

International Developed invests primarily in large cap, growth-oriented companies in developed markets (excluding US). The strategy's management team employs both top-down and bottom-up fundamental analysis to identify attractive countries and economic sectors as well as high-quality companies worthy of a long-term investment allocation. The portfolio's primary objective is long-term capital appreciation.

Market Commentary

We have previously highlighted the importance of understanding how currency can impact both domestic and foreign equity market returns. Simply put, during historical periods of US dollar (USD) strength, domestic equities have performed well when compared to both foreign developed and emerging market stocks. The reverse of this equation also tends to hold true. When foreign currencies exhibit strength versus the USD, emerging market and foreign developed market stocks outpace domestic equities. Historically, the two previous extended periods of USD strength since 1970 each lasted an average of about 6.5 years, but the current stretch of USD strength has lasted more than 13 years. Therefore, many investors have not experienced an environment where the dollar is weak; however, conditions may be changing. The US Dollar Index is flat on a year-to-date basis and lost 4.8% during the third quarter. As of September 30, the index is 5.1% weaker. Part of this shift can be explained by the Bank of Japan (BOJ) finally raising rates above zero, creating a partial unwind in the carry trade and calling some cash back to the home market. Another factor that put pressure on the dollar was the Federal Reserve's downward adjustment in interest rates in mid-September by 50 basis points. The result of a weaker USD during the quarter was that the MSCI Emerging Markets Index gained 8.7%, the MSCI EAFE Index was up 7.3% and the S&P 500 recorded a return of 5.9%. Admittedly, a one-quarter period of relative outperformance of foreign versus domestic stocks in a declining dollar environment probably does not immediately cause a large-scale change in asset allocation models, but it does highlight how a weaker dollar can shift market leadership – a trend that has historically been significant.

Last quarter, we ended our commentary by stating that it was time to "pound the table" about the quiet strength of international equities. Three months later, we can do that once more. The third quarter return of 7.3% for the MSCI EAFE Index brough its year-to-date 2024 return to 13.0%. This nine-month return is significantly stronger than the average January-September rolling return dating back three, five, 10, 15, and 20 years (see first table).

Similarly, the one-year trailing MSCI EAFE return as of September 30 is well ahead of the three-, five-, 10-, 15-, and 20-year averages, as illustrated in the second table.

While performance has been strong, we believe the fundamentals supporting the asset class remain compelling and investors that have remained on the sidelines have time to benefit from further upside. During the third quarter, seven of the 11 sectors outperformed the broad index. Five of the seven outperforming sectors have more representation within the MSCI EAFE Index than investors can achieve by investing in the

MSCI EAFE First 9 Months Returns								
Year-to-Date 2024	13.0%							
3-Year Trailing Average	(2.3%)							
5-Year Trailing Average	(1.2%)							
10-Year Trailing Average	2.2%							
15-Year Trailing Average	2.2%							
20-Year Trailing Average	3.5%							
(Sources: Confluence, MSCI)								

MSCI EAFE Annualized Trailing I	Returns
1-year (September 2023-September 2024)	24.8%
3-Year Trailing Average	8.4%
5-Year Trailing Average	10.3%
10-Year Trailing Average	7.0%
15-Year Trailing Average	7.0%
20-Year Trailing Average	6.8%
(Sources: Confluence, MSCI)	

S&P 500. Again, should global equity investor appetite continue to rotate away from what has worked (technology) and diversify into other market areas, international equities could benefit as the index is far more diversified than the S&P 500. Foreign developed market equities still trade at a discount. The Price/Earnings ratio of the MSCI EAFE is 11% below the 10-year average. The dividend yield at the index level also remains compelling and stands right at 3.0%, more than twice the yield of the S&P 500 at 1.3%. In terms of index-level earnings, Bloomberg estimates that the MSCI EAFE Index will be \$163 this year and \$174 next year, representing earnings growth of 4.5% and 7.0%, respectively. This projected growth would surpass the earnings increases of 3.0% in 2022 and 3.8% in 2023. Taking a wider view, Capital Economics forecasts that GDP growth should improve in 2025 for many of the world's developed markets outside of the US, including France, Germany, Italy, Japan, the United Kingdom, Switzerland, Canada, and Australia. For reference, Capital Economics forecasts domestic US GDP to decline from +2.8% this year to +2.2% next year.

Market Commentary continued...

So, moving forward, what are a few potential catalysts that would support improved economic activity in the developed markets outside the US? First, eurozone inflation has fallen to a reading of only 1.8% as of September. This significant development should enable the European Central Bank to further reduce rates in the coming months, potentially boosting economic demand and activity. Second, Japan, the largest developed market outside the US, has slowly been able to normalize financial conditions following a multi-decade period of deflation. This change in economic conditions should benefit the Japanese domestic economy by potentially strengthening the yen (JPY) and encouraging local investment. Third, the Chinese economy has been sluggish since emerging from the COVID pandemic. In late September, Chinese authorities initiated concrete measures to boost the economy. These efforts included stabilizing the local housing market, lowering reserve requirements for banks to encourage lending, promoting financial market investment, and introducing a fiscal stimulus package to enhance consumer spending and confidence. A sustained improvement in the Chinese economy would have a direct and positive impact on many developed market countries that have large trading relationships with China, including Germany (currently mired in a shallow recession), France, Japan, and Australia.

Once again, we believe the outlook for foreign equities will remain supportive well into next year. Therefore, we encourage investors to reassess their allocations to international equities to ensure they have the appropriate exposure.

Quarterly Trade Summary

During the past three months, we made an above-average number of trades that we believe will improve the quality of the International Developed portfolio in light of slowing global growth and changing monetary policy.

Beginning in late July, we sold Nestlé (originally purchased in May 2020) and used the proceeds to buy Consumer Staples peer Unilever plc. During the past several quarters, Nestlé has struggled to meet guidance, especially in the post-COVID environment where many of its consumers were no longer receiving assistance to purchase the company's product offerings. Q1 2024 sales for Nestlé were mixed, and in late July, Nestlé again reported earnings that missed expectations on revenue as the company lowered its forward growth and earnings estimates. Our team questioned management's ability to turn the company around in the near-to-medium term, and the decision was made to sell Nestlé from the portfolio. Post-sale, Nestlé's CFO commented that the consumer environment has worsened, and CEO Mark Schneider relinquished his role as CEO and board member, further solidifying our decision.

Unilever is a United Kingdom-based company we have owned in the past and have followed closely during the past several years as the company changed management and began divesting non-core business segments. Today, Unilever operates five business segments, Beauty & Wellbeing, Personal Care, Home Care, Nutrition, and Ice Cream (although the ice cream business is scheduled to be separated by the end of 2025), and its products are sold in 190 countries. Shoppers can find Unilever's products in more than 4.4 million stores worldwide, and importantly, nearly 60% of sales are generated within emerging markets. Unilever has a sizeable share buyback program that will be completed by the end of 2024. Earnings came in ahead of projections, and the company realized strength in volume growth and raised margin guidance. Unilever pays a dividend (currently 2.8% yield) and, in our opinion, is better positioned than Nestlé for near- and medium-term growth and profitability.

In early August, Japanese insurance company Tokio Marine was added to the portfolio. From a top-down perspective, our investment team sought to add to the strategy's Japan allocation and reduce its underweight position in the country. We preferred a Japanese company that derived a large portion of its sales domestically within Japan in order to benefit from a stronger yen, and Tokio Marine generates nearly 50% of its business within Japan and another 25% from the United States. The company is predominantly a non-life insurer, with life insurance accounting for only 10% of total revenue. From a bottom-up point-of-view, Tokio has operations in 46 countries, employs 43,000, and owns domestic US insurance brands that include Philadelphia Insurance and First Insurance Company of Hawaii. The US business has a growth rate on a three-year trailing basis of more than 20%, while its business is growing by more than 25% outside of Japan and the US. The company trades at a discount to peers on a Price/Earnings basis and currently pays a dividend of more than 2%. The addition of this name also increased the portfolio's allocation to the Financials sector to nearly equal the benchmark.

In late August, Japanese factory automation and equipment manufacturer SMC Corp. was sold. SMC was originally purchased in January 2022, but shares have underperformed the comparative country, sector, and broad index since midyear. The performance shortfall was driven by a decline in operating profits for full-year results, record-high inventory levels, and lowered 2025 guidance for both net and operating income. While we retain our conviction for the benefits (longer term) of factory automation, the current operating conditions for SMC Corp. remain subdued. Proceeds from the sale of SMC were used to purchase Hong Kong-based industrial tool manufacturer Techtronic Industries.

Quarterly Trade Summary continued...

We are quite familiar with Techtronic, having owned shares within our dedicated Emerging Markets strategy since November 2022. Techtronic engages in the design, manufacture, and marketing of power tools, outdoor power equipment, and floor care and cleaning products worldwide. It offers power tools, power tool accessories, outdoor products, and outdoor product accessories for consumer, trade, professional, and industrial users. Techtronic markets products using 13 brands, most notably Milwaukee, Ryobi, Dirt Devil, Hoover, and Oreck. It holds the leading market position in both the professional and Do-It-Yourself (DIY) user groups for power tools, which compose more than 90% of the company's business. While sales and manufacturing are worldwide, nearly 80% of its sales are in North America. We believe that Techtronic is set to become an outsized beneficiary from lower interest rates and improved housing demand from the domestic US market.

In early September, we eliminated the position in Rio Tinto in favor of adding exposure to UK-based Linde plc. Rio Tinto was one of the strategy's longest-tenured positions, originally purchased in July 2016. Shares of Rio underperformed on a year-to-date through-sale basis as global demand has lessened for iron ore and other minerals. A slowdown in China, particularly in the housing sector, will likely cap global iron ore consumption for the foreseeable future. Europe's current economic malaise is also a headwind for some commodities. While we have turned negative on the raw materials side of the commodity complex, we have a constructive view of the industrial gas sector. Therefore, against the backdrop of a change in product demand within the broad materials complex, we used the proceeds from the sale of Rio Tinto to add Linde.

With operations in 80 countries, Linde is one of the world's preeminent industrial gas and engineering companies. Linde's products are used to make chemicals, energy, food and beverages, electronics, healthcare applications, metals, mining, and more. The company is also very active in the areas of clean hydrogen and carbon capture, which could play a significant role in the transition away from the use of fossil fuels. Linde's specialty gas products are essential in manufacturing electronics (semiconductors), and the company operates four divisions: packaged gas, merchant gas, onsite, and other. Nearly half of sales are generated from North America, followed by the regions of EMEA and APAC. We believe Linde will demonstrate growth characteristics despite global macroeconomic uncertainties as its diverse range of products and solutions are essential for many recession-proof industries. Linde currently has a dividend yield of 1.2% and trades with a P/E ratio and EV/EBITDA ratio lower than global peers, including Air Liquide and Dow.

The three-year trailing turnover for this strategy is 17.7% as of 9/30/2024.

Performance Review

During the third quarter of 2024, the MSCI EAFE Index recorded a gain of 7.3%, while the Confluence International Developed strategy posted a return of 6.5% (gross of fees). On a year-to-date basis, International Developed was up 14.6% (gross of fees) versus 13.0% for the benchmark. [*The strategy's net-of-fees returns for the same periods were 5.7% QTD and 12.0% YTD. See disclosures on last page for fee description; actual investment advisory fees may vary.*]

The Confluence International Developed strategy was modestly outperforming the MSCI EAFE Index until mid-September, when the index outgained our strategy by more than 2%. The benchmark performance was driven by sectors where we are positioned with an underweight, including Consumer Discretionary, as well as countries where we also have lower exposure than the benchmark, such as Japan and Germany.

Following a quarter of outperformance, the MSCI EAFE Growth Index underperformed the MSCI EAFE Value Index by a wide margin (5.7% versus 8.9%, respectively). On a three-year trailing basis as of September 30, the MSCI EAFE Value Index is 700 bps ahead of the Growth Index (8.9% versus 1.9%, respectively) on an annualized basis. Interestingly, the phenomenon of value outperforming growth also spread to the domestic US market during the past three months as the MSCI USA Value Index outgained the MSCI USA Growth Index by nearly 7%. This abrupt change of leadership within the domestic stock market comes against a backdrop where growth has outperformed value by nearly 14% during the past year. Should global investors move to favor increasing their exposure to value over growth stocks in the coming months, this could prove to be a catalyst for the more value-oriented international stock indexes.

Quality stocks, as measured by the MSCI EAFE Quality Index, up 5.3%, also underperformed the broad MSCI EAFE Index as well as the EAFE Value Index during the past three-month measurement period, resulting in a performance headwind for our strategies.

Performance Review continued...

In the third quarter, the two best-performing countries within our portfolio on an absolute basis were Hong Kong and Singapore, while Denmark and the Netherlands recorded the worst returns. From a sector standpoint, Consumer Staples and Information Technology were the strongest sectors during the quarter, while Energy and Communication Services were the weakest.

From a relative standpoint, the most accretive country allocation was the overweight to Canada followed by the overweight to Ireland. An underweight allocation to Australia detracted the most from performance, while an underweight positioning to the United Kingdom once again proved unfavorable. From a sector perspective, our overweight allocations to Information Technology and Consumer Staples added the most alpha during the quarter, whereas our zero allocation to the Utilities sector underweight coupled with our allocation to Communication Services contributed negatively to returns.

The top contributors and detractors for the portfolio yearto-date in 2024 are shown in the accompanying table.¹

Security	Avg Weight (%)	Contribution (%)
Тор 5		
Rheinmetall AG	3.78	1.85
Safran S.A.	4.03	1.22
SAP S.E.	2.44	1.03
CyberArk Software Ltd.	3.29	1.03
AerCap Holdings N.V.	3.06	0.80
Bottom 5		
L'Oréal S.A.	2.68	(0.28)
Woodside Energy Group Ltd.	1.53	(0.29)
Infineon Technologies A.G.	1.71	(0.34)
Rio Tinto plc	Sold	(0.41)
DSV A.S.	Sold	(0.44)

(Contribution data shown from a sample account, based on individual stock performance and portfolio weighting)

What We Are Watching

The following is a list of topics that we are closely monitoring that could make an impact on portfolio construction and forward returns for international equities. This list is far from exhaustive, and we invite readers to contact us to further discuss these themes or to delve into subjects not explicitly addressed here.

There is a strong likelihood that some investors have grown weary of the continuing wars in Europe and the Middle East. This is understandable; however, the truth is that conditions continue to deteriorate and extend in the Middle East. As Israel continues to respond to being attacked by Hamas, the conflict has recently spread to Lebanon and Iran. Since Iran's retaliatory ballistic missile attack on Israel in early October, the price of Brent crude has risen nearly 7%, possibly anticipating a retaliatory strike by Israel on Iran's oil infrastructure. Whether a direct attack on these oil fields transpires or not, there are growing risks in the region.

The war between Russia and Ukraine may appear frozen, but dangers are lurking. Ukrainian President Zelensky is lobbying NATO countries to utilize more modern and powerful weaponry to attack deeper inside Russia, while Russian President Putin persists in threatening the use of nuclear weapons and consistently moves the goalposts regarding what type of attack would warrant a nuclear response. The Confluence macroeconomic team has also highlighted the elevated tensions brewing in the South China Sea. We have previously discussed the potential of China taking military action against Taiwan, and now pressure is building in a territorial dispute between China and the Philippines as there have been several encounters between the Chinese Coast Guard and Philippine vessels. Each of these situations carries a real risk of immediate escalation, which could impact investors around the globe. The International Equities Investment Committee is diligently monitoring each of these theaters to manage client portfolios accordingly.

During the past several months, there has been an increase in the asymmetric application of monetary policy worldwide. A year ago, the international battle against inflation was raging, and monetary policy became more restrictive as a result. However, inflationary pressures have largely subsided during the past few months, at least in the world's developed markets, which allowed central banks to begin easing rates. Much of the movement occurred this past September when the US Federal Reserve lowered rates by 50 bps, the European Central Bank announced its second rate reduction, and the Bank of Canada cut rates for a third time. Meanwhile, the Bank of England held rates at 5% following a 25 bps rate reduction in July, and the Bank of Mexico also cut rates by a quarter point during its August meeting. However, on the other side of the coin, the Bank of Japan has proceeded with two rate hikes so far this year. Japan is the only G7 economy currently entrenched in a rate-hiking cycle. We anticipate that the BOJ will progressively adopt more restrictive measures to combat the country's prolonged period of domestic deflation. The Central Bank of Brazil also decided recently to raise rates to curtail a rise in Brazilian inflation. What this means for our portfolios is that with differing parts of the globe beginning to employ varying monetary policies, we can make investment decisions more tailored to a specific country or region.

What We Are Watching continued...

As an example of how we work when local market dynamics change, we began adding exposure to Japan beginning in the second half of last year (and continuing through mid-2024). However, rather than adding Japanese export-oriented companies to the portfolio, we opted to add companies that primarily generated their sales from within Japan. We believed the Bank of Japan would increase rates, leading to a strengthening of the Japanese yen. While the yen's strength arrived later than we initially expected, it has strengthened by nearly 11% in the last three months. A stronger yen should serve as a tailwind to domestic Japan-oriented companies and a headwind to Japanese exporters. Therefore, investors can expect us to continue to search for similar opportunities throughout our investment universe should the proper companies avail themselves.

We entered 2024 knowing that at least half of the world's population would be heading to the polls to elect their next leaders. Some of these elections have gone as expected and some have not. Even when candidates prevailed that were expected to win, including Claudia Scheinbaum in Mexico and Narendra Modi in India, equity markets sometimes responded unexpectedly. With that in mind, we are keenly observing several key political situations likely to impact global equities for the remainder of this year and beyond. The next US president will undoubtedly be pivotal in determining the pace of deglobalization and the level of trade barriers. Newly elected UK Prime Minister Keir Starmer has had a rough time during his first 100 days in office. He has already replaced his Chief of Staff Sue Gray over complaints about her job performance and management style. Additionally, the Starmer government is embroiled in a scandal that involves the receipt of gifts and "freebies" to himself and several other senior government officials. Starmer is the fourth individual to hold the office of UK prime minister since Boris Johnson was elected in 2019! Getting his government on track is important as the UK constitutes nearly 15% of the foreign developed market equity index. We will await the Autumn Budget, set to be released in late October, for a better understanding of the direction of his leadership.

Another political development we are keeping tabs on is the current scene in French politics. Following French President Macron's surprise call for a snap election just before the Summer Olympics, he became embroiled in a struggle to establish his new government. Macron named former Brexit negotiator Michel Barnier as prime minister. Because of the differences between France's left, right, and center politicians, Barnier has already had to survive a no-confidence vote during his first 45 days in office. The health of the French economy is important to the larger European market and will need to be closely monitored on a go-forward basis. Finally, another important change in early October was the election of Shigeru Ishiba as the new prime minister of Japan. Ishiba replaces former Prime Minister Fumio Kishida, who stepped down following a three-year term that ended mired in a political-financial scandal. On October 9, Ishiba announced that he was dissolving Japan's Lower House and would hold snap elections on October 27, hoping to restore credibility to his Liberal Democratic Party. Ishiba's new cabinet appointees will also be scrutinized as the country attempts to emerge from decades of deflation.

Portfolio Characteristics² (as of 9/30/2024)

10 Largest Holdings	Weight	Sector Allocation	Weight	10 Largest Countries
Rheinmetall AG	3.7%	Consumer Discretionary	3.6%	Japan
DBS Group Holdings Ltd.	3.7%	Consumer Staples	9.8%	France
Chubb Ltd.	3.7%	Energy	6.2%	United Kingdom
Safran S.A.	3.6%	Financials	23.1%	Ireland
SAP S.E.	3.2%	Health Care	13.0%	Switzerland
Novo Nordisk A.S.	3.1%	Industrials	24.4%	Germany
AerCap Holdings N.V.	3.1%	Information Technology	11.3%	Canada
Willis Towers Watson plc	3.1%	Materials	5.5%	Netherlands
Waste Connections Inc.	3.1%	Communication Services	2.3%	Singapore
ICON plc	2.9%	Cash	0.8%	Denmark

Performance Composite Returns³ (For Periods Ending September 30, 2024)

	Since 10/1/99	20-year*	15-year*	10-year*	5-year*	3-year*	1-year	YTD	QTD
International Developed Pure Gross-of-Fees ⁴	6.0%	7.7%	7.9%	7.2%	11.5%	8.0%	25.3%	14.6%	6.5%
Max Net-of-Fees ⁵	2.9%	4.6%	4.7%	4.0%	8.2%	4.8%	21.6%	12.0%	5.7%
MSCI EAFE (Net)	4.6%	6.0%	6.0%	5.7%	8.2%	5.5%	24.8%	13.0%	7.3%

Calendar Year	Pure Gross- of-Fees⁴	Max Net- of-Fees⁵	MSCI EAFE	Difference (Gross-MSCI EAFE)	# of Portfolios	Composite Assets (000s)	Total Firm Assets (000s)	Composite 3yr Std Dev	MSCI EAFE 3yr Std Dev	Composite Dispersion
2004**	15.9%	12.4%	20.2%	(4.4%)	191	\$42,465	-	15.5%	15.4%	0.9%
2005	16.7%	13.2%	13.5%	3.2%	176	\$37,524	-	11.4%	11.4%	0.8%
2006	23.9%	20.2%	26.3%	(2.4%)	243	\$62,300	-	10.5%	9.3%	0.8%
2007	19.1%	15.6%	11.2%	8.0%	269	\$75,983	-	10.5%	9.4%	1.4%
2008	(38.2%)	(40.0%)	(43.4%)	5.2%	256	\$43,507	-	18.9%	19.2%	1.2%
2009	22.5%	18.8%	31.8%	(9.3%)	235	\$47,380	-	21.7%	23.6%	1.7%
2010	15.3%	11.8%	7.8%	7.5%	206	\$47,360	-	23.4%	26.2%	0.8%
2011	(9.7%)	(12.3%)	(12.1%)	2.5%	164	\$31,229	-	20.0%	22.4%	0.7%
2012	16.5%	13.0%	17.3%	(0.8%)	154	\$34,823	-	17.3%	19.4%	0.6%
2013	20.9%	17.4%	22.8%	(1.8%)	174	\$47,418	-	14.5%	16.3%	0.5%
2014	(0.4%)	(3.4%)	(4.9%)	4.5%	116	\$34,435	-	11.0%	13.0%	0.7%
2015	(2.3%)	(5.2%)	(0.8%)	(1.5%)	53	\$19,412	-	11.3%	12.5%	0.3%
2016	(5.1%)	(8.0%)	1.0%	(6.1%)	30	\$7,163	-	11.8%	12.5%	0.4%
2017	23.4%	19.7%	25.0%	(1.7%)	25	\$6,957	-	11.0%	11.8%	0.3%
2018	(14.4%)	(17.0%)	(13.8%)	(0.6%)	2	\$352	\$5,486,737	11.7%	11.2%	0.1%
2019	29.6%	25.7%	22.0%	7.6%	1	\$261	\$7,044,708	12.4%	10.8%	N/A
2020	15.9%	12.4%	7.8%	8.0%	1	\$241	\$6,889,798	19.3%	17.9%	N/A
2021	18.2%	14.7%	11.3%	6.9%	1	\$280	\$7,761,687	18.3%	16.9%	N/A
2022	(13.5%)	(16.1%)	(14.5%)	0.9%	1	\$238	\$6,931,635	21.7%	20.0%	N/A
2023	18.5%	15.0%	18.2%	0.3%	1	\$277	\$7,200,019	17.9%	16.6%	N/A

*Average annualized returns **Inception is 10/1/1999. Additional years of performance available on our website. See performance disclosures on last page.

Portfolio Benchmark

MSCI EAFE (Net) Index - Free float-adjusted market capitalization index designed to measure developed market equity performance, excluding the U.S. and Canada. Performance results presented net of estimated foreign withholding taxes on dividends, interest and capital gains. (*Source: Bloomberg*)

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Indexes: The MSCI EAFE Index is shown as additional information. This index is unmanaged. An investor cannot invest directly in an index. It is shown for illustrative purposes only & does not represent the performance of any specific investment. Index performance figures are reported as net returns.

¹ Contribution—Table showing the top 5 contributors/detractors reflects the strategy's best and worst performers (net), based on each holding's contribution to the sample account for the period stated. Individual client portfolios in the strategy may differ, sometimes significantly, from these listings.

² Portfolio Characteristics—Listings of countries and holdings do not represent all of the countries/stocks currently or previously owned in the portfolio or which Confluence may be currently recommending. Sector/country weightings and holdings of individual client portfolios in the program may differ, sometimes significantly, from these listings.

³ Performance Composite Returns—Confluence Investment Management LLC claims compliance with the Global investment Performance Standards (GIPS[®]) and has prepared and presented this report in compliance with the GIPS standards. Confluence Investment Management LLC has been independently verified for the periods August 1, 2008, through December 31, 2023. The verification report is available upon request. A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards.

Verification provides assurance on whether the firm's policies and procedures related to composite maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. Verification does not provide assurance on the accuracy of any specific performance report.

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The International Developed Strategy was incepted on April 1, 1992, and the current International Developed Composite was created on May 1, 2018. Performance presented prior to May 1, 2018, occurred while the Portfolio Management Team was affiliated with a prior firm and was independently verified for the periods of 10/1/1999 through 12/31/2017. The Portfolio Management Team members were the primary individuals responsible for selecting securities to buy and sell. Composite performance is typically net of foreign withholding taxes on dividends, interest income and capital gains with some exceptions based on custodian treatment. Confluence Investment Management LLC is an independent registered investment adviser. Results are based on fully discretionary accounts under management, including those accounts no longer with the firm. Past performance is not indicative of future results. The US Dollar is the currency used to express performance. Returns are presented gross and net of all fees and include the reinvestment of all income.

⁴ Pure gross returns are shown as supplemental information to the disclosures required by the GIPS® standards.

⁵ Net-of-fee performance was calculated using the highest applicable annual bundled fee of 3.00% applied quarterly. This fee includes brokerage commissions, portfolio management, consulting services and custodial services. The Confluence fee schedule for this composite: 0.60% on the first \$500,000; 0.55% on the next \$500,000; and 0.50% over \$1,000,000. There are no incentive fees. Clients pay an all-inclusive fee based on a percentage of assets under management. The collection of fees produces a compounding effect on the total rate of return net of fees. Bundled fee accounts make up 100% of the composite for all periods. Actual investment advisory fees incurred by clients may vary. Wrap fee schedules are provided by independent wrap sponsors and are available upon request from the respective wrap sponsor.

A complete list of composite descriptions is available upon request. Policies for valuing investments, calculating performance, and preparing GIPS Reports are available upon request. The annual composite dispersion is an equal-weighted standard deviation, using gross-of-fee returns, calculated for the accounts in the composite for the entire year. Prior to year-end 2018, the annual composite dispersion was an asset-weighted standard deviation calculated for accounts in the composite for the entire year. The three-year annualized standard deviation measures the variability of the composite gross returns over the preceding 36-month period. The International Developed Composite contains fully discretionary International Developed wrap accounts. The International Developed portfolio invests in US-listed shares of large capitalization, non-US companies from developed markets.

Prior to March 31, 2020, the S&P/BNY Developed Market ADR Index was shown as a secondary benchmark. This index was removed to simplify the presentation, being less widely recognized and relevant than the primary benchmark.

**Results shown for the year 1999 represent partial period performance from October 1, 1999, through December 31, 1999. N/A-Composite Dispersion: Information is not statistically meaningful due to an insufficient number of portfolios in the composite for the entire year. N/A-3yr Std Dev: Composite does not have 3 years of monthly performance history.