the future. No assurance can be given that RVC's strategies will be successful under all or any market conditions.

Strategy Risk: RVC's strategies are unlikely to be successful unless the assumptions underlying the models used to implement investment strategies, and the established rules of RVC's investment strategies are and remain realistic and relevant in the future. If such assumptions are inaccurate, or become inaccurate and are not promptly adjusted, it is unlikely that reliable signals will be generated. If, and to the extent, that the models and investment strategies do not reflect correct assumptions, RVC will continue to test, evaluate and create new models.

Custom Strategies: RVC provides custom investment strategies to its clients which are new, and therefore initially lack a live track record. Backtested strategies are subject to multiple risks which are described in RVC's presentations for SMAs.

Global Macro Strategy Risk: The success of the Global Macro Absolute Return Strategy depends upon RVC's ability to identify and exploit perceived fundamental, economic, financial and political imbalances that may exist in and between markets throughout the world. Identification and exploitation of such imbalances involves significant uncertainties. There can be no assurance that RVC will be able to locate investment opportunities or to exploit such imbalances. If these underlying clients' positions fail to be borne out in developments expected by RVC, clients may incur losses, which could be substantial.

Crowding/Convergence: There is significant competition among closed-end fund focused managers, and RVC's ability to deliver returns that behave and perform as expected is dependent on its ability to employ models that are simultaneously profitable and differentiated from those employed by other managers. To the extent that RVC is not able to develop sufficiently differentiated models, the investors' investment objectives may not be met, irrespective of whether the investment strategies are successful in an absolute sense.

Quantitative Risk: Unforeseen market dynamics could lead to a decrease in the effectiveness of RVC's models.

Risk of Programming and Modeling Errors: All quantitative analysis carries a risk that the mathematical model used might be based on one or more incorrect assumptions. Although RVC seeks to hire skilled individuals in its investment strategies group, and to provide appropriate levels of oversight, the complexity of the individual tasks, the difficulty of integrating such tasks, and the limited ability to perform "real world" testing of the end product, raises the chances that the finished model may contain an error; one or more of which errors could adversely affect the performance of an investment strategy.

Illiquidity Risk: Certain investments may not be readily sold at the desired time or price and may be sold at a lower price or may not have a sufficient market to be sold at all. An inability to sell securities can adversely affect the value of a portfolio or prevent RVC from taking advantage of other investment opportunities. Also, an inability to sell

securities may affect RVC's ability to meet redemption requests. In certain circumstances, it may be difficult for RVC to purchase and sell particular portfolio investments in closed-end funds due to infrequent trading in such investments. The prices of such investments may experience significant volatility, make it more difficult for the RVC to transact significant amounts of such investments without an unfavorable impact on prevailing market prices, or make it difficult for RVC to dispose of such investments at a fair price at the time RVC believes it is desirable to do so. Closed-end funds that are liquid investments may become illiquid or less liquid after purchase by the portfolio, particularly during periods of market turmoil or economic uncertainty. Illiquid and relatively less liquid investments may be harder to value.

Foreign Securities Risk: The portfolio may be exposed to foreign securities through its investments in closed-end funds. Investments in foreign securities are subject to special risks above and beyond those normally associated with domestic securities. Due to economic, political, and social instabilities in foreign markets, foreign securities can be more volatile than domestic securities.

Large-Cap Securities Risk: To the extent RVC invests in closed-end funds that invest in large-cap securities, the portfolio may be subject to the risks involved in investing in large-cap securities. Stocks of large companies as a group can fall out of favor with the market, causing the portfolio to underperform investments that have a greater focus on mid-cap or small-cap stocks. Larger, more established companies may be slow to respond to challenges and may grow more slowly than smaller companies.

Small and Medium Capitalization Stock Risk: Certain RVC investment strategies invest in securities that hold securities in smaller or medium capitalization companies. The price of small or medium capitalization company stocks may be subject to more abrupt or erratic market movements than larger, more established companies or the market averages in general.

Aggressive Strategies Risk: The risk that the use of leverage, short selling, futures, options, and/or derivatives may cause exposure to additional risks.

Turnover Risk: Tactical investment strategies tend to have higher portfolio turnover than strategic or passive investment strategies. Although not a primary strategy, from time-to-time, RVC may engage in frequent trading of the portfolios of the ETF or an SMA. A higher portfolio turnover will result in higher transactional and brokerage costs and may result in higher taxes when a client's investments are held in a taxable account. Additionally, frequent trading can affect investment performance.

Legal or Legislative Risk: Legislative changes or court rulings may impact the value of investments or the securities' claim on the issuer's assets and finances.

Pandemic Risk: The recent COVID-19 pandemic has caused and continues to cause disruptions in economies and individual companies and volatility in financial markets throughout the world, including those in which Rareview clients ("Clients") invest. The impact of the pandemic and resulting economic disruptions may negatively impact the Clients and the performance of their portfolios due to, among other things, (i) interruption of business operations resulting from travel restrictions, (ii) reduced consumer spending, and quarantines of employees, customers and suppliers in areas affected by the outbreak, (iii) closures of manufacturing facilities, warehouses and logistics supply chains, and (iii) uncertainty about the duration of the virus' impact on global financial markets. Governments and central banks throughout the world have responded to the pandemic and resulting economic disruptions with a variety of fiscal and monetary policy changes, including direct capital infusions into companies and other issuers, new monetary policy tools and lower interest rates, but the ultimate impact of these efforts is uncertain. It is not possible to determine the duration or severity of the disruption in financial markets or the long-term economic impact of the COVID-19 pandemic, or other future epidemics or pandemics, which may adversely affect the Clients' performance and investment strategies and significantly reduce available investment opportunities.

Item 9: Disciplinary Information

Investment advisers registered with the SEC are required to disclose certain regulatory, disciplinary and legal matters pursuant to Part 1A, Item 11 of Form ADV. Further, investment advisers are required to disclose in their brochures all material facts regarding any legal or disciplinary events that are material to a client's or prospective client's evaluation of their advisory business or the integrity of their management. Investment advisers are obligated to update responses promptly for changes.

We answered each question in Part 1A, Item 11 of Form ADV with "No" and state in this Brochure that there are no legal or disciplinary events that are material to RVC's client's or prospective client's evaluation of our advisory business or the integrity of our management.

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Investment Adviser Affiliates

RVC does not have any investment advisor affiliates.

B. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither RVC nor any of its management persons is registered, or have an application to register, as a broker-dealer or a registered representative of a broker-dealer.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

RVC serves as the investment adviser to the Rareview Funds. Each Fund is a series of Collaborative Investment Series Trust, an open-end investment management company governed by a Board of Trustees (the "Trustees"). The Trustees of the Collaborative Investment Series Trust are independent of RVC and the Rareview Funds. RVC may invest client assets in the Rareview Funds. In some cases, the Rareview Funds may have management fees and expenses or performance that differs from other mutual fund or ETF alternatives, RVC has an incentive to use the Rareview Funds that pay a higher management fee than other mutual fund and ETF alternatives. In each case where a Rareview Fund is selected for incorporation in a strategy, RVC has determined that each specific Rareview Fund to be used is an appropriate security to implement RVC's asset allocation strategy. Also, this presents a conflict of interest because RVC receives a management fee directly from clients, based on assets under management, and a

management fee from the Rareview Funds based on assets under management. To mitigate this conflict, at the account-level, clients will not be billed additionally on assets allocated to the Rareview Funds.

D. Outside Business Activities (OBA)

No RVC employee is engaged in an outside business activity.

E. Selection of Other Advisers or Managers

RVC does not utilize third-party investment advisers for SMAs. For a Fund, RVC may use a sub-advisor.

All policies and procedures described herein apply to all other financial industry activities and affiliations. Any RVC employee that may perform services for any of RVC's affiliations are subject to RVC's compliance policies and procedures. Please refer to "Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading" for additional information.

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

A. Code of Ethics

RVC has adopted a Code of Ethics that sets forth the standards of conduct expected of its covered persons and requires compliance with Section 204A-1 of the Investment Advisers Act of 1940, as amended. The Code of Ethics contains written policies reasonably designed to prevent the unlawful use of material non-public information by the Firm or any of its covered persons. The Code of Ethics also requires that the Firm's personnel report their personal securities holdings and transactions and obtain pre-approval of certain investments, report gifts and entertainment, pre-approve certain political donations, and disclose certain charitable contributions.

Specifically, RVC has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions.

Existing and prospective clients may obtain a copy of our Code of Ethics, free of charge, by sending a request via e-mail to info@rareviewcapital.com or by calling 212-475-8664.

B. Recommendations Involving Material Financial Interests

RVC does not recommend that clients buy or sell any security in which a related person to RVC or RVC has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of RVC may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of RVC to buy or sell the same securities before or after recommending the same securities to clients, resulting in representatives profiting from the recommendations they provide to clients. Such transactions may create a conflict of interest. RVC will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's

disadvantage when similar securities are being bought or sold. The Firm's fiduciary duty is fundamental to its compliance program and operating environment. Further, pursuant to Rule 204A-1 under the Investment Advisers Act of 1940, as amended, limited offerings and initial public offerings must be pre-cleared prior to allowing an employee to engage in trading such instruments. This mitigates the conflicts whereby an employee will take a scarce opportunity—such as an IPO or private placement that is a viable investment for a Firm client- and thus disadvantage the Firm's clients and compromise its fiduciary duty. Pre-clearance will not be granted for an IPO or Private Placement in which the Firm believes any of its SMAs or pooled vehicles is interested in investing.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of RVC may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of RVC to buy or sell securities before or after recommending securities to clients, resulting in representatives profiting from the recommendations they provide to clients. Such transactions may create a conflict of interest; however, RVC will never engage in trading that operates to the client's disadvantage if representatives of RVC buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Broker-Dealer Selection

When RVC is an adviser or sub-adviser to a client, RVC has discretion to select the broker-dealer to provide execution services for a particular transaction. RVC, regardless of whether advising a RIC, SMA, or sub-advisory client, has a duty to seek to obtain "best execution." RVC believes that the ability to execute through a wide network of broker-dealers provides RVC with the flexibility to seek best execution. RVC has implemented policies and procedures to evaluate broker-dealer best execution and will review price, execution capabilities, costs, block positioning, liquidity, the value of research products, and other criteria on a semi-annual basis at minimum. The determinative factor is not the lowest possible commission cost but whether the transaction represents the best overall qualitative execution for RVC's clients.

1. Conflicts of Interest Arising out of Broker-Dealer Selection

Conflict: RVC maintains a brokerage account with an affiliate of the lead market maker (LMM) for ETF's managed by RVC. The affiliate is a consulting client of RVC. RVC receiving consulting fees that could be offset by commissions paid by RVC creates potential conflicts of interest for RVC.

Resolution: RVC will seek best execution on behalf of its clients—and not perceived benefits that may be received by its affiliates. For example, the LMM is the New York Stock Exchange's largest Designated Market-Maker (DMM) and a leading electronic trading firm. RVC, via the LMM's affiliate, will access the LMM's liquidity and suite of algorithmic tools for ongoing electronic trading at reduced commission rates.

B. Directed Brokerage

RVC may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to RVC to select brokers. In such circumstances, our requirement to seek best execution may not be capable of being achieved. When a client directs brokerage, RVC will not have authority to negotiate commissions or obtain volume discounts. As a result, the client may receive less favorable prices by not being able to participate in aggregate securities transaction (unless RVC is able to engage in trades called "step outs") and may trade after such aggregate transactions and receive less favorable pricing and execution. Under these circumstances, a disparity in commission charges likely will exist between the commissions charged to

other clients. The performance of an SMA strategy may be lower or higher for accounts that do not fall under directed brokerage. Not all investment advisers allow their clients to direct brokerage. *Note: As of this filing date, RVC currently is not engaged in a directed brokerage arrangement.*

C. Trade Aggregation/Allocation

RVC seeks to provide a means of allocating trading and investment opportunities between and/or among advisory clients on a fair and equitable basis, and in compliance with all applicable state and federal guidelines, and in conformance with its written policies and procedures. Regarding clients' accounts with substantially similar investment objectives and policies, RVC may often seek to purchase or sell a particular security in each account. RVC will aggregate orders only when such aggregation is consistent with RVC's duty to seek best execution and is consistent with the investment objectives of each client. No client account will be unfairly favored over any other account. Each client that participates in an aggregated order will participate based on the average execution price in that particular security. All securities purchased or sold, whether the order is filled completely or partially, will then be allocated pro rata based on the assets of each account.

Model Portfolio Services: RVC provides non-discretionary investment advice through a model portfolio delivery service. Under such arrangements, RVC provides third parties with a model portfolio. The third party is responsible for implementing the model, including purchasing and selling securities in client accounts. RVC also manages discretionary client portfolios using these models. In accordance with its policy to treat all clients fairly and equitably over time, RVC has implemented procedures whereby RVC rotates the order in which each model is released to the third party and traded internally on behalf of RVC clients. By rotating the order in which the model is released or traded, RVC ensures it does not compete with third parties when trading portfolio holdings in the marketplace.

D. Research and Other Soft-Dollar Benefits

1. Background

"Soft dollars" are the economic benefits provided to an investment advisor by a broker-dealer as a result of commissions generated from financial transactions executed by the broker-dealer for client accounts or funds managed by the investment advisor. Section 28(e) of the Securities Exchange Act of 1934 ("SEA") establishes a safe harbor for investment advisors who use client funds to purchase brokerage and research services for their managed accounts.

All eligible services, including proprietary research provided by brokers-dealers and services provided by independent third parties, qualify for the safe harbor in section 28(e) of the SEA ("Safe Harbor") and/or other applicable laws and regulations. Generally, eligible services include research reports, data, or information on the economy, industries, groups of securities, individual companies, statistical information, accounting and tax law interpretations, political developments, legal developments affecting portfolio holdings, technical market action, pricing and appraisal services, credit analysis, measurements analysis, performance analysis, analysis of corporate responsibility issues, conferences with industry professionals, financial publications, web or computer based market data, research-oriented computer software and services, and brokerage services facilitating the communication of trade order information to counterparties and custodians. Such research services are received primarily in the form of written reports, access to various computer-generated data and research software.

Subject to the requirement of seeking best execution, RVC will engage only in soft-dollar arrangements that are consistent with the "Safe Harbor" requirements set forth in Section 28(e) of the SEA.

2. Implementation

RVC has negotiated commission schedules with various executing broker-dealers. If RVC determines to execute a transaction accompanied with a soft-dollar benefit ("Soft Dollar Trade"), then the account will be charged a higher

commission per share for the Soft Dollar Trade, usually ranging from a ½ cent to 1 cent per share. The differential between a Soft Dollar Trade and non-Soft Dollar Trade are held in an earmarked account at a brokerage firm used as an aggregator to collect monies (the "Aggregator"). The Aggregator verifies that a vendor of RVC is an eligible service and qualifies for Safe Harbor, and then pays the vendor invoice on behalf of RVC.

RVC has executed a commission sharing arrangement (CSA) with SG Cowen ("Cowen"). As an Aggregator, Cowen provides institutional brokerage and research products services, including research and brokerage products and services produced by third party research vendors and other broker-dealers, to RVC as part of RVC's need for brokerage and research products services.

3. Conflicts of Interest Arising out of Soft Dollars

Conflict: RVC utilizes soft dollars to enable RVC to obtain investment research or brokerage services ("eligible services") designed to assist in furnishing investment advice to its clients' accounts. Receiving eligible services with soft dollars generated by client commissions creates potential conflicts of interest for RVC, since RVC would otherwise have to generate the research internally or pay for it from its own resources. This could provide an incentive for RVC to select a broker-dealer based on RVC's interest in receiving the research or other products or services, rather than on the best interest of RVC's client in receiving the most favorable execution. RVC may generate soft dollar commissions through applicable agreements with broker-dealers that may be categorized as "mixed-use" research, or what is generally any product or service not used solely for investment decision-making purposes, such as marketing or client reporting.

Resolution: Receipt of these services, in exchange for soft dollars, benefits RVC by, among other things, allowing RVC to (i) supplement its own research and analysis activities and (ii) receive the views and information of individuals and research staff of other securities firms having special expertise on certain companies, industries and areas of the economy and market factors without having to produce or pay directly for such research, products or services. Where applicable, RVC will identify the use of a research product or service that does not pertain to investment decision-making and pay for such use with its own hard dollars.

Conflict: Commissions (or markups or markdowns) charged by brokers providing soft-dollar services may be higher than those charged by brokers not providing these services.

Resolution: To manage this, RVC strives to:

- Have transactions executed at prices that are advantageous to clients and at commission rates that are reasonable in relation to the benefits received;
- Use soft dollars to obtain research and related services that we believe will provide the greatest benefit to our clients;
- Pay for non-research assistance with hard dollars; and
- Make full and fair disclosure of all material facts regarding RVC's soft dollar arrangements.

Conflict: Client accounts that have paid for a specific service may not receive the benefit from that service and other client accounts may benefit from a service for which they did not pay.

Resolution: All soft dollars that are generated from clients are aggregated together and collectively used to pay for research services.

Conflict: Soft dollar benefits are not proportionally allocated to any accounts that may generate different amounts of soft dollar benefits.

Resolution: The types of research services acquired with soft dollars benefit RVC's entire investment and research team. It is not possible to independently measure the benefits a research service provides to each account managed by RVC. Also, the volume and nature of trading activities of the accounts are not uniform. Therefore, the amount of soft dollars paid by each account will vary.

4. Procedures Used to Direct Client Transactions to a Particular Broker-Dealer

RVC's investment team regularly assesses the value of eligible services provided by broker-dealers and independent third parties. Based on this assessment, an estimated nonbinding budget (the "budget") is allocated to each eligible service provider. Generally, where enough soft dollar benefits have been accumulated through trading with an executing broker-dealer to meet the budget for that broker-dealer, the executing broker-dealer will be instructed to take payment for eligible services from these soft dollars. Where trading activity with a broker-dealer accrues surplus soft dollars (i.e., benefits that exceed the budget for that broker-dealer), that broker-dealer will be instructed to transfer the surplus monies to the Aggregator. This process ensures the level of trading with broker-dealers is based on their ability to offer best execution as determined by RVC execution desk, and the soft dollars received for eligible services are based solely on the value of the service as determined by the investment teams.

5. Types of Research Services Acquired with Soft Dollars

RVC receives soft dollar research and related services for real-time analytic tools to retrieve fundamental company, financial, and economic data, monitor risk and exposure, utilize pricing models, and evaluate long and short-term performance. RVC also receives order management services, including electronic connectivity with broker-dealers, where RVC can enter orders with direct access to the market.

6. Other

In the future, RVC may set up similar arrangements with firms specializing in fixed income, currencies, listed exchanged-traded derivatives, where RVC decides the commission on agency trades, and a percentage of the commission is credited to soft dollars. RVC decides whether to execute transactions that garner soft dollar benefits on a trade-by-trade basis based on the client's best interests. Further, RVC is not required to meet an established threshold of trading activity with any broker-dealer, nor would it accept such an arrangement. There is no affiliation with any firm or control person as a broker RVC plans to execute trades through.

For further information on RVC's soft dollar arrangements, please contact us at 212-475-8664.

E. Services Provided by Schwab Advisor Services

RVC utilizes Charles Schwab & Co., Inc. ("Schwab") as its primary custodian for clients invested in SMAs that it manages. Schwab is an independent and unaffiliated SEC-registered broker-dealer and member of FINRA and SIPC.

Schwab makes available to RVC products and services that benefit RVC economically. These products and services assist RVC in managing and administering RVC's clients' accounts. Schwab makes available software and other technology that:

- Provides access to client account data;
- Facilitates trade execution and order processing;
- Facilitate payment of our fees from our clients' accounts;
- Assists RVC with back-office functions, recordkeeping and reporting.

Schwab also offers other services intended to help RVC manage and further develop RVC's business enterprise. These services include:

- Educational conferences and events;
- Discounts on compliance, marketing, research, technology, and practice management products or services provided third-party vendors;
- Publications and conferences on practice management and business succession. Schwab may discount or waive fees for some of these services or pay all or part of a third party's fees.

RVC selected Schwab as primary custodian for its SMA client investors because of the following combination of direct benefits to clients:

- Aggregate cost savings, i.e., lower commission costs, custodial fees, etc.
- Customer Service
- Technology, i.e., access to client data and performance analysis
- Strength of balance sheet and brand

The benefits received by RVC or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to Schwab. As part of its fiduciary duty to clients, RVC puts the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by RVC or its related persons creates a potential conflict of interest if RVC were to allow such benefits to influence its choice of Schwab for custody and brokerage services.

F. Brokerage for Client Referrals

In selecting a broker-dealer, RVC does not consider whether RVC or a related person receives client referrals from a broker-dealer or third party. RVC does not receive payment for order flow from any broker-dealer.

G. Non-Cash Compensation

From time to time, custodians, broker-dealers, and other investment advisors with whom RVC has a relationship will invite RVC personnel to education and training meetings primarily focused on current industry topics and issues. RVC finds these meetings valuable in helping it keep up with current industry issues. RVC personnel may be offered complimentary admission to these events, creating a non-cash compensation issue and a possible conflict of interest. RVC has created supervisory policies and procedures to ensure that participation in these meetings is valuable to RVC and performed within industry guidelines.

Item 13: Review of Accounts

A. Frequency, Nature, and Facilitator of Periodic Reviews

Registered Investment Companies

For the ETFs advised by RVC, RVC, along with the ETFs' fund administrator, auditor, custodian, and Chief Compliance Officer for the Collaborative Investment Series Trust ("CIST"), actively monitor the ETF for compliance restrictions. The ETFs' fund administrator performs back-end or "post-trade" compliance monitoring. RVC performs front-end or "pre-trade" compliance monitoring on an ongoing basis. RVC provides the CIST's Board of Trustees and Chief Compliance Officer with quarterly reporting of its management of the ETFs and other reporting information, as required.

Dual Contracts

The Primary Adviser for SMAs to which RVC serves as the sub-adviser, is wholly responsible for conducting account reviews for all applicable clients, including furnishing required reporting information to interested parties. RVC will cooperate with the Primary Adviser where applicable to help facilitate their account reviews but has no other responsibilities related to the oversight conducted. Sub-advisory clients should contact their Primary Adviser for information on account reviews conducted by the Primary Adviser. In situations where RVC has enjoined a third party investment management firm to serve as sub-advisor to a Rareview Fund(s), RVC shall perform periodic oversight of such third party investment firm to ensure it is fulfilling its contractual responsibilities and to gain assurance that such investment firm remains in compliance with applicable federal securities laws.

Separately Managed Accounts

All client accounts for RVC's advisory services provided on an ongoing basis are monitored daily for exposure to asset classes as part of RVC's investment process. All client accounts for RVC's advisory services provided on an ongoing basis are reviewed at least quarterly by Neil Azous regarding clients' respective investment policies and risk tolerance levels. In addition, RVC's Chief Compliance Officer will review client accounts for adherence to investment strategies and confirm that RVC continues to honor investment restrictions, limitations, and prohibitions, including those that may occur due to market movement and not as a result of an acquisition or sale. RVC's CCO also leads mandatory training sessions to ensure all employees are aware of governing investment limitations, restrictions, and prohibitions and to ensure that if any issues arise, they are escalated to the CCO immediately upon detection.

Model Portfolios

The Primary Adviser for model portfolios that RVC delivers to is fully responsible for conducting account reviews for all applicable clients, including furnishing required reporting information to interested parties. RVC, as an independent contractor, will review the model portfolios regularly for consistency with investment strategies, overweight or underweight positions, and available investment funds.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews of client accounts may be triggered by material market, economic, or political events or by changes in clients' financial situations (such as investment objectives, retirement, termination of employment, physical move, inheritance, or other matters).

C. Content and Frequency of Regular Reports Provided to Clients

Each client of RVC's advisory services will receive a quarterly report detailing the client's account, including assets held, asset value, and fee calculation. This written report will come from the custodian. RVC may supplement these custodial statements with reports provided during client meetings or as requested.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

RVC does not receive any economic benefit, directly or indirectly, from any third party for advice rendered to RVC's clients.

B. Compensation to Non-Advisory Personnel for Client Referrals

RVC has entered into written agreements with unaffiliated third-party solicitors ("Solicitors") to market the Firm's advisory services and bring clients to RVC. Solicitors directly responsible for bringing a client to RVC may receive compensation from RVC for client referrals. The manner and amount of compensation would typically be negotiated on a case-by-case basis. Under these arrangements, RVC will generally pay compensation in exchange for Solicitor's services in obtaining investors. RVC typically pays the Solicitor a percentage of the advisory fee and any related compensation, if applicable, earned by RVC in connection with an investor's use of RVC's services. No solicitor used by RVC is an affiliate, agent, representative, partner, or employee of RVC, but an independent contractor.

Such arrangements will comply with the requirements of the Investment Advisers Act of 1940, as amended, including the amended and restated Marketing Rule, which became effective in November 2022, and/or the applicable state securities laws, including a written agreement between RVC and the solicitor.

Solicitors engaged by RVC must provide a copy of RVC's Form ADV, Part 2A, a Privacy Notice, and a separate Solicitor's disclosure statement regarding the relationship between the Solicitor and RVC to the prospective client at the time of the solicitation or referral. The disclosure statement will describe the relationship between RVC and the Solicitor and the compensation that the Solicitor is being paid to refer the client to RVC. The Solicitor is generally paid a fee equal to a stated percentage of the annual advisory fee that the client pays to RVC. The prospective client must acknowledge this arrangement with RVC before accepting the account for advisory services.

Regarding a registered investment company that RVC renders advice and services to, RVC may pay certain fees (out of their separate assets and without additional cost to those funds or their shareholders) to intermediaries or other third parties who introduce persons to those funds (or "Placement Agents"), insofar as such persons subsequently become fund shareholders. Where applicable, RVC enters into a written agreement with Placement Agents. Placement Agents are brokerage firms registered with the SEC and members of FINRA. Agents of the brokerage firms (i.e., registered representatives) are engaged by the RVC to obtain investments in the ETFs managed by our Firm.

RVC clients may work with investment consultants who provide a wide array of services to pension plans and other institutions, including assisting in selecting and monitoring investment advisors such as RVC. From time to time, RVC and/or its affiliates may work with investment consultants and their affiliates to provide investment management and/or risk management services, creating possible conflicts of interest.

From time to time, RVC's personnel may speak at conferences, webinars, podcasts and other programs for potential investors interested in investing in products that are sponsored by a prime broker, custodian, or a third party. These conferences and programs may be a means by which RVC could be introduced to potential investors in RVC products. Currently, RVC does not intend to compensate any prime broker, custodian, or third party for organizing such "capital introduction" events or for any investments ultimately made by prospective investors attending such events. However, RVC may do so in the future. While such events and other services may influence RVC in deciding whether to use the relevant prime broker, custodian, or third parties in connection with brokerage, financing, and other activities of RVC's products, RVC will not commit to allocate a specific amount of brokerage to such a party in any such situation. Moreover, RVC has adopted policies and procedures with respect to the new Marketing Rule under the Investment Advisers Act of 1940, as amended. In cases in which RVC may speak on matters relating to its registered Commodity Pools, RVC will also adhere to requirements set forth in the National Futures Association's Compliances rules, regulations, and Interpretive Guidance.

From time-to-time, RVC will sponsor educational conferences for financial advisors designed to ensure that such financial advisors are familiar with RVC's advisory services, among other things. RVC's sponsorship may include benefits such as meals, lodging, and costs associated with continuing education credits. Additionally, in some instances, such as its OCIO services, RVC will reimburse financial advisors for their costs in prospecting, hosting educational, training and sales support events. Such payments can create an economic incentive for these financial advisors and entities to promote RVC's products and services over another adviser's products and services and could be an essential factor in these financial advisors and entities' willingness to recommend RVC's products and services

in general. RVC has adopted policies and procedures to ensure that sales support payments are reasonable and preferential treatment is not given to RVC over other advisors based on these contributions.

Item 15: Custody

Registered Investment Companies

RVC does not have physical custody of any client assets or securities invested in a RIC; instead, a qualified independent custodian holds all such assets in the name of the applicable fund. RVC's funds are audited annually, and investors receive annual financial statements within 120 days following each fund's fiscal year end, as required by applicable law. ***Please contact Rareview Capital LLC at 212-475-8664 for a copy of the audited financial statements immediately if not received within the allotted time frame.***

Dual Contracts / Separately Managed Accounts

RVC does not have physical custody of the assets of any client accounts. However, when advisory fees are deducted directly from client accounts at a client's custodian, under Rule 206(4)-2 of the Investment Advisers Act of 1940, as amended, RVC will be deemed to have limited custody of such client's assets and must have written authorization from the client to do so. Clients must make their own arrangements for custody of securities. Custodians may be broker-dealers, prime brokers, banks, trust companies, or other qualified institutions. The qualified custodian will typically provide the SMA with at least quarterly account statements relating to the assets held within the account advised by RVC. Each SMA should carefully review the qualified custodian's statement upon receipt to determine that it completely and accurately states all holdings in the account and all account activity over the relevant period. Any discrepancies identified by an SMA should be immediately reported to RVC and the qualified custodian. In addition to the account statements provided by qualified custodians to RVC's SMAs, RVC may provide supporting analytical information to SMAs on a periodic basis, as agreed upon between the SMA and RVC. As such, we encourage SMAs to compare the supporting analytical information provided to them by RVC against those statements provided to them by their qualified custodians who hold the assets of their accounts, and to report any questions, concerns, or discrepancies to both RVC and the qualified custodian promptly. RVC's supporting analytical information may vary from custodial statements based on accounting procedures, reporting dates, and/or valuation methodologies of certain securities. However, please note that custodian statements reflect the official books and records for the SMA.

Item 16: Investment Discretion

RVC provides investment advisory services to Clients on a discretionary basis. Before assuming discretion in managing a Client's assets, RVC enters into an Investment Management Agreement or other agreement that sets forth the scope of RVC's discretion. Unless otherwise instructed or directed by a Client, RVC has the authority to determine (i) the securities to be purchased and sold for the Client account (subject to restrictions on its activities set forth in the applicable investment management agreement and any written investment guidelines), and (ii) the amount of securities to be purchased or sold for the Client account. Because of the differences in Client investment objectives and strategies, risk tolerances, tax status, and other criteria, there may be differences among Clients in invested positions and securities held. In some limited circumstances, Clients may grant RVC non-discretionary authority to execute its investment recommendations in accordance with the investment management agreement (or similar document used to establish Client's objectives and suitability) and the directions and preferences provided to us by the Client. Non-discretionary authority requires us to obtain a Client's approval of each specific transaction before executing investment recommendations. Investment discretion does not extend to arrangements where RVC provides model portfolio services to clients.

Item 17: Voting Client Securities

RVC has adopted and implemented the following policies and procedures to ensure that proxies on securities held by its investment advisory clients for which RVC has assumed proxy voting authority are voted in the best interests of such clients.

Registered Investment Companies

Considering RVC's fiduciary duty to clients and given the complexity of the issues that may be raised with proxy votes, RVC has retained an independent, third-party proxy voting service provider to assist with the voting of client proxies for RICs managed by RVC. The proxy voting service provider specializes in providing various fiduciary-level proxy-related services to institutional investment managers. The services provided to RVC include in-depth research, voting recommendations, vote execution, and recordkeeping. Where RVC has not delegated proxy voting responsibility for a client to a proxy voting service provider, RVC will have responsibility for reviewing and analyzing each proposal, voting proxies, and maintaining records of its proxy voting activities.

Dual Contracts / Separately Managed Accounts

The investment management agreement between RVC and each client indicates whether RVC votes proxies for the client. In most cases, RVC has proxy voting authority over client accounts. However, RVC shall have no obligation to vote for proxies and generally intends not to do so. RVC reserves the right to abstain from voting proxies where circumstances preclude it based on a material conflict of interest or the research required to evaluate the subject issuer properly is cost-prohibitive. RVC also will not furnish advice in response to class action lawsuits for investors for whom it provides advisory services through SMAs.

Conflict: In discretionary advisory arrangements, RVC is authorized, without prior consultation with the client, to buy RVC's affiliated ETFs. On occasion, when RVC deems the facts and circumstances to be prudent and unlikely to disadvantage its clients systematically, RVC may vote a proxy for Dual Contracts/SMA clients to whom it provides advisory services for ETFs it sponsors, advises, sub-advises or otherwise engages. This activity may create a perceived or real conflict of interest.

Resolution: To mitigate this conflict when exception-based proxy voting occurs, the rationale for voting the proxy and for voting the proxy in Dual/Contracts/SMA accounts will be documented. Specifically, the portfolio manager of the ETF shall write a memorandum detailing the rationale for engaging in proxy voting on occasion. The portfolio manager will include the circumstances under which RVC has determined it is prudent to vote such proxy and will represent that such occasional vote has not and will not systematically disadvantage any client or group of clients in the future. The portfolio manager shall provide the memorandum to the CCO, who will review it to ensure the rationale is consistent with RVC's goals, policies, and disclosures. Any conflict that arises shall be resolved in favor of RVC's clients under all circumstances and without exception.

OCIO Services / Model Portfolio Services

It is the responsibility of the Primary Adviser who maintains ongoing relationships with clients to determine whether to vote for proxies.

Please contact Rareview Capital LLC at 212-475-8664 for a copy of the Firm's Proxy Voting Policy.

Item 18: Financial Information

A. Balance Sheet

RVC neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this Brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither RVC nor its management has any financial condition that is likely to reasonably impair RVC's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

RVC has not been the subject of a bankruptcy petition in the last ten years.