Summit Global Investments

Personal Social Media:

a. Usage Standard. Personal use of social media by the Firm's personnel must be legal and ethical.

b. Attribution

   i. Personal use of social media by the Firm's personnel must not create an impression that an employee is speaking for the Firm.

   ii. Personnel are limited to referencing the Firm when accurately listing their current and historical employment status or company affiliation on LinkedIn or other sites for purposes of identification. Employees are otherwise prohibited from referencing the Firm on social media.

c. Limitations

   i. Personnel must not use their personal social media accounts to disclose material nonpublic information about the Firm; confidential information belonging to the Firm; or any confidential third-party information held by the Firm.

   ii. Personnel may not mention the Firm's product(s) or service(s) or their performance in personal social media communications.

   iii. Firm personnel must not engage in discussion of individual securities or the Firm's products or services in social media.

   iv. As the maintenance of the Firm's corporate reputations is essential to the successful operations of the Firm, all personnel are cautioned that any content posted to their personal social media accounts that could reflect negatively on the individual's role at the Firm or the Firm themselves may be deemed grounds for disciplinary or other remedial actions by the Firm. Accordingly, all personnel are strongly encouraged to refrain from posting, communicating or otherwise interacting with any content that may be deemed offensive or otherwise distasteful.

d. Attestation and Monitoring.

   i. Employees shall identify any personal social media service identities or profiles identified by the CCO as requiring proactive monitoring and provide timely updates to the CCO of any additions or revisions to such monitored identities or profiles that could reasonably be expected to impact monitoring.

   ii. Employees shall attest to their compliance with these requirements applicable to the use of personal social media as requested by the CCO.

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Company Social Media:

Summit Global Investments, LLC maintains profiles and/or pages on social media sites LinkedIn and Twitter. If you choose to "Follow" Summit Global Investments, LLC on LinkedIn or Twitter and take any similar action on another social media site, you are providing your consent to receive information updates, including solicitations, from Summit Global Investments, LLC. To stop receiving this information from Summit Global Investments, LLC on a social media site, you must follow the procedure established by the site.

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Investing in funds involve risk, and you can lose money.

You should carefully consider a fund's investment goals, risks, charges and expenses before investing. This and other important information is contained in the fund's prospectus. To obtain a prospectus, visit www.sgaim.com or contact your investment professional or call (888) 251-4847. Please carefully read the prospectus before you invest or send money.