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**Firm Brochure
March 30, 2022**

This brochure provides information about the qualifications and business practices of Post Advisory Group, LLC ("Post"). If you have any questions about the contents of this brochure, please contact us at (310) 996-9600 or marketing@postadvisory.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC") or by any state securities authority.

Post is an SEC registered investment adviser. Registration as an investment adviser does not imply any level of skill or training.

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

Item 2 – Material Changes

Effective March 1, 2022, Debbie Flickinger joined Post as Chief Operating Officer, and Naomi Lynch, formerly Client Portfolio Manager, was promoted to Deputy Chief Operating Officer. Ms. Flickinger has more than 35 years of financial services experience and background in managing operations and teams. Most recently she served as chief operating officer for CenterSquare Investment Management. Prior to her time with CenterSquare, Flickinger held leadership roles at BNY Mellon, Deutsche Bank, and Merrill Lynch. She earned an MBA from Fairleigh Dickinson University and a Bachelor of Arts in finance from Pennsylvania State University. Ms. Flickinger also previously served on the board of directors for the Association of Institutional Investors.

Effective March 25, 2021, Mr. Jun Sato, President and CEO of Nippon Life Global Investors Americas, became a Director of Post, replacing Mr. Masamichi Kishimoto. Ms. Kathryn Jones, Chief Compliance Officer, left the firm on July 23, 2021, and Andrew Donohue assumed the role of Chief Compliance Officer on this date.

Pursuant to SEC Rules, you will receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our business' 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 and without charge.

Currently, our brochure may be requested by contacting Post's Client Services Department at (310) 996-9600 or marketing@postadvisory.com.

Additional information about Post is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Post who are registered, or are required to be registered, as investment adviser representatives of Post.

The last (annual) updating amendment of this brochure was dated as of March 30, 2021, and the last update was dated as of July 23, 2021.

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Item 4 – Advisory Business

Post is a leading multi-strategy, value-oriented asset manager specializing in global high yield and senior loans.

Post was founded in 1992, as Post Advisory Group, Inc. As of December 31, 2021, Post is 76.0% owned by Principal Global Investors Holding Company US LLC (“PGI Holding”), a member of Principal Financial Group, 19.0% by NLI US Investments, Inc. (“NLI”), wholly owned by Nippon Life Insurance Company, and 5.0% owned by Post select senior investment professionals. Post is headquartered in Los Angeles, California and maintains an office in New York, New York.

Post provides discretionary investment advisory services primarily to institutional clients, private investment funds, private collateralized loan obligations (“CLO”) structured vehicles, a private equity fund, pension plans, multi-employer plans, foundations and endowments, corporations, and international, state and municipal entities. In addition, Post provides sub-advisory services to certain mutual funds, Undertakings for Collective Investment in Transferable Securities (“UCITS”), and Qualifying Investor Alternative Investment Funds (“QIAIFs”).

Post specializes in high yield debt securities, including bonds, senior loans, bridge loans and non-US investments. Post may invest in a broad array of securities and reserves the right to pursue other investment strategies. There can be no assurances that Post's investments or trading activities will be profitable.

Post collaborates with clients to determine investment needs and portfolios may be tailored to specific requirements and restrictions on investing in certain securities or types of securities.

As of December 31, 2021, Post managed approximately \$17.729 billion in assets on a discretionary basis and no non-discretionary assets.

Item 5 – Fees and Compensation

Post offers its services for compensation primarily based on a percentage of assets under management or on a fixed fee basis. Post manages commingled investment vehicles (“Funds”) and separately managed accounts (“Separate Accounts”). The following describes the fees and compensation charged to the Funds and Separate Accounts.

Private Funds

With respect to the Funds, Post charges its clients a management fee and for certain Fund expenses. Any fees, expenses and deductions are expressly provided for in the offering documents that govern the operations of each Fund.

Post Traditional High Yield Fund – (master-feeder structure):

Post serves as general partner/investment advisor to the Post Traditional High Yield Fund private funds, which are organized as a master-feeder structure with onshore and offshore funds. A management fee of 0.65% is generally charged to the capital account of each investor in this structure; the management fee is typically payable monthly in advance. This Fund has no incentive fee or allocation.

Post Intermediate Term High Yield Fund -- (Delaware LP):

Post serves as general partner/investment advisor to the Post Intermediate Term High Yield Fund. A management fee of 0.65% is generally charged to the capital account of each investor in the Post

Intermediate Term High Yield Fund; the management fee is typically payable monthly in advance. This Fund has no incentive fee or allocation.

Post Limited Term High Yield Fund – (master-feeder structure):

Post serves as general partner/investment advisor to the Post Limited Term High Yield Fund private funds, which are organized as a master-feeder structure with offshore and onshore funds. A management fee of 0.65% is generally charged to the capital account of each investor in this structure; the management fee is typically payable monthly in advance. This Fund has no incentive fee or allocation.

Post Senior Loan Fund – (master-feeder structure):

Post serves as general partner/investment advisor to the Post Senior Loan Fund private funds, which are organized as a master-feeder structure with offshore and onshore funds. A management fee of 0.50% is generally charged to the capital account of each investor in this structure; the management fee is typically payable monthly in advance. This Fund has no incentive fee or allocation.

Post CLO Equity Fund – (master-feeder structure)

Post serves as investment manager to the Post CLO Equity Fund private funds, which are organized as a master-feeder structure with offshore and onshore funds. Post is affiliated with the general partner to the funds, Post CLO Equity Fund Management, LLC, a Delaware limited liability company. No management fee is charged to the funds.

The governing documents for the Funds provide that Post may enter into separate agreements with various clients in certain circumstances. The separate agreements may offer terms that are otherwise not available to other fund investors. These agreements may entitle Post to receive performance fees or allocations from clients. This fee arrangement may create an incentive to choose investments that have higher risk than may be the case with alternative fee arrangements. Post has procedures in place that are designed to treat all clients fairly and equally, and to prevent conflicts from influencing the allocation of investment opportunities among clients.

Fees and/or minimum investment amounts in all categories and ranges described herein are subject to negotiation, as appropriate. In general, Funds (and indirectly investors) do not incur brokerage fees, however per share commissions are charged on equity shares or (high yield) exchange-traded funds (ETFs), as may be applicable. Please see Item 12 for more information on brokerage practices. Other transactional costs including, but not limited to, custodial fees, may be charged to the client as set out in the Funds' offering documents.

Separate Accounts

With respect to Separate Accounts, management fees are generally charged net of expenses. Invoices are generally sent quarterly to the client. Fees and reimbursable expenses are expressly set out in each client's respective investment management agreement.

Post High Yield Strategy:

A typical management fee for Separate Accounts in Post's High Yield Strategy is 60 basis points, excluding certain custodial and other charges, as set out in the investment management agreement.

Post High Yield Plus Strategy:

A typical management fee schedule for Separate Accounts in Post's High Yield Plus Strategy is 65 basis points, excluding certain custodial and other charges, as set out in the investment management agreement.

Post Intermediate Term High Yield Strategy:

The typical management fee for Separate Accounts in Post's Intermediate Term High Yield Strategy is 65 basis points, excluding certain custodial and other charges as set out in the investment management agreement.

Post Limited Term High Yield Strategy:

The typical management fee for Separate Accounts in Post's Limited Term High Yield Strategy is 65 basis points excluding certain custodial and other charges as set out in the investment management agreement.

Post Senior Loans Strategy:

The typical management fee for Separate Accounts in Post's Senior Loans Strategy is 50 basis points excluding certain custodial and other charges as set out in the investment management agreement.

Post ESG Strategy:

The typical management fee for Separate Accounts in Post's ESG Strategy is 65 basis points excluding certain custodial and other charges as set out in the investment management agreement.

Fees and minimum investment amounts are negotiable. In general, clients do not incur brokerage fees, however per share commissions are charged on equity shares or (high yield) exchange-traded funds (ETFs), as may be applicable. Please see Item 12 for more information on brokerage practices. However, other transactional costs, including, but not limited to, custodial fees, may be charged to the client as set out in each Separate Account's investment management agreement.

Apostle Funds Management Pty. Limited

Apostle Funds Management Pty. Limited (Australian corporation) ("Apostle") and Post have entered into a distribution agreement regarding managing of certain funds or fund portions for which it appoints Post as manager and for providing distribution services for Post in Australia. The negotiated fee is the greater of an annual percentage of the gross asset value or a minimum flat fee in AUD per annum.]

Briarwood Partners Limited

Briarwood Partners Limited (England and Wales corporation) ("BPL") and Post have entered into a distribution agreement with regard to marketing or introducing UCITS funds which Post will be managing and for providing distribution services in the European Economic Area, United Kingdom and Switzerland on behalf of Post for such fund(s) or separately managed accounts (of similar strategy) introduced to Post. The negotiated fee is based on a percentage of the applicable management fees on fund or separate account assets attributed to GPL's introduced investors or separate accounts, respectively.

Principal (various legal entities)

Principal Global Investors, LLC (Delaware llc) ("Principal") and Post have entered into sub-advisory agreements with regard to management of certain funds for which it appoints Post as the sub-advisor and for which Post receives a sub-advisory fee. In addition, the parties have entered into a distribution agreement for providing distribution services for Post. The negotiated fee is an annual percentage of the management fees earned on clients referred to Post by Principal.

Gudme Raaschou Asset Management

Gudme Raaschou Asset Management (company in Denmark)("Gudme") and Post have entered into a distribution agreement with regard to management of certain funds for which it appoints Post as manager and for providing distribution services for Post in Denmark. The negotiated fee is an annual percentage of the management fees earned on clients referred to Post by Gudme.

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

There are circumstances where Post may charge a performance fee. Any performance fees will be in compliance with Rule 205-3 of the Investment Advisers Act of 1940, as amended (the “Advisers Act”). Performance fees, if appropriate, are negotiated on an individual basis. In measuring clients' assets for the calculation of performance-based fees, Post shall include realized and unrealized capital gains and losses. Performance-based fee arrangements may create an incentive for Post to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee-paying accounts over other accounts in the allocation of investment opportunities. Post has procedures in place that are designed to treat clients fairly and equally, and to prevent conflicts from influencing the allocation of investment opportunities among clients.

Item 7 – Types of Clients

Post provides investment advisory services primarily to institutional clients, private investment funds, private collateralized loan obligation (CLO) structured vehicles, a private equity fund, pension plans, Taft-Hartley (multiemployer) plans, foundations and endowments, corporations and international, state and municipal entities. In addition, Post provides sub-advisory services to certain mutual funds, commingled funds, UCITS and QIAIFs.

Private Fund Accounts

In general, the minimum account size for an investor in a Private Fund is \$3 million, although Post reserves the right, in its sole discretion, to accept a lesser amount.

Separate Accounts

In general, the minimum account size for a Separate Account is \$50 million, although Post reserves the right, in its sole discretion, to accept a lesser amount.

Separate Limited Partnerships

In general, the minimum account size for a separate limited partnership is \$75 million, although Post reserves the right, in its sole discretion, to accept a lesser amount.

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

Our investment process is more fully described in the steps outlined below.

1. **Idea Generation:** Investment ideas are generated and evaluated by the investment professionals responsible for credit research. Our analysts are always looking for new ideas or new perspectives on old ideas and are responsible for monitoring all of the credits in the industries they cover as well as relevant developments in these industries that have the potential to impact these credits. Investment opportunities come from many different sources including research on credits currently in a Post managed portfolio, new issuers to the market, industry sources, attendance at trade and business conventions, industry publications and newspapers, and high yield dealers.
2. **Value Scoring Model:** One of the tools we use to help summarize and screen potential ideas is the Value Scoring Model. The Value Scoring Model is a 100-point system that includes quantitative and qualitative factors, including: (1) industry position (stability/predictability, barriers to entry, competition, pricing power and regulatory environment); (2) company position (assets, profitability, cash flow trends, credit statistics, company scale, ownership/management and event risk); and (3) security position (seniority in capital structure, covenant protection and corporate structure). Analysts are responsible for the initial creation of the Value Scoring Model for potential investment ideas.

3. **Fundamental Credit Research:** Once an investment opportunity is deemed to be attractive, as part of our fundamental credit research process, analysts will build their own financial model or discreet financial analysis, which may contain some combination of historical and projected financial results, key financial performance drivers (e.g., prices and volumes, and cost drivers), key credit metrics (e.g., free cash flow, leverage statistics, and interest coverage statistics), asset value estimates, and/or sum-of-the-parts analyses. Financial projections are developed and refined throughout the due diligence process, and monitored and updated continuously, after carefully identifying and reviewing revenue and cost drivers, supply and demand fundamentals, each company's competitive landscape, macro industry trends, and any available financial guidance from the issuer or competitors. Analysts will also conduct a detailed relative value analysis of each individual security to ensure attractive pricing relative to other securities with a similar duration and risk profile, both within the issuer's capital structure and in relation to comparable companies.

Importantly, our due diligence process will typically include in-person meetings with management/equity holders, on-site visits and investigative conference calls with competitors, industry experts, and sell-side analysts. We believe this qualitative diligence is extremely important and not only provides a thorough and well-rounded understanding of a company's business model, competitive challenges and strategic plans, but also gives us the ability to identify sustainable competitive advantages (or disadvantages) and potential risks associated with actions taken by competitors or equity holders.

Finally, analysts will conduct a thorough legal analysis of all applicable covenants as well as corporate structure to ascertain potential future risk and to ensure downside protection.

4. **Portfolio Management:** After the research analysis is complete, the CIO, Deputy CIO, and portfolio managers will determine the securities to be purchased, the size of each position, and the purchase strategy (e.g., whether to scale in gradually vs. building a position more quickly) based on market conditions. Utilization of a top-down macro and technical overlay allows us to reposition the portfolio to play "defense" and "offense" as market conditions warrant, which enhances our ability to generate high upside correlations and low downside correlations. For example, when the market strengthens materially and for a prolonged period of time, we often play "defense" by incrementally diversifying portfolios, rotating from higher beta, more cyclical industries to more defensive industries, moving up the capital structure, moving in on the credit curve to shorten duration, reducing exposure to liquid "flow" bonds, and raising cash levels. On the other hand, when the market is weak and we believe a sell-off is overdone, we begin to play "offense" by buying oversold securities which we believe are attractive, selectively rotating into higher beta credits with more upside potential, moving down in the capital structure, moving out on the credit curve to increase convexity, purchasing liquid "flow" bonds that have been technically oversold, and reducing cash levels.

Another key component of our portfolio construction process is position sizing. We firmly believe appropriate position sizing is almost as important as strong credit selection - it is imperative that the right amount of capital is deployed behind the right ideas at the right time, based on both relative and absolute value. As part of this right-sizing process, we proactively and opportunistically scale in and out of positions to maximize value based on market conditions, relative and absolute value, and liquidity considerations.

5. **Active Risk Management:** We continually monitor our investments once investments are added to our portfolios. Our analysts routinely follow procedures so they have the most up-to-date information about the investments that are held in the portfolios and report these findings to portfolio managers, who rebalance the portfolio as necessary given changes in the risk profile of individual securities and / or industries as a whole. As part of these procedures, analysts review news releases relating to the specific company as well as key competitors in the industry, institutional research, and filings with the SEC including 10Qs, 10Ks, and 8Ks. In addition, analysts

speaking directly with senior and middle management, customers, suppliers, and other industry experts. We believe this process enables us to obtain a thorough understanding of the fundamentals for that particular investment and how it stands relative to its industry. Portfolio managers continually manage risk through our disciplined investment process.

Investing in securities involves risk of loss that clients should be prepared to bear. Post cannot guarantee the performance of client accounts, any specific level of performance, the success of any investment decisions or strategies, or the success of Post's overall management of the account. Investment decisions made by Post are subject to various risks, including but not limited to, market, currency, economic, political and business risks, and those investment decisions will not always be profitable. Post focuses on high-yield fixed income securities, and therefore, may expose clients to special risks (although the accounts may invest in other securities and investments with separate risks). In addition, high-yield bonds generally have greater volatility and risk of loss of principal due to a higher default rate than securities that are rated investment grade. Changes by recognized ratings services in their ratings of a bond, changes in the financial condition of a company, and changes in general economic conditions may dramatically affect a company's ability to make interest and principal payments, and this may in turn affect the value of the company's high-yield bonds.

For more information on the risks involved in investing in the Funds, please see the applicable Fund offering documents.

Item 9 – Disciplinary Information

Investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Post or the integrity of Post's management team. Post has no information that is responsive to this Item 9.

Item 10 – Other Financial Industry Activities and Affiliations

Post serves as general partner/investment adviser to the Post Traditional High Yield Master Fund, LP, Post Traditional High Yield Fund LP, Post Traditional High Yield Offshore Fund, Ltd., Post Intermediate Term High Yield Fund LP, Post Limited Term High Yield Master Fund LP, Post Limited Term High Yield Fund LP, Post Limited Term High Yield Offshore Fund Ltd, Post Senior Loan Master Fund LP, Post Senior Loan Fund LP, Post Senior Loan Offshore Fund Ltd., Post CLO Equity Master Fund LP, Post CLO Equity Offshore Fund LP, Post CLO Equity Onshore Fund LP. Post serves as collateral manager to the Post CLO 2018-1 Ltd., Post CLO 2021-1 Ltd., and Post CLO 2022-1 Ltd., or other CLO vehicles it may manage and/or co-issue.

Certain clients of Post may be offered the opportunity to invest in one or more of these limited partnerships, or additional limited partnerships that may be formed by Post or its affiliated general partner, Post CLO Equity Management, LLC from time to time.

Post is majority owned by PGI Holding, with minority stakes held by NLI and by select Post investment professionals, it may have certain common officers and/or directors with PGI Holding or its subsidiary, Principal Global Investors, LLC ("PGI"), or Principal Global Asset Management ("PGAM").

From time to time, Post may serve as an adviser or sub-advisor for PGI and/or NLI accounts, which currently includes Separate Accounts. Post also acts as sub-investment advisor under Principal Global Investors Funds (the "Unit Trust") for the Post Global Limited Term High Yield Fund (a UCITS). In addition, Post acts as sub-investment advisor under Principal Global Opportunities Series p.l.c. for the Post Intermediate Term High Yield Fund (a QIAIF). In order to perform certain sub-advisory services, Post, PGI and NLI may share investment and compliance information. Also, Post, PGI, PGAM and NLI may share certain personnel and/or other resources for compliance and/or operational functions.

PGI Holding and PGI are under common control with Principal Securities, Inc., ("Principal Securities"), a broker-dealer registered with the SEC and a FINRA member firm that markets a variety of mutual funds, unit investment trusts and limited partnerships. Principal Securities is the principal underwriter and distributor of institutional shares of a family of mutual funds organized by Principal Life. Post does not currently conduct any brokerage business with Principal Securities. PGI Holding and PGI are also under common control with SAMI Brokerage, LLC, ("SAMI") and with Principal Funds Distributor, Inc, ("PFD") both are broker-dealers registered with the SEC and FINRA member firms. Post does not currently conduct any brokerage business with SAMI, however certain Post employees may be and currently are registered representatives of PFD.

Principal Financial Services, Inc. ("Principal Financial") is the sole legal and beneficial owner of PGI Holding, and of Principal Life Insurance Company ("Principal Life"). Principal Life is an Iowa stock license insurance company engaged in the business of insurance and retirement services. Principal Life is licensed as an insurance company in all states in the United States and the District of Columbia and Puerto Rico.

Item 11 – Code of Ethics

Pursuant to Rule 204A-1 under the Advisers Act, Post has adopted a Code of Ethics Policy (the "Code") which seeks to prevent conflicts of interest or the appearance of such conflicts and sets forth certain standards of business conduct and personal transactions for employees/access persons of Post. All Post access persons must acknowledge they understand and are subject to the terms of the Code annually or as materially amended. Below is a summary of certain provisions of the Code and related policies.

Personal Securities Transactions

With respect to access person (employees, temporary employees and certain other persons) effecting personal securities transactions, Post has implemented personal trading policies as part of its Code. Access persons must pre-clear all purchases and sales of securities except for securities of asset classes in which Post does not invest on behalf of clients, exempted securities, and certain exempted transactions. Also access persons are restricted from transacting in short sales of a security, as well as any public or 144A/REG S private security or underlying security issued by an entity on Post's Watchlist (e.g. for which Post may have non-public information). Additionally, employees must obtain a pre-clearance approval exception for the prohibition for participation in initial public offerings, pre-clearance for any private placement interest, and meet a 30 day holding period prior to sale of any "reportable funds" shares (shares of investment companies advised or sub-advised by Post or any of its affiliated entities). Employees must acknowledge they are subject to, have read and understand the Code and all applicable compliance manual policies upon joining the firm and annually, and upon a material amendment of the Code. Employees may request an exception with respect to certain restrictions or prohibited transactions, which may be granted under limited circumstances.

Subject to Post's Code, Post and/or its employees may invest in the same securities that are purchased for clients and may own securities that are subsequently purchased for clients. In addition, certain Post employees currently are investors in private funds managed by Post and with pre-clearance approval may also invest in similar private funds for which Post or an affiliate is general partner. Although this may create a conflict of interest, Post has procedures in place designed to treat clients fairly and equally, and to prevent conflicts from influencing the allocation of investment opportunities among clients.

Insider Trading Policy

Post maintains an Insider Trading Policy designed to identify and prevent the misuse of material, non-public information. There may be certain instances in which Post employees receive material nonpublic information due to Post's investment activities and, consequently, this may restrict Post with respect to that investment. Post, when required, institutes trading and communication prohibitions, including, but not limited to: watch lists, or firm-wide restrictions.

Privacy Policy

Post maintains a Privacy Policy, which is intended to describe Post's policies, educate employees about Post's policies, establish procedures, prescribe monitoring, and to the extent feasible, ensure that Post satisfies its obligations in this area. Post may have access to nonpublic personal information about clients and investors in Funds. Post does not disclose any nonpublic personal information about current or former clients or investors in Funds without their authorization, except as permitted by law or in response to regulatory or governmental inquiries. Post restricts access to the aforementioned nonpublic personal information to those agents who need to know the specific information in order to provide services to Post on behalf of mutual clients or Fund investors. Post also may disclose nonpublic personal information to third parties (such as brokers, custodians, administrators, or back-office service providers) only as permitted by law and on an as needed basis. Post maintains safeguards to protect such nonpublic personal information. If, at any time in the future, it becomes necessary to disclose such nonpublic personal information in a way that is inconsistent with this policy, Post will provide the applicable client or investor in a Fund advance notice of the proposed policy change so that they may have the opportunity to opt out of such disclosure.

Service on Board of Directors or similar conflict of interest

An employee of Post, with CIO approval, (or a related party) may serve on the board of directors of companies in which Post invests on behalf of its clients. In such cases, Post may face conflicts and be prohibited from engaging in transactions with respect to securities or instruments of such company, such prohibition may have an adverse effect on Post's clients. In a situation such as when an investment team employee's spouse or household family member holding an executive or officer position with an issuer or with a private equity firm sponsoring an issuance of a security for which Post conducts analysis, such conflict is addressed per the Conflict of Interest Policy, and the Post employee may be required to recuse themselves from a buy or sell decision with respect to such security(ies) or new issuance(s).

A complete copy of the Code, Insider Trading, and Conflicts of Interest Policies are available to clients and/or prospective clients upon written request.

Item 12 – Brokerage Practices

Post generally has discretionary authority to determine which securities are to be bought or sold, the appropriate allocations for each client, which broker or dealer to utilize and commission and/or fee rates paid, if any. Any limitations on Post's authority are set forth in the client's Separate Account investment management agreement or if applicable, in the offering documents of the Funds. Generally, fixed income transactions do not include brokerage commissions and Post will typically effect such transactions on a "net" basis. Therefore, it is expected that clients would not be subject to significant brokerage commissions and/or fees. It is noted, however, that Post has the ability to execute trades on peer-to-peer liquidity platforms. When executing in this manner, the platform sponsor takes a small fee for facilitating the trade. In the event a transaction is effected that would include a brokerage commission (i.e. per share commissions charged on exchange-traded funds (ETF) shares), Post would use its best efforts to obtain the most favorable commission while also attempting to obtain "best execution" on all transactions.

In selecting broker-dealers and financial institutions to effect portfolio securities transactions, Post shall comply with its fiduciary duty to seek "best execution" on behalf of its clients. Post shall consider relevant factors, including but not limited to, price, nature of the market, quantity, commissions, block trading and positioning capabilities, willingness to execute difficult transactions, and research products and services.

Generally, Post does not use soft dollar research services ("Soft Dollars"), and no Soft Dollars were used in 2021. In the event Soft Dollars are used, Post has a Soft Dollar policy in place. Where commissions are charged, allowances may be made for superior research products as to the adequacy of commissions paid. Therefore, clients may pay a brokerage commission in excess of that which another broker may charge for effecting the same transaction in recognition of the value of various services provided by the broker or dealer. From time to time, unless expressly prohibited in the client's agreement, Post may determine to

allocate a portion of client commissions (or markups or markdowns with respect to certain riskless principal transactions) for effecting transactions in recognition of the value of the brokerage and research products or services provided by the broker-dealer or a third-party vendor. The services Post receives may include investment and financial market research, securities and economic analysis, company information, and other services which are of the type that qualify under the “safe harbor” provided in Section 28(e) of the Securities Exchange Act of 1934, as amended. Commissions paid are consistent with Post’s Best Execution and Soft Dollar policies. To the extent applicable, in situations where services could be used for both research and non-research purposes, Post shall make an appropriate allocation of the service and will permit brokers to provide only that portion of the service used for research purposes (qualifying under “safe harbor” above). If Post effects transactions representing Soft Dollar research services, they are used for the benefit of Post for all clients/Funds and not solely for the benefit of the particular clients/Funds which effected transactions through the broker providing such research services.

Principal Transactions and Cross Trades

In the event that Post was to effect principal transactions, Post would comply with the requirements set forth in Section 206(3) of the Advisers Act. This would include notifying the client in writing of the prospective transaction and obtaining consent to such transaction.

In addition, Post may effect transactions in portfolio securities between its Separate Accounts and/or Funds unless otherwise prohibited or restricted by the client or applicable law (including, without limitation, the Employee Retirement Income Security Act of 1974, as amended). Post conducts these “cross transactions” only when it believes the transaction is in the best interests of any accounts included in such transactions. Post does not receive any special compensation for effecting these types of transactions. Commissions or (broker) transfer fees, if any, related to such cross transactions are typically shared equally (on a basis point basis) between the clients involved, but exceptions may be made, pursuant to Post’s Cross Trade Policy, with compliance approval and as long as both buyer and seller benefit.

To the extent permitted by applicable law and when consistent with Post’s obligation of best execution, Post may aggregate the trade orders of a particular client with the trade orders of Post for other accounts advised or sub-advised by Post or its affiliates.

If Post agrees, a client may instruct Post to direct brokerage for a client’s account to a particular broker. In the event a client directs Post to use a particular broker (and to the extent such brokerage is directed), Post may be unable to negotiate commissions, obtain volume discounts, batch (i.e. combine for efficiency) trades and ensure best execution on the client’s behalf. Clients directing brokerage may also pay higher commissions than those clients not directing Post to execute with a particular broker. No assurances can be given that the transactions executed in accordance with such client’s directed brokerage arrangement will result in best execution for the client.

Item 13 – Review of Accounts

Post uses Aladdin Risk and several proprietary risk assessment tools to evaluate client portfolios on a daily basis. Aladdin Risk integrates sophisticated risk analytics with portfolio management tools to give the investment team the tools to make more informed investment decisions. Aladdin offers a comprehensive view of security positions, issuer exposures, industry exposures, country exposure, rating exposure and risk for both portfolios and indices such as client benchmarks. With Aladdin the team creates customized reports to manage portfolio positioning and risk over time. Post uses Aladdin Risk to monitor industry and issuer exposures, risk statistics and sensitivities. Additionally, Aladdin Risk allows Post to perform scenario analysis, monitor tracking error and value at risk and evaluate performance. Post also prepares and uses several risk-management reports which are reviewed and discussed by the portfolio management team on a regular basis. These risk management reports are summarized below:

- Cash Sheet (prepared before each trading day). Daily the operations team prepares a cash sheet which reflects each account’s cash position (on a trade date and settlement date basis). This assists

our portfolio managers in monitoring Post's portfolio-level liquidity and adjusting cash weightings as market conditions warrant.

- Position Matrix (prepared at beginning of each trading day). The position matrix displays all positions by account on a daily basis, and all portfolio managers have their own bespoke risk monitoring tools layered onto the position matrix to help them control sub-sector investment positions, portfolio risk and weightings.
- Portfolio Analytics Dashboard (prepared weekly). The portfolio analytics dashboard compares characteristics (including yield to worst, option adjusted spread, duration, loan exposure, ratings distribution, industry and issuer exposures) across portfolios and relative to key market benchmarks. This assists the CIO, Deputy CIO, and portfolio managers in monitoring positioning of individual portfolios relative to others in the strategy and to the broader market.
- Risk Matrix (prepared monthly). The risk matrix reports rank each security in the portfolio on a scale of 1 to 5 to create a weighted average risk assessment for the overall portfolio. A "1" ranking is deemed to be a cash equivalent, while a "5" indicates a distressed security. By creating a weighted average risk assessment of the portfolio, we can monitor the risk profile of a portfolio to keep it in line with the client's guidelines and expectations. As a general matter, we seldom exceed 2% exposure to an individual issuer.
- CRTS Batch Alerts (prepared daily). Each portfolio is continuously monitored for compliance with the client's investment guidelines. Specifically, each investment portfolio has exposure and/or diversification limits by issue, issuer, industry, security type, duration, maturity, and/or credit rating. CRTS produces daily batch alerts that notify the compliance team of any portfolio conditions that have moved out of compliance as a result of changes in market value from the prior day. When these alerts occur, the Compliance Department reports them to the portfolio management and trading team so that they can be addressed in a timely manner.

As part of our fundamental credit research process, analysts will build their own financial model or discrete financial analysis. Analysts will also conduct a detailed relative value analysis of each individual security to ensure attractive pricing relative to other securities with a similar duration and risk profile, both within the issuer's capital structure and in relation to comparable companies. Importantly, our due diligence process will typically include in-person meetings with management/equity holders, on-site visits and investigative conference calls with competitors, industry experts, and sell-side analysts. We believe this qualitative diligence is extremely important and not only provides a thorough and well-rounded understanding of a company's business model, competitive challenges, and strategic plans, but also gives us the ability to identify sustainable competitive advantages (or disadvantages) and potential risks associated with actions taken by competitors or equity holders.

We continually monitor all our investments. Our analysts seek to obtain real-time information about our investments and report these findings to the portfolio management team, who rebalance the portfolio as necessary given changes in risk profile. The portfolio management team continually manages risk through our disciplined investment process, while closely monitoring the portfolio's average duration, ratings, industry exposures, issuer exposures, as well as other portfolio characteristics. Through our compliance system, Charles River, we also closely monitor account specific guidelines and will seek to fix any passive breaches that may occur in a timely manner.

Clients invested in Private Funds receive unaudited monthly account statements, an annual report containing audited financial statements and a statement of each client's capital account as of the end of the fiscal year. Holders of Post CLO 2018-1 LTD, Post CLO 2021-1 LTD, and Post CLO 2022-1 LTD receive monthly reports as well as quarterly audited payment reports issued by the trustee. Clients invested in Separate Accounts receive monthly reports in addition to quarterly or annual reports the client may request. All clients receive quarterly newsletters, which include market commentary.

Item 14 – Client Referrals and Other Compensation

PGI and Post may enter into compensation arrangements with certain related persons or third parties who act as solicitors of clients for PGI and/or clients of Post or investors in its private funds. In addition, PGI may enter into compensation arrangements with other related persons who act as solicitors of clients for PGI when it appears to PGI that a solicitor may provide PGI with access to clients PGI might not otherwise have. At all times such arrangements will be maintained in compliance with Rule 206(4)-3 under the Advisers Act. PGI may pay any such solicitor (a) a salary, or (b) a percentage of the management fee PGI earns from the account a solicitor introduced, or (c) a one-time fee, or (d) any combination of (a), (b), or (c). In the event PGI uses unaffiliated solicitors to procure clients for investment pools they manage, the payments will not be treated as cash solicitation fees per Rule 206(4)-3. The SEC, in an Interpretive Letter to Mayer Brown LLP dated July 28, 2008, indicated that Rule 206(4)-3 does not apply to an investment adviser's cash payment to a person solely to compensate that person for soliciting investments in the investment pools managed by the investment adviser. Please refer to PGI's Form ADV for disclosure related to PGI's activities.

Item 15 – Custody

Private Funds

Under current rules applicable to Post under the Advisers Act, Post is deemed to maintain custody of certain of the Private Funds' assets because it serves as general partner ("GP")/investment adviser to the Funds. In accordance with such rules, physical custody of the Funds' assets is maintained with a qualified custodian (as defined under such rules) and each Fund is audited on an annual basis. The audited financial statements of the Funds are distributed to the underlying investors within 120 days following the end of the Fund's fiscal year. Similarly, Post is deemed to have custody of Post CLO Equity Master Fund L.P. because the GP, Post CLO Equity Management, LLC, has agreed for Post to provide investment adviser services to the Fund. Again, physical custody of the Funds' assets is maintained with a qualified custodian (as defined under such rules) and the Fund is audited on an annual basis. The audited financial statements of the Fund are distributed to the underlying investors within 120 days following the end of the Fund's fiscal year.

Under federal securities laws, Post is deemed not to have custody of the assets of Post CLO 2018-1 LTD, Post CLO 2021-1 LTD, or Post CLO 2022-1 LTD (or similar CLO warehouse or vehicle it may manage from time to time) by virtue of its status as collateral manager. Post does not have actual physical custody of any CLO's assets; each CLO's assets are held in the custody of its trustee.

Separate Accounts

Clients should receive statements from the broker, bank or other qualified custodian that holds and maintains the clients' investment assets at least quarterly.

Post urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on components including, but not limited to, accounting procedures, reporting dates, or valuation methodologies of certain securities, investments or forward FX currency contracts.

Item 16 – Investment Discretion

Post generally has discretionary authority to manage investments on behalf of clients. Such discretion is exercised in a manner consistent with the stated investment objectives for each particular client or Fund account. When selecting securities and determining amounts, Post observes the investment guideline policy limitations and restrictions (or CLO indenture covenants, as applicable) of the clients for which it advises, sub-advises or manages collateral. Any limitations on Post's authority are set forth either in the client's investment management agreement, in the offering documents of the Funds, or (as collateral manager) in the indenture to each CLO. Investment guidelines, restrictions, and any security/issuer exclusion lists must be provided to Post in writing, and Post assumes discretionary investment authority

upon execution of the investment management agreement of a client, CLO “warehouse agreement” or indenture, or acceptance of properly executed Fund offering documents by a prospective investor.

Item 17 – Voting Client Securities

While Post primarily manages fixed income securities, from time to time it may hold a limited amount of securities with voting rights in the accounts of Separate Account clients and Funds. Unless otherwise directed by a client, Post shall vote all proxies and/or act on all other corporate actions (as received in sufficient time prior to their deadlines) as part of its discretionary authority over the account assets. When voting proxies or acting on corporate actions, Post shall implement decisions in the best interest of the Separate Accounts and Funds as a whole and act in a manner deemed prudent, diligent, and that it believes enhances the value of the assets/asset proceeds of accounts.

Where a proxy proposal raises a material conflict of interest between Post’s interests and the clients’ interests, Post will disclose such conflict to the relevant clients and obtain their consent to the proposed vote prior to voting the securities. When a client does not respond to such a conflict disclosure request or denies the request, Post will abstain from voting the securities held by that client’s account. Post’s Proxy Voting Policy, adopted in compliance with Rule 206(4)-6 under the Advisers Act, contains guidelines that describe matters that may be voted for, or against; each voting determination is handled on a case by case basis.

To request a copy of the Proxy Voting Policy or if applicable, to obtain information on how security proxies were voted please send a written request to Post's Client Services Department or telephone (310) 996-9600.

Item 18 – Financial Information

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about Post’s financial condition. Post has no financial commitment that impairs its ability to meet either contractual or fiduciary commitments to clients and Fund investors. In addition, Post has not been the subject of a bankruptcy proceeding.