

Form ADV Part 2A

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February 28, 2023

This brochure provides information about the qualifications and business practices of Unimar Financial Services LLC (“Unimar”). If you have any questions about the contents of this brochure, please contact us at 786-245-4164 and/or jacobo.gadala@unimarfinancial.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.

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

Material Changes [Item 2]

This Item 2 provides clients with a summary of material changes since the Brochure filing in 2022. The material updates and changes are as follows:

- There were no material updates or changes

The foregoing is only a summary of the material changes to the Brochure. It does not purport to identify every change to the Brochure since the last filing. This summary of material changes is qualified in its entirety by reference to the full discussion in this Brochure. Clients and prospective clients are encouraged to read the Brochure in detail and contact their account representative with any questions. Our Brochure may be requested by contacting Jacobo Gadala-Maria, at 786-245-4164 or jacobo.gadala@unimarfinanciam.com.

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

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ADVISORY BUSINESS [Item 4]

Principal Owners [Item 4.A.]

Unimar Financial Services LLC, a Florida limited liability company (“Unimar”, “Adviser”, the “Company” or “We”), was founded in 2011 and offers investment management services to various categories of institutions and sophisticated high net worth investors with respect to both traditional as well as alternative asset investments. Our services are offered on a discretionary basis directly through separate accounts (“Clients”) and privately-offered pooled investment vehicles (collectively, the “Funds”) as described below.

Unimar is employee-owned. Jacobo Gadala-Maria, Unimar’s President and CIO, is the only individual who owns more than 25% of the Company.

Types of Advisory Services [Item 4.B.]

Unimar manages separate accounts and Funds focusing on global portfolio management with a particular focus on fixed income securities and fixed income mutual and private funds. Adviser provides investment advisory services to various funds in its capacity as investment manager.

Interests in the Funds are not registered securities under the U.S. Securities Act of 1933, as amended (the “Securities Act”). In addition, the Funds are not registered as investment companies under the U.S. Investment Company Act of 1940, as amended (the “Investment Company Act”). Accordingly, interests in the Funds are offered and sold exclusively to investors satisfying the applicable eligibility and suitability requirements in private transactions pursuant to available exemptions under the Securities Act, the Investment Company Act and any applicable U.S. state securities laws.

Unimar provides investment advisory and management services to its clients in accordance with the objectives and guidelines of each Fund, as stated in each Private Placement Memorandum, or the managed account forms of its managed account Clients, or in accordance with the risk profiles of individual Clients.

Investment Restrictions [Item 4.C.]

The investment objectives and the investment strategies of each Fund managed by Unimar are described in detail in the Fund’s offering and subscription documents or investment management agreement.

Separate account management is guided by the stated objectives of the Client (i.e., capital preservation, income, growth, etc.). Client investment objectives are identified by assessing the Client’s risk tolerance based upon various criteria like need for cash flow, investment goals and the like. These objectives are then typically documented via the investment guidelines contained within an investment management agreement. When a Client grants the Adviser investment discretion, Unimar is authorized to invest, sell, and reinvest proceeds in the Client’s account without obtaining the Client’s prior confirmation of any proposed action. Unimar will manage the account in accordance with the investment guidelines and/or restrictions that have been provided by the Client.

Unimar provides investment advice to Funds. Information about a Fund’s investment objective

and strategies, fees and expenses, and other material information may be found in the Fund's private placement memorandum.

Wrap Fee Programs [Item 4.D.]

Unimar does not participate in wrap programs.

Assets Under Management [Item 4.E.]

As of December 31, 2022, Unimar had firm wide regulatory assets under management of \$220,729,402.

FEES AND COMPENSATION [Item 5]

Fee Schedules [Item 5.A.]

Generally and pursuant to contract, clients pay a fee based upon the percentage of assets under management at fixed annual rates, generally 1% and subject to negotiation. The compensation method is explained and agreed with the Client in advance before any services are rendered. Management fees may be billed monthly or quarterly in arrears pursuant to the written investment management agreement.

Fees for our Funds depend upon the vehicle and strategy. Funds typically pay a management fee based upon the percentage of assets under management at fixed annual rates. The specific manner in which fees are charged by Unimar is established in the Funds' Private Placement Memoranda.

Performance fees, if any, generally will be an annual percentage rate of the net realized and unrealized profits for each year (the "Performance Fee"). In certain cases, the Performance Fee may be charged after restoration of any losses carried forward from prior years and, in certain cases, after achieving a threshold annual return on invested capital at varying rates. Generally the annual percentage rate of Performance Fee will be 10% of the net realized and unrealized profits, subject to negotiations. Performance Fees generally will be charged after the close of each calendar year.

Deduction of Fees [Item 5.B.]

Clients typically are charged quarterly in arrears for fees incurred. For our Funds, fees will be typically deducted monthly in arrears from the Fund's account.

Other Fees and Expenses [Item 5.C.]

Unimar does not charge additional types of fees or expenses for separate account Clients. Funds also pay their own fund-level expenses (*e.g.*, fund administration, audit, tax and legal) in connection with operating the Fund.

All Clients and Funds incur brokerage and other transaction costs; see "Brokerage Practices."

Prepaid Fees [Item 5.D.]

None of our Clients or Funds prepay fees.

Compensation for the Sale of Securities [Item 5.E.]

Neither Unimar nor any of its supervised persons accepts compensation for the sale of securities or other investment products.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT [Item 6]

Unimar has adopted Trading and Trade Allocation policies that govern the treatment of Funds with different fee structures and the potential conflicts of interest that these fee structures might present. All Unimar employees must adhere to these trading and trade allocation policies and all employee policies and procedures in place at the Advisor. As a general rule, trades from similar strategies are allocated to our various Clients or Funds pro rata based on assets under management. The intent of this policy is that assets cannot be allocated on a preferential basis to any one account. It is possible for the allocation policy to be applied differently in instances where one Client or Fund has a higher cash position as compared to other Clients or Funds using a similar strategy due to, among other reasons, account funding.

In addition to management fees, Unimar will receive a performance fee or allocation from some of the Funds that it manages. The calculation of the performance fee or allocation is described in each Fund's Private Placement Memorandum. In general, for each Fund, Unimar will be entitled to a performance fee or allocation in respect of each fund investor's capital account generally equal to ten percent (10%) of the appreciation in the net asset value of the Fund as described in the client's written agreement with Unimar or the Fund's Private Placement Memorandum. The performance fee may also be subject to a Highwater Mark as described in the client's written agreement with Unimar or the Fund's Private Placement Memorandum.

If in the future, Unimar manages accounts that are not charged consistently, performance-based fee arrangements may create an incentive for Unimar to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements may also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. In such cases, Unimar would have procedures designed and implemented to ensure that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients.

TYPES OF CLIENTS [Item 7]

Unimar primarily provides portfolio management services to pooled investment vehicles as well as accredited investors and qualified clients on a discretionary basis.

Generally, the minimum dollar value of assets required to establish an investment advisory account is \$1,000,000. However, Adviser reserves the authority to waive the account minimum as it deems appropriate.

Details concerning applicable suitability criteria for investment in the Funds are set forth in the respective Fund's prospectus and subscription application materials or investment management agreement.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

[Item 8]

General Description [Item 8.A.]

Unimar seeks capital appreciation by searching for investments offering current income and/or opportunities for future capital appreciation. Unimar adheres to a long-term strategic approach while seeking to meet the investment objectives of income and capital appreciation.

The accounts and Funds managed by Unimar seek to follow the investment objectives outlined in their respective Investment Management Agreements (accounts) or Offering Memoranda (Funds). Investments may include publicly traded debt and equity securities, ETFs, mutual funds and private funds depending on the circumstances of the particular account or Fund. Investments may also be made in various other derivative instruments, including futures, forwards, options and swaps. Funds which are sub-advised will follow the investment strategies and utilize the methods of analysis of the respective sub-advisor.

Unimar uses qualitative and quantitative proprietary and third-party research to search for undervalued securities offering current income and/or opportunities for future capital appreciation. Unimar performs credit analysis of debt issuers and seeks to maintain a diversified portfolio to limit exposure to any given credit. Unimar also analyzes macroeconomic cycles as part of the investment process.

Material Risks for Significant Investment Strategies and Securities [Items 8.B. and 8.C]

Investment in any securities, including an investment in our Funds or separate accounts, involves significant risk. Each prospective investor should carefully consider the risk factors inherent in investing. Investors must be able to bear the economic risk of loss of value or loss of their investment.

While it is the intention of Unimar to implement strategies which are designed to minimize potential losses suffered by its clients, there can be no assurance that such strategies will be successful. The following is a discussion of certain material risks for Unimar's significant investment strategies, but it does not purport to be a complete explanation of the risks involved in Unimar's investment strategies. The particular risks associated with an investment in any of the Funds are discussed in their offering documents, such as the Funds' Private Placement Memoranda.

It is possible that a client may lose a substantial proportion or all of its assets in connection with investment decisions made by Unimar, and there is no guarantee that in any time period, particularly in the short term, a client's portfolio will achieve appreciation in terms of capital growth or that a client's investment objective will be met by Unimar. The risks of investing in emerging markets, such as Brazil and other Latin American countries, as well as investing in non-U.S. securities are significant. In addition, Unimar may invest, on behalf of its clients, in lower-rated securities, derivatives, or engage in short-selling, which have inherent risks. A client's portfolio may also be subject to interest rate risks and currency risks, which may adversely affect the value of a client's portfolio. Clients, as well as investors in the Funds, must also pay attention to the risks discussed in the Funds' Private Placement Memoranda.

Unimar does not recommend primarily a particular type of security. The material risks involved in Unimar's general investment strategies are described above.

DISCIPLINARY INFORMATION [Item 9]

Neither Unimar nor any management persons have ever been the subject of any disciplinary event or action.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS [Item 10]

Broker-Dealer Registration [Item 10.A.]

None of Unimar's management persons are presently registered representatives of a licensed broker-dealer.

Commodity Pool Operator, Commodity Trading Adviser, Futures Commission Merchant Registration [Item 10.B.]

Neither Unimar nor any 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.

Other Material Relationships [Item 10.C.]

Unimar has no relationships or arrangements with affiliates that are material to our advisory business or to our clients.

Receipt of Compensation from Investment Advisers [Item 10.D.]

Unimar does not receive compensation, either directly or indirectly from other advisers.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING [Item 11]

Code of Ethics [Item 11.A.]

Unimar has adopted a Code of Ethics as part of its compliance policy. All Unimar employees must adhere to the compliance policy and all employee policies and procedures in place at the Adviser. In short, at Unimar we are committed to maintaining the highest legal and ethical standards in the conduct of our business. We have built our reputation on client trust and confidence in our professional abilities and our integrity. As fiduciaries, we place our clients' interests above our own. Meeting this commitment is the responsibility of our firm and each and every one of our employees.

A copy of our Code of Ethics, as well as our compliance and policy manuals, are available to any Client or prospective Client upon request.

Participation or Interest in Client Transactions, Recommendations, and Trading [Items 11.B., C., and D.]

Principals, officers and employees of Unimar are or may be investors in our Funds. As such, it is possible that Unimar could cause an investor or Client to buy or sell securities in which the Adviser or one of its related persons has a financial interest. For example, Unimar could recommend that a client or investor invest in a Fund for which Unimar serves as investment manager, general partner, managing member or manager. Unimar also could recommend that a Fund invest in a portfolio company in which another Fund previously has invested. Because Unimar will have a nominal ownership interest in the Funds, Unimar could have a potential conflict of interest in making such a recommendation.

Unimar has adopted a personal trading policy that governs employees' ability to trade securities, including when employees seek to trade the same securities as Clients are trading, at the same or at different times. Unimar also has adopted a policy and procedures to prevent the misuse of material, inside information, both of which are designed to avoid conflicts of interest that may arise when Unimar personnel and members of their family engage in securities transactions for their own account. All Unimar employees must adhere to all compliance and other employee policies and procedures in place at the Adviser.

BROKERAGE PRACTICES [Item 12]

Broker-Dealer Selection [Item 12.A.]

In the course of providing our services, we will execute trades for our clients through broker-dealers. When a client has given us broker discretion, there is no restriction on the brokers we may select to execute client transactions. Unimar's general guiding principle is to trade through broker-dealers who offer the best overall execution under the particular circumstances. With respect to execution, we consider a number of factors, including if the broker has custody of client assets, the actual handling of the order, the ability of the broker-dealer to settle the trade promptly and accurately, the financial standing of the broker-dealer, the ability of the broker-dealer to position stock to facilitate execution, our past experience with similar trades, and other factors which may be unique to a particular order. Based on these judgmental factors, we may trade through broker-dealers that charge fees that are higher than the lowest available fees. In addition, Unimar may cause a client to pay a commission that is higher than the lowest available commission if Unimar believes that the value of the products and services, execution and other services rendered by the broker are reasonable in relation to the amount of the commission.

Research and Other Soft Dollar Benefits

Consistent with obtaining best execution, brokerage commissions on client portfolio transactions may be directed to brokers in recognition of research services furnished by them, as well as for services rendered in the execution of orders by such brokers. As a general matter, such research services are used to service all of Unimar's clients. However, each and every research service may not be used to service each and every client managed by Unimar, and brokerage commissions paid by one account may apply towards payment for research services that may not be used in the service of that account.

Unimar may, in its discretion, cause the client to pay such brokers a commission for effecting portfolio transactions in excess of the amount of commission another broker adequately qualified to effect such transactions would have charged for effecting such transactions. This may be done where Unimar has determined in good faith that such commission is reasonable in relation to the value of brokerage and research services received. In reaching such a determination, Unimar would not be required to place or attempt to place a specific dollar value on the brokerage or research services provided by such broker.

When Unimar uses its client's brokerage commissions (or markups or markdowns) to obtain research or other products or services, Unimar receives a benefit because it does not have to produce or pay for such research, products or services. Unimar may have an incentive to select or recommend a broker-dealer based in its interest in receiving the research or other products or services, rather than on its clients' interest in receiving the most favorable execution.

Brokerage for Client Referrals [Item 12.A.2.]

Neither Unimar nor any of its Clients or Funds may select or recommend a broker-dealer based on whether Unimar or a related person receives client referrals from a broker-dealer or third party.

Directed Brokerage [Item 12.A.3.]

Unimar does not recommend, request or require a Client or Fund to execute transactions through a specified broker-dealer.

At times, a client may direct Unimar to use certain brokerage firms as part of a commission recapture or minority brokerage program. As a result of directed brokerage the Client may pay higher brokerage commissions because Unimar may not be able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices because Unimar cannot use a broker-dealer offering a better price.

Aggregation of Trades [Item 12.B.]

We will typically aggregate numerous Clients' or Funds' purchases or sales as a single transaction. Transactions are usually aggregated to seek a lower commission, lower costs, or a more advantageous net price. The benefits, if any, obtained as a result of such aggregation, are generally allocated pro-rata among the accounts of the Clients or the Funds that participated in the aggregated transaction by charging all clients the same price per unit of the security acquired.

The Adviser is not obligated to acquire for all Client or Funds a security that we may acquire for the account of a particular Client or Fund, if in the Adviser's absolute discretion it is not practical or desirable to acquire a position in such security.

REVIEW OF ACCOUNTS [Item 13]

General Description [Item 13.A.]

Unimar's investment team monitors capital market conditions and client circumstances and makes portfolio adjustments as appropriate. Client and Fund accounts are formally reviewed periodically, depending on their size and complexity, for compliance with investment guidelines. At a minimum, the Portfolio Manager and Chief Operating Officer participate in the review.

Factors Triggering a Review [Item 13.B.]

There are no specific triggering factors leading to a review.

Client Reports [Item 13.C.]

Investors in the Funds receive monthly written performance reports from the Fund administrator and audited financial statements annually from the Funds' accountants. Clients receive account statements from their custodian.

CLIENT REFERRALS AND OTHER COMPENSATION [Item 14]

Other Compensation [Item 14.A.]

Unimar does not receive any benefits, economic or otherwise, for non-advisory services.

Compensation for Client Referrals [Item 14.B.]

Unimar may compensate its own personnel or employees who refer potential investors or Clients to Unimar. Any such compensation will be paid by Unimar from its assets and will not be charged to its clients. Any such arrangement with a solicitor will comply with Rule 206(4)-1 under the Investment Advisers Act of 1940, as amended.

CUSTODY [Item 15]

Investors in our Funds receive account statements monthly directly from the Fund Administrator. Investors should carefully review the account statements received. Our Clients receive monthly account statements directly from their custodian. Clients should carefully review the account statements received from both the custodian and Unimar to make certain that the information in each is consistent.

INVESTMENT DISCRETION [Item 16]

Unimar routinely accepts discretionary authority to manage securities on behalf of its Clients. When a Client grants Unimar investment discretion, Unimar is authorized to invest, sell, and reinvest proceeds in the Client's account without obtaining the Client's prior confirmation of any proposed action. Unimar does, however, manage the account in accordance with the investment guidelines and/or restrictions that have been provided by the Client.

Unimar provides investment advice to Funds. Information about a Fund's investment objective and strategies, investment guidelines and restrictions, fees and expenses, and other material information may be found in the Fund's private placement memorandum.

VOTING CLIENT SECURITIES [Item 17]

Proxy Voting Policies – Authority to Vote [Item 17.A.]

Unless directed otherwise by contract, Unimar generally is responsible for voting proxies with respect to securities held in Client and Fund accounts, including Clients that are pension plans (“plans”) subject to the ERISA. As part of our Compliance Policy we have implemented a proxy voting policy which is designed to ensure that we vote proxies in the best interest of our Clients and Funds. Unimar’s proxy voting policy includes an assessment of the materiality of the items presented on the proxy.

From time to time, proxy voting proposals may raise conflicts between the interests of our Clients and Funds and the interests of Unimar. Unimar takes certain steps designed to ensure, and demonstrate that those steps resulted in a decision to vote the proxies that was based on the clients' best interests and was not the product of such conflicts. Those steps may include voting a proxy according to a third party’s recommendations, or requesting that a Client direct us as to the manner of voting the proxy.

A copy of our Proxy Voting Policy is available to upon request. Clients may also request information regarding how we voted on a particular proxy upon request.

Proxy Voting Policies - No Authority [Item 17.B.]

Some of our Clients maintain the authority to vote their own proxies. In these circumstances, the Client receives proxies directly from the custodian. We will sometimes forward our view and recommendation on a particular proxy or solicitation to a Client for their consideration, but the Client is under no obligation to consider our views. Alternatively, we also respond to proxy questions from Clients as needed.

FINANCIAL INFORMATION [Item 18]

Balance Sheet [Item 18.A.], Financial Conditions [Item 18.B.], Bankruptcy Petition [Item 18.C.]

Unimar does not require or solicit prepayment of more than \$1,200 in fees per Client or Fund six months or more in advance and thus has not included a balance sheet of its most recent fiscal year. Unimar is not aware of any financial condition that is reasonably likely to impair its ability meet its contractual commitments to Clients or Funds, nor has Unimar been the subject of a bankruptcy petition at any time during the past ten years

Requirements for State-Registered Advisers [Item 19]

- A. Information regarding principal executive officers and management persons is available in Part 2B of Form ADV.
- B. Information regarding other businesses in which Advisor is actively engaged is available in Part 2B of Form ADV.
- C. Information regarding the calculation of performance-based fees is described in Item 6 of Part 2A. Performance based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to a client. Neither the Adviser nor any of its management persons have relationships with any issuer of securities other than the Funds sponsored by the Adviser or affiliates of the Adviser
- D. Neither Unimar nor any management persons have been involved in an arbitration claim alleging damages in excess of \$2,500 involving an investment or an *investment-related* business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices. Neither Unimar nor any management persons have been involved in an award or otherwise being found liable in a civil, *self-regulatory organization*, or administrative *proceeding involving* any of the following: an investment or an *investment-related* business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.
- E. Neither Unimar nor any management persons have a relationship or arrangement with any issuer of securities that is not listed in Item 10.C of Part 2A.

UNIMAR FINANCIAL SERVICES LLC

Form ADV: Part 2B – Brochure Supplement

JACOBO GADALA-MARIA, President and CIO

KENNETH ANDERSON, COO

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February 14, 2022

This brochure supplement provides information about the individuals listed above that supplements the Unimar brochure. You should have received a copy of that brochure. Please contact Jacobo Gadala-Maria if you did not receive Unimar's brochure or if you have any questions about the contents of this supplement.

Jacobo Gadala-Maria, President and CIO**Born:** February 20th, 1958

Item 2 – Education Background and Business ExperienceEducation

- Jacobo Gadala-Maria earned a Bachelor of Science in Chemical Engineering from the University of Notre Dame in 1979. He subsequently earned a Master of Business Administration in Finance and Economics from the University of Rochester, N.Y., in 1981.

Business Experience

- Jacobo Gadala-Maria was the President and Chief Executive Officer of PRS International Investment Advisory Services (a wholly owned affiliate of the EFG Group) from March, 2008, through October, 2011. Concurrently, Mr. Gadala-Maria was the Vice President of the Board and Project Manager of Asesores y Gestores Financieros S.A., the Spanish wealth management affiliate of the EFG Group, as well as the Chief Executive Officer of EFG Capital Asset Management. Mr. Gadala-Maria initially joined the EFG Group as President of EFG Capital International when EFG acquired Dresdner Lateinamerika Financial Advisors (DLFA) in 2005, and remained in that capacity until mid-2009. Prior to joining EFG, Mr. Gadala-Maria was Chief Executive Officer of DLFA from May, 2002, through August, 2005. He was Principal and Founding Partner of Vestrust Securities from 1991 through 2002, at which time Vestrust was acquired by the Dresdner Bank Group. Mr. Gadala-Maria currently serves on the Board of Directors of Insigneo Securities, LLC, a Miami-based broker dealer.

Item 3 – Disciplinary Information

Jacobo Gadala-Maria has no reportable disciplinary history.

Item 4 – Other Business ActivitiesInvestment-Related Activities

- Jacobo Gadala-Maria is not engaged in any other investment-related activities. He does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

Non Investment-Related Activities

- Jacobo Gadala-Maria is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5 – Additional Compensation

Jacobo Gadala-Maria does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 – Supervision

Supervisor: Jacobo Gadala-Maria

Phone Number: 786-245-4164

Unimar has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its partners, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee and officer is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Unimar's Compliance Department, in conjunction with the officers and partners, are primarily responsible for the development and implementation of appropriate policies and procedures. Monitoring systems are tailored to particular policies and procedures, the manner and frequency of testing varying as appropriate.

These compliance procedures include the reporting of violations or errors to designated personnel. After any preliminary due diligence and investigation, matters are corrected or resolved in an appropriate manner, which will vary depending on, among other things, the nature and severity of the violation. Advisory Firm senior management may be involved for significant errors or violations.

Kenneth Anderson, CFA, CFP®

Born: November 27, 1976

Item 2 – Education Background and Business Experience

Education

- Kenneth Anderson earned a Bachelor of Arts from Wesleyan University in 1998.

Business Experience

- Kenneth Anderson was a Portfolio Manager at PRS International Investment Advisory Services from November, 2008, through December, 2011, and a Portfolio Manager at SunTrust Banks, Inc. from August, 2004, through September, 2008. Mr. Anderson was also an Analyst at Credit Suisse from July, 1998, through September, 2000.

Item 3 – Disciplinary Information

- Kenneth Anderson has no reportable disciplinary history.

Item 4 – Other Business Activities

Investment-Related Activities

- Kenneth Anderson is not engaged in any other investment-related activities. He does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

Non Investment-Related Activities

- Kenneth Anderson is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

Item 5 – Additional Compensation

Kenneth Anderson does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 – Supervision

Supervisor: Jacobo Gadala-Maria

Phone Number: 786-245-4164

Unimar has adopted written policies and procedures which are designed to set standards and internal controls for the firm, its partners, its employees, and its businesses and are also reasonably designed to detect and prevent any violations of regulatory requirements and the firm's policies and procedures. Every employee

and officer is required to be responsible for and monitor those individuals and departments he or she supervises to detect, prevent and report any activities inconsistent with the firm's procedures, policies, high professional standards, or legal/regulatory requirements.

Unimar's Compliance Department, in conjunction with the officers and partners, are primarily responsible for the development and implementation of appropriate policies and procedures. Monitoring systems are tailored to particular policies and procedures, the manner and frequency of testing varying as appropriate.

These compliance procedures include the reporting of violations or errors to designated personnel. After any preliminary due diligence and investigation, matters are corrected or resolved in an appropriate manner, which will vary depending on, among other things, the nature and severity of the violation. Advisory Firm senior management may be involved for significant errors or violations.