

## Item 1 – Cover Page

**Christian Brothers Investment Services, Inc.**  
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**March 10, 2020**

This Brochure provides information about the qualifications and business practices of **Christian Brothers Investment Services, Inc.** (“CBIS” or the “Company”). If you have any questions about the contents of this Brochure, please contact us at (312) 803-4726 and/or [dmiller@cbisonline.com](mailto:dmiller@cbisonline.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

**Christian Brothers Investment Services, Inc.** is a registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information with which you determine to hire or retain an Adviser.

Additional information about **Christian Brothers Investment Services, Inc.** also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

NOTE: For the purposes of this document, “client” refers solely to the Catholic United Investment Trust (“CUIT”), CBIS Global Funds plc (“CBIS Global”), and the separately managed accounts (“SMA”) managed by CBIS. “Investor” refers to individual Catholic institutions or, when permitted, others investing with CBIS through CUIT or CBIS Global. “Fund” or “Funds” refers to any fund or funds established by CUIT or CBIS Global.

## Item 2 – Material Changes

This Brochure dated **March 10, 2020** has no material changes from the December 23, 2019, Brochure.

Pursuant to SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business's fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting **Diane K. Miller, Chief Compliance Officer** at (312) 803-4726 or [dmiller@cbisonline.com](mailto:dmiller@cbisonline.com).

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## Item 4 – Advisory Business

CBIS is a global investment management firm that has been a trusted partner for Catholic institutions and their consultants for more than three decades. CBIS manages approximately \$8 billion in assets for Catholic institutions worldwide, including dioceses, religious institutes, educational institutions and healthcare organizations. CBIS pioneered Catholic Responsible Investing<sup>SM</sup>, an investment management approach designed specifically to help Catholic institutions pursue their missions by seeking to provide competitive, risk adjusted returns, while remaining faithful to the teachings of the Catholic Church. Specializing in Catholic Responsible Investing<sup>SM</sup>, CBIS enables Catholic institutions to align their investments with their mission by blending Catholic investment screens and active ownership strategies with institutional investment products.

CBIS was founded in 1981 by the De La Salle Christian Brothers to provide trusted Catholic responsible investment management services exclusively to Catholic institutions. The Company operates as a for-profit corporation and CBIS' shareholders are the three districts of the De La Salle Christian Brothers in the United States and the Center of the Institute of the Brothers of the Christian Schools, each of which has a representative on the Board of Directors.

CBIS is a manager of managers, and our primary objective is to deliver highly competitive risk adjusted returns in a manner consistent with the moral and social teachings of the Catholic Church. CBIS' investment process consists of: 1) manager identification, 2) portfolio construction, and 3) ongoing due diligence. We seek out managers with a clearly identified core competency, who demonstrate a credible, repeatable investment process that has produced superior results over a complete market cycle. We strive to combine managers in order to diversify alpha sources in seeking to improve risk-adjusted returns. After a manager is hired, we follow a rigorous, systematic, ongoing monitoring and evaluation process that employs a range of quantitative performance and risk analytics as well as the qualitative monitoring of the manager's organizational characteristics, personnel changes and business development efforts.

The Company provides investment management services to Catholic institutions of all sizes: some maintain large, diversified portfolios with CBIS while others may invest in a single Fund. CBIS' services are provided through separately managed accounts ("SMA"), Catholic United Investment Trust ("CUIT") and CBIS Global Funds plc ("CBIS Global"), all described below.

CBIS regularly recommends to investors participation in the pooled Funds offered by CUIT. CUIT is a non-profit organization and as such is exempt from the definition of "Investment Company" as defined in the Investment Company Act of 1940. Participation in these Funds is limited to non-profit, Catholic institutions in the United States. CUIT is organized into two separate series of funds: the CUIT Fund Series and the CUIT Magnus<sup>®</sup> Series. The CUIT Magnus<sup>®</sup> Series is structured as four separate funds, with each, as a fund-of-funds, investing substantially all of its assets in funds in the CUIT Fund Series. (The CUIT Fund Series and the CUIT Magnus<sup>®</sup> Series are referred to collectively as the "CUIT Funds"). CUIT compensates CBIS in CBIS' capacity as an investment adviser and administrator to the CUIT Funds.

For certain strategic and legacy relationships, CBIS provides guidance concerning the allocation of such investors' assets among the various investment Funds offered by CUIT and CBIS Global. This advice is determined by the information obtained from investors and reflects CBIS' understanding of the investment and financial circumstances, goals and needs, as well as the risk tolerance, of each particular investor. CBIS does not receive fees from investors for this allocation advice but does receive fees from CUIT and CBIS Global in its capacity as investment manager of CUIT's Funds and CBIS Global. This may incentivize CBIS to offer products that are more profitable to CBIS over those that are not. To monitor such advice, CBIS has established the Asset Allocation Review Committee ("AARC"). The AARC seeks to ensure consistent application of CBIS' asset allocation process and rebalancing across the firm, and reviews the asset allocations for these relationships.

CBIS Global is an investment company incorporated with limited liability in Ireland and established as an umbrella fund with segregated liability between Funds pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations. CBIS Global is offered primarily to foreign investors.

CBIS monitors investments made by the CUIT Funds or CBIS Global to ensure that such investments are consistent with CBIS' Catholic investment screens, which is a component of CBIS' Catholic Responsible Investing<sup>SM</sup> program, or otherwise meet the social investing criteria established by its clients.

With respect to the client portfolios the Company manages on a discretionary basis, CBIS generally obtains written objectives, policies and restrictions from each of its clients regarding said portfolios no later than the date on which CBIS and the client enter into a Discretionary Investment Advisory Agreement. These objectives, policies and restrictions may be amended by clients, and the Company is subject to these written objectives, policies and restrictions at all times.

CBIS has for some years provided stand-alone Catholic Responsible Investing<sup>SM</sup> services, including Catholic Responsible Investing<sup>SM</sup> guideline development, proxy voting services and portfolio audits to a small number of clients. Fees from these services are negotiable with clients. CBIS no longer actively promotes these services.

## Item 5 – Fees and Compensation

This section contains fee schedules for each of the CBIS client types. Fees that an investor indirectly pays through their investment in the Funds are determined by the specific Funds the investor is invested in and the total amount of assets invested in CUIT and CBIS Global. CBIS does not charge separate fees to investors for the advice given with respect to an investor's asset allocation. In certain limited circumstances, CBIS may enter into agreements with investors in the Funds to make payments to those investors which will have the effect of those investors experiencing different fee schedules than paid through their investment in the Funds.

## CUIT

Schedules of investment management fees for CUIT are listed below. Fees are also listed in the CUIT Fund Series Offering Memorandum and the CUIT Magnus<sup>®</sup> Series Offering Memorandum, located on the CBIS website.

As provided in the Investment Management Agreement between CUIT and CBIS, to the extent that CBIS voluntarily agrees to waive fees and/or reimburse expenses, CUIT, on behalf of such Fund, may reimburse CBIS for any of its fee waivers and/or expense reimbursements up to the amount waived or reimbursed during the preceding five-year period.

### CUIT Fund Series:

#### Equity Funds:

##### Value Equity Fund<sup>1</sup>

Class A shares	1.00%
Class B shares	0.65%
Class X shares	0.00% <sup>2</sup>

##### Core Equity Index Fund

Class A shares	0.35%
Class B shares	0.15%
Class C shares	0.00% <sup>3</sup>
Class X shares	0.00% <sup>2</sup>

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<sup>1</sup> One sub-adviser to the CUIT Value Equity Fund has voluntarily reduced its fee to CBIS; this temporary concession of five percent of this investment management fee (approximately 1.5 basis points) paid by the Company has been passed on to the CUIT Value Equity Fund as a fee waiver, and will continue to be passed on as a fee waiver so long as the temporary concession remains in place. This temporary concession and fee waiver will continue until January 1, 2020.

<sup>2</sup> As Class X Shares (as defined below) may only be held by a fund of the CUIT Magnus<sup>®</sup> Series, each a “fund-of-funds,” no management fee or “Other Expenses” are charged to Class X Shares, pursuant to the management contract between CUIT and CBIS. Each fund in the CUIT Magnus<sup>®</sup> Series bears a proportionate share of the expenses incurred by the respective Class X Shares in which it invests. The total expense ratio of each fund in the CUIT Magnus<sup>®</sup> Series is disclosed later in this document and in the CUIT Magnus<sup>®</sup> Series Offering Memorandum.

<sup>3</sup> No management fee exists for CUIT Core Equity Index Fund Class C Shares, pursuant to the management contract between CUIT and CBIS. Rather, Investors that hold Class C Shares will be billed and pay directly to CBIS a separate investment management fee pursuant to an Investment Management Fee Agreement by and between CBIS and the Investor. Investors shall submit to the Bank of New York Mellon, as transfer agent of the CUIT Funds, the CUIT Core Equity Index Fund – Class C Shares: Standing Instructions to Transfer Agent regarding Investment Management Fee, that shall set forth the calculation of, and authorize payment of, the investment management fee to be paid to CBIS, based upon the following fee schedule, subject to negotiation in CBIS’ discretion:

<u>Assets in Class C Shares</u>	<u>Core Equity Index Fund (Annual Percentage Rate)</u>	<u>International Fund (Annual Percentage Rate)</u>
First \$50 Million	0.15	0.79
Next \$50 Million	0.09	0.70
Over \$100 Million	0.06	0.65

<b>Growth Fund</b>	
Class A shares	1.10%
Class B shares	0.80%
Class X shares	0.00% <sup>4</sup>

<b>Small Cap Index Fund</b>	
Class A shares	0.50%
Class B shares	0.20%
Class X shares	0.00% <sup>4</sup>

<b>International Equity Fund</b>	
Class A shares	1.30%
Class B shares	0.79%
Class C shares	0.00% <sup>5</sup>
Class X Shares	0.00% <sup>4</sup>

<b>International Small Cap Fund</b>	
Class B shares	0.96%
Class X Shares	0.00% <sup>4</sup>

#### Fixed Income Funds:

<b>Short Bond Fund</b>	
Class A shares	0.30%
Class X Shares	0.00% <sup>4</sup>

<b>Intermediate Diversified Bond Fund</b>	
Class A shares	0.50%
Class B shares	0.35%

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<sup>4</sup> As Class X Shares (as defined below) may only be held by a fund of the CUIT Magnus<sup>®</sup> Series, each a “fund-of-funds,” no management fee or “Other Expenses” are charged to Class X Shares, pursuant to the management contract between CUIT and CBIS. Each fund in the CUIT Magnus<sup>®</sup> Series bears a proportionate share of the expenses incurred by the respective Class X Shares in which it invests. The total expense ratio of each fund in the CUIT Magnus<sup>®</sup> Series is disclosed later in this document and in the CUIT Magnus<sup>®</sup> Series Offering Memorandum.

<sup>5</sup> No management fee exists for CUIT International Equity Fund Class C Shares, pursuant to the management contract between CUIT and CBIS. Rather, Investors that hold Class C Shares will be billed and pay directly to CBIS a separate investment management fee pursuant to an Investment Management Fee Agreement by and between CBIS and the Investor. Investors shall submit to the Bank of New York Mellon, as transfer agent of the CUIT Funds, the CUIT International Equity Fund – Class C Shares: Standing Instructions to Transfer Agent regarding Investment Management Fee, that shall set forth the calculation of, and authorize payment of, the investment management fee to be paid to CBIS, based upon the following fee schedule, subject to negotiation in CBIS’ discretion:

<u>Assets in Class C Shares</u>	<u>Core Equity Index Fund (Annual Percentage Rate)</u>	<u>International Fund (Annual Percentage Rate)</u>
First \$50 Million	0.15	0.79
Next \$50 Million	0.09	0.70
Over \$100 Million	0.06	0.65

Class X shares	0.00% <sup>4</sup>
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Opportunistic Bond Fund:

Class A shares	0.50%
Class B shares	0.35%
Class X shares	0.00% <sup>4</sup>

Cash Fund:

Money Market Fund	0.25%
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The Amended and Restated Declaration of Trust provides that the CUIT Board of Trustees (the “Trustees”) may establish one or more classes of shares representing interests in the portfolio of any such Fund. All classes of shares in a specific Fund shall share in the common investment portfolio of such Fund. Subject to the approval of the Trustees, different classes of shares may bear different fees.

With respect to the Short Bond Fund, the Trustees have established two classes of Shares, designated “Class A Shares” and “Class X Shares”. The Class A Shares are issued to investors who are ineligible for Class X Shares. Class X Shares are issued only to the funds in the CUIT Magnus<sup>®</sup> Series.

With respect to the International Small Cap Fund, the Trustees have established two classes of Shares, designated “Class B Shares” and “Class X Shares”. The Class B Shares are issued to investors who are ineligible for Class X Shares. Class X Shares are issued only to the funds in the CUIT Magnus<sup>®</sup> Series.

With respect to each CUIT Fund (other than the Money Market Fund, Short Bond Fund and International Small Cap Fund), the Trustees have established three classes of Shares, designated “Class A Shares,” “Class B Shares,” and “Class X Shares.” The Class A Shares are issued to investors who are ineligible for Class B Shares and Class X Shares. The Class B Shares are issued to investors who are ineligible for Class X Shares: (i) that have invested an amount equal to or greater than the Class B Threshold (as defined below) in one of the Funds; or (ii) that, in the judgment of CUIT, work regularly with an investment consultant or advisor who provides advice on (1) investment manager selection, (2) asset allocation, and (3) rebalancing, provided that CBIS expects to be able to achieve efficiencies and benefits from consolidation of interactions or services provided. The “Class B Threshold”, subject to CBIS’ exercise of limited discretion in its capacity as Investment Manager under a policy adopted by CUIT, for each Fund in the CUIT Fund Series is as follows:

Value Equity Fund	\$5 million
Core Equity Index Fund	\$3 million
Growth Fund	\$5 million
Small Cap Index Fund	\$3 million
International Equity Fund	\$5 million



International Small Cap Fund	\$1 million
Intermediate Diversified Bond Fund	\$5 million
Opportunistic Bond Fund	\$5 million

Class X Shares are issued only to the CUIT Magnus® Series. Please see CUIT Magnus® Series Offering Memorandum for more information.

With respect to the Core Equity Index Fund and the International Equity Fund, the Trustees have also established a fourth class of shares (in addition to Class A Shares, Class B Shares, and Class X Shares), designated “Class C Shares.” The Class C Shares are issued to investors that have invested an amount equal to or greater than the Class C Threshold (as defined below) in the Core Equity Index Fund or the International Fund, respectively, and have executed an Investment Management Fee Agreement with CBIS. The “Class C Threshold”, subject to CBIS’ exercise of limited discretion in its capacity as investment Manager under a policy adopted by CUIT, is currently \$50 million for the Core Equity Index Fund and the International Equity Fund respectively.

For each Fund that offers Class B Shares, under a policy adopted by CUIT, the assets of Related Investors (as defined below) may be aggregated in order to determine whether an investor has met the Class B Threshold invested in each Fund. CUIT generally defines “Related Investors” as organizations that, subject to CBIS’ exercise of limited discretion in its capacity as Investment Manager under a policy adopted by CUIT, are closely affiliated by reasons of structure or operations. For example, such organizations may have consolidated their financial and investment decision-making process under a single group of individuals (e.g. board, committee, council) who represent a discrete serviceable and reporting entity to CUIT. The group may have authority over multiple pools of assets serving multiple purposes and operating under a single or multiple tax identification or CUIT master organization numbers, but which are consolidated for investment purposes at CUIT. In addition, for Investors in the Intermediate Bond Fund and the Opportunistic Bond Fund, Related Investor assets in these two Funds will be aggregated for purposes of determining whether the Class B Threshold has been met for such Funds.

For each Fund that offers Class C Shares, under a policy adopted by CUIT, the assets of Related Investors may be aggregated in order to determine whether an investor has met the Class C Threshold invested in each Fund.

Accounts that fall below the minimum for investment in Class B Shares due solely to investment performance may continue to hold Class B Shares. Accounts that fall below the minimum due to withdrawals or redemptions may continue to hold Class B Shares so long as the accounts are restored to a value exceeding the Class B Threshold within the period established from time to time by CBIS. Notwithstanding the foregoing, CBIS reserves the right to cause the exchange of Class B Shares for Class A Shares in any case where the account or accounts are below the minimum. Generally, determinations regarding eligibility for Class B Shares will be made monthly, as of the last business day of the month.

Accounts that fall below the minimum for investment in Class C Shares due solely to investment performance may continue to hold Class C Shares. Accounts that fall below the minimum due to

withdrawals or redemptions may continue to hold Class C Shares so long as the accounts are restored to a value exceeding the Class C Threshold within the period established from time to time by CBIS following the withdrawal or redemption that caused the accounts to fall below the minimum. For each Fund that offers both Class A and Class B Shares, CBIS reserves the right to cause the exchange of Class C Shares for Class B Shares in any case where the account or accounts are below the minimum. Generally, determinations regarding eligibility for Class C Shares will be made monthly, as of the last business day of the month.

The Funds and each of the classes thereof share pro rata the custodial fees and expenses of the master custodian and certain other expenses of the Funds, which affect the total expense ratio of the Funds.

CBIS has agreed to waive its fees or reimburse expenses, or both, so that the total annual fund operating expenses of the Money Market Fund will not exceed 0.35%, and that of the International Fund - Class B so the total annual fund operating expense will not exceed 0.89%, and that of the International Small Cap Fund – Class B so the total annual fund operating expense will not exceed 1.15%.

#### CUIT Magnus® Series:

A schedule of the fees for the CUIT Magnus® Series is listed below. Fees are also listed in the CUIT Magnus® Series Offering Memorandum, located on the CBIS website.

As provided in the Investment Management Agreement between CUIT and CBIS, to the extent that CBIS voluntarily agrees to waive fees and/or reimburse expenses, CUIT, on behalf of such Magnus® Fund, may reimburse CBIS for any of its fee waivers and/or expense reimbursements up to the amount waived or reimbursed during the preceding five-year period.

Total Expense Ratio (Expense that you pay each year as a percentage of the value of your investment)

#### CUIT Magnus® 45/55 Fund:

Class A shares	0.58%
Class B shares	0.38%

#### CUIT Magnus® 60/40 Alpha Plus Fund:

Class A shares	0.71%
Class B shares	0.54%

#### CUIT Magnus® 60/40 Beta Plus Fund:

Class A shares	0.56%
Class B shares	0.39%

#### CUIT Magnus® 75/25 Fund:

Class A shares	0.67%
Class B shares	0.47%

## Classes of shares:

The Amended and Restated Declaration of Trust provides that the Trustees may establish one or more classes of Shares representing interests in the portfolio of any Fund. All classes of Shares in a specified Fund shall share in the common investment portfolio of such Fund. Subject to the approval of the Trustees, different classes of Shares may bear different fees.

With respect to each Fund, two classes of Shares have been established, designated “Class A Shares” and “Class B Shares”. The Class A Shares are issued to investors designated “Class A Shares” and Class B Shares.” The Class A Shares are issued to investors who are ineligible for Class B Shares. The Class B Shares are issued to investors: (i) that have invested an amount equal to or greater than the Class B Threshold (defined below) in the Fund; or (ii) that, in the judgement of CUIT, work regularly with an investment consultant or advisor who provides advice on (1) investment manager selection, (2) asset allocation, and (3) rebalancing, provided that CBIS expects to be able to achieve efficiencies and benefits from consolidation of interactions or services provided. The “Class B Threshold” is currently: \$25 million for each Fund.

Under a policy adopted by CUIT, the assets of Related Investors (as defined below) in the CUIT Magnus<sup>®</sup> Funds may be aggregated in order to determine whether an Investor has met the Class B Threshold for each Fund. CUIT generally defines “Related Investors” as organizations that, in the judgement of CBIS, are closely affiliated by reasons of structure or operations. For example, such organizations may have consolidated their financial and investment decision-making process under a single group of individuals (e.g. board, committee, council) who represent a discrete serviceable and reporting entity to CUIT. The group may have authority over multiple pools of assets servicing multiple purposes and operating under a single or multiple tax identification or CUIT master organization numbers, but which are consolidated for investment purposes at CUIT.

Accounts that fall below the minimum for investment in Class B Shares due solely to investment performance may continue to hold Class B Shares. Accounts that fall below the minimum due to withdrawals or redemptions may continue to hold Class B Shares so long as the accounts are restored to a value exceeding the Class B Threshold within the period established from time to time by CBIS following the withdrawal or redemption that caused the accounts to fall below the minimum. For each Fund that offers both Class A and Class B Shares, CBIS reserves the right to cause the exchange of Class B Shares for Class A Shares in any case where the account or accounts are below the minimum. Generally, determinations regarding eligibility for Class B Shares will be made monthly, as of the last business day of the month.

- The “Total Expense Ratio”, which is borne by the Magnus<sup>®</sup> Funds and all the classes thereof, includes the investment management fee paid to CBIS pursuant to the management contract between CUIT and CBIS and all other expenses described in the CUIT Magnus<sup>®</sup> Series Offering Memorandum.

CBIS has voluntarily agreed to waive its fees and/or reimburse expenses as necessary to prevent the total expense ratio of each of the Magnus<sup>®</sup> Funds from exceeding the Total Expense Ratio for

each Fund, respectively. This information is presented in this manner, as compared to the CUIT Fund Series, because each Magnus<sup>®</sup> Fund is a “fund-of-funds” with a single Total Expense Ratio.

Each Fund, as a “fund-of-funds,” bears a proportionate share of the expenses incurred by the Underlying Funds in which it invests; this proportionate share is included in the Total Expense Ratio disclosed above. Please see the CUIT Fund Series Offering Memorandum and the CUIT Magnus<sup>®</sup> Fund Offering Memorandum for additional information.

### CBIS Global Funds:

A schedule of the fees for CBIS Global is listed below. Fees are also listed in the CBIS Global Prospectus, located on the CBIS website.

European Short-Term Government Bond Fund	0.25%
World Bond Fund	0.65%
European Equity Fund	1.25%
World Equity Fund	1.10%

CBIS Global also established a US Core Equity Index Fund which is not funded or available for sale.

Each Fund shall pay all of its expenses and its share of any expenses incurred by CBIS Global. These expenses are described in the CBIS Global Prospectus.

CBIS has agreed to waive its fees or reimburse expenses, or both, so that the total annual fund operating expenses are as follows:

European Short-Term Government Bond Fund	0.45%
World Bond Fund	0.85%
European Equity Fund	1.55%
World Equity Fund	1.30%

### Separately Managed Accounts:

CBIS' yearly fee generally ranges from 1.00% down to 0.13% of the value of the assets under management, depending on the value of, and the services required by, the client's portfolio. However, investment management fees, as well as the manner and frequency of payment, are subject to negotiation between CBIS and the client. This fee is typically payable quarterly, in advance, based on the portfolio's value at the close of the last business day of the immediately preceding quarter. The interim fee for the period after a portfolio is first accepted for management is based on the portfolio's value at the close of the last business day of the month in which such acceptance occurs, pro-rated as appropriate. Fee schedules for our SMAs are as follows.

#### Equity Index Accounts

0.13% on all assets (\$20 million new account minimum):

#### Balanced Accounts

Below \$30 million (\$20 million minimum):

0.875% on the first \$5 million

0.625% on the next \$5 million

0.500% on the next \$15 million

0.450% on the next \$5 million

Between \$30 - \$50 million:

0.500% on the first \$30 million

0.400% on the next \$20 million

Above \$50 million

0.450% on all assets

#### Value Equity Accounts

Below \$20 million (\$20 million new account minimum):

0.875% on the first \$5 million

0.625% on the next \$5 million

0.500% on the next \$10 million

Above \$20 million:

0.520% on the first \$20 million

0.400% on the next \$30 million

Negotiable over \$50 million

#### Fixed Income Accounts

Below \$30 million (\$30 million account minimum):

0.500% on the first \$5 million

0.375% on the next \$15 million

0.250% on the next \$10 million

Above \$30 million:

0.350% on the first \$30 million

0.250% on the next \$20 million

Negotiable over \$50 million

CBIS' standard form of investment advisory contract may be terminated by the client or by CBIS upon 90 days' notice in writing. Fees paid in advance of termination will be pro-rated to the date of termination and any unearned portion thereof will be refunded to the client.

## Relationship between CBIS fees and CBIS' asset allocation advice

For the relationships in which CBIS provides asset allocation advice, CBIS may have an incentive to provide allocation advice that recommends that more assets be allocated to those asset classes and styles in which CBIS receives a higher fee or which are more profitable to CBIS. However, CBIS believes that the asset allocation advice that it gives results from placing the interests of the client or investor over CBIS' own interests.

To monitor such advice, CBIS has established the Asset Allocation Review Committee ("AARC"). The AARC seeks to ensure consistent application of CBIS' asset allocation process and rebalancing across the firm, and reviews the asset allocations for certain existing relationships.

## Relationship between sub-advisory fees and CBIS' assignment of CUIT and CBIS Global Fund assets to sub-advisers

With respect to the CUIT Funds that have more than one sub-adviser, the Company has the discretion to determine what percentage of the particular Fund's assets should be assigned to each sub-adviser. The Company negotiates with sub-advisers individually to determine their respective fees. Accordingly, CBIS may have an incentive to award a greater percentage of Fund's assets to that sub-adviser to which the Company pays the lower fee, as this would increase profits to CBIS. However, the Company believes that its decisions regarding assignment of Fund assets to sub-advisers result from placing the interests of the Fund investors ahead of the Company's own interests.

## Securities Lending

To the extent a CBIS client participates in a securities lending program, the program agent assesses a fee for its services based on income generated by the lending of securities. This fee is in addition to the investment management fee charged by the Company.

To the extent that the Funds participate in securities lending, the proceeds are credited to the Funds and the fee is paid by the Funds. Investors will bear their pro-rata share of this fee, as well as receive their pro-rata share of any proceeds credited, indirectly through the Funds.

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

The Company does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## Item 7 – Types of Clients

The Company manages investments for CUIT, CBIS Global, and Catholic institutions worldwide, including dioceses, religious institutes, educational institutions and healthcare organizations.

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

The Company's investment management services are intended to earn a competitive rate of return on the client's portfolio, consistent with the level of risk and investment style which the client considers to be acceptable. Of the various accounts which may comprise a portfolio, it is frequently the case that the client will prefer a different level of risk for each. The client may also furnish the Company with written investment objectives, policies and restrictions. Investing in any securities involves risk of loss that the investor should be prepared to bear.

As part of the Catholic Responsible Investing<sup>SM</sup> program, CBIS uses moral and social criteria when making investment decisions on behalf of its clients and investors. Use of such criteria may result in profitable investments being excluded from the portfolio and in a reduction in diversification. Data suggests that the Company's use of such criteria does not adversely affect Fund performance over market cycles. However, there is no assurance that such criteria will not adversely affect the Fund.

The Company delegates to the sub-advisers the ability to recommend and effect the purchase and sale of securities in the portfolios of CUIT, CBIS Global and SMAs within the guidelines set by the Company with the goal of generating a competitive risk adjusted return consistent with the specified investment objective.

CBIS also has contractual relationships with Lazard Asset Management, Global Alpha Capital Management, Ltd., Brandywine Global Investment Management, LLC, Sun Life Capital Management, Dodge & Cox, RhumbLine Advisers, Wellington Management Company, LLP, AJO, Causeway Capital Management LLC, Longfellow Investment Management Co., Principal Global Investors, WCM Investment Management, Los Angeles Capital Management, ARCA, Degroof Petercam Asset Management, and Scott Investment Partners LLP as sub-advisers.

CUIT may purchase securities on margin or make short sales of securities only in connection with the purchase and sale of (i) exchange-traded Treasury bond futures in order to control overall portfolio duration, or (ii) forward-settling mortgage-backed securities, in fixed income funds; or in connection with the entrance into forward foreign currency exchange contracts in the International Fund to protect against uncertainty in the level of future foreign exchange rates; or in connection with the purchase and sale of exchange-traded S&P 500® Index, S&P SmallCap 600® Index, Mini S&P 500® Index futures, or Mini S&P SmallCap 600® Index futures for cash equitization; or as an integral strategy within a merger arbitrage program in the Opportunistic Bond Fund, in order to capture an arbitrage spread between securities in a Target transaction. The

sub-advisers for the Opportunistic Bond Fund may also engage in credit default swaps to gain exposure to various sectors of the corporate bond market.

CUIT may utilize derivative instruments, not as a principal investment strategy or for speculation, but generally for the purpose of managing or mitigating risk. For the example, the Fund may utilize derivatives to equitize cash positions in the equity funds or to control overall portfolio duration in a cost-effective manner in the fixed income funds.

Free cash balances in client accounts may be invested in money market mutual funds or other pooled funds offered or administered by CBIS' master custodian of the client assets ("Cash Management Vehicles"). Accordingly, with respect to such cash balances, a client will bear both the management fee payable to CBIS and, indirectly, the management fee charged by the Cash Management Vehicles.

The Funds advised by CBIS use the specific strategies discussed below.

## Catholic United Investment Trust (CUIT)

The CUIT Funds operate in a manner similar to open-end mutual funds, and are designed to provide their shareholders with professional management primarily in equities as well as in short-term and intermediate-term fixed income investments. The Funds will take reasonable risks in seeking to achieve their investment objectives as described below. There is no assurance that the Funds will be successful in meeting their objectives, as inherent risks (such as fluctuating market conditions) exist in the ownership of all securities. To reduce the risk of market fluctuations, each CUIT Fund intends to diversify its investments. However, such diversification will not eliminate risk.

## CUIT Fund Series

Please see the CUIT Fund Series Offering Memorandum to view complete information and disclosures about CUIT and the CUIT Funds. The CUIT Offering Memorandum can be found on the CBIS Website at [www.cbisonline.com](http://www.cbisonline.com) under Investor Services. Highlights of such risks are listed below each Fund description.

## CUIT Value Equity Fund

The Fund seeks long-term capital appreciation by investing primarily in the common stocks of U.S. companies. These stocks are of well-established medium to large companies believed to be undervalued. Investments by the Fund may be in existing as well as new issues of equity securities and may be subject to wide fluctuations in market value. The Value Fund does not intend to concentrate its investments in any particular industry. The Fund combines two complementary value-oriented strategies. The first seeks to identify industry leading companies selling at depressed valuations using fundamental research in order to construct a high quality portfolio. The second employs a quantitative model to identify undervalued companies by analyzing asset values, earnings, revenues, historic return on assets, insider trading, corporate



stock buybacks, long-term expected earnings growth, estimate revisions and relative price strength. The Fund's share price fluctuates with the broad market, but we believe it should perform better in periods of market decline due to its value orientation.

The Fund may invest a portion of its assets in cash equivalents and high quality short-term debt securities. The Fund may temporarily invest up to 100% of its assets in such instruments or hold cash when the sub-adviser believes that a temporary defensive posture in the market is appropriate. The Fund may also invest in other fixed-income securities at the discretion of the sub-adviser.

Risks may include the following:

- market fluctuation (i.e., the possibility that common stock prices will decline, perhaps substantially, over short or even extended periods) and
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability).

### CUIT Core Equity Index Fund

The Fund seeks to replicate the return of the S&P 500® Index, an index of a broadly diversified portfolio of equity securities of large-capitalization companies. It is designed for long-term investors seeking the advantages of a low-cost, "passive" approach for investing in a diversified portfolio of common stocks.

The Fund's investments adhere to CBIS' commitment to Catholic Responsible Investing<sup>SM</sup> and there may be circumstances where, because of these principles, the Fund is unable to invest in a security that is included in the S&P 500® Index. In such circumstances, the Fund's sub-adviser will optimize the remaining securities in the Fund to closely match significant characteristics of the S&P® Index. However, the performance of the S&P 500® Index is a hypothetical number which does not take into account the expense borne by the Fund.

The Fund intends to remain fully invested, to the extent practicable, in a pool of securities which duplicate the investment characteristics of the S&P 500® Index. Nevertheless, the Fund may, from time to time, also invest a portion of its assets in cash equivalents and high quality short-term debt. The Fund utilizes Index futures to minimize trading and cash impact.

Risks may include the following:

- market fluctuation (i.e., the possibility that common stock prices will decline, perhaps substantially, over short or even extended periods);
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability);
- because of the difficulty and expense of executing relatively small stock transactions, the Fund may not always be invested in the less heavily weighted S&P 500® Index stocks and may at times have its portfolio weighted differently from the S&P 500® Index; and

- cash flow may affect the Fund's ability to meet its objectives.

## CUIT Growth Fund

The Fund seeks long-term capital appreciation by investing primarily in a broadly diversified portfolio of equity securities of well-established, medium to large companies that are believed to have above-average market appreciation potential. The fund combines two complementary growth oriented strategies. The first uses a fundamental, bottom-up approach focusing on free cash flow growth, valuation and quality characteristics to select stocks. The second uses a quantitative model with a forward looking adaptive process that blends bottom up fundamental stock research and quantitative equity analysis. The Fund targets established companies as well as in equity securities of relatively small new companies. Portfolio equity securities may have limited marketability or may be widely traded. Investments by the Growth Fund may be in existing as well as new issues of equity securities and may be subject to wide fluctuations in market value. The Growth Fund does not intend to concentrate its investments in any particular industry. The Fund's share price fluctuates with the broad market, but may be more volatile than the broad market in the short term due to the Fund's growth orientation.

Although the Fund primarily invests in equity securities, it may also invest a portion of its assets in cash equivalents and high quality, short-term debt securities. The Fund may temporarily invest up to 100% of its assets in such instruments or hold cash when the sub-adviser believes that a temporary defensive posture in the market is appropriate. The Fund may also invest in fixed-income securities for the purpose of capital appreciation, such as bonds traded at substantial discount.

Risks may include the following:

- market fluctuation (i.e., the possibility that common stock prices will decline, perhaps substantially, over short or even extended periods); and
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability).

## CUIT Small Capitalization Equity Index Fund

The Fund seeks to replicate the performance of the S&P SmallCap 600® Index, an index of a broadly diversified portfolio of equity securities of small-capitalization companies. It is designed for long-term investors seeking the advantages of a low-cost, "passive" approach for investing in a diversified portfolio of common stocks.

The Small Capitalization Equity Index Fund's investments do adhere to CBIS' commitment to Catholic Responsible Investing<sup>SM</sup> and there may be circumstances where, because of these principles, the Fund is unable to invest in a security that is included in the S&P SmallCap 600® Index. In such circumstances, the Fund's sub-adviser will, to the extent possible, attempt to identify investment opportunities in companies which are of comparable size, capitalization and market position, and which are engaged in the same or a related industry, although the securities

of such companies may not be included in the S&P SmallCap 600® Index. The performance of the S&P SmallCap 600® Index is a hypothetical number which does not take into account the expense borne by the Fund.

Although the Fund intends to remain fully invested, to the extent practicable, in a pool of securities which duplicate the investment characteristics of the S&P 600® Index, the Fund may, from time to time, also invest a portion of its assets in cash equivalents and high quality short-term debt securities.

Risks may include the following:

- market fluctuation (i.e., the possibility that common stock prices will decline, perhaps substantially, over short or even extended periods);
- smaller capitalization companies may have limited product lines, markets or financial resources or lack of management depth, which can make them more susceptible to setbacks and reversals;
- smaller capitalization securities may be subject to more abrupt or erratic price movements than securities of larger companies;
- smaller capitalization stocks may not respond to general market rallies or downturns as much as other types of equity securities;
- may be more likely to be adversely affected by poor economic conditions;
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability);
- because of the difficulty and expense of executing relatively small stock transactions, the Fund may not always be invested in the less heavily weighted S&P 600® Index stocks and may at times have its portfolio weighted differently from the S&P 600® Index; and
- cash flow may affect the Fund's ability to meet its objectives.

### CUIT International Equity Fund

The Fund seeks long-term capital appreciation by investing primarily in a broadly diversified portfolio of equity securities of well-established companies based in those countries included in the MSCI All Country World ex-U.S. Index ("ACWI ex-U.S.") that are believed to have above-average market appreciation potential. No more than 30% of the portfolio is invested in emerging markets. The Fund may invest in equity securities of seasoned, well-established companies as well as in equity securities of relatively small new companies. Portfolio equity securities may have limited marketability or may be widely traded. Investments by the Fund may be in existing as well as new issues of equity securities and may be subject to wide fluctuations in market value. The Fund does not intend to concentrate its investments in any particular industry. The Fund blends a fundamental, bottom-up value-style manager with lower turnover and two growth-style managers (one that combines quantitative and qualitative techniques with relatively higher turnover; and one with a high-conviction growth strategy and a concentrated portfolio). The investment process emphasizes stock selection as the primary source of added-value. The Fund may also, but is not obligated to, enter into forward foreign currency exchange contracts intended to protect against uncertainty in the level of future foreign exchange rates.

Although the Fund primarily invests in equity securities, it may also invest a portion of its assets in cash equivalents and high quality short-term debt securities. The Fund may temporarily invest up to 100% of its assets in such instruments or hold cash when the sub-adviser believes that a temporary defensive posture in the market is appropriate. Although the assets of the Fund will not generally be invested in other fixed-income securities, the Fund may, in the discretion of the sub-adviser, invest in such securities for defensive purposes.

Risks may include the following:

- market fluctuation (i.e., the possibility that common stock prices will decline, perhaps substantially, over short or even extended periods);
- currency exchange risks (Transactions in foreign securities are conducted in local currencies, so U.S. dollars must be exchanged for another currency each time a stock is bought or sold or a dividend is paid. Fluctuations in foreign exchange rates can significantly increase or decrease the U.S. dollar value of a foreign investment, boosting or offsetting its local market return.);
- costs and pricing (It is more expensive for U.S. investors to trade in foreign markets. Overall expense ratios of international stock funds are usually somewhat higher than those of typical domestic stock funds.);
- portfolio securities may be listed on foreign exchanges that are open on days when the fund does not compute its prices, which may affect the net asset value;
- economic considerations (The economies, markets and political structures of countries the Fund invests in may not compare favorably with the U.S. in terms of wealth and stability. Investments in these countries may be riskier, and may be subject to increased likelihood of erratic and abrupt price movements);
- possible seizure or nationalization of the issuers of portfolio securities, the assets of portfolio companies or foreign deposits withholding of taxes assessed on, or the adoption of governmental restrictions affecting the payment of dividends, principal and interest to investors located outside the country of the issuers;
- the Fund may find it difficult to pursue legal remedies and obtain or enforce judgments in foreign countries; and
- accounting, auditing, financial reporting and information disclosure standards of certain portfolio countries may be different from, and less stringent than, comparable standards in the U.S.
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### CUIT International Small Capitalization Fund

The International Small Cap Fund seeks to achieve long-term capital appreciation by investing primarily in a broadly diversified portfolio of equity securities of small capitalization companies based in those countries included in the Morgan Stanley Capital International (MSCI) All Country World ex-US Small Cap index that are believed to have above-average market appreciation potential. The International Small Cap Fund will primarily invest in international equities traded on recognized global exchanges, private placements, rights, warrants, ADRs, “new issues”, ETFs, cash and cash equivalents and derivatives. The International Small Cap

Fund invests in both developed markets and emerging markets but will not invest in frontier markets. Generally, less than ten percent (10%) of the International Small Cap Fund's assets will be invested in emerging markets, but it is permitted to invest up to 25% of its assets in emerging markets at the time of such investments

The International Small Cap Fund diversifies its investments widely among regions, countries and sectors in the portfolio. The International Small Cap Fund may also, but is not obligated to, enter into forward foreign currency exchange contracts intended to protect against uncertainty in the level of future foreign exchange rates.

Although the International Small Cap Fund primarily invests in equity securities, it may also invest a portion of its assets in cash equivalents and high quality short-term debt securities. The International Small Cap Fund may temporarily invest up to 100% of its assets in such instruments or hold cash when the investment sub-adviser believes that a temporary defensive posture in the market is appropriate. Although the assets of the International Small Cap Fund will not generally be invested in other fixed-income securities, the International Small Cap Fund may, in the discretion of the investment sub-adviser, invest in such securities for defensive purposes.

Risks may include the following:

- market fluctuation (i.e., the possibility that common stock prices will decline, perhaps substantially, over short or even extended periods);
- currency exchange risks (Transactions in foreign securities are conducted in local currencies, so U.S. dollars must be exchanged for another currency each time a stock is bought or sold or a dividend is paid. Fluctuations in foreign exchange rates can significantly increase or decrease the U.S. dollar value of a foreign investment, boosting or offsetting its local market return.);
- currency hedging transactions, if they are undertaken, may not perfectly offset the fund's foreign currency exposure.
- costs and pricing (It is more expensive for U.S. investors to trade in foreign markets. Overall expense ratios of international stock funds are usually somewhat higher than those of typical domestic stock funds.);
- portfolio securities may be listed on foreign exchanges that are open on days when the fund does not compute its prices, which may affect the net asset value;
- economic considerations (The economies, markets and political structures of countries the Fund invests in may not compare favorably with the U.S. in terms of wealth and stability. Investments in these countries may be riskier, and may be subject to increased likelihood of erratic and abrupt price movements);
- possible seizure or nationalization of the issuers of portfolio securities, the assets of portfolio companies or foreign deposits withholding of taxes assessed on, or the adoption of governmental restrictions affecting the payment of dividends, principal and interest to investors located outside the country of the issuers;
- the Fund may find it difficult to pursue legal remedies and obtain or enforce judgments in foreign countries; and

- accounting, auditing, financial reporting and information disclosure standards of certain portfolio countries may be different from, and less stringent than, comparable standards in the U.S.
- smaller capitalization companies may have limited product lines, markets or financial resources or lack of management depth, which can make them more susceptible to setbacks and reversals;
- smaller capitalization securities may be subject to more abrupt or erratic price movements than securities of larger companies;
- smaller capitalization stocks may not respond to general market rallies or downturns as much as other types of equity securities;
- may be more likely to be adversely affected by poor economic conditions;
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability);
- because of the difficulty and expense of executing relatively small stock transactions, the Fund may not always be invested in the less heavily weighted S&P 600® Index stocks and may at times have its portfolio weighted differently from the S&P 600® Index; and
- cash flow may affect the Fund's ability to meet its objectives.

### CUIT Money Market Fund

The Fund seeks to preserve capital, provide current income and maintain liquidity by investing in high quality, short-term, fixed-income obligations. Liquidity and credit quality are maintained by investing only in securities rated A-1/P-1 or higher, and maintaining an average maturity of the overall portfolio of less than 90 days. Credit and default risk are further minimized by diversifying among issuers. The Fund attempts to maintain a stable net asset value of \$1.00 per share.

The Fund intends to provide liquidity and income through cash management services. Under certain circumstances it may not be possible to maintain a stable net asset value of \$1.00 per unit.

Risks may include the following:

- the risk associated with market fluctuations;
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability);
- circumstances may exist when portfolio securities have to be sold by the Fund at prices lower than it expected to realize; and
- the Money Market Fund is not backed or guaranteed by the U.S. government.

### CUIT Short Bond Fund

The Fund seeks maximum current income to the extent consistent with preservation of capital. Its portfolio effective duration will be similar to that of its benchmark, the Bloomberg Barclays US Treasury 1-3 Year Index, generally one to three years. The Fund invests primarily in fixed

income obligations issued by the U.S. government or its agencies, fixed income obligations issued by corporations, asset-backed and mortgage-backed securities. Issuers may be domestic, supranational or foreign, but all are U.S. dollar-denominated. The Fund may invest in corporate securities rated below investment grade at the time acquired, but may not be comprised of more than 10% below investment grade issues, whether resulting from downgrade or purchase. Extensive credit research is employed to minimize “downgrade” risk. The Fund’s value and yield are affected primarily by changes in U.S. interest rates.

Depending on market conditions the Fund may invest a substantial portion of its assets in mortgage-backed debt securities issued by the Government National Mortgage Association (“GNMA”), the Federal National Mortgage Association (“FNMA”), and the Federal Home Loan Mortgage Corporation (“FHLMC”). The Fund may also invest in other types of U.S. government securities, including collateralized mortgage obligations (“CMOs”) issued by U.S. government agencies or instrumentalities thereof, and may also invest in other mortgage-backed and asset-backed securities, as well as enter into repurchase agreements covering the securities described.

While the Fund normally invests its assets in accordance with its investment objective, the Fund reserves the right to, and may, temporarily invest up to 100% of its assets in cash equivalents and high quality short-term debt securities or hold cash when a temporary defensive posture in the market is appropriate.

The constraints on portfolio effective duration are designed to help minimize the extent of fluctuation in the value of the Fund’s shares. The Fund will be concentrated on securities with prices that are anticipated to be relatively less sensitive to changes in broad-based interest rates. To further reduce the risk of market fluctuation, the Fund intends to diversify its investments. However, none of these measures will eliminate risk.

Risks may include the following:

- interest rate fluctuations (the value of the portfolio can be expected to fall when prevailing interest rates rise and to increase when rates fall);
- zero-coupon bonds may be subject to greater market fluctuations in periods of changing interest rates than are debt securities that pay interest currently;
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability);
- the value of the Fund’s shares may fluctuate;
- emphasis on capital preservation may at times result in the Fund providing lesser yield and total return opportunity than other Funds invested in longer-term or lower quality bonds or other debt securities;
- at redemption, the shares of a participating organization may be worth more or less than the amount paid for them;
- the value and yield of the Fund will vary from day to day based on, among other things, interest rates, market conditions, political and economic news, and the liquidity, quality and maturity of its portfolio securities; and
- the Short Bond Fund is not backed or guaranteed by the U.S. government.



## CUIT Intermediate Diversified Bond Fund

The Fund seeks current income and long-term capital appreciation. Its portfolio effective duration will be similar to that of its benchmark, the Bloomberg Barclays Capital Aggregate Bond Index, generally four to six years. The Fund invests primarily in fixed income obligations issued by the U.S. government or its agencies, fixed income obligations issued by corporations and mortgage-backed securities. The portfolio is expected to have a dollar-weighted quality portfolio and may invest in corporate securities rated below investment grade at the time acquired, but may not be comprised of more than 10% below investment grade issues, whether resulting from a downgrade or purchase. Duration is generally four to six years, though this may be adjusted in response to expected changes in interest rates. Economic and fundamental research, which attempt to capture inefficiencies in the valuation of sectors and individual securities, are combined with duration management in pursuit of above-benchmark returns. The Fund's value and yield are affected primarily by changes in U.S. interest rates.

Depending on market conditions, the Fund may invest a substantial portion of its assets in mortgage-backed debt securities and asset-backed securities. The Fund may also invest in other types of U.S. government securities, including securities issued by U.S. government agencies or instrumentalities thereof, and including collateralized mortgage obligations ("CMOs"). The Fund anticipates entering into repurchase agreements covering the foregoing securities.

The Fund may temporarily invest up to 100% of its assets in cash equivalents and high quality short-term debt securities or hold cash when a temporary defensive posture in the market is appropriate. The Fund has a 10% limit to exposure to below investment grade issues. The Fund will take reasonable risks in seeking to achieve its investment objective. There is no assurance that the Fund will be successful in meeting its objective because inherent risks exist in the ownership of all securities. To reduce the extent of market fluctuations, the Fund intends to diversify its portfolio. This diversification will not eliminate risk.

Risks may include the following:

- interest rate fluctuations (the value of the portfolio can be expected to fall when prevailing interest rates rise and to increase when rates fall);
- zero-coupon bonds may be subject to greater market fluctuations in periods of changing interest rates than are debt securities that pay interest currently;
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability);
- the value of the Fund's shares may fluctuate;
- emphasis on capital preservation may at times result in the Fund providing lesser yield and total return opportunity than other funds invested in longer-term or lower quality bonds or other debt securities;
- at redemption, the shares of a participating organization may be worth more or less than the amount paid for them;
- the value and yield of the Fund will vary from day to day based on, among other things, interest rates, market conditions, political and economic news, and the liquidity, quality



- and maturity of its portfolio securities; and
- the Intermediate Diversified Bond Fund is not backed or guaranteed by the U.S. government.

## CUIT Opportunistic Bond Fund

The Fund seeks current income and to provide relatively low correlation to equity assets. While it will generally offer short duration bond exposure similar to its benchmark, the Bloomberg Barclays 1-5 Year Government Credit Index, its sub-advisers will have substantial discretion to modify effective duration (one-half to five years) and to implement strategies using a wide range of physical bond, equity and derivative strategies. The Fund will invest primarily in U.S. government securities, securities issued by U.S. government agencies, fixed income obligations of domestic U.S. and foreign corporations and mortgage-backed and asset-backed securities, including collateralized mortgage obligations (“CMO”).

The Fund also anticipates entering into repurchase agreements covering the foregoing securities. In addition, the Fund will utilize strategies involving equity securities, derivative and option-based instruments, primarily within hedged combinations to capture merger arbitrage, interest rate or credit spread, or other fixed income opportunities, or to more cost effectively replicate a position than by use of physical fixed income issues.

The Fund will take reasonable risks in seeking to achieve its investment objective. There is no assurance that the Fund will be successful in meeting its objective because inherent risks exist in the ownership of all securities. To reduce the extent of market fluctuations, the Fund intends to diversify its portfolio. This diversification will not eliminate risk. Under normal market conditions, it is anticipated that the portfolio will have duration of one-half to four years. It is expected to have a dollar-weighted quality portfolio rating of at least “A-” or its equivalent.

Risks may include the following:

- interest rate fluctuations (the value of the portfolio can be expected to fall when prevailing interest rates rise and to increase when rates fall);
- zero-coupon bonds may be subject to greater market fluctuations in periods of changing interest rates than are debt securities that pay interest currently;
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability);
- the value of the Fund’s shares may fluctuate;
- emphasis on capital preservation may at times result in the Fund providing less yield and total return opportunity than other funds invested in longer-term or lower quality bonds or other debt securities
- at redemption, the shares of a participating organization may be worth more or less than the amount paid for them;
- the value and yield of the Fund will vary from day to day based on, among other things, interest rates, market conditions, political and economic news, and the liquidity, quality and maturity of its portfolio securities;

- the Opportunistic Bond Fund is not backed or guaranteed by the U.S. government
- merger arbitrage risks;
- short sale risks, such as loss should a sold security increase in value;
- swap risks, such as the failure of the counterparties to perform their obligations, changes in the underlying investment and a possible lack of liquidity in the swap market; and
- the Opportunistic Bond Fund may invest in securities rated below investment grade at the time acquired, but may not be composed of more than 20% of below investment-grade issues.

## CUIT Magnus® Series

Each Fund invests substantially all of its investable assets in CUIT Fund Series funds (each, an “Underlying Fund” and together, the “Underlying Funds”). Because the Funds invest in Underlying Funds rather than in individual securities, each Fund is considered a “fund-of-funds.”

The Magnus® Series offers distinct choices for different investment styles and goals through different target risk-reducing and return-seeking asset allocations. The investment objectives, strategies and policies of each Fund are described in the CUIT Magnus® Series Offering Memorandum. The Offering Memorandum provides complete information and disclosures about CUIT and the CUIT Magnus® Series. The CUIT Magnus® Series Offering Memorandum can be found on the CBIS Website at [www.cbisonline.com](http://www.cbisonline.com) under Investor Services.

Each Fund takes reasonable risks in seeking to achieve its respective investment objective. There is, of course, no assurance that any Fund will be successful in meeting its respective objective as inherent risks, such as fluctuating market conditions, exist in the ownership of all securities. To reduce the risk of market fluctuations, each Fund intends to diversify its investments; please see the CUIT Fund Series Offering Memorandum for more information on the intended diversification for each Underlying Fund. However, such diversification will not eliminate risk. All securities investments risk the loss of capital, up to the entire amount of an Investor’s investment.

In addition, certain additional risks should be considered in connection with the investment objective and policies of the Funds. For example, if an Underlying Fund were to assume substantial positions in particular securities with limited marketability, the activities of such Underlying Fund could have an adverse effect upon the liquidity and marketability of such securities and the Underlying Fund might not be able to dispose of its holdings in these securities at then current market prices. Circumstances could also exist (to satisfy redemptions, for example) when portfolio securities might have to be sold by an Underlying Fund at prices lower than it expected to realize. Also, with respect to each Fund, the character of the Fund, the permissibility of borrowing for certain limited investment purposes, the right to invest in foreign securities, the ability to write covered call options, and the ability to use a wide range of derivative strategies are other risk factors which an investor should consider. Flexibility of investment and consideration of potential for capital appreciation may involve a greater portfolio turnover rate than that of investment funds whose objective, for example, is generation of current income. The rate of portfolio turnover cannot be predicted with assurance and may vary from year to year.

- Each Fund is proportionately subject to the risks of the Underlying Funds in which it invests.

Highlights, investment objectives and the allocations to the Underlying Funds for each Fund are provided in the summary below.

### 45/55 Fund

The 45/55 Fund's investment objective is to achieve current income and long-term capital appreciation.

The 45/55 Fund invests in the Underlying Funds according to a fixed formula that reflects an allocation of approximately 45% of the Fund's assets to return-seeking securities and approximately 55% of the Fund's assets to risk-reducing securities. The targeted percentage of the 45/55 Fund's assets allocated to each of the Underlying Funds is:

#### Return-Seeking:

CUIT Value Equity Fund	03.50%
CUIT Growth Fund	03.50%
CUIT Core Equity Index Fund	22.25%
CUIT Small Capitalization Equity Index Fund	04.50%
CUIT International Equity Fund	09.00%
CUIT International Small Capitalization Equity Fund	02.25%

#### Risk-Reducing:

CUIT Short Bond Fund	13.75%
CUIT Opportunistic Bond Fund	13.75%
CUIT Intermediate Diversified Bond Fund	27.50%

The 45/55 Fund's indirect risk-reducing holdings are a diversified mix of short-, intermediate-, and long-term U.S. government, U.S. agency, and investment-grade U.S. corporate bonds; mortgage-backed and asset-backed securities; and government, agency, corporate, and securitized investment-grade foreign bonds issued in currencies other than the U.S. dollar (which may be hedged to minimize foreign currency exposure).

The 45/55 Fund's indirect return-seeking holdings are a diversified mix of U.S. and foreign small-, mid-, and large-capitalization equity securities.

### 60/40 Alpha Plus Fund

The 60/40 Alpha Plus Fund's investment objective is to achieve current income and long-term capital appreciation.

The 60/40 Alpha Plus Fund invests in the Underlying Funds according to a fixed formula that reflects an allocation of approximately 60% of the Fund's assets to return-seeking securities and

approximately 40% of the Fund's assets to risk-reducing securities, with a bias towards "active" management in the equity portion of the portfolio. The targeted percentage of the 60/40 Alpha Plus Fund's assets allocated to each of the Underlying Funds is:

Return-Seeking:

CUIT Value Equity Fund	12.00%
CUIT Growth Fund	12.00%
CUIT Core Equity Index Fund	15.00%
CUIT Small Capitalization Equity Index Fund	06.00%
CUIT International Equity Fund	12.00%
CUIT International Small Capitalization Equity Fund	03.00%

Risk-Reducing:

CUIT Short Bond Fund	10.00%
CUIT Opportunistic Bond Fund	10.00%
CUIT Intermediate Diversified Bond Fund	20.00%

The 60/40 Alpha Plus Fund's indirect risk-reducing holdings are a diversified mix of short-, intermediate-, and long-term U.S. government, U.S. agency, and investment-grade U.S. corporate bonds; mortgage-backed and asset-backed securities; and government, agency, corporate, and securitized investment-grade foreign bonds issued in currencies other than the U.S. dollar (which may be hedged to minimize foreign currency exposure).

The 60/40 Alpha Plus Fund's indirect return-seeking holdings are a diversified mix of U.S. and foreign small-, mid-, and large-capitalization equity securities.

## 60/40 Beta Plus Fund

The 60/40 Beta Plus Fund's investment objective is to achieve current income and long-term capital appreciation.

The 60/40 Beta Plus Fund invests in the Underlying Funds according to a fixed formula that reflects an allocation of approximately 60% of the Fund's assets to return-seeking securities and approximately 40% of the Fund's assets to risk-reducing securities, with a bias towards "passive" management in the return-seeking portion of the portfolio. The targeted percentage of the 60/40 Beta Plus Fund's assets allocated to each of the Underlying Funds is:

Return-Seeking:

CUIT Core Equity Index Fund	39.00%
CUIT Small Capitalization Equity Index Fund	06.00%
CUIT International Equity Fund	12.00%
CUIT International Small Capitalization Equity Fund	03.00%

Risk-Reducing:

CUIT Short Bond Fund	10.00%
CUIT Opportunistic Bond Fund	10.00%
CUIT Intermediate Diversified Bond Fund	20.00%

The 60/40 Beta Plus Fund's indirect risk-reducing holdings are a diversified mix of short-, intermediate-, and long-term U.S. government, U.S. agency, and investment-grade U.S. corporate bonds; mortgage-backed and asset-backed securities; and government, agency, corporate, and securitized investment-grade foreign bonds issued in currencies other than the U.S. dollar (which may be hedged to minimize foreign currency exposure).

The 60/40 Beta Plus Fund's indirect return-seeking holdings are a diversified mix of U.S. and foreign small-, mid-, and large-capitalization equity securities.

75/25 Fund

The 75/25 Fund's investment objective is to achieve current income and long-term capital appreciation.

The 75/25 Fund invests in the Underlying Funds according to a fixed formula that reflects an allocation of approximately 75% of the Fund's assets to return-seeking securities and approximately 25% of the Fund's assets to risk-reducing securities. The targeted percentage of the 75/25 Fund's assets allocated to each of the Underlying Funds is:

Return-Seeking:

CUIT Value Equity Fund	07.50%
CUIT Growth Fund	07.50%
CUIT Core Equity Index Fund	33.75%
CUIT Small Capitalization Equity Index Fund	07.50%
CUIT International Equity Fund	15.00%
CUIT International Small Capitalization Equity Fund	03.75%

Risk-Reducing:

CUIT Short Bond Fund	06.25%
CUIT Opportunistic Bond Fund	06.25%
CUIT Intermediate Diversified Bond Fund	12.50%

The 75/25 Fund's indirect risk-reducing holdings are a diversified mix of short-, intermediate-, and long-term U.S. government, U.S. agency, and investment-grade U.S. corporate bonds; mortgage-backed and asset-backed securities; and government, agency, corporate, and securitized investment-grade foreign bonds issued in currencies other than the U.S. dollar (which may be hedged to minimize foreign currency exposure).

The 75/25 Fund's indirect return-seeking holdings are a diversified mix of U.S. and foreign small-, mid-, and large-capitalization equity securities.

## CBIS Global Funds plc

CBIS Global is an investment company incorporated with limited liability in Ireland and established as an umbrella fund with segregated liability between Funds pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities - UCITS) Regulations. Please see the CBIS Global Prospectus to view complete information and disclosures about CBIS Global. The CBIS Global Prospectus can be found on the CBIS Global website at which can be found at [www.cbisonline.com/eu](http://www.cbisonline.com/eu) under Investor Services.

Each CBIS Global Fund takes reasonable risks in seeking to achieve its respective investment objective. There is no assurance that any CBIS Global Fund will be successful in meeting its respective objective as inherent risks, such as fluctuating market conditions, exist in the ownership of all securities. To reduce the risk of market fluctuations, each CBIS Global Fund intends to diversify its investments. However, such diversification will not eliminate risk. Specific Fund risks are outlined in detail in the CBIS Global Prospectus. Highlights of such risks are listed below each Fund description.

### European Short-Term Government Bond Fund

The Fund seeks to provide current income, consistent with the preservation of capital. The Fund will invest primarily in a diversified portfolio of high quality short term, Euro-denominated deposits and fixed-income securities, managed with an effective duration +/- 25% of its benchmark.

Risks may include the following:

- interest rate fluctuations (the value of the portfolio can be expected to fall when prevailing interest rates rise and to increase when rates fall);
- zero-coupon bonds may be subject to greater market fluctuations in periods of changing interest rates than are debt securities that pay interest currently;
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability);
- debt securities fluctuate in response to perceptions of the issuer's creditworthiness;
- at redemption, the shares of a participating organization may be worth more or less than the amount paid for them;
- the value and yield of the Fund will vary from day to day based on, among other things, interest rates, market conditions, political and economic news, and the liquidity, quality and maturity of its portfolio securities; and
- not all government securities are backed by the full faith and credit of the United States or other national government in the case of foreign government securities.
- Investing in equity or fixed income markets of emerging market countries involves exposure to economic structures that are generally less diverse and mature, and to political systems that can be expected to have less stability than those of developed

countries. Markets in emerging market countries tend to be more volatile than the markets of more mature economies in developed countries; however, such markets often have provided higher rates of return. A more complete list and description of risks related to emerging markets can be found in the CBIS Global Prospectus.

## World Bond Fund

The Fund seeks sustainable income and modest capital appreciation through diverse exposure to global bond markets and currencies. It focuses primarily on investment-grade sovereign, supranational, corporate and mortgage debt securities, including securitizations.

Risks may include the following:

- interest rate fluctuations (the value of the portfolio can be expected to fall when prevailing interest rates rise and to increase when rates fall);
- zero-coupon bonds may be subject to greater market fluctuations in periods of changing interest rates than are debt securities that pay interest currently;
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability);
- debt securities fluctuate in response to perceptions of the issuer's creditworthiness;
- at redemption, the shares of a participating organization may be worth more or less than the amount paid for them;
- the value and yield of the Fund will vary from day to day based on, among other things, interest rates, market conditions, political and economic news, and the liquidity, quality and maturity of its portfolio securities; and
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## European Equity Fund

The Fund seeks capital appreciation through investment generally in the equity securities of European issuers with a market capitalization greater than €65 million. The Fund focuses primarily on developed European markets.

Risks may include the following:

- market fluctuation (i.e., the possibility that common stock prices will decline, perhaps



- substantially, over short or even extended periods);
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability); and
- non-publicly traded and Rule 144A securities may be less liquid than publicly traded securities and a Fund may take longer to liquidate these positions than would be the case for publicly traded securities. Investing in these securities may result in substantial losses.
- Investing in equity or fixed income markets of emerging market countries involves exposure to economic structures that are generally less diverse and mature, and to political systems that can be expected to have less stability than those of developed countries. Markets in emerging market countries tend to be more volatile than the markets of more mature economies in developed countries; however such markets often have provided higher rates of return. A more complete list and description of risks related to emerging markets can be found in the CBIS Global Prospectus.

## World Equity Fund

The Fund seeks capital appreciation through investment in equity securities of medium- to large-capitalization companies worldwide. Sub-investment managers use a combination of different yet complimentary investment approaches to minimize downside risk. Risks may include the following:

- market fluctuation (i.e., the possibility that common stock prices will decline, perhaps substantially, over short or even extended periods);
- currency exchange risks (Transactions in foreign securities are conducted in local currencies, so Euros must be exchanged for another currency each time a stock is bought or sold or a dividend is paid. Fluctuations in foreign exchange rates can significantly increase or decrease the Euro value of a foreign investment, boosting or offsetting its local market return.);
- economic considerations (The economies, markets and political structures of countries the Fund invests in may not compare favorably with the U.S. in terms of wealth and stability. Investments in these countries may be riskier, and may be subject to increased likelihood of erratic and abrupt price movements.)
- possible seizure or nationalization of the issuers of portfolio securities, the assets of portfolio companies or foreign deposits;
- withholding of taxes assessed on, or the adoption of governmental restrictions affecting the payment of dividends, principal and interest to investors located outside the country of the issuers;
- the Fund may find it difficult to pursue legal remedies and obtain or enforce judgments in foreign countries;
- accounting, auditing, financial reporting and information disclosure standards of certain portfolio countries may be different from, and less stringent than, comparable standards in the U.S.;
- some securities may be difficult for the Fund to dispose of at current market prices (securities with limited marketability); and



- non-publicly traded and Rule 144A securities may be less liquid than publicly traded securities and a Fund may take longer to liquidate these positions than would be the case for publicly traded securities. Investing in these securities may result in substantial losses.
- Investing in equity or fixed income markets of emerging market countries involves exposure to economic structures that are generally less diverse and mature, and to political systems that can be expected to have less stability than those of developed countries. Markets in emerging market countries tend to be more volatile than the markets of more mature economies in developed countries; however, such markets often have provided higher rates of return. A more complete list and description of risks related to emerging markets can be found in the CBIS Global Prospectus.

#### Additional Considerations for all CBIS Portfolios

CBIS, CUIT, and CBIS Global will not be responsible for any account losses caused by fraud if the Company or the Fund trustees or directors reasonably believe that the person transacting business on an account is authorized to do so. Each investor or client, in the case of an SMA, is urged to take precautions to protect itself from fraud by keeping its account information private, and by immediately reviewing any account statements that CBIS, CUIT, or CBIS Global send to the investor or client. It is important that the investor or client contact the Company immediately about any transactions such organization believes to be unauthorized.

## Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of the Company or the integrity of the Company's management. The Company has no information applicable to this Item.

## Item 10 – Other Financial Industry Activities and Affiliations

An immaterial amount of the Company revenue is from a stand-alone Catholic Responsible Investing<sup>SM</sup> product where the Company may review non-investor, non-client portfolios to determine the extent to which they reflect Catholic moral and social teachings, or offer proxy voting services without investment management services. CBIS no longer actively promotes these services.

CBIS Financial Services' primary function is to act as a broker-dealer in connection with the offer and sale of interests in the pooled investment Funds offered by CUIT, and on a limited basis, CBIS Global. CBIS Financial Services does not receive commissions or any other direct or indirect compensation for this activity. Because it neither carries inventories nor undertakes underwriting functions, potential conflicts of interest between the broker-dealer and the Company are minimized.

CBIS Financial Services also performs certain administrative functions for the Company, for which it receives an administrative fee. Jeffrey A. McCroy is the President and sole director of CBIS Financial Services. Erin Lavelle is the Secretary and Treasurer. Diane Miller is the Chief Compliance Officer and Assistant Secretary.

## Item 11 – Code of Ethics

Although related persons of the Company may engage in trades of the same securities that are purchased on behalf of clients, it is the policy of the Company that the interests of the clients always take precedence. Furthermore, CBIS contracts with sub-advisers who render portfolio management services with respect to client accounts. Consequently, persons related to the Company do not generally possess knowledge of which portfolio securities transactions will be engaged in and therefore are not as likely to be in a position to knowingly engage in personal securities transactions that are likely to disadvantage clients as would be the case if CBIS itself rendered portfolio management services.

The Company has adopted a Code of Ethics, which applies to all of its supervised persons. A copy of this Code of Ethics is available to any client or prospective client upon request. The Code of Ethics is predicated upon the following principles: (1) supervised persons of the Company shall always place the interest of investors ahead of the interest of the firm or its employees; (2) personal securities transactions shall be conducted in such a manner as to avoid any actual or apparent conflict of interest, or any abuse of an individual's position of trust and responsibility; and (3) supervised persons shall always be aware of how their actions may look in hindsight, and never take inappropriate advantage of their positions. It further provides that supervised persons must comply with all applicable federal securities laws. Finally, it imposes certain trading restrictions on certain persons who may know about securities positions that result from the investment advice given by the Company and its sub-advisers. Among other restrictions, there are preclearance procedures for purchases of private placements, and there are prohibitions on the knowing purchase or sale of most securities within seven calendar days before and after CBIS trades (or has traded) in any such security on behalf of a Fund or investor.

Every investor in CUIT is a 501(c)(3) public charity. From time to time, CBIS employees make personal contributions to CBIS investors. These charitable contributions are required to be reported by access persons on a quarterly basis as part of the gift reporting.

## Item 12 – Brokerage Practices

CBIS has the authority to determine, without obtaining specific client consent, the broker or dealer to be used and the commissions to be paid in connection with client portfolio transactions. However, because the Company delegates portfolio management responsibilities to sub-advisers, CBIS does not generally select broker-dealers.

The Company does not participate in any soft dollar arrangements. The Company's sub-advisers may participate in soft dollar arrangements and those who are using soft dollars meet the requirements of the safe harbor in section 28(e) of the 1934 Act.

From time-to-time, certain clients may direct the Company to utilize certain broker-dealers with respect to portfolio transactions in such clients' accounts. CBIS will endeavor to follow such directions but in such cases clients may be paying more in brokerage commissions than they would in the absence of such direction and may otherwise not be receiving best execution with respect to their portfolio transactions.

## Item 13 – Review of Accounts

The primary responsibility for all client account management functions and review of client accounts has been delegated by the President, Jeffrey A. McCroy, to the Chief Investment Officer. The Chief Investment Officer works in association with assigned staff and contracted sub-advisory entities and personnel to review all client and investor accounts under management. Each client account is reviewed quarterly to determine whether the portfolio continues to meet investment objectives; (b) level of risk preferred by the client; and (c) CBIS's standards as to performance.

CBIS furnishes its SMA clients with a report on the value of their portfolios at the end of each month. This report sets forth all transactions concerning the portfolio, including the prices at which such transactions were affected.

The CUIT trustees receive a report that details the value of the Funds and the associated fees on a monthly basis. Investors in the CUIT Funds receive a monthly statement of the value of their portfolios at the end of each month. This statement also discloses all transactions, including the prices at which such transactions were affected.

CBIS Global directors receive quarterly information on the value of the funds. The designated persons receive monthly information on the value of the funds. Investors in CBIS Global receive a monthly statement of the value of their portfolios at the end of each month. This statement also discloses all transactions, including the prices at which such transactions were affected.

## Item 14 – Client Referrals and Other Compensation

All Company employees are eligible for an annual discretionary bonus that takes into account all aspects of their performance and contributions towards the success of CBIS. The amount available to be distributed in payment of this bonus varies, in part, with the Company net income for the year.

CBIS business development, relationship management, and investment concierge employees are eligible for bonuses that are, in part, determined by the amount of assets generated from new investors invested in the CBIS managed programs attributable to relationships established by

business development employees. The bonuses paid with respect to assets from new investors vary according to product type (i.e., whether the investment is in the CUIT Funds or an SMA), and this may provide incentives for the business development employees to direct new investors' assets to certain types of products instead of others. Accordingly, CBIS has developed an internal process to review initial asset allocations for new investors.

## Item 15 – Custody

CBIS does not maintain actual custody of client cash or securities. However, we are deemed to have custody of the Funds and securities in CUIT, CBIS Global and SMAs because, among other reasons, we debit fees from those accounts directly. We comply fully with the custody rules under the Investment Advisers Act of 1940 which includes certain exemptions regarding pooled investment vehicles. Therefore, we distribute CUIT and CBIS Global annual audited financials to investors within 120 days following the fiscal year end.

## Item 16 – Investment Discretion

Pursuant to agreements with CUIT and CBIS Global, we have discretionary authority with respect to the assets in these Funds, which includes the discretion to select sub-advisers with approval of the CUIT Trustees and the CBIS Global Board of Directors. We delegate authority to sub-advisers who manage the day-to-day trading in the Funds or accounts. CBIS receives discretionary authority from clients with SMAs to select the identity and amount of securities to be bought or sold, which includes the discretion to select sub-advisers.

Trading and purchase of securities for our Funds and SMA clients take place at the level of our sub-advisers. The Company provides sub-advisers with investment policies and restrictions as outlined by the Fund or SMA client. On a limited exceptional basis, CBIS may have discretion to rebalance a Fund investors account to a target allocation that is documented in a written agreement.

## Item 17 – Voting Client Securities

CBIS votes the proxy ballots of both domestic and international holdings on behalf of our investors.

Any CBIS client with an separately managed account, or the trustees or directors of any equity or balanced Fund under CBIS advisement, may designate proxy-voting authority to the Company to vote proxy ballots of the companies in portfolios managed by the sub-advisers retained by CBIS. In addition, any Catholic-affiliated institutional investor may designate proxy voting authority to the Company to vote proxy ballots of companies in portfolios managed by investment advisors other than CBIS. However, the Company may not be able to vote proxies for companies in a portfolio's securities lending program.

The Company generally votes proxy ballots in accordance with the guidelines set forth in its Proxy Voting Guidelines (“Guidelines”). The Guidelines are intended only as a general guide, however, as it is not possible to anticipate each and every resolution (either management- or shareholder-sponsored) on which we may be asked to vote. From time to time, the Company may also cast company-specific votes that are not in accordance with the specific Guidelines in the event that company-specific information indicates that doing so is in the best interest of our investors or clients. In determining how to cast a vote on an issue not covered in the Guidelines, the Company looks to the principles underlying the guidelines in the Policy and to the values and priorities of our investors and clients as we understand them.

On a limited, exceptional basis, a client in a CBIS SMA or a proxy voting client using investment advisers other than the Company may direct the Company on how to vote issues on a particular proxy ballot. All CBIS voting decisions are intended to meet our fiduciary obligations to our investors and clients, which include support for high standards of corporate governance and social and environmental responsibility. We foresee no conflicts of interest that would hinder the application of this principle. If a conflict does arise, we will seek to eliminate the conflict if it is feasible to do so and, in any event, we will resolve any such conflict in the best interests of our investors and clients.

The Company makes available a copy of its Proxy Voting Guidelines on the CBIS website. CBIS posts on our corporate website a public record of how it votes the proxy ballots for which we have authority. The Company also makes available semi-annual proxy voting reports to the entities that have granted it proxy voting authority.

## Item 18 – Financial Information

Registered Investment Advisers are required to provide you with certain financial information or disclosures about their financial condition. The Company has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.