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Services Of

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This brochure provides information about the qualifications and business practices of Refinitiv Global Markets, Inc. ("RGM") and its services, IFR and Municipal Market Data. If you have any questions about the contents of this brochure, please contact us at 857.365.1280 or jonathan.alvarado@lseg.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. RGM is registered with the SEC as an investment adviser; however, please note that such registration does not imply a certain level of skill or training.

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

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* A NOTE ABOUT THE FORMAT OF THIS BROCHURE: The SEC requires all investment advisers to organize their disclosure documents according to specific categories, some of which may not pertain to a particular adviser's business. Where a required category is not relevant to our business, we list the category and state that it does not apply.

A. ADVISORY BUSINESS

1. Background

Founded in 1993 as Thomson Technical Data Corporation, RGM (sometimes referred to as “the Company”) is an indirect subsidiary of the London Stock Exchange Group plc (“LSEG”). LSEG is a British-based financial information company that also owns, and is listed on, the London Stock Exchange. You can find more information about LSEG at www.lseg.com.

2. Services Provided

RGM publishes a broad range of market data and analysis through two primary divisions. In addition, the Company affords subscribers to many of its publications the opportunity to contact RGM’s analysts by telephone, e-mail, Microsoft Teams Chat and Eikon/Refinitiv Messenger to discuss the published information. RGM does not have discretion over or otherwise manage client accounts. In addition to distributing its services directly, the Company makes its written commentary as well as audio and video commentary by its analysts available through affiliated and unaffiliated third-party distribution channels.

RGM's products and services include the following:

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This division publishes various market commentary, relative and technical analysis, trade recommendations and information regarding high-grade debt securities, economics, and foreign currencies. Its flagship service, *United States Rates*, monitors the pulse of the U.S. economy, while assessing the sentiment of bond traders, salespeople, and the buy-side community. The product provides technical and fundamental market-flow analysis, real-time trading recommendations and yield curve strategies to global participants in the rates markets. Asset class coverage includes U.S. Treasuries, money markets, and agency Mortgage Backed Securities in both cash and derivative markets. There is also an economic team providing forecasts and analysis on relevant economic topics. Content also includes intra-day market commentary and analysis, along with news, and details of primary market issues that may have market-moving potential in the interest rate markets.

Affiliated Services Distributed by IFR

Global Rates – Produced by IFR Publication, part of an LSEG non-investment advisory affiliate, this service provides real-time coverage predominantly of European sovereign bond markets including commentary, technical analysis and recommendations in an unbiased fashion that may provide value to global fixed income market participants. Coverage also includes central bank decisions and previews for upcoming meetings including trade ideas based on expected decisions.

Global Credit – Also produced by IFR Publication, this service delivers real-time coverage of impending and newly launched international and local debt issues, with a focus on origination of investment-grade corporate debt, high-yield bonds and asset-backed securities, and ancillary coverage of emerging markets, LATAM and Asia debt markets.

Municipal Market Data (MMD)

MMD electronically publishes real-time commentary and analysis of the U.S. domestic municipal bond market. MMD's analysts report on trading activity, supply and demand pressures and technical conditions, emphasizing significant factors that influence the fixed-income markets. MMD's suite of products and services includes:

Municipal Market Data-Line - Provides proprietary indicative yield curves on a daily basis, as well as intra-day indications of probable movement on those daily yield curves. Other product components include daily market commentary, key muni-to-taxables ratios, and technical and historical analysis of the U.S. municipal and U.S. Treasury markets. Also provides analytical studies on SOFR/SIFMA Swaps, and Yield Volatilities.

MMD Fundamental - Provides comprehensive intra-day commentary and analysis on municipal and Treasury markets. The "Squawk Box" feature of this product provides rolling commentary and analysis on the U.S. municipal bond market as well as broader fixed-income markets when relevant. Strategy comments such as weekly and long-term outlooks provide critical views on market trends. State reviews focus on the market activity within California, New York, Florida, and Texas. A review of the taxable municipal bond market, including Build America Bonds, focuses on market activity specific to that sector.

MMD Short-Term - Offers comprehensive commentary and analysis on short-term, tax-exempt markets with a focus on variable rate demand securities, municipal notes and other money-market-eligible instruments. This product includes VRDN benchmark averages, MMD MIG-1 municipal note yield curves, market surveys and short-term supply/demand indicators, as well as coverage of municipal cash trading through the shorter maturity range of the yield curve.

State & Sector - Offers more than 250 yield curves, including state general obligation curves for all 50 states, Washington, D.C., Puerto Rico, New York City and Texas PSF insured. Provides sector curves for all investment-grade ratings with sector coverage for general obligation, revenue, pre-refunded, housing, healthcare, COP, non-callable and zero coupon debt. Also provides state level tax-guide data and taxable equivalent yield data.

Data Feeds – Provides customized feeds of various MMD data as requested by clients.

Please note that MMD's services are not subject to the EU Benchmarks Regulation or equivalent law or rule. More information about benchmark regulation is available at: <https://www.refinitiv.com/benchmarkdisclaimer>.

B. FEES AND COMPENSATION

IFR provides its services to clients on a subscription basis, generally for a fixed term of one to two years. Fees for United States Rates and the affiliated Global Credit, and Global Rates services depend upon the number of users and the delivery platform used. Where IFR is delivered through Workspace, the cost of IFR will be included in the relevant subscription. Where clients purchase IFR through RGM directly (*i.e.*, through www.ifre.com) fees are charged in advance, on a monthly or annual basis. Fees for data feeds depend on the number of end users, nature of the content, its timeliness and its history. Other arrangements may be made at a client's request.

MMD's services are also furnished to clients on a subscription basis for a fixed term of one to two years and available through www.tm3.com, Workspace (<https://workspace.refinitiv.com/web/rap/tm3-app>) and through feeds. Subscription rates vary, depending on the nature and quantity of the services provided and the number of users a client has. Fees generally are charged quarterly, in advance, although other arrangements may be made at a client's request. Fees for customized data feeds also depend on the amount of data requested.

An RGM client may terminate its subscription upon 90 days' written notice prior to the end of the then-current term; in the absence of advanced notice to terminate, the contract renews for successive one-year or two-year terms. Upon termination of a subscription agreement in accordance with its terms, the Company will refund the pro-rata portion of any advance payment based on the number of days remaining in the billing period after the effective date of termination of the contract.

Note that RGM's fees do not include the cost of managing assets, the cost maintaining custody of assets or brokerage or other transaction costs, which are all beyond the scope of RGM's services.

C. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

This item does not apply to our business.

D. TYPES OF CLIENTS

All of the Company's subscribers are large institutions such as banks or thrift institutions, pension

and profit sharing plans, hedge funds, asset managers, trusts, state or municipal government entities, consultants, law firms and universities. In total, RGM's clients are responsible for managing hundreds of billions of dollars of investments.

E. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Among the analytical methods RGM uses in formulating investment advice are technical, fundamental, relative value and cyclical analyses. Clients wishing to implement the advice they receive from RGM may employ the investment strategy(ies) of their choosing using RGM advice as a consideration.

RGM utilizes a variety of technologies in creating and distributing its analysis and advice. IFR may utilize artificial intelligence tools for editing suggestions, but any output is double-checked by an IFR analyst before publication. AI is not used in the creation of the MMD yield curves at this time.

Please be aware that investing in securities involves a risk of loss that the investor should be prepared to bear. The value of an account may decline, among other reasons, because of a general weakness in the stock market or because of factors that affect particular companies or industries. Fixed-income investments entail "interest rate risk," which is the risk that the price of a bond will fall as interest rates rise. These investments also entail "credit risk," which is the risk that the issuer of a debt security will fail to make scheduled principal or interest payments. Where foreign securities are acquired, client accounts may be adversely affected by global political and economic conditions, reduced liquidity or decreases in foreign currency values relative to the U.S. dollar. Depending on the nature of the account, other risks may also apply. RGM does not guarantee that the advice it provides will lead to any particular return in or performance of a client's account.

F. DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

G. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

As noted in Section A. above, RGM is an indirect subsidiary of LSEG, one of the world's largest providers of financial markets data and infrastructure, serving clients in over 170 countries. LSEG provides leading data and insights, trading platforms, and open data and technology platforms that connect a thriving global financial markets community – driving performance in trading, investment, wealth management, regulatory compliance, market data management, enterprise risk and fighting financial crime. RGM leverages this extensive network of affiliates in a number of ways. For example, RGM has an arrangement with Tradeweb LLC, a registered broker-dealer and Alternative Trading System ("ATS"), whereby Tradeweb LLC distributes RGM's products via its electronic trading communication facility and provides RGM with aggregated, non-attributed market information relating to securities traded on the Tradeweb LLC platform.

Furthermore, as described in Section A. above, RGM's services are distributed alongside the Global Rates and Credit service produced by IFR Publication, part of a separate LSEG affiliate that is not registered as an investment adviser. RGM's IFR may include in its own products and

services attributed data and other market information supplied by Thomson Reuters editorial services.

RGM also has a material relationship with Refinitiv Evaluated Pricing Service ("REPS"). In this regard, RGM supplies REPS with MMD yield curves for use in REPS' pricing methodology, and REPS supplies Evaluated Pricing data to RGM for use by RGM clients who seek supplementary market data. Neither RGM nor REPS has access to the other party's information before that information is released to the party's unaffiliated clients.

RGM does not believe that any of these arrangements presents material conflicts between its interests and those of its clients.

H. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

In accordance with SEC Rule 204A-1, RGM has adopted a Code of Ethics that describes certain standards of conduct that the Company's employees must follow, and that addresses personal trading by employees and their related accounts. With regard to the standards of conduct, the Code of Ethics, among other things, emphasizes that RGM is obligated to carry out its duties solely in the best interests of clients and free from all compromising influences and loyalties. The Code also imposes limits on gifts, business entertainment and political contributions, and emphasizes the importance of maintaining the confidentiality of sensitive information learned about clients. RGM will provide a copy of its Code of Ethics to clients and prospective clients upon request.

RGM's employees (or employees of its affiliates) may, from time to time, maintain personal securities accounts with registered broker-dealers who subscribe to the Company's services. In the ordinary course of trading in such accounts, such employees may buy securities from or sell securities to such broker-dealers on a principal basis. All such purchases or sales will be completely independent of any investment advice rendered to such clients.

Furthermore, from time to time, the Company's officers, directors and employees (or the officers, directors and employees of its affiliates) may invest in the same or related securities that the Company recommends to clients and may do so at or around the same time that such recommendations are made. Where RGM's affiliates are concerned, such personal trading does not appear to present a conflict of interest, because RGM generally will be unaware if an affiliate or its associated persons have a financial interest in a security, and affiliates generally do not have pre-publication access to RGM's advice. (While as noted in Section G above, certain affiliates contribute content for distribution to RGM's clients, the production of such content is governed by the affiliates' respective editorial guidelines that are designed to protect the integrity of all published advice.)

However, where RGM's employees and inside officers and directors are concerned, personal investing presents a potential conflict of interest. In order to ensure that the personal trading activities of these related persons are independent of any investment advice rendered to clients, RGM's Code of Ethics contains a number of specific provisions. These include provisions designed to prevent RGM's employees from improperly trading on inside information, and those that obligate employees to report their trading activity to the Company's chief compliance officer on a periodic basis. Employees also must preclear any purchases or sales of municipal securities and newly-issued corporate fixed-income securities for their own accounts, in order to prevent such

personal trades from interfering with the objectivity and independence of the advice the Company renders to clients. Additional restrictions are placed on personal trading in any derivative security with an MMD scale as the underlying instrument; municipal bond futures; short-term trading in municipal bonds; and aggregate holdings of any one municipal issue.

I. BROKERAGE PRACTICES

This item does not apply to our business.

J. REVIEW OF ACCOUNTS

This item does not apply to our business.

K. CLIENT REFERRALS AND OTHER COMPENSATION

At a client's election, RGM may receive cash payments from one or more broker-dealers in consideration for providing services to that client. In such a situation, RGM acts as a third-party research provider in the client's soft-dollar arrangement with the client's broker-dealer. We do not believe such situations involve any conflicts between our interests and those of our clients who choose to pay in this fashion. Please note that RGM also relies on affiliated LSEG sales staff to market certain RGM products and services.

L. CUSTODY

This item does not apply to our business.

M. INVESTMENT DISCRETION

This item does not apply to our business.

N. VOTING CLIENT SECURITIES

This item does not apply to our business.

O. FINANCIAL INFORMATION

This item does not apply to our business.