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Form ADV Part 2A: Firm Brochure

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September 2021

This brochure (“Brochure”) provides information about the qualifications and business practices of Isometry Capital, LLC (“Isometry” or “Adviser” or the “Firm”). If you have any questions about the contents of this brochure, please contact us at (347) 480-2544 or by email at sgonzalez@isometrycapital.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about Isometry is also available on the SEC’s website at www.adviserinfo.sec.gov.

Registration of an investment adviser does not imply a certain level of skill or training. The oral and written communications of an adviser provide you with information that assists you in determining whether to hire or retain an adviser.

This brochure does not constitute an offer to sell or the solicitation of an offer to purchase any securities or interests in any of the entities described in this brochure. Any such offer or solicitation will be made solely to qualified investors by means of a private placement memorandum and related subscription documents or by means of a managed account investment management agreement and related documentation.

Item 2 – Material Changes

Since its last annual updating amendment on March 29, 2021, the Firm has updated information related to its principal place of business in Item 1 and its regulatory assets under management in Item 4.

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Item 4 – Advisory Business

Isometry Capital, LLC is an investment firm founded in January 2020.

Isometry’s advisory business consists of serving as the investment manager to one or more discretionary managed accounts (“Managed Account”) and is expected to manage one or more privately offered pooled investment vehicles (a “Fund” and together with a Managed Account, the “Clients”).

There are no material restrictions on the types of investments and/or strategies the Adviser may employ for Clients.

Each Managed Account may be specifically tailored to the individual needs of the Managed Account holder such that certain securities or types of securities are restricted, though Isometry generally has entered into relationships with investors whose investment objectives generally fall within one or more of the investment strategies that are the focus of Isometry’s investment team.

Certain Clients may have restrictions on investing in certain securities or types of securities, restrictions regarding specific securities or industries, gross or net exposure guidelines, or maximum position sizes, among other restrictions as individually negotiated with such Clients.

Suhaib Jamjoom and Sebastian von Renouard are principal owners of the firm.

Isometry does not participate in any wrap fee programs.

As of August 31, 2021, the Firm managed \$394,603,880 in regulatory assets under management (“RAUM”) all on a discretionary basis.

Item 5 – Fees and Compensation

A. The specific terms of Isometry’s fees and compensation arrangements are set forth in each of the Client’s offering documents or investment management agreement (“IMA”). Isometry receives an annual management fee calculated as a percentage of assets under management (“Management Fee”) from its Clients paid either quarterly or monthly. Management Fees generally range between 1% to 2%.

B. Management Fees are deducted from Client assets or invoiced for fees owed monthly or quarterly in advance as further disclosed in each Client’s offering documents or IMA.

While the management fee is generally not negotiable, Isometry may waive or modify the fee for certain Investors that are members, employees or affiliates of Isometry, relatives of such persons, or for certain large or strategic Investors.

C. In addition to the management fees described above, each Client is responsible for certain of its operating expenses as disclosed in each Client's offering documents or IMA. Isometry's fees are exclusive of brokerage commissions, brokerage fees, transaction fees, and other related costs and expenses incurred by the Client. Please see also Item 12-Brokerage Practices below. Other expenses born by Clients include certain charges imposed by custodians, brokers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

D. The Funds are expected to pay management fees, in advance, on a quarterly basis, as further disclosed in each Fund's Offering Documents. The calculation and payment of the Management Fee for the Clients are pro-rated for any period that is less than a full month or quarter, as applicable. Any prepaid fees not subsequently earned through continuing management services are refunded.

E. Neither Isometry nor any of the Firm's supervised persons will accept compensation for the sale of securities or other investment products.

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

As mentioned in Item 5 of this Brochure, the Firm receives performance-based fees, in the form of Carried Interest from the Clients.

Performance-based fee arrangements may potentially create an incentive for Isometry to favor Clients paying such performance-based fees versus other Clients, who do not pay such fees or may pay lower management fees and/or performance-based fees, when allocating investment opportunities. Such arrangements may also potentially create an incentive for Isometry to recommend investments that may be riskier or more speculative than those that would be recommended under a different fee arrangement. Isometry aims to design, implement and consistently apply procedures, including allocation procedures, to ensure that all Client accounts, over time, are treated equitably and fairly and that conflicts do not improperly influence the allocation of investment opportunities among Clients. However, there is no guarantee that a Client will participate in every investment opportunity identified by Isometry. Isometry periodically reviews the allocations among Client accounts in an attempt to determine that higher fee paying accounts are not systematically favored.

All Carried Interest are charged in accordance with Rule 205-3 of the Advisers Act, whereby each investor that is charged a performance fee must be a “Qualified Client.”

For a more detailed discussion on performance based fees, please see the relevant Client’s offering documents or IMA.

Item 7 – Types of Clients

Isometry’s Clients include a managed account and is expected to include private investment funds.

The minimum investment for a Managed Account is specific to the particular account. Initial and additional subscription minimums are disclosed in the offering memorandum or IMA. Holders of Managed Accounts are generally institutions, corporations, and sovereign wealth funds.

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

METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

Set forth below is a description of the firm’s methods of analysis and investment strategy.

The Saudi long-only strategy endeavors to achieve capital appreciation by entering into a relatively concentrated number equities for companies operating, residing and/or incorporated in Saudi Arabia (including, to the extent allowed under local law, direct investment in the equity and/or debt of such companies). The strategy combines a top-down view on regional economics, (geo)politics, demographics, and fiscal/monetary policy that informs their research process with a bottom-up fundamental research process, seeking to identify under-valued and/or high-growth investment opportunities within the Saudi equity market. Fundamental analysis methods include primary and secondary research on companies and research relating to strategic changes in industry sector dynamics in order to refine individual security selection. Trading and technical methods are utilized in an effort to manage overall portfolio risks as well as to attempt to hedge and balance specific market/sector/factor beta exposures.

Isometry intends to launch additional Fund vehicles combining the Adviser’s macro, fundamental and quantitative methods of idea generation, analysis and portfolio construction in emerging markets, with a focus on the Middle East and North Africa (“MENA”) region. While the strategy employs a long bias, the strategy also employs short positions through derivative swap exposure.

The strategy, from time to time, involves frequent trading which can lower investment performance, particularly due to increased brokerage and other transaction costs and taxes.

There can be no assurance that the strategies, Clients or risk management employed by Isometry will meet their objectives. Investing in securities involves a substantial and/or total risk of loss that investors should be prepared to bear.

RISK OF LOSS

Each prospective investor should, prior to investing, thoroughly review the risk factors described in the offering document or IMA, as applicable, of the relevant Client, which provides an extensive, but non-exhaustive, list of applicable risk factors. A number of the material risks related to the various investment strategies and different types of securities or other investments used by the firm are also described further below in this Item 8. Not all possible risks are described below.

Investments in the Funds or Managed Accounts involve a high degree of risk. Isometry makes no guarantee, either oral or written, that a Client's investment objective will be achieved.

MATERIAL RISKS

Prospective investors should carefully consider, among other factors, the risks described below which relate to the various investment strategies and investments made by the firm. The risks involved will vary based on the respective investment strategy and the type of securities or other investments held in the portfolio. These risk factors are not meant to be an exhaustive listing of all potential risks associated with a Client investment.

Reliance on the Adviser. The Adviser has a limited operating history. There can be no assurance that Clients will achieve their investment and risk management objectives. The past investment performance of the Adviser and its respective employees and affiliates who are responsible for managing the portfolios may not be indicative of the future results of an investment in any Fund or Managed Account. The success of an investment strategy will depend on the management, skill and acumen of the Adviser. There can be no assurance that the members of the investment management team will remain employed by the Adviser.

No Input in Fund or Managed Account Affairs. Investors in a Managed Account will generally have no right to take part in the conduct or management of a Managed Account.

Investment and Trading Risks In General. All investments risk the loss of capital. Isometry believes that its investment programs and research techniques attempt to moderate this risk to a certain degree through a selection of securities and other financial instruments and risk management techniques. No guarantee or representation, however, is made that any investment program will be successful, and investment results may vary substantially over time. An investment program may utilize such investment techniques as options, limited diversification, margin transactions and short sales, which practices can, in certain circumstances, magnify the adverse impact to which the portfolio may be subject.

Concentration of Investments; Investment Discretion. The portfolios of Managed Accounts are generally not limited with respect to the concentration of their investments in particular securities, industries, or sectors, subject to compliance with the terms of their respective IMA. The portfolios may hold a relatively small number of positions, each representing a relatively large

portion of capital. Losses incurred in positions making up a significant percentage of a portfolio's capital could have a material adverse effect on a portfolio.

In addition, the Adviser will have latitude, subject to any particular restriction or guidelines contained in the applicable private placement memorandum ("PPM") or IMA to invest or trade a Fund's and Managed Account's assets, to pursue any particular strategy or tactic or to change a Fund's or Managed Account's emphasis, objectives, policies and/or strategy, all without obtaining the approval of the Investors.

Risks Associated with Investing in Foreign Markets. The Clients will invest in foreign or domestic securities denominated in foreign currencies and/or traded outside of the United States. Such investments require consideration of certain risks typically not associated with investing in U.S. securities or property. Such risks include, among other things, trade balances and imbalances and related economic policies, unfavorable currency exchange rate fluctuations, impositions of exchange control regulation by the United States and foreign governments, U.S. and foreign withholding taxes, limitations on the removal of funds or other assets, policies of governments with respect to possible nationalization of their industries and political difficulties, including expropriation of assets, confiscatory taxation, and economic or political instability in foreign nations.

There may be less publicly available information about certain foreign companies than would be the case for comparable companies in the United States, and certain foreign companies may not be subject to accounting, auditing and financial reporting standards and requirements comparable to or as uniform as those applicable to U.S. companies. Securities markets outside the United States, while growing in volume, have, for the most part, substantially less volume than U.S. markets and many securities traded on these foreign markets are less liquid and their prices more volatile than securities of comparable U.S. companies. In addition, settlement of trades in some non-U.S. markets is generally much slower and subject to a greater risk of failure than in U.S. markets. There also may be less extensive or more arbitrary regulation of the securities markets in particular countries than in the United States. Additional costs could be incurred in connection with international investment activities. Foreign brokerage commissions generally are higher than in the United States. Expenses may also be incurred on currency exchanges when a portfolio changes investments from one country to another. Increased custodian costs as well as administrative difficulties (such as the applicability of foreign laws to foreign custodians in various circumstances, including bankruptcy, ability to recover lost assets, expropriation, nationalization, and record access) may be associated with the maintenance of assets in foreign jurisdictions. There is also potential difficulty in pursuing legal remedies.

Risks of Emerging Markets. Clients may invest in global markets that are considered to be emerging markets. Such markets are generally less mature and developed than those in advanced countries. There are significant risks involved in investing in emerging markets, including liquidity risks, sometimes aggravated by rapid and large outflows of "hot money" and capital

flight, currency risks, and political risks, including potential exchange control regulations and potential restrictions on foreign investment and repatriation of capital. In many cases, such risks are significantly higher than those in developed markets.

Emerging market countries have varying laws and regulations and, in some countries, foreign investment is controlled or restricted to varying degrees. In some countries where prior government approval is required for foreign investments, there are regulations that may limit the amount of the foreign investment in a particular type of investment, company or sector of the economy, or there are certain restrictions on foreign capital remittances abroad. There are also different fiscal policies: (i) in some countries the same treatment is given to nationals as to foreigners; (ii) in some countries capital gains are not taxable; and (iii) in some countries interest income from some securities may not be taxable or may be taxable at lower rates.

Highly Volatile Markets. The prices of financial instruments in which Clients may invest can be highly volatile. Price movements of forward and other derivative contracts in which Client assets may be invested are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. Clients are also subject to the risk of the failure of any of the exchanges on which their positions trade or of their clearinghouse.

Availability and Accuracy of Information. Isometry, as Adviser, will select investments for its Clients on the basis of information and data derived from research by Isometry and, for public companies, filed by the issuers of such securities with the SEC or foreign exchanges or regulators. Although Isometry intends to evaluate such information and data and to seek independent corroboration when Isometry considers it appropriate and when it is reasonably available, Isometry will not in many cases be in a position to confirm the completeness, genuineness, or accuracy of such information and data.

Availability of, and Ability to Acquire, Suitable Investments. While Isometry believes that many attractive investments of the type in which Clients may invest are currently available and can be identified, there can be no assurance that such investments will continue to be available or that available investments will meet Client investment criteria. In addition, Clients may be unable to find a sufficient number of attractive investment opportunities to meet their investment objective.

High Portfolio Turnover and Recognition of Gain. Clients respective investment strategy may result in a short holding period before investments are rolled over into new investments or sold. This will cause the recognition of any investment gains on a more frequent basis than other investment strategies. Many of those gains will not likely qualify for the holding period needed for capital gains tax treatment. Therefore, U.S. taxable investors may have a greater need to pay

regular taxes (out of their own resources or by requesting withdrawals) than compared to other investment strategies that hold investments longer.

Equity Securities. Clients are expected to invest in equity securities, among other types of securities. The purchaser of an equity security typically receives an ownership interest in the company as well as certain voting rights. The owner of an equity security may participate in a company's success through the receipt of dividends, which are distributions of earnings by the company to its owners. Equity security owners may also participate in a company's success or lack of success through increases or decreases in the value of the company's shares as traded in the market for such shares. Equity securities generally take the form of common stock or preferred stock. Preferred stockholders typically receive greater dividends but may receive less appreciation than common stockholders and may have lesser or greater voting rights as well. Equity securities may also include convertible securities, warrants, or rights. Convertible securities typically are debt securities or preferred stocks, which are convertible into common stock after certain time periods or under certain circumstances. Warrants or rights give the holder the right to purchase a common stock at a given time for a specified price.

Small Company Risk. Clients may invest in the securities of small or medium-sized companies that may be more susceptible to market downturns and have prices that are more volatile than those of larger companies. Smaller companies generally have narrower markets and more limited managerial and financial resources than larger established companies.

Decline in Oil Prices. The recent sustained decline in global oil prices can be attributed to a number of factors, including, but not limited to, a decline in demand for oil due to a worsening of global economic conditions, the increase in oil production by other producers and competition from alternative energy sources. In general, international prices for crude oil are also affected by the economic and political developments in oil producing regions, particularly the Middle East; prices and availability of new technologies; and the global climate and other relevant conditions. There can be no assurance that these factors, in combination with others, will not result in a prolonged or further decline in oil prices, which may continue to have an adverse effect on Saudi Arabia's GDP growth, government revenues, balance of payments and foreign trade, and therefore an adverse effect on the MENA strategy.

Limited Liquidity. Investments advised by Isometry are only suitable for sophisticated investors who have no need for liquidity in their investment. An investment in the Funds or Managed Accounts provides limited liquidity. Interests in the Funds are not freely transferable and withdrawals and redemptions are subject to applicable lock-ups and other restrictions such as notice requirements and specified dates when withdrawals and redemptions are permitted. Withdrawal and redemption proceeds may be paid in-kind, in a form that may be illiquid, not easily disposable or readily marketable for an extended period of time. Withdrawals and redemptions

are also subject to the withdrawal and redemption limits, suspension of withdrawals and redemptions and other restrictions described in the PPMs and IMAs.

Incentive Allocation or Performance-Based Fee. The allocation to the Adviser or its affiliates of a percentage of each investor's net capital appreciation for a fiscal year, or the payment to the Adviser of a performance-based fee, may create an incentive for the Adviser to cause the portfolios to make investments that are riskier or more speculative than would be the case if this special allocation or payment of performance fees were not made, as noted in Item 6 above. In addition, since the Adviser or its affiliate's incentive allocation and performance fees are calculated on a basis which includes unrealized appreciation of Client assets, such allocations and fees may be greater than if it were based solely on realized gains. The incentive allocation made and performance-based fees paid by the Clients to the Adviser or its affiliate were set by the Adviser or its affiliates without negotiations with any third party.

Valuation of the Fund's or Managed Account's Assets. The Adviser has delegated to an administrator (the "Administrator") the determination of the net asset value of certain of the Funds and Managed Accounts. In determining the net asset value, the Administrator will follow the valuation policies and procedures adopted by the Adviser. If and to the extent that the Adviser or its affiliates are responsible for or otherwise involved in the pricing of any of the Funds' or Managed Accounts' portfolio securities or other assets, the Administrator may accept, use and rely on such prices in determining the net asset value of the Fund or Managed Account and shall not be liable to the Fund or Managed Account or any investor, or the Adviser, or any other person in so doing. Since the Funds and Managed Accounts may hold a significant portion of their assets in a form of illiquid, not readily marketable or non-publicly traded securities or other investments, the value assigned to such securities or other investments by the Adviser or its affiliates and/or the Administrator may materially differ from the actual value received for such securities or other investments upon a happening of a liquidation event with respect to such securities or other investments.

Reliance on Technology and Electronic Trading. The Adviser relies heavily on computer hardware and software, online services and other computer-related or electronic technology and equipment to facilitate the investment activities of its Clients. Specifically, the Adviser may trade financial instruments through electronic trading or order routing systems, which differ from traditional open outcry pit trading and manual order routing methods. Such electronic trading exposes the Clients to risks associated with system or component failure, which could render the Adviser unable to enter new orders, execute existing orders or modify or cancel previously entered orders. System or component failure may also result in loss of orders or order priority. Should events beyond the Adviser's control cause a disruption in the operation of any technology or equipment, the investment program of the Clients may be severely impaired, causing it to experience substantial losses or other adverse effects.

Business Continuity and Disaster Recovery Risks.

The Firm's business operations may be vulnerable to disruption in the case of catastrophic events such as fires, natural disaster, terrorist attacks, pandemic outbreak or other circumstances resulting in property damage, network/operations interruption and/or prolong power outages. A disaster or a disruption in the infrastructure that supports the Adviser's business, including a disruption involving electronic communications or other services used by it or third parties with whom it conducts business, or directly affecting one of its offices or facilities, may have a material adverse effect on its ability to continue to operate the business without interruption. Although the Adviser has a business continuity program in place, there can be no assurance that this will be sufficient to mitigate the harm that may result from such a disaster or infrastructure disruption. In addition, insurance and other safeguards might only partially mitigate the effects of such a disaster or disruption.

Cybersecurity Risk and Identity Theft. The Adviser's hardware and software systems are subject to threats from hackers and others, such as a malicious attack, malware or other event that leads to unanticipated interruption or malfunction of such systems. Any interruption of the Adviser's hardware or software functionality could lead to material or even complete losses to a Client. Hackers could also theoretically access and steal the Adviser's research, models, trading programs or other software or data and implement such programs or software on their own behalf. This could lead to increased competition for, or elimination of, the investment opportunities sought by any of the Clients or otherwise render the models developed by the Adviser obsolete, possibly resulting in material or complete losses to a Client.

Conflicts Associated with the Adviser's or its Affiliates' Other Activities. The Adviser and/or its affiliates may also elect in the future to sponsor, manage or participate in other securities and other investment activities and programs unrelated to the Funds and Managed Accounts (some of which may compete with the Funds and Managed Accounts' investment activities). The Adviser and/or its affiliates may also engage in business ventures unrelated to the activities of the Funds and Managed Accounts and business opportunities that relate to, or which they became aware of because of, investments made by a Fund(s) or Managed Account(s) but which opportunities are deemed by the Adviser not to be suitable for the Fund's or Managed Account's portfolio. Investors in the Funds and Managed Accounts will have no right to participate in such activities of the Adviser or its affiliates and will have no right to participate in any profits generated from such activities. The Adviser may in certain circumstances enter into agreements with companies owned by, or affiliated with, the Adviser or its principals, the expenses of which are borne by the Funds or the Managed Accounts. The Adviser will enter into such arrangements only if it determines that such arrangements are made on arm's length and the fees to be paid are reasonable in relation to similar services available in the marketplace.

1. **Competing Time Pressures.** The other activities of the Adviser and its affiliates will create conflicts of interest with the Funds and Managed Accounts over the time devoted

to managing the portfolios of the Funds and Managed Accounts versus the time devoted to other activities.

2. **Conflicting Fiduciary Duties.** Because the Adviser and its affiliates may have fiduciary duties to a Fund or Managed Account and to other clients, the interests of a Fund or Managed Account and the other clients in the selection, allocation, negotiation and administration of investments may conflict, and the Adviser and its affiliates will be subject to conflicting demands on their time and attention. The Adviser and its affiliates will attempt to resolve all such conflicts in a manner that is fair to all such interests.

Allocation of Investment Opportunities. The Adviser on behalf of the Funds and Managed Accounts, and in other capacities with other entities or for its own accounts, will have discretion in determining which investments will be made by the Funds, Managed Accounts or other clients, sold to others, or made by the Adviser or their affiliates with or without the participation of the Funds or Managed Accounts. In addition, the Adviser may be able to obtain more favorable compensation, cost reimbursement or risk-sharing arrangements in connection with some investments if a Fund or Managed Account does not participate and the Adviser or its affiliates may be influenced to refrain from causing a Fund or Managed Account to make such investments even though participation might benefit such Fund or Managed Account. Under the governing documents of a Fund or Managed Account (which investors and potential investors should carefully review) the Adviser or its affiliates may be permitted to make any investments, whether or not in competition with a Fund or Managed Account or in a manner that would limit or eliminate such Fund's or Managed Account's opportunity to make the investment, without any accountability to such Fund or Managed Account.

When two or more share classes of a Fund(s) or Managed Account seek to purchase the same securities, the securities actually purchased or sold will be allocated among the share classes on a good faith equitable basis by the Adviser or its affiliates in their sole discretion in accordance with the respective investment objectives and policies of each share class, including any special investment policies of a particular share class, and the procedures adopted by the Adviser.

Item 9 –Disciplinary Information

Neither Isometry nor any of Isometry's management personnel are subject to, or have in the past been subject to, any criminal or civil action in any domestic or foreign court, and neither has Isometry nor any of our management personnel been subject to any material administrative proceeding before the SEC or any other state, federal or foreign financial regulatory authority.

Item 10 – Other Financial Industry Activities and Affiliations

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

Additionally, neither Isometry nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Isometry does not recommend or select other investment advisers for its Clients from which it directly or indirectly receives compensation.

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

Isometry has adopted a Code of Ethics (the “Code”) for all supervised persons describing its standards of business conduct. The Code of Ethics includes provisions relating to personal securities trading and participation in outside business interests, among other things. All supervised persons at Isometry must acknowledge the terms of the Code annually and when amended. A copy of Isometry’s Code is made available to investors and prospective investors upon request.

Isometry anticipates that, in appropriate circumstances, consistent with Clients’ investment objectives, it will cause accounts over which it has management authority to purchase or sell securities in which Isometry, its affiliates and/or Clients, directly or indirectly, may have a position of interest. Isometry anticipates that in most, but not necessarily all, circumstances it will also recommend such purchases or sales of securities to Clients. The determination and resolution of any conflict will be addressed by the Chief Compliance Officer.

All employees and other supervised persons are required to follow the Code. Subject to satisfying this policy and applicable laws, Isometry and its members, owners, directors, officers and employees, and their immediate families to the extent residing in the same household, may trade for their own accounts in securities that are recommended to and/or purchased for Isometry’s Clients. The Code is designed to prevent the personal securities transactions, activities and interests of employees and other supervised persons from interfering with their duty to act in the best interest of Isometry’s Clients. However, actual or apparent conflicts of interest may exist. Personal trading is periodically monitored under the Code of Ethics in an attempt to reasonably prevent conflicts of interest between Isometry and its Clients. The Code sets forth formal policies and procedures with respect to the personal securities trading activities of the Firm’s employees. The Code prohibits personal securities transactions of issuers who have been placed on the Firm’s restricted list, and requires written pre-approval for all initial-public offerings and private

placements. The Code requires employees to preclear and report all reportable securities transactions and provide a summary of securities holdings initially upon hire and on an annual basis thereafter. The Code also addresses outside activities of employees, conflicts of interest, policies and procedures concerning the prevention of insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and the pre-clearance and reporting of political contributions.

Item 12 – Brokerage Practices

Federal law requires Isometry to deal fairly and honestly with and on behalf of its Clients. While Isometry is not required to obtain the lowest available commission rate for executing a given trade, it is Isometry's fiduciary obligation to use its "best efforts" to obtain a reasonable commission rate in relation to the quality of the execution and the value of brokerage services received from the executing broker. Therefore, Isometry has adopted standards with respect to executing trades.

It is Isometry's policy for the Chief Operating Officer, in consultation with the portfolio managers and traders, to assess a new broker-dealer relationship using some or all of the following performance factors: execution capability; research quality; commissions and pricing; and use of electronic efficiencies.

Isometry evaluates existing broker-dealer relationships using the assessment factors itemized above.

Isometry conducts meetings with trade personnel (including portfolio managers and traders) to review its approved broker dealers, as reflected on Isometry's written broker commission report.

Research and Other Soft Dollar Benefits. It is Isometry's policy to limit its use of soft dollars to arrangements falling within the safe harbor of Section 28(e) of the Securities Exchange Act of 1934, as amended. Only bona fide research and brokerage products and services that provide assistance to Isometry in the performance of its investment decision-making responsibilities are permitted and any allocation of brokerage commissions is reasonable in relation to the research, service or product provided.

Isometry receives a wide range of research services from brokers and dealers. These services include information on the economy, industries, groups of securities, individual companies, statistical information, political developments, legal developments affecting portfolio securities, technical market action, pricing and appraisal services, credit analysis, risk measurement analysis, performance analysis and analysis of corporate responsibility issues. These services provide both domestic and international perspective. Isometry may use soft dollars to pay for research services provided by companies owned by, or affiliated with, Isometry or its principals only if Isometry determines that: (i) the research services provide assistance to Isometry in its investment decision making responsibilities, (ii) any such arrangement is made on arm's length and (iii) the fees paid

to such providers are reasonable in relation to similar services available in the marketplace. In addition, such services may be provided in the form of meetings arranged with corporate and industry spokespersons, economists, academicians and government representatives. In some cases, research services are generated by third parties but are provided to Isometry by or through broker-dealers.

Consistent with seeking best execution, Isometry directs transactions for the Funds and Managed Accounts to executing brokers in return for research or brokerage services furnished by them to Isometry. Selecting an executing broker in recognition of such research or brokerage services, rather than on the basis of simple transaction execution, is known as paying for those services with “soft dollars.” Research and other brokerage services or products received by Isometry generally will be used to service all of the Isometry-advised Funds and Managed Accounts. Research provided by such brokers may be used to service all Clients and not exclusively in connection with the management of the Client that generated the particular soft dollar credits.

In some cases, the soft dollars paid to an executing broker for a Fund’s or Managed Account’s transactions may be greater than the commissions that are charged by another broker that does not provide soft dollar research or services to Isometry. Because many brokerage soft dollar products or services could be considered to provide a benefit to Isometry, and because the soft dollars used to acquire them are the assets of the client Funds and/or Managed Accounts paid as execution costs, Isometry could be considered to have a conflict of interest in allocating client brokerage business.

Isometry does not use brokerage in exchange for client referrals nor does it participate in directed brokerage.

Aggregation Policy. The SEC has stated that when a transaction is suitable for more than one client, an investment adviser may aggregate trade orders and allocate purchase and sale opportunities on a fair and consistent basis. Management of the Client’s portfolios is governed by the principle of fair allocation of investment opportunities.

The following policy applies to all portfolios managed by Isometry and is designed to ensure that trades are allocated on a basis Isometry believes to be fair and equitable.

Subject to exceptions referenced below, Isometry aggregates contemporaneous trade orders for the same security on the same day. Each Fund or Managed Account that participates in an aggregated order through a broker will participate at the average price for all of Isometry’s transactions that fill that order that day. Transaction costs are promptly allocated to each applicable Fund and Managed Account on a pro rata basis based upon the ratio of the amount of particular issue of securities purchased or sold for the fund/account in relation to the overall amount of that issue purchased or sold for all accounts in the aggregated order.

On occasion, Isometry will not purchase or sell in a single day all of the securities ordered as part of an aggregated order. If the order is partially filled, it will generally be allocated pro rata in proportion to the size of the orders placed for each fund based on the final allocation instructions.

Notwithstanding the foregoing, if an order is partially filled, it may be allocated on a basis different from that specified in the final allocation instructions, provided that the participating funds/accounts receive fair and equitable treatment consistent with this policy and procedures. The reason(s) for allocating on a basis different from the final allocation should be explained in reasonable detail and documented with the Compliance department.

Once an order is filled, or partially filled, subsequent same day orders for the same security from other funds or accounts will not necessarily be aggregated with the previously filled order if to do so would not be equitable under the circumstances.

Different portfolio managers or teams may on occasion be active in the same security on the same day. Orders for the same security on the same day may be worked and filled separately if the terms of the orders, or the desired pace of fill specified by the respective portfolio managers, are different, or if the portfolio manager(s) specifically request individual order segregation.

Other permissible bases for not aggregating trades in a particular situation include: use of limit orders or other different terms or objectives makes aggregation disadvantageous or inequitable; the head trader or relevant portfolio managers determine in a particular case that all participating funds or accounts would likely benefit from working orders individually with several brokers; foreign market regulations or foreign market settlement practices preclude effective aggregation; or the head trader or relevant portfolio managers determine that aggregation will create trading inefficiencies in a given case.

In allocating investment opportunities among Clients, Isometry will consider several factors including:

- a. The investment objectives of the respective Client;
- b. The current exposure of each Client to that particular position or that particular sub-sector;
- c. The target allocation of each Client for that particular position or that particular sub-sector;
- d. The current exposure (long, short, gross and net) of each Client in total and by sub-sector; and
- e. The liquidity of the investment opportunity.

Item 13 – Review of Accounts

Mr. von Renouard and the portfolio managers he assigns are responsible for the daily review of any Client accounts.

The portfolios of the Clients are reviewed on a continual basis by the assigned portfolio managers to assure conformity with investment objectives and guidelines. The Adviser actively manages the Clients and accordingly reviews the transactions, positions and cash balances on a daily basis.

The Adviser utilizes an independent administrator to send monthly account statements to Client investors.

Item 14 – Client Referrals and Other Compensation

None.

Item 15 – Custody

Isometry generally does not accept custody with respect to SMAs.

With the exception of certain instruments evidencing ownership of certain privately issued securities, if and when a Fund vehicle is launched, custody of the securities of each Fund will be maintained under clearing broker arrangements with one or more clearing brokers or banks (the “Custodian”) selected by Isometry in its sole discretion, each of whom is a “qualified custodian” as required under the Custody Rule. Such instruments evidencing ownership of privately issued securities, if applicable, will be maintained in accordance with the Custody Rule. Isometry will also engage an independent public accountant registered with, and regularly examined by, the Public Company Accounting Oversight Board to conduct annual financial audits of its Funds prepared in accordance with U.S. Generally Accepted Accounting Principles and deliver the audited financial statements directly to investors in such Funds within 120 days of the end of any Funds’ fiscal year.

Item 16 – Investment Discretion

Isometry has full discretionary authority over assets held by the Clients, limited only by the investment guidelines set forth in each Client’s offering documents and IMA. Investment discretion exercised by Isometry includes discretion regarding:

1. Securities to be bought or sold;

2. The amount of the securities to be bought or sold;
3. The broker-dealer to be used in the transaction; and
4. The commission rate to be paid to the broker-dealer that executes the transaction.

Isometry's discretionary authority may be subject to conditions imposed by each Client (for example, investment restrictions regarding specific securities or industries, gross or net exposure guidelines, or maximum position sizes).

Prior to assuming discretionary authority of a new Client, an IMA is prepared and executed.

Item 17 – Voting Client Securities

In compliance with Advisers Act Rule 206(4)-6, Isometry has adopted proxy voting policies and procedures. The general policy is to vote proxy proposals, amendments, consents or resolutions (collectively, "Proxies") in a prudent and diligent manner that will serve the applicable Client's best interests and is in line with each Client's investment objectives.

Isometry exercises proxy voting authority with respect to securities held in Managed Accounts as mandated by their respective IMAs (and may do the same with regard pooled investment vehicles) with the exception that securities that may be lent out pursuant to a Master Securities Lending Agreement may, from time to time, not be voted by Isometry. Potential or actual conflicts of interest that exist between the Adviser (or its principals or employees) and the Client's best interests may require that either Client consent to vote the proxy is obtained or that Isometry delegate voting authority back to the Client or a qualified third party. Generally, Clients are not able to direct the vote in a particular situation. Policies and procedures are implemented by Isometry to ensure its compliance with all regulatory requirements and are made available to investors upon request.

Upon written request to a member of Isometry's investor relations group or its Chief Compliance Officer, Isometry will promptly provide an investor in a Fund or Managed Account information as to how the Client voted (or declined to vote) a proxy(s) relating to a security(s) held by the Client, including the date of such action and the basis for the vote or decision not to vote a proxy(s).

Managed Accounts may decide to vote their own proxies. In such cases they will receive their proxies or other solicitation directly from their custodian or a transfer agent. A Managed Account may contact Isometry's Chief Compliance Officer with questions regarding a particular solicitation.

Item 18 – Financial Information

Isometry does not require or solicit pre-payment of fees six months or more in advance. Isometry 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.

Item 19 – Requirements for State-Registered Advisers

This section is not applicable to Isometry.