Client Relationship Summary

1. Introduction

Clark Capital Management Group, Inc. ("Clark Capital") is registered with the Securities and Exchange Commission as an investment adviser. The services offered and fees charged by an investment adviser differ from those of broker-dealers and it is important that you understand the differences. Free and simple tools are available to research investment adviser firms, broker-dealers, and their financial professionals at www.Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

2. Relationships and Services

What investment services and advice can you provide me? We offer investment advisory services to retail investors and other clients through separately managed accounts ("SMAs") and unified managed accounts ("UMAs") through third-party wrap fee programs ("Wrap Fee Programs") sponsored by financial services firms, such as banks, broker-dealers, and other investment advisers ("Program Sponsors"). Program Sponsors engage us to be a sub-adviser (sometimes referred to as a "strategist") within these Wrap Fee Programs to manage all or a portion of clients' assets on a discretionary basis. Clients are generally introduced to Wrap Fee Programs and Clark Capital's advisory services through financial advisors that act as solicitors to the Wrap Fee Programs. Clark Capital also provides its services directly to certain clients outside of Wrap Fee Programs (our "Private Clients"), although these services are not actively being offered.

Clark Capital accepts discretionary authority to manage client accounts. This means that Clark Capital has the authority to determine which securities are purchased or sold for your accounts, consistent with written information received from the Program Sponsor and your financial advisor regarding your selected investment strategy (or allocation), investment objectives, and any restrictions that you or the Program Sponsor has imposed. Members of the Portfolio Management and Operations departments conduct periodic reviews of client accounts for adherence to investment strategy and to confirm that account performance is consistent with applicable model portfolios. Clark Capital also participates in Wrap Fee Programs where we provide non-discretionary investment advice to a Program Sponsor by delivering a model securities portfolio ("Model Delivery Programs"). In Model Delivery Programs, the Program Sponsor has authority to execute client securities transactions. In all Wrap Fee Programs, the Program Sponsors set the minimum account size. Clark Capital does not have a minimum for Private Client accounts.

More detailed information about our services is provided in Items 4, 7, 13 and 16 of our Form ADV Part 2A or Items 4 and 5 of our Form ADV Part 2A Appendix 1 (wrap fee program brochure), which are available on our website at ccmg.com/form-adv.

Conversation Starters. Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

3. Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay? Program Sponsors set the fees for clients in their Wrap Fee Programs. Clients in Wrap fee Programs are subject to a "wrap fee," which generally covers the cost of investment advice, custody of assets, and execution of most transactions. Wrap Fee Clients typically have either a "single contract" or "dual contract" agreement. Under a single contract, the client pays a single asset-based wrap fee to the Program Sponsor, and the Program Sponsor pays us out of that fee. Under a dual contract agreement, the client has a separate contract with us, and pays us an asset-based advisory fee in addition to the wrap fee they pay to the Program Sponsor. Our advisory fee varies across different Wrap Fee Programs. Clients are typically not charged a commission on trades executed through the Program Sponsor; however, clients will be charged for transactions placed through a broker-dealer other than the Program Sponsor (also known as a step-out transaction). Clark Capital typically places a significant amount of trades away from the Program Sponsor. The commissions or other fees for these step-out transactions are in addition to the wrap fee.

You will also bear a proportionate share of an investment product's expenses, such as investment management fees that are paid to the product's adviser, and distribution, shareholder services or other fees. These expenses are an additional expense to you and not covered by the fees or charges described above; rather, they are embedded in the price of the fund. These fees and expenses are described in each fund's prospectus. Where we serve as the adviser to a fund held in your account (for example, the Navigator Mutual Funds), we will generally earn more compensation than if you invested in a fund managed by a third-party.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Because we receive an asset-based fee, the more assets there are in your account, the more you will pay in fees, and we therefore have an incentive to encourage you to increase the assets in your account. Please make sure you understand what fees and costs you are paying.

More detailed information about our fees and costs is provided in Item 5 of our Form ADV Part 2A, and Item 4 of our Form ADV Part 2A Appendix 1 (wrap fee program brochure), which are available on our website at ccmg.com under About/Form ADV.

Conversation Starters. Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? *When we act as your investment adviser,* we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means. The following arrangements and activities give us an incentive to make investments for you based on our own interests rather than on your needs.

Proprietary Products. We receive additional compensation from products we manage, known as proprietary products. For example, the Navigator Mutual Funds are proprietary products. This creates an incentive for us to recommend proprietary products over third-party products.

Personal Trading. We invest personally in the same (or related) securities that we recommend to you. We also buy or sell securities for you at or about the same time that we buy or sell the same securities for our own accounts. This gives us an incentive to favor our own accounts over your account.

Third-Party Payments. Clark Capital hosts conferences with co-sponsors that may pay Clark Capital to defray a portion of a conference's costs, creating an incentive for us to favor the products or services of co-sponsors.

Sales Support. Clark Capital has entered into sales support agreements with broker-dealers and financial services firms who receive payments from Clark Capital in exchange for educational, training and related sales support expenses. These reimbursements and payments can create an economic incentive for these financial advisors and entities to promote Clark Capital's products and services over another adviser's products and services.

More detailed information about our conflicts of interest is provided in Items 5, 6, 10, 11, 12, 14, and 17 of our Form ADV Part 2A and Items 4, 6 and 9 of our Form ADV Part 2A Appendix 1 (wrap fee program brochure), which are available on our website at ccmg.com under About/Form ADV.

Conversation Starters. How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money? Financial professionals acting in a portfolio management capacity generally receive a base salary and a discretionary annual bonus. The discretionary bonus takes into account several factors, including the investment performance of client accounts or products versus their respective benchmarks and firm profitability. These compensation factors give our portfolio managers an incentive to make riskier investments. Financial professionals acting in a sales capacity receive a base salary and additional compensation based on gross sales, the types of products or advisory services sold, and asset retention. These compensation factors create an incentive for our salespersons to recommend that you increase the size of your account with us.

4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history? No. Visit www.Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starters. As a financial professional, do you have any disciplinary history? For what type of conduct?

5. Additional Information

You can find additional information about our investment advisory services on the SEC's website and on our website. You can request up-to-date information and a copy of our relationship summary by contacting us at 1-800-766-2264.

Conversation Starters. Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

Form ADV Part 2A

March 31, 2026

Form ADV, Part 2A is our "Disclosure Brochure" or "Brochure" as required by the Investment Advisers Act of 1940 and is a very important document to you as a client and Clark Capital Management Group, Inc. ("Clark Capital" or the "Firm").

This brochure provides information about the qualifications and business practices of Clark Capital. If you have any questions about the contents of this brochure, please contact Conor Mullan at 215-569-2224 or at cmullan@ccmg.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

For additional information about Clark Capital you may go to the SEC's website *www.adviserinfo.sec.gov* (select "Investment Adviser Search," then select "Investment Adviser Firm" and type in our firm name). You will be able to access both Part 1 and 2 of our Form ADV.

We are a registered investment adviser. Our registration as an investment adviser does not imply any level of skill or training.

Phone 1-800-766-2264 Website: www.ccmg.com

One Liberty Place
53rd Floor
1650 Market Street
Philadelphia, PA 19103
1.800.766.2264
www.ccmg.com

Item 2 – Material Changes

This Brochure dated 03/31/2026 replaces the version dated 03/26/2025, which was the Firm's last annual amendment. The following material changes have been made since the last annual update:

- **Item 4 – Advisory Business**. Updated to describe the proposed acquisition of Clark Capital Management Group, Inc. by Carillon Tower Advisers, Inc. d/b/a Raymond James Investment Management ("RJIM"). The proposed acquisition would result in a change in control within the meaning of the Investment Advisers Act of 1940, as amended.

You may obtain a complete copy of this Brochure, without charge, by downloading it from the SEC website as indicated on the prior page or by contacting cmullan@ccmg.com.

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Item 4 – Advisory Business

OVERVIEW OF CLARK CAPITAL

Clark Capital is a Philadelphia-based registered investment adviser that has been managing investor assets since 1986. Clark Capital was founded by Harry Clark, our Executive Chairman. In January 2026, Clark Capital entered into an agreement pursuant to which it is expected to be acquired by Carillon Tower Advisers, Inc., d/b/a Raymond James Investment Management ("RJIM") (the "Transaction"). The Transaction remains subject to customary closing conditions, including regulatory approvals and other conditions, and has not yet closed. Upon completion of the Transaction, Clark Capital will continue to operate as a direct, wholly-owned subsidiary of RJIM, which is a wholly-owned subsidiary of Raymond James Financial, Inc. The Transaction is a change in control of Clark Capital within the meaning of the Investment Advisers Act of 1940. There can be no assurance that the Transaction will be completed as contemplated or at all.

Our advisory services are offered through several channels, including: (1) wrap fee programs sponsored by third party financial services firms ("Wrap Fee Programs"); (2) registered investment companies (the "Navigator Mutual Funds"); and (3) private clients through a turnkey asset management program ("TAMP") offered by Clark Capital. As of 12/31/2025, the firm managed $46,033,278,336 $ in total assets, $35,687,719,135 of which were managed on a discretionary basis, and $10,345,559,201of which were managed on a Model Delivery basis.

The information in this Brochure is primarily related to the advisory services we provide to clients through Wrap Fee Programs. For more information on the other services we offer, please read Clark Capital's Form ADV Part 2A Appendix 1 ("Clark Capital's Wrap Fee Brochure", describing services provided by Clark Capital through its TAMP program) and the prospectuses and relevant offering materials for the Navigator Mutual Funds.

OUR PHILOSOPHY

Clark Capital's investment philosophy is driven by a single-minded focus: to add value for our clients. This focus requires us to produce institutional investment solutions that aim to consistently generate competitive risk-adjusted returns over full market cycles. It compels us to maintain a long-term perspective and provide innovative investment management solutions that add value for our clients. It also requires us to place an emphasis on risk management, because understanding and managing risk is critical to our clients' investment success. We firmly believe that successful investment management rests not on the ability to excel through any one of these elements, but through the combined strength of all of them.

ADVISORY SERVICES

With almost four decades of experience providing wealth management solutions to investors, Clark Capital has navigated our clients' wealth through a variety of investment environments. We offer investment solutions to individuals, businesses, institutions, investment companies and financial services firms and their clients. Portfolios are customized to effectively meet clients' risk and return objectives.

Clark Capital generally has discretionary authority to manage accounts on behalf of our clients, which includes determining the securities to be bought or sold for a client's account and the amount of those securities, the broker or dealer to be used for purchase or sale of securities for a client's account, and the commission rates to be paid to a broker or dealer for a client's securities transactions. Also, you should note that we have full discretion to determine when your assets are invested, both when we begin to manage your account and upon receipt of additional contributions to your account. As discussed below, Clark Capital also participates in programs where we provide investment recommendations in the form of a model portfolio ("Model Delivery Programs"). In these programs, we are not considered to have discretionary authority.

WEALTH PLANNING

Clark Capital provides free wealth planning services to client households with $10 million or more in assets. Services may include general advice regarding asset management related to trust and estate planning, strategic tax management, concentrated position planning, philanthropic planning, business succession planning, and equity compensation planning. Clark Capital's Wealth Planning Team coordinates these services with clients upon request alongside clients' financial advisors and other professional advisors including a client's attorney, CPA or other professionals engaged by the client.

WRAP FEE PROGRAMS AND MODEL DELIVERY PROGRAMS

Clark Capital acts as a sub-advisor (sometimes referred to as a "strategist") in Wrap Fee Programs sponsored by financial services firms, such as banks, broker-dealers, and other investment advisers ("Program Sponsors"). The investment management services we provide through these Wrap Fee Programs follow the investment philosophy, investment process, and security selection offered in certain Navigator portfolios. As a sub-advisor in these Wrap Fee Programs, we are compensated by the Program Sponsor with a portion of the wrap fee paid by the client. In Wrap Fee Programs, we will often enter into a contract with the Program Sponsor rather than the client. In some instances, however, the client will enter into dual contracts with the Program Sponsor and Clark Capital.

In certain Wrap Fee Programs, Clark Capital maintains discretion as to which securities are purchased or sold for accounts and executes those trades ("Discretionary Programs"). Clients in Discretionary Programs are generally permitted to impose reasonable restrictions on the management of their account by, for example, prohibiting Clark Capital or the Program Sponsor from buying certain securities or types of securities. Typically, the Program Sponsor will provide us with written information regarding your selected investment style, investment objectives, guidelines and investment restrictions (if any), and we will manage your account in accordance with these written instructions.

Clark Capital also participates in Wrap Fee Programs where we are retained by the Program Sponsor to provide a model portfolio and update the model portfolio as Clark Capital makes changes to its own Navigator portfolios ("Model Delivery Programs"). In Model Delivery Programs, we do not exercise investment discretion or trade the account. Rather, the Program Sponsor maintains investment discretion for the account and, therefore, may or may not elect to execute any or all of the purchase or sale transactions that we recommend. Furthermore, in Model Delivery arrangements, the Program Sponsor is responsible for determining the timing of transactions, execution venue, and other decisions relating to the trade execution. As a result, there can be material performance differences between accounts invested in the same or similar strategies in Discretionary Programs and Model Delivery Programs.

NAVIGATOR MUTUAL FUNDS

Clark Capital provides discretionary portfolio management services to the Navigator Tactical Fixed Income Fund, the Navigator Ultra Short Bond Fund, the Navigator Tactical U.S. Allocation Fund, and the Navigator Tactical Investment Grade Bond Fund (each a "Fund" and collectively the "Navigator Mutual Funds"), each a series of Northern Lights Fund Trust, a Delaware statutory trust (the "Trust"). The Trust is registered as an open-end management investment company under the Investment Company Act of 1940, as amended. The presentation of information in this Brochure relating to the Navigator Mutual Funds is not intended as an offer or solicitation to invest.

The Navigator Tactical Fixed Income Fund. Clark Capital serves as advisor to the Navigator Tactical Fixed Income Fund which is an open-end investment company. The Fund invests primarily in various types of long and/or short positions in fixed income securities. The investment management services we provide to the fund mirror the investment mandate of the Navigator Fixed Income Total Return portfolio.

The Navigator Ultra Short Bond Fund. Clark Capital serves as advisor to the Navigator Ultra Short Bond Fund, which is an open-end investment company. The Fund invests primarily in various types of short duration, investment grade debt (or fixed income) securities.

The Navigator Tactical U.S. Allocation Fund. Clark Capital serves as advisor to the Navigator Tactical U.S. Allocation Fund, which is an open-end investment company. The Fund seeks long-term capital appreciation. The Fund invests at least 80% of its net assets in US equity and fixed income securities. The Fund's strategy is driven by using a relative strength modeling process which determines the Funds long or short positions in equity and fixed income securities.

The Navigator Tactical Investment Grade Bond Fund. Clark Capital serves as advisor to the Navigator Tactical Investment Grade Bond Fund, which is an open-end investment company. The Fund seeks long-term capital appreciation. The Fund invests at least 80% of its net assets in US equity and fixed income securities. The Fund's strategy is driven by using a relative strength modeling process which determines the Funds long or short positions in equity and fixed income securities.

As described in Items 5 and 8 of this Brochure, the Navigator Mutual Funds are used in separately managed accounts and Wrap Fee Program Accounts, including Navigator Personalized Unified Managed Account ("PUMA"), Total Wealth Strategies ("TWS"), Navigator Diversified Portfolios, and other multi-strategy accounts. Additional information about the Navigator Mutual Funds is available in the Funds' prospectus and SAI, which are available on the Funds' website (www.navigatorfunds.com) or on the SEC's EDGAR database.

CLARK CAPITAL SPONSORED TAMP

Clark Capital also sponsors a turnkey asset management program (or "TAMP"), which is considered a wrap fee program under the Investment Advisers Act of 1940, as amended ("Advisers Act"). In this program, our investment advisory services, the cost of transactions, and custodial fees are all "wrapped" into a single fee based on the value of a client's portfolio. For more information on the services we provide in this program, please read Clark Capital's Wrap Fee Brochure, which is available on the SEC's website at www.adviserinfo.sec.gov or may be obtained by calling Clark Capital.

Item 5 – Fees and Compensation

ANNUAL INVESTMENT ADVISORY FEES

Clark Capital's fees are described generally below and detailed in each client's advisory agreement or applicable account documents. In some cases, the total investment advisory fees charged by Program Sponsors may be negotiated. Clients should refer to the applicable Program Sponsor's Form ADV Part 2A for more information about fees.

WRAP FEE PROGRAM FEES

We charge a fee based on a percentage of a client's assets under management for the services that we provide through Wrap Fee Programs. The Program Sponsors calculate fees based on a percentage of the assets in your account and the amount of compensation paid to Clark Capital is negotiated with the Program Sponsor of your account. Once calculated, the Program Sponsors pay us the portion of our fees for managing your account. Currently, the fees paid to Clark Capital in Wrap Fee Programs range from 0% to .60%. These fees vary for several reasons, including but not limited to: (a) negotiations with the Program Sponsor; (b) size of the account; (c) the investment strategy or strategies selected; (d) the level of services provided; and (e) whether Navigator Mutual Funds are part of the investment strategy selected, as further described in Items 5 and 10 below. Program Sponsors of Wrap Fee Programs in which Clark Capital participates provide information to their clients indicating the total fee the client is charged.

Our fees are generally payable quarterly in advance unless negotiated differently with the Program Sponsor. The contracts that clients enter into with the Program Sponsors contain the total investment advisory fee, termination provisions, and refund provisions, as applicable. The total fee for Wrap Fee Programs typically covers the investment advice, portfolio allocations, client consultation, custodial, clearing, and brokerage, although the services provided in these programs vary. You should review the Program Sponsor's contract and the applicable Wrap Fee Program Brochure prior to opening an account with a Program Sponsor.

A list of Wrap Fee Program Sponsors whose accounts Clark Capital sub-advises can be found in Clark Capital's Form ADV Part 1A. The investment strategies that Clark Capital currently provides in Wrap Fee Programs are listed below.

NAVIGATOR MUTUAL FUND MANAGEMENT FEES

Each Navigator Mutual Fund pays Clark Capital a management fee of a specified percentage of the Fund's average daily net assets. The fee schedules below reflect the fees stated in each Fund's prospectus as of the date of this Brochure. Navigator Mutual Fund management fees are not negotiable but are reviewed by the Funds' Board of Trustees on an annual basis.

Fund Name	**Annual Management Fee**
Navigator Tactical Fixed Income Fund	0.81%
Navigator Tactical U.S. Allocation Fund	0.85%
Navigator Ultra Short Bond Fund	0.30%
Navigator Tactical Investment Grade Bond Fund	0.85%

The fee schedules for the Navigator Tactical Fixed Income Fund, the Navigator Tactical U.S. Allocation Fund, and the Navigator Tactical Investment Grade Bond Fund include management fee breakpoints, which reduce Clark Capital's total management fees when the net assets in the aforementioned funds exceeds the thresholds in the table below:

Portion of Net Assets	**Annual Management Fee**
Less than $4.5 billion	0.85%
Greater than $4.5 billion and less than or equal to $5.5 billion	0.80%
Greater than $5.5 billion	0.75%

Navigator Mutual Fund investors also pay fees and expenses that are in addition to the stated management fees, including distribution fees and expenses, administrative expenses, custodial and transfer agent expenses, acquired fund fees and expenses, and other operating expenses as described in the Funds' prospectus. Additional information about the fees and expenses charged to the Navigator Mutual Funds is available in the Funds' prospectus, which is available on the Funds' website (www.navigatorfunds.com) or on the SEC's EDGAR database.

CLARK CAPITAL SPONSORED TAMP FEES

Please read Clark Capital's Wrap Fee Brochure for a complete description of the fees in the TAMP that we sponsor, including the applicable fee schedule.

ADDITIONAL FEES AND EXPENSES

In Wrap Fee Programs and Model Delivery Programs, the wrap fees payable to Program Sponsors may not include all of the fees and expenses that you will pay. The following fees could be assessed depending upon your contract with the Program Sponsor: (1) advisory fees and administrative fees charged by mutual funds and exchange traded products (such as 12b-1 distribution fees, servicing fees, operating expenses and deferred sales charges); (2) wire transfer and electronic fund processing fees; (3) SEC or other regulatory fees; (4) brokerage commissions or ticket charges imposed by broker-dealers or the custodian if trades are cleared by another broker-dealer (including step-out costs, which are discussed in more detail in Item 12); (5) early termination fees assessed by the custodian, when client terminates IRA and Qualified Retirement Plan accounts; or (6) other fees mandated by law. Additionally, certain Clark Capital strategies offered in Wrap Fee Programs invest in one or more of the Navigator Mutual Funds. In those instances, the assets invested in a Navigator Mutual Fund will be subject to the applicable management fee imposed on Fund assets, as described in the Fund's prospectus and in Item 5 of this Brochure. In some instances, Wrap Fee Program clients are subject to a separate investment advisory fee payable to Clark Capital when assets are allocated to a Navigator Mutual Fund. This investment advisory fee, which is negotiated between Clark Capital and each

Program Sponsor, is lower than what Clark Capital would receive if Navigator Mutual Funds were not allocated to a client account to offset the management fees that Clark Capital will receive from the Navigator Mutual Funds. Clark Capital's overall compensation will depend, however, on the actual proportion of a client's account allocated to a Fund, which can vary over time. Furthermore, Clark Capital's overall compensation will generally be higher when a greater percentage of a client's assets are invested in a Navigator Mutual Fund. Assets invested in a Navigator Mutual Fund will also be subject to the other expenses described in the Funds' prospectus, including any applicable distribution fees, administrative expenses, and other Fund operating expenses.

Please consult with the Program Sponsor for a complete list of any additional fees or expenses associated with your account. Please refer to the Navigator Mutual Funds' prospectuses and statements of additional information for information on additional fees and expenses associated with those investments. Please read Clark Capital's Wrap Fee Brochure for information on additional fees and expenses applicable to the Clark Capital TAMP.

For more information about brokerage and other transactional costs, including additional costs that may be incurred by client accounts when we trade away from Program Sponsors, please see Item 12 of this Brochure.

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

Clark Capital does not charge performance-based fees (fees based on a share of capital gains or on capital appreciation of the funds or securities in your account).

Item 7 – Types of Clients

We provide our services to a variety of clients including:

- Individuals, including high net worth individuals
- Registered investment companies
- Trusts, estates and charitable organizations
- Corporations or other business entities not otherwise listed
- Pension and profit-sharing plans (but not plan participants)
- Non-profit entities
- Wrap Fee Programs
- Other investment advisers

Wrap Fee Program accounts must meet minimum size requirements depending upon the description of each portfolio/strategy in which you invest.

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

METHODS OF ANALYSIS

Quantitative Analysis.
In managing investors' accounts, Clark Capital employs quantitative analysis techniques. Such techniques seek to understand market behavior by using complex mathematical and statistical modeling, measurement and research. Among the methods of quantitative analysis used by Clark Capital, relative strength analysis and top down analysis are significant.

Relative Strength Analysis. Relative strength is a technical momentum indicator that measures price trend and indicates how a security is performing relative to other securities in its group.

Top Down Analysis. Top down analysis is a method of analysis that examines the "big picture" first, and then looks at the smaller components in turn. By looking at the overall picture, such as trends in the overall economy and conditions in a given industry, the aspects for further analysis can be narrowed.

Fundamental Analysis.
In managing investors' accounts, Clark Capital employs fundamental analysis of individual assets. This method of evaluating a security involves attempting to measure its intrinsic value by studying everything that can affect the security's value, including macroeconomic factors (such as the overall economy and industry conditions) and company-specific factors (such as financial condition and management quality).

Bottom Up Analysis. Bottom up analysis is a method that emphasizes a thorough review of an individual security and de-emphasizes the importance of economic and market cycles and the industry in which the company operates. This approach assumes that individual companies can do well even in an industry that is not performing well and under adverse economic conditions. The company's products, services, financials, and earnings are scrutinized.

INVESTMENT OPTIONS

Asset Allocation. In managing investors' accounts, Clark Capital employs the strategy of asset allocation. Asset allocation attempts to balance portfolio risk and reward to dovetail with an individual's goals, risk comfort zone, and investment time horizon by dividing the portfolio among different asset categories, such as stocks, bonds, and cash. Clark Capital employs both strategic and tactical asset allocation.

Strategic Asset Allocation. In strategic asset allocation, a proportional combination of asset classes is established based upon expected rates of return for each asset class on the basis of historical data. For example, if stocks historically returned 10% per year and bonds returned 5% a year, the expected return for a portfolio consisting of half stocks and half bonds would be 7.5% over time, less any fees. The asset class proportions are periodically adjusted to the original percentages. Once the allocation has been determined, there is no attempt to consciously deviate from the percentages of the original allocation.

Tactical Asset Allocation. Unlike strategic asset allocation, in tactical asset allocation, an effort is made to take advantage of market opportunities by adjusting the percentages of the various asset classes in the portfolio while maintaining the risk control framework established on behalf of the individual investor.

Hedging. Hedging involves strategically using financial instruments in the market in an effort to offset the risk of any potential loss. One investment is "hedged" against another. The investments chosen are expected to be negatively correlated (the price movement of one is expected to be opposite the movement of the other). If the investment loses value, a successful hedge will reduce the loss. On the other hand, if the investment performs well, the potential profit is less.

INVESTMENT PROGRAMS

NAVIGATOR PERSONALIZED UNIFIED MANAGED ACCOUNT ("PUMA")

With a Personalized Unified Managed Account (or "PUMA"), Clark Capital gives financial advisors and their clients the opportunity to choose from the various investment strategies or products offered by Clark Capital and incorporate these options into one managed account. Portfolio allocations are selected by the client from the following asset classes: U.S. equities, international equities, fixed income, and alternative investments. The components of a PUMA must meet certain minimums. The account must have a minimum size of $50,000 and must incorporate two or more strategies prior to adding an Alternative component.

TOTAL WEALTH STRATEGIES

Clark Capital's Total Wealth Strategies ("TWS") are multi-asset class accounts that combine certain equity, fixed income, and alternative strategies managed by Clark Capital. TWS accounts are available in five risk profiles – conservative, moderately conservative, moderate, moderate growth, and growth. TWS accounts also are available in tax aware formats, which offer investment allocations to tax-free high credit quality (average quality is investment grade or better) individual tax-free municipal securities. TWS accounts are available in Wrap Fee Programs offered by third-party Program Sponsors. Fees and minimum account sizes vary by Wrap Fee Program.

INVESTMENT STRATEGIES AND PRODUCTS

EQUITY STRATEGIES

Navigator All Cap Core U.S. Equity

The Navigator All Cap Core U.S. Equity portfolio is primarily invested in stocks of companies with market capitalizations generally falling between $300 million and $400 billion and that are constituents of the Russell 3000 Broad Market Index. Our investment process is both quantitative and qualitative, incorporating proprietary models and analytical techniques that search for companies that we believe possess three characteristics: superior quality, attractive value and improving business prospects. By purchasing the undervalued shares of companies with a durable competitive advantage whose businesses have accelerating momentum, we tend to benefit over time as value increases and as the spread between price and value narrows. Our risk controls are sensitive to company and sector diversification to reduce both overall portfolio volatility and tracking error to the benchmark. The goal of the portfolio is to deliver consistent excess returns over a full market cycle at/or below benchmark volatility.

Navigator High Dividend Equity

Navigator High Dividend Equity is invested in high-quality domestic and international equities, REITs and preferred stocks. The goal of the strategy is to provide above average dividend income with capital appreciation. The focus is on reasonably priced, multi-capitalized stocks with strong valuation characteristics. Only securities with strong and absolute relative values are considered for use in the portfolio and is diversified across several broad economic sectors. Fundamental and quantitative analysis is used in determining the stocks to be included in the portfolio such as: revenue growth, price/cash flow, price/book, P/E, ROE (return on equity), price/sales, dividend yield, PEG ratios and earnings momentum. Generally, 35 to 55 securities are held in the portfolio. Preferred stocks and REITs are considered for the portfolio. The sell discipline considers dividend reductions, weakening earnings trends and declining margins over two to three consecutive quarters. Relative performance to market peers is also a factor. The strategy seeks to provide capital appreciation with current income on a consistent basis by applying a fundamental investment approach that is focused on securities with above average dividend yield.

Navigator High Dividend Equity Option

Navigator High Dividend Equity Option strategy invests in high quality domestic and international equities, REITs, and preferred stocks. The goal of the strategy is to provide above average dividend income with capital appreciation. The focus is on reasonably priced, multi-capitalized stocks with strong valuation characteristics. Only securities with strong and absolute relative values are considered for use in the portfolio and is diversified across several broad economic sectors. Fundamental and quantitative analysis is used in determining the stocks to be included in the composite such as: revenue growth, price/cash flow, price/book, P/E, ROE (return on equity), price/sales, dividend yield, PEG ratios and earnings momentum. Generally, 35 to 55 securities are held in the strategy. Preferred stocks and REITs are also considered for the strategy. The sell discipline considers dividend reductions, weakening earnings trends and declining margins over 2-3 consecutive quarters. Relative performance to market peers is also a factor. The option overlay is an actively managed strategy that sells call options on portfolio securities, in an effort to provide income. The strategy seeks to provide capital appreciation with current income on a consistent basis by applying a fundamental investment approach that is focused on securities with above average dividend yield.

Navigator Small Cap Core U.S. Equity

The Navigator Small Cap Core U.S. Equity portfolio primarily invests in stocks of companies with market capitalizations generally falling between $300 million and $3 billion and that are constituents of the Russell 2000 Small Cap Index. Our investment process is both quantitative and qualitative, incorporating proprietary models and analytical techniques that search for companies that we believe possess three characteristics: superior quality, attractive value and improving business prospects. By purchasing the undervalued shares of companies with a Durable Competitive Advantage whose businesses have accelerating momentum, we tend to benefit over time as value increases and as the spread between price and value narrows. Our risk controls are sensitive to company and sector diversification to reduce both overall portfolio volatility and tracking error to the benchmark. The goal of the portfolio is to deliver consistent excess returns over a full market cycle at/or below benchmark volatility. The performance prior to 4/1/2003 were achieved by Anthony Soslow while at his prior firm, using a substantially similar investment style. Anthony Soslow joined Clark Capital Management Group on 3/1/2013.

Navigator SMID Cap Core U.S. Equity
The Navigator SMID Cap Core U.S. Equity portfolio primarily invests in stocks of companies with market capitalizations generally falling between $300 million and $5 billion. Our investment process is both quantitative and qualitative, incorporating proprietary models and analytical techniques that search for companies that possess three characteristics: superior quality, attractive value and improving business prospects. By purchasing the undervalued shares of companies with a Durable Competitive Advantage whose businesses have accelerating momentum, we tend to benefit over time as value increases and as the spread between price and value narrows. Our risk controls are sensitive to company and sector diversification to reduce both overall portfolio volatility and tracking error to the benchmark. The goal of the portfolio is to deliver consistent excess returns over a full market cycle at/or below benchmark volatility.

Navigator U.S. Equity Strategic Beta
Navigator U.S. Equity Strategic Beta is designed to provide broad U.S. equity market diversification by utilizing domestic equity exchange traded funds. This composite is passively managed and serves as the anchor or core of a total unified composite. The core composite will be tax managed to minimize capital gains transactions. The investment approach seeks wide diversity through inclusion of all capitalizations and styles of the domestic equity market and is constructed so that the broad U.S. equity market will be mirrored. These ETFs are passively managed with the objective of the same performance as the indexes they are tracking. The composite will be over-weighted in large cap indexes that have significant dividend yield. The strategy seeks to provide capital appreciation over a market cycle with a focus on dividends in a broadly diversified domestic equity composite

Navigator International Equity/ADR
The Navigator International Equity/ADR portfolio primarily invests in American depository receipts (ADRs) of companies with market capitalizations generally falling between $300 million and $250 billion and are constituents of the MSCI All Country ex US Index. Our investment process is both quantitative and qualitative, incorporating proprietary models and analytical techniques that search for companies that we believe possess three characteristics: superior quality, attractive value and improving business prospects. By purchasing the undervalued ADRs of companies with a durable competitive advantage whose businesses have accelerating momentum, we tend to benefit over time as the spread between price and value narrows and value increases. Our risk controls are sensitive to company and sector diversification to reduce both overall portfolio volatility and tracking error to the benchmark. The goal of the portfolio is to deliver consistent excess returns over a full market cycle at/or below benchmark volatility. The performance results prior to 4/1/2013 were achieved by Anthony Soslow while at his prior firm, using a substantially similar investment style. Anthony Soslow joined Clark Capital Management Group on 3/31/2013.

Navigator International Equity Strategic Beta
The Navigator International Equity Strategic Beta seeks to provide capital appreciation over a market cycle. The portfolio invests in broad based international equity exchange traded funds by applying a fundamental investment approach. The diversified portfolio has the objective of providing broad-based international equity exposure. While limited strategic emphasis may be placed on emerging markets, broad diversification is always maintained. Portfolio construction employs a passive "top down" approach seeking wide diversity reflective of international markets with limited turnover. Construction of the portfolio begins with a rigorous due diligence process to select the exchange traded funds.

Navigator U.S. Sector Opportunity
Navigator U.S. Sector Opportunity is primarily invested in U.S. sectors and industries through strategic rotation. The strategy has an unconstrained asset allocation policy and is allocated to the sectors and industries that appear to have the potential for producing exceptionally strong performance in the near future. A portfolio is constructed with a bias toward large cap equities and weighted to pursue maximum returns. The portfolio is actively managed; security weightings are adjusted to take advantage of emerging market opportunities as they arise and to harvest gains as they

mature. Portfolios are implemented using exchange traded funds which provide diversification, limit specific security risk, and provide tax efficiencies. The strategy seeks to provide capital appreciation.

Navigator U.S. Style Opportunity

Navigator U.S. Style Opportunity invests in exchange traded funds through strategic rotation among U.S. equity styles (growth & value), capitalizations (large, medium and small), The portfolio is then opportunistically over-weighted in the market segments expected to be the most profitable in the near term – large or small cap, growth or value, etc. – and underweighted in those segments expected to be weaker. The strategy is passively managed using a strategic allocation of broad-based market indices, rebalanced annually. The portfolio has an unconstrained asset allocation policy and seeks to maximize the returns through a rigorous investment discipline that seeks to take advantage of the performance differential between segments of the equity market under different market conditions. Style and capitalization rotation are employed in an effort to take advantage of emerging opportunities and to minimize the effect of securities that are no longer option for the composite. The goal of the strategy is to outperform an unmanaged buy and hold investment, reduce the effects of broad market declines and provide capital appreciation.

Navigator Global Equity ETF

The Navigator Global Equity ETF actively manages a portfolio targeting U.S. equity styles, market capitalizations, and sectors coupled with exposure to international countries and regions. The strategy uses Clark Capital's proprietary relative strength research to allow us to adapt to changing themes and is not biased to a traditional style, market capitalization approach or international country or region. Blending U.S. and international investments may lower risk by reducing portfolio volatility. The appropriate risk profile is achieved through careful allocation of the portfolio within established percentage ranges of styles, sectors, and international securities. The strategy is implemented using exchange traded funds as they provide an efficient, low cost alternative to traditional mutual funds and seeks to provide capital appreciation.

Navigator Global Tactical

The Navigator Global Tactical is constructed from a wide range of investment opportunities including domestic and foreign equities, fixed income, real estate, commodities, precious metals and currencies. The objective is to provide investors with consistent, competitive investment returns over time by tactically capitalizing on a broad range of global market opportunities. The strategy seeks to provide capital appreciation through an unconstrained tactical allocation methodology in an effort to lower portfolio volatility and increase returns. The unconstrained investment mandate is designed to allow for the efficient allocation of risk capital globally to opportunities where potential returns are identified and seeks to provide the flexibility to avoid declining markets or asset classes. The portfolio invests in exchange-traded funds which provide diversification, limit specific security risk, and provide tax efficiencies. The strategy seeks to provide capital appreciation.

Navigator International Opportunity

Navigator International Opportunity invests in international countries and regions in a vigorous and creative "explore" approach which seeks to provide performance through strategic rotation among equity securities of foreign countries and regions. The strategy has an unconstrained asset allocation policy and is allocated to international markets and regions including those of developed countries and emerging markets that appear to have the potential for producing strong performance in the near future. The portfolio is actively managed; security weightings are adjusted to take advantage of emerging market opportunities as they arise and to harvest gains as they mature. The portfolio invests in exchange traded funds which provide diversification, limit specific security risk, and provide tax efficiencies. The strategy seeks to provide capital appreciation.

Navigator Conservative Diversified Portfolio

Navigator Conservative Diversified is a risk-based allocation portfolio seeking to provide well-diversified asset allocation consisting of multiple strategies and asset classes. The strategy typically utilizes ETFs. The goal is to provide attractive risk-adjusted returns through strategic asset class diversification and active management of the strategies. The Navigator Conservative Diversified Portfolio targets a 20% (+/-10%) allocation to equity and an 80% (+/-10%) allocation to fixed income. The asset allocation will be actively managed by Clark Capital's investment team to capture market opportunities with a focus on delivering attractive risk-adjusted returns. The portfolio may fall outside of the allocation limits stated due to risk management decisions of certain strategies utilized. The strategy is designed to provide current income and capital preservation while providing nominal capital appreciation for investors with a low tolerance for risk.

Navigator Moderately Conservative Diversified Portfolio
Navigator Moderately Conservative Diversified is a risk-based allocation portfolio seeking to provide well-diversified asset allocation consisting of multiple strategies and asset classes. The strategy typically utilizes ETFs. The goal is to provide attractive risk-adjusted returns through strategic asset class diversification and active management of the strategies. The Navigator Moderately Conservative Diversified Portfolio targets a 35% (+/-10%) allocation to equity and a 65% (+/-10%) allocation to fixed income. The asset allocation will be actively managed by Clark Capital's investment team to capture market opportunities with a focus on delivering attractive risk-adjusted returns. The portfolio may fall outside of the allocation limits stated due to risk management decisions of certain strategies utilized. The strategy is designed to provide current income and moderate capital appreciation for investors with a below average tolerance for risk.

Navigator Moderate Diversified Portfolio
Navigator Moderate Diversified is a risk-based allocation portfolio seeking to provide well-diversified asset allocation consisting of multiple strategies and asset classes. The strategy typically utilizes ETFs. The goal is to provide attractive risk-adjusted returns through strategic asset class diversification and active management of the strategies. The Navigator Moderate Diversified Portfolio targets a 57.5% (+/-10%) allocation to equity and a 42.5% (+/-10%) allocation to fixed income. The asset allocation will be actively managed by Clark Capital's investment team to capture market opportunities with a focus on delivering attractive risk-adjusted returns. The portfolio may fall outside of the allocation limits stated due to risk management decisions of certain strategies utilized. The strategy is designed to provide capital appreciation over a long-term investment horizon for investors with an average tolerance for risk.

Navigator Moderate Growth Diversified Portfolio
Navigator Moderate Growth Diversified is a risk-based allocation portfolio seeking to provide well-diversified asset allocation consisting of multiple strategies and asset classes. The strategy typically utilizes ETFs. The goal is to provide attractive risk-adjusted returns through strategic asset class diversification and active management of the strategies. Navigator Moderate Growth Diversified Portfolio targets a 70% (+/-10%) allocation to equity and a 30% (+/-10%) allocation to fixed income. The asset allocation will be actively managed by Clark Capital's investment team to capture market opportunities with a focus on delivering attractive risk-adjusted returns. The portfolio may fall outside of the allocation limits stated due to risk management decisions of certain strategies utilized. The strategy is designed to provide capital appreciation over a long-term investment horizon for investors with an above average tolerance for risk.

Navigator Growth Diversified Portfolio
Navigator Growth Diversified is a risk-based allocation portfolio seeking to provide well-diversified asset allocation consisting of multiple strategies and asset classes. The strategy typically utilizes ETFs. The goal is to provide attractive risk-adjusted returns through strategic asset class diversification and active management of the strategies. The Navigator Growth Diversified Portfolio targets a 90% (+/-10%) allocation to equity and a 10% (+/-10%) allocation to fixed income. The asset allocation will be actively managed by Clark Capital's investment team to capture market opportunities with a focus on delivering attractive risk-adjusted returns. The portfolio may fall outside of the allocation limits stated due to risk management decisions of certain strategies utilized. The strategy is designed to provide capital appreciation over a long-term investment horizon for investors with a high tolerance for risk.

Navigator Large Cap Growth
The Navigator Large Cap Growth Strategy primarily invests in companies that are listed on the U.S. exchanges, including ADRs, with a market capitalization generally over $3 billion. Our investment process is both quantitative and qualitative, incorporating proprietary models and analytical techniques that search for companies that possess large and growing cash flows, margins, and sales. Our risk controls are sensitive to company and sector diversification to reduce both overall portfolio volatility and tracking error to the benchmark. The goal of the portfolio is to deliver consistent excess returns over a full market cycle at/or below benchmark volatility.

FIXED INCOME STRATEGIES

Navigator Enhanced Short Duration

The Navigator Enhanced Short Duration Bond Strategy primarily invests in a broad range of short duration corporate investment grade fixed income securities with a weighted duration typically below one year and, to a lesser degree, intermediate term fixed income securities, U.S treasuries, and money market securities. Given the low interest rate environment, the portion of the strategy that invests in corporate debt, which can include below investment grade, uses a rotational approach to in an effort to enhance total return potential. Active management supported by in-depth, internally generated research seeks to pursue attractive risk-adjusted performance results with greater consistency and lower volatility of returns. The portfolio may also invest in exchange-traded funds and mutual funds targeting high yield corporate, investment grade corporate, government, government agency and treasury fixed income sectors. The Strategy seeks to provide current income, modest capital appreciation, and capital preservation.

Navigator Fixed Income Total Return

Navigator Fixed Income Total Return is designed to maximize total return by rotational management of a fixed income portfolio invested in low quality bonds (high-yield), high quality corporate and government bonds, short-term treasuries. The strategy seeks to take advantage of the performance differential between segments of the bond market under different market conditions. Through investment in segments of the fixed income market believed to be the strongest performer in the near term, the portfolio may have the opportunity to outperform the broad bond market without exposure to the risk of the equity market. Active management supported by in-depth, internally generated research seeks to pursue superior performance results with greater consistency and lower volatility of returns. The portfolio invests in exchange traded funds and mutual funds targeting high yield corporate, investment grade corporate, government, government agency and treasury fixed income sectors. The strategy has an unconstrained allocation policy. The goal of the strategy is capital preservation while outperforming an unmanaged buy and hold investment.

Navigator Tax-Free Fixed Income

Navigator Tax-Free Fixed Income portfolio is comprised of those accounts invested in high credit quality (average quality is investment grade or better) individual tax-free municipal securities. The portfolio is constructed to control risk through maintaining duration in the portfolios (a measure of interest rate sensitivity) of between four and seven years. The strategy seeks to provide current income on a consistent basis by applying a fundamental investment approach. Active management in the portfolios seeks to provide returns to the stated benchmark through state, sector and security selection. Portfolio turnover will vary based on market opportunities such as tax loss harvesting and yield curve shifts. State-specific variations on the tax-free fixed income strategy are also offered. These strategies provide at least 80% targeted exposure to state-specific municipal bonds and seek to deliver total return with a secondary goal of income. Municipal bond issues from the following states are offered as part of these state-specific strategies: California, New Jersey, New York and Pennsylvania.

Navigator Tax-Free Fixed Income Core

Navigator Tax-Free Fixed Income Core is designed to maximize total return by investing actively across the full maturity and investment grade spectrum of municipal fixed income securities. The strategy seeks to add value through a rigorous investment discipline that identifies market inefficiencies in the valuation of risk and reward, combined with an effort to capitalize upon shifting market themes, yield curve inefficiencies, and undervalued maturities. The portfolio is constructed in an effort to control risk by maintaining composite duration (a measure of interest rate sensitivity) in adherence to the benchmark range of four to seven years. Active management is supported by in-depth, internally generated research looking to pursue superior performance results with greater consistency and lower volatility of returns. The strategy seeks to provide a high level of tax-free total return and current income by investing in municipal bond mutual funds and exchange traded funds.

Navigator Taxable Fixed Income

Navigator Taxable Fixed Income invests in corporate bonds, government bonds, mortgage securities and taxable municipal bonds. The portfolio is managed to opportunistically take advantage of changing expectations regarding the shape of the yield curve, credit spreads, and sector valuation. The average duration of the composite is maintained at the intermediate range of four to eight years in order to limit interest rate risk, but bonds of longer maturities of 20

– 25 years may be purchased in order to build a higher yielding composite. The portfolio is generally fully invested and is appropriately diversified by sector, issuer, and credit quality. The portfolio seeks to provide current income.

Navigator Taxable Fixed Income Core

Navigator Taxable Fixed Income Core is designed to maximize total return by investing actively across the full maturity and investment grade spectrum of U.S. fixed income sectors and securities. The strategy seeks to identify market inefficiencies in the valuation of risk and reward, combined with an approach to capitalize upon shifting market themes, yield curve inefficiencies and undervalued maturities. Portfolios are constructed in an effort to control risk by maintaining portfolio duration (a measure of interest rate sensitivity) in adherence to the composites intermediate benchmark range of four to eight years. Portfolios are generally fully invested and are diversified among corporate, government and mortgage securities. Active management is supported by in-depth, internally generated research to pursue performance results with greater consistency and lower volatility of returns. The goal of the strategy is to provide a high level of total return by investing in high-quality corporate, government bonds, treasury bonds, exchange traded products, and mortgage-backed securities.

Navigator Short Duration Taxable Bonds

Navigator Short Duration Taxable Fixed Income strategy invests in U.S. Treasuries, government-related and investment grade U.S. corporate securities. The strategy is managed to opportunistically take advantage of credit spreads, and sector valuation. The average duration of the portfolio is maintained at the short-term range of 1 to 2 years in order to limit interest rate and credit risk. The portfolio typically seeks bonds with a maturity of 36 months or less. The strategy may, at times, purchase bonds with longer maturities. The portfolio is generally fully invested and is appropriately diversified by sector, issuer, and credit quality. The strategy seeks to provide current income.

Navigator Short Duration Tax-Free Bonds

The Navigator Short Duration Tax-Free Fixed Income strategy invests in very high credit quality (average quality is Investment Grade or better) individual municipal securities. The portfolio is constructed to control risk through maintaining duration in the portfolios (a measure of interest rate sensitivity) of between approximately 1 to 2 years. The strategy may, at times, have shorter or longer portfolio duration based on market opportunities. Active management in the portfolios seeks to provide returns to the stated benchmark through state, sector and security selection. Portfolio turnover will vary based on market opportunities such as tax loss harvesting and yield curve shifts. The strategy seeks to provide capital preservation while providing nominal capital appreciation by applying a fundamental investment approach.

Navigator Tactical Investment Grade Bond

The Navigator Tactical Investment Grade Bond Strategy utilizes Clark Capital's proprietary quantitative relative strength model to identify risks in the fixed income market and shift to safer, risk-off assets when guided by the model. The strategy maintains exposure to investment grade corporate fixed income when positioned in a "risk-on" environment. When Clark Capital's quantitative research model indicates a "risk-off" environment, the portfolio shifts exposure to either mostly U.S. Treasuries and/or cash equivalent securities. Exposure may be shared between the fixed income sectors depending on the model. The strategy seeks to provide long-term capital appreciation while minimizing overall volatility. The portfolio may invest in exchange-traded funds and mutual funds targeting investment grade corporate, government, government agency and treasury fixed income sectors. The strategy has an unconstrained allocation policy.

Navigator Tactical U.S. Allocation Strategy

The Navigator Tactical U.S. Allocation Strategy utilizes Clark Capital's proprietary quantitative relative strength model to identify risks in the U.S. equity market and shift to safer, risk-off assets when guided by the model. The strategy maintains exposure to U.S. equities when positioned in a "risk-on" environment. When Clark Capital's quantitative research model indicates a "risk-off" environment, the portfolio shifts exposure to either mostly U.S. Treasuries and/or cash equivalent securities. Exposure may be shared between asset classes depending on the model. The strategy seeks to provide an unbiased, unemotional, and repeatable process that seeks long-term capital appreciation with lower overall volatility relative to the primary benchmark. The portfolio primarily invests in exchange traded funds and mutual funds targeting U.S. equities, government, government agency and treasury fixed income sectors. The strategy has an unconstrained allocation policy.

ALTERNATIVE STRATEGIES

Navigator Alternative
Navigator Alternative is constructed from a wide range of investment opportunities including long and short allocation among U.S. equity, international equity, U.S. fixed income, international fixed income, real estate, commodities and precious metals, currencies, energy and absolute/hedge strategies. The objective is to provide investors with capital appreciation independent of the direction of the traditional equity markets. The use of alternative investments in concert with traditional assets in a total investment plan may result in lower portfolio volatility and increased returns due to the increase in portfolio diversity and the lack of correlation between alternative and traditional investments. Exchange traded funds are utilized when possible as they may provide diversification, limit specific security risk, and provide tax efficiencies. Mutual funds may also be utilized. The portfolio has an unconstrained asset allocation policy and seeks capital appreciation by applying a disciplined quantitative investment approach that is non-correlated to the equity markets.

Navigator Global Risk Management Conservative
The Navigator Global Risk Managed strategies utilize Clark Capital's proprietary quantitative risk management model to identify risks in the global equity markets and shift to safer, risk-off assets when guided by the model. The strategies seek to provide an unbiased, unemotional, and repeatable process that seeks long-term capital appreciation while minimizing overall volatility. The Navigator Global Risk Managed Conservative strategy is comprised of 25% global equity and 75% fixed income when the model favors risk-on assets. The allocation is designed to provide current income and modest capital appreciation potential for investors with a slightly below average tolerance for risk. When the model favors risk-on assets, the strategies will allocate to a blend of U.S. equity, international equity, and fixed income. When the model favors risk-off assets, the strategies will shift to either mostly U.S. Treasuries and/or cash equivalents**.**

Navigator Global Risk Management Growth
The Navigator Global Risk Managed strategies utilize Clark Capital's proprietary quantitative risk management model to identify risks in the global equity markets and shift to safer, risk-off assets when guided by the model. The strategies seek to provide an unbiased, unemotional, and repeatable process that seeks long-term capital appreciation while minimizing overall volatility. The Navigator Global Risk Managed Growth strategy is comprised of 75% global equity and 25% fixed income when the model favors risk-on assets. The allocation is designed to provide capital appreciation over a long-term investment horizon for investors with an above average tolerance for risk. When the model favors risk-on assets, the strategies will allocate to a blend of U.S. equity, international equity, and fixed income. When the model favors risk-off assets, the strategies will shift to either mostly U.S. Treasuries and/or cash equivalents.

Navigator Global Risk Management Moderate
The Navigator Global Risk Managed strategies utilize Clark Capital's proprietary quantitative risk management model to identify risks in the global equity markets and shift to safer, risk-off assets when guided by the model. The strategies seek to provide an unbiased, unemotional, and repeatable process that seeks long-term capital appreciation while minimizing overall volatility. The Navigator Global Risk Managed Moderate strategy is comprised of 50% global equity and 50% fixed income when the model favors risk-on assets. The allocation is designed to provide capital appreciation and some current income over a long-term investment horizon for investors with about an average tolerance for risk. When the model favors risk-on assets, the strategies will allocate to a blend of U.S. equity, international equity, and fixed income. When the model favors risk-off assets, the strategies will shift to either mostly U.S. Treasuries and/or cash equivalents.

BALANCED STRATEGIES AND MULTI-STRATEGY

Navigator Global Balanced 20-80
Navigator Global Balanced 20-80 strategy consists of portfolios with a 20% allocation to equity and 80% to fixed income. The portfolio provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component seeking to lower risk and reduce portfolio volatility. The

20% allocation to equity utilizes the Navigator Global Equity ETF strategy which invests in exchange traded funds in U.S. equity styles, market capitalizations and factors, sectors and industry groups, and international countries and regions. The 80% fixed income allocation utilizes the Navigator Fixed Income Total Return strategy which has an unconstrained allocation policy targeting high yield corporate, investment grade corporate, government, government agency, treasury fixed income sectors. The strategy seeks to provide preservation of capital.

Navigator Global Balanced 40-60
Navigator Global Balanced 40-60 strategy consists of portfolios with a 40% allocation to equity and 60% to fixed income. The portfolio provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component seeking to lower risk and reduce portfolio volatility. The equity allocation invests in the Navigator Global Equity ETF strategy, which invests in exchange traded funds in U.S. equity styles, market capitalizations and styles, sectors and industry groups, and international countries and regions. The fixed income allocation utilizes the Navigator Fixed Income Total Return Strategy. The fixed income allocation has an unconstrained allocation policy targeting high yield corporate, investment grade corporate, government, government agency, and treasury fixed income sectors. The strategy seeks to provide growth of capital.

Navigator Global Balanced 60-40
Navigator Global Balanced 60-40 strategy consists of portfolios with a 60% allocation to equity and 40% to fixed income. The portfolio provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component seeking to lower risk and reduce portfolio volatility. The equity allocation invests in the Navigator Global Equity ETF strategy which invests in exchange traded products in U.S. equity styles, market capitalizations and factors, sectors and industry groups, and international countries and regions. The fixed income allocation utilizes the Navigator Fixed Income Total Return Strategy. The fixed income allocation has an unconstrained allocation policy targeting high yield corporate, investment grade corporate, government, government agency and treasury fixed income sectors. The strategy seeks to provide growth of capital.

Navigator Global Balanced 80-20
Navigator Global Balanced 80-20 strategy consists of portfolios with an 80% allocation to equity and 20% to fixed income. The portfolio provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component seeking to lower risk and reduce portfolio volatility. The equity allocation invests in the Navigator Global Equity ETF strategy which invests in exchange traded funds in U.S. equity styles, market capitalizations and factors, sectors and industry groups, and international countries and regions. The fixed income allocation utilizes the Navigator Fixed Income Total Return Strategy. The fixed income allocation has an unconstrained allocation policy targeting high yield corporate, investment grade corporate, government, government agency and treasury fixed income sectors. The strategy seeks to provide growth of capital.

Navigator MultiStrategy (75-25, 50-50, 25-75)
Navigator MultiStrategy consists of portfolios with an allocation to equity and fixed income. The strategy is available with 75%/25%, 50%/50% and 25%/75% equity/fixed allocations. The equity allocation provides exposure to the U.S. equity market and duplicates (in proportion) the Navigator U.S. Style Opportunity portfolio, a portfolio that engages in strategic rotation among U.S. equity styles (growth and value) and capitalizations (large, medium and small). The strategy is passively managed using a strategic allocation of broad-based market indices and is rebalanced annually. The fixed income allocation is designed to maximize total return by rotational management of a fixed income portfolio invested in low quality bonds (high-yield), high quality corporate and government bonds, and short-term treasuries. The segments of the portfolio have an unconstrained asset allocation policy and seek to take advantage of the performance differentials between segments of both the equity market and segments of the bond market under different market conditions. The portfolios use the Navigator Tactical Fixed Income Fund to achieve their fixed income exposure. This portfolio was formerly known as Navigator Style Preferred.

NAVIGATOR MUTUAL FUNDS

Navigator Tactical Fixed Income Fund
Clark Capital serves as advisor to the Navigator Tactical Fixed Income Fund, which is an open-end investment company. The investment management services we provide to the fund mirror the investment philosophy, investment process, and security selection of the Navigator Fixed Income Total Return portfolio. Additional information about the Navigator Mutual Funds is available in the Funds' prospectus and SAI, which is available on the Funds' website (www.navigatorfunds.com) or on the SEC's EDGAR database.

Navigator Ultra Short Bond Fund
Clark Capital serves as advisor to the Navigator Ultra Short Bond Fund, which is registered as an open-end investment company. The Fund invests primarily in various types of short duration, investment grade debt (or fixed income) securities. Additional information about the Navigator Mutual Funds is available in the Funds' prospectus and SAI, which are available on the Funds' website (www.navigatorfunds.com) or on the SEC's EDGAR database.

Navigator Tactical U.S. Allocation Fund
Clark Capital serves as an advisor to the Navigator Tactical U.S. Allocation Fund, which is registered as an open-end investment company. The Fund invests at least 80% of its net assets in U.S. equity and fixed income securities. Additional information about the Navigator Mutual Funds is available in the Funds' prospectus and SAI, which are available on the Funds' website (www.navigatorfunds.com) or on the SEC's EDGAR database.

Navigator Tactical Investment Grade Bond Fund
Clark Capital serves as an advisor to the Navigator Tactical Investment Grade Bond Fund, which is registered as an open-end investment company. The Fund invests at least 80% of its assets in long and/or short positions in investment grade fixed income securities. Additional information about the Navigator Mutual Funds is available in the Funds' prospectus and SAI, which are available on the Funds' website (www.navigatorfunds.com) or on the SEC's EDGAR database.

RISK OF LOSS

All investments in securities include a risk of loss of your principal (invested amount) and any profits that have not been realized (the securities were not sold to "lock in" the profit). Stock markets and fixed income markets fluctuate substantially over time. Different types of investments tend to shift in and out of favor depending on market, economic, and other forces. In addition, performance of any investment is not guaranteed, and your account may experience loss of assets due to a variety of reasons including market movements and global and domestic events affecting the economy. As a result, there is a risk of loss of the assets we manage that may be out of our control. We cannot guarantee any level of performance or that you will not experience a loss of your account assets. Depending upon the program you choose and the securities used, your portfolio may be subject to the risks described below.

GENERAL RISKS

General Economic and Market Conditions. The success of Clark Capital's activities will be affected by general economic and market conditions, such as interest rates, availability of credit, credit defaults, inflation rates, economic uncertainty, changes in laws (including laws relating to taxation of Clark Capital's investments), trade barriers, currency exchange controls, and national and international political circumstances (including wars, terrorist acts or security operations). These factors can affect, among other things, the level and volatility of securities' prices, the liquidity of investments, and the availability of certain securities' prices. Clients may incur major losses in the event of disrupted markets and other extraordinary events in which historical pricing relationships become materially distorted. The risk of loss from pricing distortions is compounded by the fact that in disrupted markets many positions become illiquid, making it difficult or impossible to close out position against which the markets are moving. Market disruptions can from time to time cause dramatic losses for clients, and such events can result in otherwise historically low-risk strategies performing with unprecedented volatility and risk.

General Market and Credit Risks of Debt Obligations. Investments in debt obligations are subject to credit risk and interest rate risk. "Credit Risk" refers to the likelihood that an issuer will default in the payment of principal and/or interest on an instrument. Financial strength and solvency of an issuer are the primary factors influencing credit risk. In addition, inadequacy of collateral or credit enhancement for a debt instrument may affect its credit risk.

Management Risk. There is no guarantee that our judgments about the worth and implementation of given strategies, the value of individual securities, and the state of the financial markets is sound and that investments in Navigator strategies will be profitable. Clark Capital attempts to execute a complex strategy for certain portfolios and funds using a proprietary quantitative model. Investments selected using this model may perform differently than expected as a result of the factors used in the model, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models (including, for example, data problems or software issues). There is no guarantee that Clark Capital's use of a model will result in effective investment decisions.

Market Disruptions; Governmental Intervention; Dodd-Frank Wall Street Reform and Consumer Protection Act. The global financial markets have in recent years gone through pervasive and fundamental disruptions that have led to extensive governmental intervention. Such intervention was in certain cases implemented on an "emergency" basis, suddenly and substantially eliminating market participants' ability to continue to implement certain strategies or manage the risk of their outstanding positions. In addition, certain of these interventions have been unclear in scope and application, resulting in confusion and uncertainty which in itself has been materially detrimental to the efficient functioning of the markets as well as previously successful investment strategies. The Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act"), which aims to reform various aspects of the U.S. financial markets, covers a broad range of market participants including investment advisers. The Dodd-Frank Act may directly affect Clark Capital by mandating additional new reporting requirements, including, but not limited to, position information, use of leverage and counterparty and credit risk exposure. Until the SEC implements all of the new reporting requirements, the full burden of such reporting obligations will not be known.

Deflation. Deflation risk is the risk that prices throughout the economy decline over time, which may have an adverse effect on the market value of an investment.

Inflation. Inflation risk is the risk that the value of assets or income from investments will be worth less in the future as inflation decreases the value of money. As inflation increases, the real value of an account and distributions can decline.

RISK ASSOCIATED WITH STRATEGIES

Asset Allocation. The success of asset allocation depends upon the manager's ability to make decisions that will achieve an account's objectives. Asset categories may not perform as expected due to economic and market influences both foreign and domestic and anticipated returns may not be realized.

Concentration Risk. This type of risk occurs when a strategy's investments are concentrated in a limited number of securities or specific regions or countries. The value of the account will vary considerably in response to changes in the value of the security or region/country. This may result in increased volatility.

Counterparty Risk. Transactions, including certain derivative transactions, entered into directly with a counterparty are subject to the risk that the counterparty will fail to perform its obligations in accordance with the agreed terms and conditions of the transaction. A counterparty's bankruptcy or other failure to perform its obligations due to financial difficulties would result in significant delays in obtaining any recovery in a bankruptcy or other reorganization proceeding or no recovery in such circumstances. Some of the markets in which Clark Capital may effect transactions are "over-the-counter" or "interdealer" markets. The participants in such markets are typically not subject to the credit evaluation and regulatory oversight to which members of "exchange-based" markets are subject. This exposes Clark Capital to the risk that a counterparty will not settle a transaction in accordance with its terms and conditions because of a dispute over the terms of the contract (whether or not bona fide) or because of a credit or liquidity problem, thus causing investors to suffer a loss.

Hedging. If the hedged investment performs well, there is likely to be a loss of upside potential. If the hedge does not perfectly match the underlying portfolio, there is a risk that results will not be as anticipated. If the investment is underhedged, it may not offer the degree of protection anticipated.

Foreign/International Market Risk. International investments involve special risks such as fluctuations in currencies, foreign taxation, economic and political risks, and differences in accounting and financial standards. Investments in emerging markets are generally riskier than investments in developed markets.

Proprietary Models. Clark Capital has developed certain proprietary investment models that Clark Capital, in its discretion, consults with and uses to assist Clark Capital with the construction of portfolios and to assist Clark Capital with making investment decisions. There are numerous risks associated with the proprietary models used by Clark Capital, certain of which are described below. The models require significant real-time and historical data to be effectively analyzed. The ability of investors to achieve their investment objective is, therefore, based in part on the ability of Clark Capital to continuously receive and analyze such data. In addition, there is no assurance that the models will be effective in all market conditions or that Clark Capital has considered all factors necessary for the models to function properly. There is also no assurance that risk management factors will be accurately or timely determined by Clark Capital given changing market conditions. Accordingly, there are no assurances that investors will not be exposed to the risk of significant losses, particularly if the underlying patterns of market behavior studied by Clark Capital and which provide the basis for its investment models change in ways not anticipated by Clark Capital. As the models are proprietary, an investor will not be able to determine the full details of Clark Capital's investment process or whether the process is being followed. If Clark Capital relies on such models, Clark Capital intends to monitor its models and seek to make enhancements and changes as necessary, but there is no assurance that Clark Capital will be able modify them to adapt to changing market conditions or other factors. The results generated by the proprietary models are just one consideration that Clark Capital takes into account as a part of its investment process.

RISK ASSOCIATED WITH SECURITIES AND INVESTMENTS

Affiliated Fund Risk. Clark Capital is subject to potential conflicts of interest in determining whether to invest client assets in a fund managed by Clark Capital (the Navigator Mutual Funds) or in a fund managed by an unaffiliated manager and will in certain cases have an economic or other incentive to select a Navigator Mutual Fund over another fund.

American Depository Receipts (ADRs). ADRs represent ownership in the shares of a non-U.S. company that trades in U.S. financial markets. While ADRs eliminate some of the inconveniences of ownership of foreign securities, they are subject to the same risks as international securities as well as being subject to possible termination, resulting in the inability to trade in U.S. markets and the inconveniences that entails.

Commodities. Commodities have risk in that they are affected by global supply and demand; domestic and foreign interest rates; political, economic, financial events, or natural disasters; regulatory and exchange position limits; and concentration within a commodity.

Cryptocurrency. Cryptocurrencies (also referred to as "virtual currencies" and "digital currencies"), including bitcoin, are digital assets designed to act as a medium of exchange. From time to time, Clark Capital clients may obtain exposure to cryptocurrencies through mutual funds, ETFs, and other investment products. The value of these products is often intended to reflect the value of one or more cryptocurrencies, and the risks of investing in these products are similar to the risks of investing in cryptocurrencies generally, as well as the risks specific to investing in the applicable investment product (e.g., if an investment is made through a mutual fund, the risks of investing in a mutual fund will apply). Cryptocurrency facilitates decentralized, peer-to-peer financial exchange and value storage that is used like money, without the oversight of a central authority or banks. The value of cryptocurrency is not backed by any government, corporation, or other identified body. Similar to fiat currencies, cryptocurrencies are susceptible to theft, loss and destruction. The value of investments in cryptocurrency is subject to fluctuations in the value of the cryptocurrency, which have been and may in the future be highly volatile. The value of cryptocurrencies is determined by the supply and demand for cryptocurrency in the global market for the trading of cryptocurrency. The price of a cryptocurrency could drop precipitously for a variety of reasons, including, but not limited to, regulatory changes, a crisis of confidence, flaw or operational issue in the cryptocurrency's network or a change in user preference to competing cryptocurrencies. A client's exposure to cryptocurrency could result in substantial losses. Cryptocurrencies trade on exchanges, which are largely unregulated and, therefore, are more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. These exchanges have in the past, and may in the future, cease operating temporarily or even permanently, resulting in the potential loss of users' cryptocurrency or other market disruptions. Cryptocurrency exchanges that are regulated typically must comply with minimum net capital, cybersecurity, and anti-money laundering requirements, but are not typically required to protect customers or their markets to the same extent that regulated securities exchanges or futures exchanges are required to do so. Furthermore, many cryptocurrency exchanges lack certain safeguards established by traditional exchanges to enhance the stability of trading on the exchange and, as a result, the prices of cryptocurrencies on these exchanges may be subject to larger and more frequent sudden declines than assets traded on traditional exchanges. In addition, cryptocurrency exchanges are also subject to the risk of cybersecurity threats and breaches, resulting in the theft and/or loss of cryptocurrencies, and/or an adverse effect on value of cryptocurrencies. Factors affecting the further development of cryptocurrency include, but are not limited to: continued worldwide growth or possible cessation or reversal in the adoption and use of cryptocurrency and other digital assets; government and quasi-government regulation or restrictions on or regulation of access to and operation of digital asset networks; changes in consumer demographics and public preferences; maintenance and development of open-source software protocol; availability and popularity of other forms or methods of buying and selling goods and services; the use of the networks supporting digital assets, such as those for developing smart contracts and distributed applications; general economic conditions and the regulatory environment relating to digital assets; negative consumer or public perception; and general risks tied to the use of information technologies, including cyber risks. Currently, there is relatively limited use of cryptocurrency in the retail and commercial marketplace, which contributes to price volatility. Cryptocurrency is a new technological innovation with a limited history; it is a highly speculative asset and future regulatory actions or policies may limit, perhaps to a materially adverse extent, the value of a client's investment in cryptocurrency and the ability to exchange a cryptocurrency or utilize it for payments.

Derivatives. Investments in derivatives, or similar instrument, including but not limited to, options, futures, options on futures, forwards, participatory notes, swaps, swaptions, structured securities, tender-option bonds and derivatives relating to foreign currency transactions, which can be used to hedge a portfolio's investments or to seek to enhance returns, entail specific risks relating to liquidity, leverage and credit that can reduce returns and/or increase volatility. Losses in a portfolio from investments in derivative instruments can result from the potential illiquidity of the markets for derivative instruments, the failure of the counterparty to fulfill its contractual obligations, the portfolio receiving cash collateral under the transactions and some or all of that collateral being invested in the market, or the risks arising from margin posting requirements and related leverage factors associated with such transactions. In addition, many jurisdictions continue to review practices and regulations relating to the use of derivatives, or similar instruments. Such reviews could make such instruments more costly, limiting the availability of, or otherwise adversely affecting the value or performance of such instrument.

Exchange Traded Funds (ETFs). ETFs may not accurately track their underlying index and may not have liquidity under severe market conditions.

Exchange Traded Notes (ETNs). ETNs are unsecured debt instruments. As such, exchange traded notes are subject to risk by default by the issuing bank (counterparty risk) as well as market risk. Exchange traded notes may fail to track the index they are designed to track as well as being negatively impacted by a decline in the credit rating of the issuer. They may lack liquidity under severe market conditions.

Fixed Income. Fixed income securities may be affected by interest rate risk as increases or decreases in interest rates occur and also by credit risk in that issuers may not make payment on the securities.

High Yield Securities. High yield securities (including but not limited to bonds, ETFs, ETNs, and open and closed-end funds) tend to be more sensitive to economic conditions than higher-rated securities and generally involve more credit risk. The risk of loss due to default by an issuer of a high yield security is significantly greater than issuers of higher-rated securities because such securities are generally unsecured and are often subordinated to other creditors. An account may have difficulty disposing of certain high yield securities because there may be a thin trading market for such securities. As a result, an account may have to accept a lower price to sell a high yield security, which could have a negative effect on performance.

Index-Linked Securities. Index-linked securities are securities whose prices are indexed to the prices of securities indices, currencies, or other financial statistics. Indexed securities typically are debt securities or deposits whose value at maturity and/or coupon rate is determined by reference to a specific instrument or statistic. The performance of indexed securities fluctuates (either directly or inversely, depending upon the instrument) with the performance of the index, security or currency. At the same time, indexed securities are subject to the credit risks associated with the issuer of the security, and their value may substantially decline if the issuer's creditworthiness deteriorates. Recent issuers of indexed securities have included banks, corporations and certain US government agencies.

Liquidity Risk. Liquidity risk is the risk that a client's account may not be able to sell or buy a security or close out an investment at a favorable price or time. As a result, the client account may have to accept a lower price to sell a security, which could have a negative effect on performance.

Money Market Instruments. Money market instruments are high quality, short-term fixed-income obligations, which generally have remaining maturities of one year or less, and may include U.S. government securities, commercial paper, certificates of deposit and bankers' acceptances issued by domestic branches of U.S. banks that are members of the Federal Deposit Insurance Corporation, and repurchase agreements. However, there can be no assurances that such investments will not be subject to significant risks.

Municipal Securities. Municipal issuers may be adversely affected by rising health care costs, increasing unfunded pension liabilities, and the phasing out of federal programs that provide financial support to municipalities. Unfavorable conditions and developments relating to projects financed with municipal securities can result in lower revenues to issuers thereof. Issuers often depend on revenues from these projects to make principal and interest payments. The value of municipal securities also can be adversely affected by changes in the financial condition of insurers of municipal issuers, regulatory and political developments, tax law changes or other legislative actions, and by uncertainties and public perceptions concerning these and other factors.

Mutual Funds. Mutual funds are subject to risks related to the manager's ability to achieve the components' objectives and market conditions affecting the components' assets. Each is subject to different levels of risk, based on the types and sizes of its underlying asset class allocations and strategy.

Navigator Mutual Funds. The Navigator Mutual Funds invest in certain derivatives, including but not limited to, futures contracts and options on futures contracts, interest rate swaps, total return swaps and credit derivatives (such as credit default swaps ("CDS") and credit default swap indices ("CDX")), put and call options, forward contracts, and exchange-traded and structured notes. More information about the derivatives and other securities and instruments that the Navigator Mutual Funds are able to invest in, and the associated risks, is available in the Funds' prospectus and SAI, which are available on the Funds' website (www.navigatorfunds.com) or on the SEC's EDGAR database.

Options. Investing in options can provide greater potential for profit or loss than an equivalent investment in the underlying asset. The value of an option may decline because of a change in the value of the underlying asset relative to the strike price, the passage of time, changes in the market's perception as to the future price behavior of the underlying asset, or any combination thereof. In the case of the purchase of an option, the risk of loss of an investor's entire investment (i.e., the premium paid plus transaction charges) reflects the nature of an option as a wasting asset that may become worthless when the option expires. Upon request, Clark Capital will also sell (write) covered call options or purchase put options on securities held in client accounts to hedge or generate income. The risks of covered call writing includes the potential for the market to rise sharply. In such case, the security may be called away and the account will no longer hold the security. The risk of buying long puts is limited to the loss of the premium paid for the purchase of the put if the option is not exercised or otherwise sold by the account.

Real Estate. Real estate has risks associated with direct ownership; valuations of real estate may be affected by economic or financial conditions or catastrophic events resulting from forces of nature or terrorist acts.

Securities Selected to Reflect Particular U.S. Styles and U.S. Sectors. These securities are subject to risk as an individual segment of the equity market may underperform other segments of the equity market as a whole. Small stocks are more volatile than larger, more established companies and are subject to significant price fluctuations, business risks, and are thinly traded.

Sectors. Sectors may be subject to risk when a substantial portion of assets are devoted to a particular market sector or industry thereby having the potential of greater volatility than with broadly diversified strategies. A market sector or industry may underperform the market as a whole for a variety of reasons.

Stocks. Stocks have risk in that their returns and the principal invested in them is not guaranteed and they are subject to changing market conditions. They may decline in price significantly over short or extended periods in relation to overall market movement or due to factors affecting a segment of the market or factors affecting an individual company, such as a poor earnings report. Small stocks are more volatile than large stocks and are subject to significant price fluctuations and may be thinly traded.

Item 9 – Disciplinary Information

We are obligated to disclose any disciplinary event that would be material to you when evaluating us when you are considering initiating or continuing a client/advisor relationship with us. We do not have any legal, financial or disciplinary information to report to you. This statement applies to our firm and every employee of the firm.

Item 10 – Other Financial Industry Activities and Affiliations

REGISTERED REPRESENTATIVES

We permit our employees to serve as registered representatives of broker-dealers. Currently, several of our employees are registered representatives of Grant Williams, LP (GWLP), a broker-dealer registered with FINRA. None of our employees receives (directly or indirectly) any compensation from the purchase or sale of securities or investments for your account.

INDUSTRY ACTIVITIES

Navigator Mutual Funds
Clark Capital serves as the investment adviser to the Navigator Mutual Funds. In certain cases, Clark Capital is authorized to invest a portion of an advisory client's assets in the Navigator Mutual Funds. As described in Item 5 of this Brochure, an investment advisory fee is payable to Clark Capital by a Program Sponsor when Navigator Mutual Funds are used in a client account, which is negotiated with and set by the Program Sponsor. This investment advisory fee will be lower than what Clark Capital would receive if Navigator Mutual Funds were not allocated to a client account to offset the management fees that Clark Capital will receive from the Navigator Mutual Funds. Clark Capital's overall compensation will depend, however, on the actual proportion of a client's account allocated to a Fund, which may vary over time. Furthermore, Clark Capital's overall compensation will generally be higher when a greater percentage of a client's assets are invested in a Navigator Mutual Fund. Wrap Fee Program clients should be aware that this presents a conflict of interest in that Clark Capital has a financial incentive to invest client assets in the Navigator Mutual Funds to earn higher compensation. Assets invested in a Navigator Mutual Fund will also be subject to the other expenses described in the Funds' prospectus, including any applicable distribution fees, administrative expenses, and other Fund operating expenses.

Item 11 – Code of Ethics

CODE OF ETHICS

Clark Capital has adopted a code of ethics pursuant to Rule 204A-1 under the Advisers Act (the "Code of Ethics") that governs a number of conflicts of interest that can arise when providing our advisory services to you. This Code of Ethics is designed to ensure we meet our fiduciary obligation to you, our client (or prospective client), to detect and prevent violations of securities laws, and to drive home a culture of compliance within Clark Capital.

This Code of Ethics is distributed to each employee at the time of hire and when there are any material changes. On a quarterly basis, employees are required to attest that they have read, understood, and have observed the Code of Ethics. The Code is reinforced in monthly all-employee meetings, as necessary, and on-going monitoring of employee activity.

Our Code includes the following:

- Requirements related to the confidentiality of your personal information;
- Prohibitions on:
  - Insider trading (if we are in possession of material, non-public information);
  - Providing or accepting gifts and entertainment that exceed our policy standards;
  - Political contributions and outside business activities that exceed or are inconsistent with our policy standards;
- Reporting of gifts received and business entertainment;
- Pre-clearance of employee securities transactions;
- Reporting of investment holdings on an annual basis;
- Quarterly (and annual) reporting all personal securities transactions (what we call "covered securities" as mandated by regulation); and
- Quarterly (and annual) reporting of all personal brokerage accounts; and
- Quarterly reporting of all social media accounts.

Our Code does not prohibit personal trading by employees. Our employees may buy or sell securities for their personal accounts identical to or different than those recommended to clients. A conflict of interest arises when an employee buys or sells a security in close proximity to the date of a purchase or sale of the same security on a client's behalf. There could be an incentive for an employee to take advantage of the market effect of a client's trade, or the market effect of an employee's trade can negatively affect a subsequent purchase or sale price obtained for a client. Accordingly, our Code of Ethics subjects all of our employees to various procedures and restrictions relating to their personal securities transactions. These procedures include, among other things, the filing of annual reports of their investment holdings, the filing of quarterly reports of their transactions, and review and pre-approval of trades in covered securities from the Chief Compliance Officer or a designee.

You may request a complete copy of Clark Capital's Code of Ethics by contacting Conor Mullan, Chief Compliance Officer, One Liberty Place, 53rd Floor, 1650 Market St., Philadelphia, PA 19103 or by email at cmullan@ccmg.com.

Item 12 – Brokerage Practices

BROKER-DEALER SELECTION

Except as noted below, we generally have discretionary authority to select broker-dealers for executing client securities transactions. In selecting broker-dealers, Clark Capital's policy is to seek the best execution for client transactions. Best execution entails seeking the best overall result for our clients. Accordingly, in deciding what constitutes best execution, the determinative factor is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution. As a result, client transactions will not always be executed at the lowest price, commission or mark-up/mark-down.

When selecting broker-dealers for trade execution, we consider several factors, including but not limited to:

- Our experience with the firm on prices and other results obtained in prior trading transactions;
- The quality of the brokerage services provided to us (and thus to our clients);
- The liquidity of the security being traded;
- The level of commissions (or commission equivalents per share when traded on a net basis) charged by that firm;
- The firm's ability to source liquidity in the underlying constituents when trading ETPs and the ability to provide transparency when doing so;
- The firm's market making activity in a stock;
- The firm's access to liquidity in the stock;
- The value of any research or brokerage services received from the broker-dealer or a third party;
- The speed and attention we receive from the trading desk for our clients;
- Whether the firm has been able to trade anonymously for us;
- Whether the brokerage firm can and will commit its capital (if we request this) or obtain or dispose of the position for our clients;
- The market capitalization of the security being traded;
- The use of limit orders and the likelihood of getting within the limit or missing the desired trade if the trading process takes too long;
- Any particular trading expertise at the firm;
- Access or potential access to blocks of a particular stock;
- Market conditions at the time of the trade (both general conditions and conditions impacting the specific stock); and
- Any past issues we encountered when using a particular broker-dealer for similar trades.

Clark Capital has also established a Best Execution Committee to oversee the firm's brokerage practices, including reviewing broker-dealer performance and the reasonableness of their compensation. The Best Execution Committee also supervises a voting process for evaluating broker-dealers, which is completed by members of the Investment Committee no less frequently than semi-annually. The broker evaluation is designed to rank broker-dealers based on the quality of execution services provided. The results of this evaluation are used as general guidelines by the firm in deciding which broker-dealers to use for transactions.

BROKER-DEALER SELECTION IN WRAP FEE PROGRAMS

As described in Item 4 of this Brochure, when we manage client accounts through Wrap Fee Programs, all of the fees and costs to the client are wrapped into a single fee charged by the Program Sponsor. This fee typically covers all trading costs for a Wrap Fee Program client, as long as transactions are executed with the Program Sponsor (or its affiliated broker-dealer). Trades that are executed with a broker-dealer other than the Program Sponsor are referred to as "step-out trades" or "trading away" from the Program Sponsor, which can result in additional trading costs to the client.

When Clark Capital acts as an adviser or sub-adviser in a Wrap Fee Program, we may or may not retain discretion to select the executing broker-dealers. When Clark Capital does retain discretion to select broker-dealers, we execute most model-following transactions (i.e., trades based on investment decisions for an entire model or strategy) away from the Program Sponsor for purposes of order aggregation. Furthermore, for Wrap Fee Programs where Clark Capital is managing fixed income securities, nearly all fixed income transactions are traded away from the Program Sponsor. We generally do not, however, step out small trades or trades that are not based on a change to our models, such as account openings and closings, new subscriptions, and redemptions.

When we trade away from Program Sponsors, clients can incur trading costs, such as commissions, mark-ups or mark-downs or other transaction fees, which are in addition to the bundled fee charged by the Program Sponsor. We believe, however, that trading away from Program Sponsors as described herein ultimately benefits all clients because the size of the block orders generally results in better execution than trading with Program Sponsors. Specifically, by blocking client orders where feasible, we are often able to limit the market impact of our trades, achieve lower execution costs that are typically associated with larger orders, and minimize dispersion across our client accounts. (For additional information about order aggregation, please see “Trade Aggregation” below).

In certain Wrap Fee Programs, we do not retain discretion to select the executing broker-dealers for client transactions because the client has appointed the Program Sponsor as the exclusive broker-dealer for handling securities transactions. In these programs, Clark Capital is not able to aggregate orders or otherwise trade away from Program Sponsors. Additionally, certain client custodians used in Wrap Fee Programs allow stepped-out trades and impose fees for these trades. In these programs, we generally trade with the Program Sponsor to avoid such charges to client accounts. Alternatively, certain Wrap Fee Program Sponsors will choose to pay these step-out charges on behalf of their clients. Clients in Wrap Fee Programs should review their investment advisory agreements with Program Sponsors and custodial account agreements to determine if there are any fees imposed for stepped-out trades, and consult with the Program Sponsors to determine if the trade execution and other services provided under these programs are reasonable in comparison to the benefits received.

BROKER-DEALER SELECTION IN CLARK CAPITAL-SPONSORED TAMP

Clark Capital has authority to select or recommend broker-dealers for client transactions in TAMP accounts. Consistent with our obligations as an investment adviser, it is our practice to recommend that transactions be directed to a broker-dealer that we believe can obtain best execution, which may be other than the custodian selected by the client in a TAMP account. We execute most model-following equity trades, and almost all model-following fixed income trades, away from these clients’ custodians. For a complete description of our brokerage practices in the TAMP that we sponsor, please read Clark Capital’s Wrap Fee Brochure.

RESEARCH SERVICES AND OTHER SOFT DOLLAR BENEFITS

Clark Capital has not entered into any soft-dollar arrangements and does not otherwise utilize soft dollars or soft dollar credits. Some broker-dealers that execute securities transactions for Clark Capital's clients provide proprietary research and/or statistical data (collectively, “services”) to Clark Capital. These services generally include, among other things, such items as general economic and security market reviews, industry and company reviews, evaluations of securities, recommendations as to the purchase and sale of securities, and services related to the execution of securities transactions. Clark Capital believes that such services are available to all asset managers of a similar size. Clark Capital may give consideration to such services and may place orders for the execution of transactions with brokers or dealers supplying those services at commission rates higher than those charged by another broker-dealer. This creates a potential conflict of interest because Clark Capital may be viewed as allocating trades to a broker-dealer in order to obtain such services rather than to obtain the most favorable execution available. To address this conflict, Clark Capital has adopted policies and procedures and criteria for assessing best execution (discussed above).

BROKERAGE FOR CLIENT REFERRALS

In selecting or recommending broker-dealers, we do not consider whether we or a related person receives client referrals from a broker-dealer or third party.

DIRECTED BROKERAGE IN THIRD-PARTY WRAP PROGRAMS

As described above, Wrap Fee Program clients may direct Clark Capital to execute all transactions with the Program Sponsor or another broker-dealer. These arrangements, however, will limit or eliminate our ability to obtain volume discounts on aggregated orders or obtain best price and execution for a particular transaction. Accordingly, client directed brokerage orders may result in greater transaction costs. Clark Capital does not permit any other clients or types of clients to direct brokerage.

TRADE AGGREGATION

When possible, we aggregate (or block) trade orders when we desire to purchase or sell the same security for multiple client accounts. We aggregate such orders to limit the market impact of Clark Capital's orders, to achieve lower execution costs that are typically associated with larger orders, and for administrative convenience, among other reasons. We may be unable to aggregate transactions for client accounts based on client-imposed investment restrictions or due to constraints or limitations in Wrap Fee Programs, as described above. In such cases, we are unable to obtain volume discounts and may not be able to obtain the best net price for these clients.

We have adopted policies and procedures designed to ensure that we allocate blocked trades among client accounts on a reasonable and equitable basis. These policies and procedures require, among other things, that each client account that participates in a block trade receives an average share price and that all transaction costs are shared equally.

TRADE ROTATION

We manage assets for a variety of clients in various programs that use different custodians and broker-dealers for executing equity securities transactions. Accordingly, we use trade rotations and other trading methods so that all clients or groups of clients are treated equitably over time.

Discretionary Accounts are traded by Clark Capital's Trading Desk, and the trades are aggregated and traded in a block, and all block orders are staged and released simultaneously through Clark Capital's order management system throughout the day. Model Delivery accounts are updated by a third-party, Archer Investment Management Solutions ("Archer"), and Archer uses trade rotations to determine the order in which Model Delivery programs are updated. Each trading day, once Clark Capital's investment models are reviewed and approved by Clark Capital's Trading Desk, the models are released to Clark Capital's Trading Desk and Archer's Trading Desk simultaneously so that Discretionary Accounts and Model Delivery Accounts are able to begin trading at the same time.

TRADE ERRORS

As a fiduciary, Clark Capital has the responsibility to effect orders correctly, promptly and in the best interests of our clients. In the event that an error occurs in the handling of any client transactions, due to our actions or inaction, or the actions of others, our policy is to seek to identify and correct the errors as promptly as possible without disadvantaging the client. If the error is our responsibility, any client transaction will be corrected and we will be responsible for any loss resulting from the error.

Item 13 – Review of Accounts

REVIEW OF ACCOUNTS

Members of the Portfolio Management and Operations departments conduct periodic reviews of client accounts for adherence to investment strategy and to confirm that account performance is consistent with applicable model portfolios. The frequency and scope of individual account reviews depend on certain factors, including but not limited to: (1) client contributions or withdrawals; (2) client-directed services, such as tax-loss harvesting; and (3) questions regarding account performance. For clients invested in a PUMA, Operations also monitors accounts on a daily basis for drift or variance from model portfolio weightings. In addition, Portfolio Managers, Analysts, Traders and other investment personnel monitor markets, world and economic events, and securities held in client accounts.

CLIENT REPORTING

All clients will receive custodial statements on a monthly basis from the custodian of your account providing information such as your account value, asset allocation, holdings and transactions. For clients invested in Clark Capital's TAMP and certain clients in Wrap Fee Programs, our Client Portfolio Management team provides complete portfolio summaries on a quarterly basis. For more information on client reporting in third-party Wrap Fee Programs, please review the Program Sponsor's Wrap Fee Brochure.

Item 14 – Client Referrals and Other Compensation

SOLICITATION ARRANGEMENTS

Clark Capital does not receive compensation for referrals. Additionally, it is Clark Capital's policy to not accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

THIRD-PARTY WRAP FEE PROGRAMS AND MODEL DELIVERY PROGRAMS

When investing in a third-party Wrap Fee or Model Delivery Program, the Program Sponsor may compensate employees or independent personal investment advisors for referring you to the Program Sponsor and performing other tasks for your account. Please review the Program Sponsor's Wrap Fee Brochure for additional information on client referrals. For information on client referrals and the fees involved in the TAMP sponsored by Clark Capital, please read Clark Capital's Wrap Fee Brochure.

PARTNER CONFERENCES AND SALES SUPPORT

From time to time, Clark Capital will sponsor educational conferences for financial advisors designed to ensure that such financial advisors are familiar with Clark Capital's advisory services, among other things. These conferences are offered to financial advisors free of charge, and benefits provided generally include meals, lodging and continuing education credits. Clark Capital has also offered financial services firms and third-party service providers the opportunity to sponsor these conferences and contribute to the cost of the events. These sponsorships create a conflict of interest to the extent that Clark Capital works with or otherwise uses the services of the sponsors. To reduce this conflict, Clark Capital ensures that the amount of funds received from a sponsor are reasonable in amount and that all sponsorship funds are used exclusively for the cost of the events. Clark Capital has also entered into sales support agreements with broker-dealers and financial services firms who receive payments from Clark Capital in exchange for educational, training and related sales support expenses. Additionally, in some instances, Clark Capital will reimburse financial advisors for their costs in hosting educational, training and sales support events. Such payments can create an economic incentive for these financial advisors and entities to promote Clark Capital's products and services over another adviser's products and services and could be an important factor in these financial advisors and entities' willingness to recommend Clark Capital's products and services in general. Clark Capital has adopted policies and procedures to ensure that sales support payments are reasonable.

Item 15 – Custody

Clark Capital does not have custody of client securities or assets in Wrap Fee Programs or Model Delivery Programs. Program Sponsors are responsible for making arrangements for the clients' custodians to provide custodian account statements. Such clients generally will receive account statements directly from their third-party custodians for the accounts and should carefully review these statements.

Clark Capital is deemed to have limited custody of client funds in Clark Capital's TAMP due to our ability to debit our investment advisory fee from client accounts. To mitigate this, Clark Capital custodies all client accounts with qualified custodians. Otherwise we do not have custody of client assets or funds. Clients in the Clark Capital-sponsored TAMP receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets. These custodial account statements are sent no less frequently than quarterly and show all transactions in the account, including fees paid to Clark Capital. Clark Capital urges clients to carefully review and compare official custodial records to any account statements that Clark Capital provides. Clark Capital statements may vary slightly from custodial statements based on accounting procedures, reporting dates, and/or valuation methodologies of certain securities. For more information, please review Clark Capital's Wrap Fee Brochure.

Item 16 – Investment Discretion

INVESTMENT DISCRETION

We generally accept discretionary authority to manage accounts on behalf of our clients including determining the securities to be bought or sold for a client's account and the amount of those securities, the broker or dealer to be used for purchase or sale of securities for a client's account, and the commission rates to be paid to a broker or dealer for a client's securities transactions. In Wrap Fee Programs, clients have the ability to impose reasonable restrictions on the management of their accounts, such as designating particular securities or types of securities that should not be purchased for the account, through either an investment advisory agreement with us or a Program Sponsor's client agreement. Some Wrap Fee Program clients will transfer certain securities into their managed account and specifically request that they be retained for personal reasons. In situations where Clark Capital has discretionary authority over the client's account and has control over client billing, Clark Capital will mark these securities as "unmanaged" or "restricted" and will not charge a management fee on these assets. These securities will generally not be reflected in any performance reports provided to clients by Clark Capital. As discussed in Item 4 of this Brochure, we also participate in Model Delivery arrangements, where we provide a model portfolio to Program Sponsors, but do not exercise investment discretion. Accordingly, all client restrictions in such accounts are handled by a third party, such as the Program Sponsor or another manager.

Item 17 – Voting Client Securities (i.e., Proxy Voting)

PROXY VOTING

Clark Capital accepts authority to vote proxies on behalf of certain clients. Specifically, Clark Capital has accepted authority to vote proxies with respect to certain clients in Wrap Fee Programs (which will be set forth in Clark Capital's agreement with a Program Sponsor) and the Navigator Mutual Funds. Clark Capital generally does not vote proxies on behalf of direct advisory clients and clients in Clark Capital's TAMP. These clients will receive proxies or other solicitations directly from their custodian, and should direct all questions about a particular proxy solicitation to the custodian. Additionally, if a client for whom Clark Capital votes proxies wishes to vote their own proxies for securities held in their account, the client must notify Clark Capital in writing that they wish receive proxy solicitations directly and assume responsibility for voting them.

When Clark Capital has proxy voting authority, we will apply our written proxy voting policies and procedures adopted pursuant to Rule 206(4)-6 under the Advisers Act ("Proxy Voting Policies and Procedures"). The Proxy Voting Policies and Procedures provide that where Clark Capital has accepted proxy voting authority, Clark Capital will vote such securities for the exclusive benefit, and in the best economic interest, of those clients and their beneficiaries, as determined by Clark Capital in good faith, subject to any restrictions or directions from a client. Such voting responsibilities will be exercised in a manner that is consistent with the general antifraud provisions of the Advisers Act, as well as with Clark Capital's fiduciary duties under federal and state law to act in the best interests of its clients.

Our Proxy Voting Policies and Procedures authorize Clark Capital to delegate certain proxy voting functions to service providers, and we have contracted with Broadridge Financial Solutions ("Broadridge") to utilize their Proxy Edge® platform ("PE"). Under the terms of its arrangement with Broadridge, Clark Capital can instruct PE to vote either for or against a particular type of proposal or Clark Capital can instruct PE to seek instruction with respect to that particular type of proposal from Clark Capital on a case-by-case basis ("Voting Instructions"). PE receives all proxy statements and sorts the proposals according to Clark Capital's Voting Instructions. Proposals for which a voting decision has been pre-determined are automatically voted by PE pursuant to the Voting Instructions. Case-by-case decisions are generally made by the Chief Investment Officer or the Chief Compliance Officer with assistance from Portfolio Managers, as needed.

From time to time, a particular proxy vote may pose a conflict of interest between the interests of Clark Capital and our clients. When a conflict of interest arises, Clark Capital may choose one of several options to avoid or minimize the conflict, including: (1) automatic voting by PE in accordance with the Voting Instructions, if it involves little or no discretion; (2) engaging another party to determine how proxies should be voted; (3) "echo" or "mirror" voting the proxies in the same proportion as the votes of other proxy holders that are not Clark Capital clients; or (4) if possible, erecting information barriers around the person or persons making the voting decision sufficient to insulate the decision from the conflict. Clients may request a copy of Clark Capital's Proxy Voting Policies and Procedures and/or information about how Clark Capital has voted securities in their account by contacting Clark Capital at 1-800-766-2264.

Item 18 – Financial Information

Clark Capital does not have any financial condition that is likely to impair our ability to meet our contractual or fiduciary commitments to you. Advisors who require or solicit prepayment of more than $1,200 in fees per client, six months or more in advance, are required to provide you with a balance sheet for the most recent fiscal year. This requirement does not apply to Clark Capital.

PRIVACY NOTICE

As a client of Clark Capital, you have entrusted your personal information and financial data to our care. Because this is your private information and data, we exercise extreme care in how we handle it. We are required by federal law to advise you how we collect, share, and protect your personal information. You have the right to limit some but not all sharing of personal information. Please read this notice carefully to understand what we do.

The Types of Personal Information We Collect
The types of personal information we collect and share depend on the product or service you have with us. This information can include, among other things:

- Your name and address
- Social Security number
- Date of birth
- Assets and income
- Account balances

We may collect your personal information, for example, when you enter into an investment advisory agreement, open an account with a custodian, or make deposits or withdrawals from your account.

Why We May Need to Share Your Personal Information
Like all financial companies, we need to share your personal information with third parties to run our everyday business and to provide you services such as processing transactions and maintaining your account. The third parties that we share your personal information with (such as financial service companies, consultants and auditors) are contractually prohibited from disclosing or using your personal information for any purpose other than providing such services and are required to maintain appropriate security measures for protecting your personal information. We may also share your personal information as required by law, such as responding to court orders and legal investigations. We do not disclose your personal information to anyone for marketing purposes.

How We Protect Your Personal Information
Within Clark Capital, we restrict access to information about you to those employees who need to know the information to service your account. To protect your personal information from unauthorized access and use, we use physical, electronic, and procedural safeguards that comply with applicable laws and industry standards and practices.

When You Can Limit Sharing
Federal law gives you the right to limit only: (1) sharing for affiliates' everyday business purposes, (2) sharing with affiliates to use your information to market to you, and (3) sharing with non-affiliates to use your information to market to you. We do not share your information in any of these ways. State laws and individual companies may give you additional rights to limit sharing.

When you are no longer our customer, we continue to share your information only as described in this notice.

Definitions
Affiliates: Companies related by common ownership or control. They can be financial and non-financial companies. We do not share with affiliates.

Non-affiliates: Companies not related by common ownership or control. They can be financial and nonfinancial companies. We do not share with non-affiliates except as described in this notice.

Joint Marketing: A formal agreement between non-affiliated financial companies that together market financial products or services to you. We do not engage in joint marketing.

Questions? Call 1-800-766-2264 and ask for the Chief Compliance Officer.

CLARK CAPITAL MANAGEMENT GROUP, INC.
Guide to Services and Compensation Provided for ERISA Plans

Pursuant to ERISA Section 408(b)(2), we are furnishing the guide below. This guide provides important information that should be considered in connection with the services that we provide to your ERISA plan ("Plan") as a sub-adviser to a third party's platform or wrap fee program ("Platform").

Information Required under 408(b)(2)	Specific Disclosure	Location(s) of Information
Services that Clark Capital will provide to your Plan.		Services we expect to provide are described in the Investment Advisory Agreement executed between the Plan and Clark Capital and are further described in Clark Capital's Form ADV – Part 2A, Item 4, Advisory Business.[1]
A statement concerning the services that Clark Capital will provide as an ERISA fiduciary and as a registered investment adviser.	Clark Capital will provide services as an investment adviser registered under the Investment Advisers Act of 1940 and as a fiduciary under ERISA § 3(21).	
Compensation that Clark Capital will receive from your Plan ("direct" compensation).	Direct compensation received by Clark Capital is a percentage of plan assets as specified in the Investment Advisory Agreement executed between the Plan and Clark Capital.	Direct compensation is described in the Investment Advisory Agreement executed between the Plan and Clark Capital and in Clark Capital's Form ADV – Part 2A, Item 5 – Fees and Compensation.
Compensation that Clark Capital will receive from other parties that are not related to Clark Capital ("indirect" compensation).	From time to time, third parties that provide services to client accounts will sponsor conferences or events hosted by Clark Capital. These sponsorships we consider to be a form of indirect compensation. When they occur compensation is nominal and is used to cover expenses. Additionally, from time to time, third parties may provide Clark Capital with nonmonetary gifts and gratuities, such as promotional items (i.e., coffee mugs, calendars or gift baskets), meals and access to certain industry-related conferences (collectively, "gifts"). Clark Capital does not expect to receive gifts in excess of the de minimis threshold established under the Department of Labor's regulations and guidance.	
Compensation that will be paid among Clark Capital and related parties.	Not applicable to the services provided by Clark Capital.	

[1] Available at http://www.adviserinfo.sec.gov.

Information Required under 408(b)(2)	**Specific Disclosure**	**Location(s) of Information**
Compensation Clark Capital will receive if you terminate this service agreement.		For information regarding compensation paid upon termination of services, please refer to the Investment Advisory Agreement executed between the Plan and Clark Capital and Clark Capital's Form ADV – Part 2A, Item 5 – Fees and Compensation.
The cost to your Plan of recordkeeping services.	Not applicable to the services provided by Clark Capital.	

One Liberty Place
53rd Floor
1650 Market Street
Philadelphia, PA 19103
1.800.766.2264
www.ccmg.com

Form ADV Part 2B, Brochure Supplement

March 31, 2026

This brochure supplement is provided on the following supervised persons who provide discretionary advice as part of a team:

- K. Sean Clark, CFA
- Mason Wev
- Maira F. Thompson
- Anthony W. Soslow
- Alexander J. Meyer

The above individuals may be contacted at the address above.

This brochure supplement provides information about the supervised persons named above and supplements the Clark Capital Management Group Form ADV Part 2A. You should have received a copy of that brochure. Please contact Client Services at the above number(s) if you did not receive our Form ADV Part 2A or if you have any questions about the contents of this supplement.

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

Phone 1-800-766-2264 Website: www.ccmg.com

K. Sean Clark, CFA, Executive Vice President, Chief Investment Officer, Born 1969

Educational Background and Business Experience: Mr. Clark graduated from the University of Delaware with a Bachelor of Science and subsequently earned a Master of Arts in Economics. Mr. Clark joined Clark Capital Management Group in 1993 as a portfolio manager and later became the Chief Investment Officer. Mr. Clark is responsible for the oversight and direction of all Clark Capital's Navigator Investment Solutions. In particular, Mr. Clark's primary roles include management of Clark Capital's asset allocation programs as well as the ongoing research and development of the Firm's proprietary tactical and strategic asset allocation models. Mr. Clark earned the Chartered Financial Analyst[2] (CFA) designation in 1999. Mr. Clark is a member of the CFA Institute (formerly AIMR) and the Financial Analysts Society of Philadelphia.

Disciplinary Information: There are no legal or disciplinary events to report.

Other Business Activities: Mr. Clark devotes full time to Clark Capital. He has no investment-related outside business activities.

Additional Compensation: Mr. Clark does not receive any economic benefit from third parties for providing advisory services.

Supervision: Mr. Clark heads the Investment Committee. The Committee works as a team and meets weekly to review current security positions and consider the likelihood that each security will contribute to the investment objectives and risk profile of Clients. The models used in strategy management are continually fine-tuned to fit each strategy's objectives as conditions change. Mr. Clark is a member of, and reports directly to, the Clark Capital Executive Committee. His activities are also monitored by Clark Capital's CCO, Conor Mullan. Conor Mullan can be reached at cmullan@ccmg.com or 215-569-2224.

Mason Wev, CFA, Senior Portfolio Manager, Born 1971

Educational Background and Business Experience: Mr. Wev graduated from Dickinson College with a Bachelor of Arts and subsequently earned a Master of Business Administration in International Management from the Garvin School of Management at Thunderbird (the American Graduate School of International Management). Mr. Wev joined Clark Capital Management Group in 2005 as a Portfolio Manager. Mr. Wev is responsible for quantitative investment analysis, asset allocation, security selection, and communicating the firm's investment policy to wealth advisors and consultants. He also directs the ongoing research into securities selection and portfolio strategies used to enhance the Navigator investment programs. Mr. Wev earned the Chartered Financial Analyst[3] (CFA) designation in 1999.

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[2] The Chartered Financial Analyst® (CFA®) designation is an international professional certification offered by the CFA Institute to financial analysts who complete a series of three examinations generally over a three-year period. To become a CFA Charterholder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charterholders are also required to understand and sign a professional conduct statement that commits the individual to the CFA Institute's Code of Ethics and Standards of Professional Conduct, which requires adherence to a high level of integrity, professionalism and duty to clients among others. CFA and Chartered Financial Analyst are registered trademarks owned by the CFA Institute.

[3] The Chartered Financial Analyst® (CFA®) designation is an international professional certification offered by the CFA Institute to financial analysts who complete a series of three examinations generally over a three-year period. To become a CFA Charterholder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charterholders are also required to understand and sign a professional conduct statement that commits the individual to the CFA Institute's Code of Ethics and Standards of Professional Conduct, which requires adherence to a high level of integrity, professionalism and duty to clients among others. CFA and Chartered Financial Analyst are registered trademarks owned by the CFA Institute.

Disciplinary Information: There are no legal or disciplinary events to report.

Other Business Activities: Mr. Wev devotes full time to Clark Capital. He has no investment-related outside business activities.

Additional Compensation: Mr. Wev does not receive any economic benefit from third parties for providing advisory services.

Supervision: Mr. Wev is a member of the Investment Committee and reports to K. Sean Clark. The Committee works as a team and meets weekly to review current security positions and consider the likelihood that each security will contribute to the investment objectives and risk profile of Clients. The models used in strategy management are continually fine-tuned to fit each strategy's objectives as conditions change. Mr. Wev's activities are also monitored by Clark Capital's CCO, Conor Mullan. Conor Mullan can be reached at cmullan@ccmg.com or 215-569-2224.

Maira F. Thompson, Co-Head of Equity, Born 1960

Educational Background and Business Experience: Ms. Thompson is Co-Head of Equity and a Senior Portfolio Manager for the High Dividend Equity portfolio in the Premier Portfolio Group. She is responsible for management and portfolio relationships. Her more than thirty years of investment experience included the position of Vice President and head of the Philadelphia Investment Group for Meridian Asset Management. After Delaware Trust became part of Meridian, Ms. Thompson managed their Trust Investment Group in Wilmington, Delaware. Prior to that she was employed by Prudential Bache Securities and Legg Mason Wood Walker. Ms. Thompson is a graduate of Ohio Wesleyan University and undertook additional studies in economics at the London School of Economics. She joined Clark Capital in 1997.

Disciplinary Information: There are no legal or disciplinary events to report.

Other Business Activities: Ms. Thompson devotes full time to Clark Capital. She has no investment-related outside business activities.

Additional Compensation: Ms. Thompson does not receive any economic benefit from third parties for providing advisory services.

Supervision: Ms. Thompson is a member of the Investment Committee and reports to K. Sean Clark. The Committee works as a team and meets weekly to review current security positions and consider the likelihood that each security will contribute to the investment objectives and risk profile of Clients. The models used in strategy management are continually fine-tuned to fit each strategy's objectives as conditions change. Ms. Thompson's activities are also monitored by Clark Capital's CCO, Conor Mullan. Conor Mullan can be reached at cmullan@ccmg.com or 215-569-2224.

Anthony W. Soslow, CFA, Co-Head of Equity, Born 1965

Educational Background and Business Experience: Mr. Soslow graduated from the Wharton School of the University of Pennsylvania. He has over 30 years of portfolio management experience utilizing both a quantitative and fundamental process. From 1997 to 2013, Mr. Soslow was the President and Chief Investment Officer of Global Capital Management which he founded. From 1986 through 1997, Mr. Soslow was Director of Portfolio Management at RTE Asset Management where he was responsible for portfolio management across all asset classes. Mr. Soslow has earned the Chartered Financial Analyst[4] (CFA) designation. He joined Clark Capital Management in 2013.

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[4] The Chartered Financial Analyst® (CFA®) designation is an international professional certification offered by the CFA Institute to financial analysts who complete a series of three examinations generally over a three-year period. To become a CFA Charterholder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA

Disciplinary Information: There are no legal or disciplinary events to report.

Other Business Activities: Mr. Soslow devotes full time to Clark Capital. He has no investment-related outside business activities.

Additional Compensation: Mr. Soslow does not receive any economic benefit from third parties for providing advisory services.

Supervision: Mr. Soslow is a member of the Investment Committee and reports to K. Sean Clark. The Committee works as a team and meets weekly to review current security positions and consider the likelihood of whether or not each security will contribute to the investment objectives and risk profile of Clients. The models used in strategy management are continually fine-tuned to fit each strategy's objectives as conditions change. Mr. Soslow's activities are also monitored by Clark Capital's CCO, Conor Mullan. Conor Mullan can be reached at cmullan@ccmg.com or 215-569-2224.

Alexander J. Meyer, CFA, Head of Fixed Income, Born 1983

Educational Background and Business Experience: Mr. Meyer is Clark Capital's Head of Fixed Income. He is responsible for managing the Navigator fixed income mutual funds. Mr. Meyer has over 15 years of experience as a trader and senior portfolio manager in the institutional bond industry and across fixed income sectors, including municipals, investment grade corporate bonds, and high yield corporate bonds, as well as experience with credit analysis, portfolio hedging strategies and quantitative analysis. Mr. Meyer joined Clark Capital in 2019. Prior to joining Clark Capital, Mr. Meyer was Vice President at Jefferies where he held portfolio management roles trading municipals, investment grade corporate bonds and high yield corporate bonds. Mr. Meyer received his Bachelor of Arts in economics from the University of Pennsylvania and earned the Chartered Financial Analyst[5] (CFA) designation in 2014.

Disciplinary Information: There are no legal or disciplinary events to report.

Other Business Activities: Mr. Meyer devotes full time to Clark Capital Management. He has no investment-related outside business activities.

Additional Compensation: Mr. Meyer does not receive any economic benefit from third parties for providing advisory services.

Supervision: Mr. Meyer is a member of the Investment Committee and reports to K. Sean Clark. The Committee works as a team and meets weekly to review current security positions and consider the likelihood that each security will contribute to the investment objectives and risk profile of the Clients. The models used in strategy management are continually fine-tuned to fit each strategy's objectives as conditions change. Mr. Meyer's activities are also

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Charterholders are also required to understand and sign a professional conduct statement that commits the individual to the CFA Institute's Code of Ethics and Standards of Professional Conduct, which requires adherence to a high level of integrity, professionalism and duty to clients among others. CFA and Chartered Financial Analyst are registered trademarks owned by the CFA Institute.

[5] The Chartered Financial Analyst® (CFA®) designation is an international professional certification offered by the CFA Institute to financial analysts who complete a series of three examinations generally over a three-year period. To become a CFA Charterholder candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA Charterholders are also required to understand and sign a professional conduct statement that commits the individual to the CFA Institute's Code of Ethics and Standards of Professional Conduct, which requires adherence to a high level of integrity, professionalism and duty to clients among others. CFA and Chartered Financial Analyst are registered trademarks owned by the CFA Institute.

monitored by Clark Capital's CCO, Conor Mullan. Conor Mullan can be reached at cmullan@ccmg.com or 215-569-2224.