

FORM ADV

UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

Primary Business Name: BARING INTERNATIONAL INVESTMENT LTD	CRD Number: 105724
Annual Amendment - All Sections	Rev. 10 / 2021
3 / 30 / 2026 1:06:44 PM	

WARNING: Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 4.

Item 1 Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you. If you are filing an *umbrella registration*, the information in Item 1 should be provided for the *filing adviser* only. General Instruction 5 provides information to assist you with filing an *umbrella registration*.

A. Your full legal name (if you are a sole proprietor, your last, first, and middle names):
BARING INTERNATIONAL INVESTMENT LTD

B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A.
BARING INTERNATIONAL INVESTMENT LTD

List on *Section 1.B. of Schedule D* any additional names under which you conduct your advisory business.

(2) If you are using this Form ADV to register more than one investment adviser under an *umbrella registration*, check this box ☐

If you check this box, complete a Schedule R for each relying adviser.

C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.(1)), enter the new name and specify whether the name change is of
☐ your legal name or ☐ your primary business name:

D. (1) If you are registered with the SEC as an investment adviser, your SEC file number: **801-15160**
(2) If you report to the SEC as an *exempt reporting adviser*, your SEC file number:
(3) If you have one or more Central Index Key numbers assigned by the SEC ("CIK Numbers"), all of your CIK numbers:

CIK Number
1568131

E. (1) If you have a number ("CRD Number") assigned by the *FINRA*'s *CRD* system or by the IARD system, your *CRD* number: **105724**

If your firm does not have a *CRD* number, skip this Item 1.E. Do not provide the *CRD* number of one of your officers, employees, or affiliates.

(2) If you have additional *CRD* Numbers, your additional *CRD* numbers:
No Information Filed

F. Principal Office and Place of Business

(1) Address (do not use a P.O. Box):
Number and Street 1: 20 OLD BAILEY
City: LONDON State: Country: United Kingdom ZIP+4/Postal Code: EC4M 7BF
Number and Street 2:

If this address is a private residence, check this box: ☐

List on *Section 1.F. of Schedule D* any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for SEC registration, if you are registered only with the SEC, or if you are reporting to the SEC as an exempt reporting adviser, list the largest twenty-five offices in terms of numbers of employees as of the end of your most recently completed fiscal year.

(2) Days of week that you normally conduct business at your *principal office and place of business*:
☒ Monday - Friday ☐ Other:
Normal business hours at this location:
9:00 TO 5:00

(3) Telephone number at this location:
+44(0)20-7628-6000

(4) Facsimile number at this location, if any:

(5) What is the total number of offices, other than your *principal office and place of business*, at which you conduct investment advisory business as of the end of your most recently completed fiscal year?

G. Mailing address, if different from your *principal office and place of business* address:

Number and Street 1:		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

H. If you are a sole proprietor, state your full residence address, if different from your *principal office and place of business* address in Item 1.F.:

Number and Street 1:		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:

Yes No

I. Do you have one or more websites or accounts on publicly available social media platforms (including, but not limited to, Twitter, Facebook and LinkedIn)?

☒☐

If "yes," list all firm website addresses and the address for each of the firm's accounts on publicly available social media platforms on [Section 1.I. of Schedule D](#). If a website address serves as a portal through which to access other information you have published on the web, you may list the portal without listing addresses for all of the other information. You may need to list more than one portal address. Do not provide the addresses of websites or accounts on publicly available social media platforms where you do not control the content. Do not provide the individual electronic mail (e-mail) addresses of employees or the addresses of employee accounts on publicly available social media platforms.

J. Chief Compliance Officer

(1) Provide the name and contact information of your Chief Compliance Officer. If you are an *exempt reporting adviser*, you must provide the contact information for your Chief Compliance Officer, if you have one. If not, you must complete Item 1.K. below.

Name:		Other titles, if any:	
Telephone number:		Facsimile number, if any:	
Number and Street 1:		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:

Electronic mail (e-mail) address, if Chief Compliance Officer has one:

(2) If your Chief Compliance Officer is compensated or employed by any *person* other than you, a *related person* or an investment company registered under the Investment Company Act of 1940 that you advise for providing chief compliance officer services to you, provide the *person's* name and IRS Employer Identification Number (if any):

Name:

IRS Employer Identification Number:

K. Additional Regulatory Contact Person: If a person other than the Chief Compliance Officer is authorized to receive information and respond to questions about this Form ADV, you may provide that information here.

Name:		Titles:	
Telephone number:		Facsimile number, if any:	
Number and Street 1:		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:

Electronic mail (e-mail) address, if contact person has one:

Yes No

L. Do you maintain some or all of the books and records you are required to keep under Section 204 of the Advisers Act, or similar state law, somewhere other than your *principal office and place of business*?

☒☐

If "yes," complete [Section 1.L. of Schedule D](#).

Yes No

M. Are you registered with a *foreign financial regulatory authority*?

☒☐

Answer "no" if you are not registered with a foreign financial regulatory authority, even if you have an affiliate that is registered with a foreign financial regulatory authority. If "yes," complete [Section 1.M. of Schedule D](#).

Yes No

N. Are you a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934?

☐☒

Yes No

O. Did you have \$1 billion or more in assets on the last day of your most recent fiscal year?

☒☐

If yes, what is the approximate amount of your assets:

☐ \$1 billion to less than \$10 billion

☒ \$10 billion to less than \$50 billion

☐ \$50 billion or more

For purposes of Item 1.O. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.

P. Provide your *Legal Entity Identifier* if you have one:
213800IVBMSKINS3PP05

A *legal entity identifier* is a unique number that companies use to identify each other in the financial marketplace. You may not have a *legal entity identifier*.

SECTION 1.B. Other Business Names

No Information Filed

SECTION 1.F. Other Offices

No Information Filed

SECTION 1.I. Website Addresses

List your website addresses, including addresses for accounts on publicly available social media platforms where you control the content (including, but not limited to, Twitter, Facebook and/or LinkedIn). You must complete a separate Schedule D Section 1.I. for each website or account on a publicly available social media platform.

Address of Website/Account on Publicly Available Social Media Platform: [HTTPS://WWW.LINKEDIN.COM/SHOWCASE/BARINGS-REAL-ESTATE](https://www.linkedin.com/showcase/barings-real-estate)

Address of Website/Account on Publicly Available Social Media Platform: [HTTP://WWW.LINKEDIN.COM/COMPANY/BARINGS](http://www.linkedin.com/company/barings)

Address of Website/Account on Publicly Available Social Media Platform: [HTTPS://X.COM/BARINGS](https://x.com/Barings)

Address of Website/Account on Publicly Available Social Media Platform: [HTTP://WWW.BARINGS.COM](http://www.barrings.com)

Address of Website/Account on Publicly Available Social Media Platform: <https://www.youtube.com/@barings>

Address of Website/Account on Publicly Available Social Media Platform: [HTTP://WWW.LINKEDIN.COM/SHOWCASE/BARINGS-GLOBAL-PRIVATE-FINANCE/](http://www.linkedin.com/showcase/barings-global-private-finance/)

Address of Website/Account on Publicly Available Social Media Platform: <https://podcast.barings.com/public/75/Streaming-Income---A-Podcast-from-Barings-6f727a82>

Address of Website/Account on Publicly Available Social Media Platform: <https://open.spotify.com/show/7wv1GJCQHcggXDdMHbhRIY>

Address of Website/Account on Publicly Available Social Media Platform: <https://podcasts.apple.com/ug/podcast/streaming-income-a-podcast-from-barings/id1449496233>

SECTION 1.L. Location of Books and Records

Complete the following information for each location at which you keep your books and records, other than your *principal office and place of business*. You must complete a separate Schedule D, Section 1.L. for each location.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
12958 MIDWAY PLACE

City:
CERRITOS

State:
California

Number and Street 2:

Country:
United States

ZIP+4/Postal Code:
90703

If this address is a private residence, check this box: ☐

Telephone Number:
800-934-3453

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE ARCHIVED AT IRON MOUNTAIN.

Name of entity where books and records are kept:
BARINGS LLC

Number and Street 1:
2331 ROSECRANS AVENUE

City:
EL SEGUNDO

State:
California

Number and Street 2:
SUITE 4225

Country:
United States

ZIP+4/Postal Code:
90245

If this address is a private residence, check this box: ☐

Telephone Number:
(310) 234-2525

Facsimile number, if any:

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
BARINGS SHANGHAI

Number and Street 1:
INTERNATIONAL FINANCE CENTER TOWER 2 8 CENTURY AVE

City:
SHANGHAI

State:

Number and Street 2:
UNIT 1511-12, LEVEL 15. TOWER 2

Country:
China

ZIP+4/Postal Code:
PUDONG DIST

If this address is a private residence, check this box: ☐

Telephone Number:
8621 3107 1898

Facsimile number, if any:

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940

ARE KEPT AT THE OFFICE OF BARINGS LLC.

Name of entity where books and records are kept:
BARINGS SICE (TAIWAN) LIMITED

Number and Street 1:
101 BUILDING, 55TH FLOOR, ROOM A
City:
TAIPEI

State:

Number and Street 2:
NO. 7, SECTION 5, XINYI ROAD
Country:
Taiwan, Republic of China

ZIP+4/Postal Code:
11012

If this address is a private residence, check this box: ☐

Telephone Number: 886 2 66388188
Facsimile number, if any:

This is (check one):
☒ one of your branch offices or affiliates.
☐ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS LLC.

Name of entity where books and records are kept:
DUBAI

Number and Street 1:
DUBAI INTERNATIONAL FINANCIAL CENTRE, GATE DISTRICT
City:
DUBAI

State:

Number and Street 2:
FLOOR 15, EAST WING
Country:
United Arab Emirates

ZIP+4/Postal Code:
121208

If this address is a private residence, check this box: ☐

Telephone Number: 97156 6650724
Facsimile number, if any:

This is (check one):
☒ one of your branch offices or affiliates.
☐ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
8700 MERCURY LANE
City:
PICO RIVERA

State:
California

Number and Street 2:
Country:
United States
ZIP+4/Postal Code:
90660

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453
Facsimile number, if any:

This is (check one):

- ☐ one of your branch offices or affiliates.
- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE ARCHIVED AT IRON MOUNTAIN.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 2641 SEMINOLE AVE		Number and Street 2:	
City: SOUTH GATE	State: California	Country: United States	ZIP+4/Postal Code: 90280

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE ARCHIVED AT IRON MOUNTAIN.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 1915 S GRAND AVE		Number and Street 2:	
City: SANTA ANA	State: California	Country: United States	ZIP+4/Postal Code: 92705

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE ARCHIVED AT IRON MOUNTAIN.

Name of entity where books and records are kept:
STARCOMPLIANCE

Number and Street 1: 9200 CORPORATE BLVD		Number and Street 2: SUITE 440	
City: ROCKVILLE	State: Maryland	Country: United States	ZIP+4/Postal Code: 20850

If this address is a private residence, check this box: ☐

Telephone Number:
301-340-3900

Facsimile number, if any:

This is (check one):
☐ one of your branch offices or affiliates.
☒ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
USES THIS LOCATION TO ELECTRONICALLY STORE ALL THE FIRM'S CODE OF ETHICS RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940

Name of entity where books and records are kept:
BARINGS FOXBOROUGH

Number and Street 1:
2 HAMPSHIRE STREET

City:
FOXBOROUGH

State:
Massachusetts

If this address is a private residence, check this box: ☐

Number and Street 2:
SUITE 101

Country:
United States

ZIP+4/Postal Code:
02025

Telephone Number:
617) 235-1570

Facsimile number, if any:

This is (check one):
☒ one of your branch offices or affiliates.
☐ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS LLC.

Name of entity where books and records are kept:
BARINGS AUSTRALIA

Number and Street 1:
80 COLLINS STREET

City:
MELBOURNE

State:

If this address is a private residence, check this box: ☐

Number and Street 2:
LEVEL 42, NORTH TOWER SUITE 4

Country:
Australia

ZIP+4/Postal Code:
VIC 3000

Telephone Number:
61 2 9000 2117

Facsimile number, if any:

This is (check one):
☒ one of your branch offices or affiliates.
☐ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS LLC.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
2920-E HUTCHINSON MCDONALD RD.

City:
CHARLOTTE

State:
North Carolina

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
28269

If this address is a private residence, check this box: ☐

Telephone Number:
1-800-934-3453

Facsimile number, if any:

This is (check one):
☐ one of your branch offices or affiliates.
☒ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
1420 EXCHANGE STREET

City:
CHARLOTTE

State:
North Carolina

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
28208

If this address is a private residence, check this box: ☐

Telephone Number:
1-800-934-3453

Facsimile number, if any:

This is (check one):
☐ one of your branch offices or affiliates.
☒ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
5319 TULANE DR SW

City:
ATLANTA

State:
Georgia

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
30336

If this address is a private residence, check this box: ☐

Telephone Number:
1-800-934-3453

Facsimile number, if any:

This is (check one):
☐ one of your branch offices or affiliates.
☒ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
600 DISTRIBUTION DR. SW

Number and Street 2:

City: ATLANTA	State: Georgia	Country: United States	ZIP+4/Postal Code: 30336
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If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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This is (check one):

- ☐ one of your branch offices or affiliates.
- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
600 BURNING TREE ROAD

Number and Street 2:

City: FULLERTON	State: California	Country: United States	ZIP+4/Postal Code: 92833
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If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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This is (check one):

- ☐ one of your branch offices or affiliates.
- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE ARCHIVED AT IRON MOUNTAIN.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
2680 SEQUOIA DR

Number and Street 2:

City: SOUTH GATE	State: California	Country: United States	ZIP+4/Postal Code: 90280
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If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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This is (check one):

- ☐ one of your branch offices or affiliates.
- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 5086 4TH ST		Number and Street 2:	
City: IRWINDALE	State: California	Country: United States	ZIP+4/Postal Code: 91706

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE ARCHIVED AT IRON MOUNTAIN.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 6711 VALLEY VIEW STREET		Number and Street 2:	
City: LA PALMA	State: California	Country: United States	ZIP+4/Postal Code: 90623

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE ARCHIVED AT IRON MOUNTAIN.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 811 STATE ROUTE #33		Number and Street 2:	
City: FREEHOLD	State: New Jersey	Country: United States	ZIP+4/Postal Code: 07728

If this address is a private residence, check this box: ☐

Telephone Number:1-800-934-3453

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
26 S MIDDLESEX AVE

City:
MONROE

State:
New Jersey

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
08831

If this address is a private residence, check this box: ☐

Telephone Number:1-800-934-3453

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
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Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
1420 EXCHANGE STREET

City:
CHARLOTTE

State:
North Carolina

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
28269

If this address is a private residence, check this box: ☐

Telephone Number:1-800-934-3453

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
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Name of entity where books and records are kept:
BARINGS LLC

Number and Street 1:
340 MADISON AVENUE

City:
NEW YORK

State:
New York

Country:
United States

Number and Street 2:
18TH FLOOR

ZIP+4/Postal Code:
10173

If this address is a private residence, check this box: ☐

Telephone Number:
9175428300

Facsimile number, if any:

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING THOSE RELATING TO THE FIRM'S INVESTMENT ADVISORY BUSINESS CONDUCTED BY ITS FIXED INCOME, PUBLIC EQUITY, ALTERNATIVE INVESTMENTS, PRIVATE FINANCE AND REAL ESTATE GROUPS AND THOSE RELATING TO SYNDICATED BANK LOAN ACCOUNTS MANAGED BY THE FIRM).

Name of entity where books and records are kept:
BARINGS LLC

Number and Street 1:
111 SOUTH WACKER DRIVE

City:
CHICAGO

State:
Illinois

Country:
United States

Number and Street 2:
SUITE 3100

ZIP+4/Postal Code:
60606

If this address is a private residence, check this box: ☐

Telephone Number:
3124651500

Facsimile number, if any:

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING THOSE RELATING TO THE FIRM'S INVESTMENT ADVISORY BUSINESS CONDUCTED BY ITS MIDDLE MARKET LENDING GROUP).

Name of entity where books and records are kept:
REDBOX

Number and Street 1:
450 LEXINGTON AVE

City:
NEW YORK

State:
New York

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
10017

If this address is a private residence, check this box: ☐

Telephone Number:
8664741429

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☒ other.

Briefly describe the books and records kept at this location.
THIS LOCATION IS USED AS A DEPOSITORY TO STORE THE FIRMS RECORDED CALLS FOR TRADERS.

Name of entity where books and records are kept:
BARINGS LLC

Number and Street 1: 300 SOUTH TRYON STREET		Number and Street 2: SUITE 2500	
City: CHARLOTTE	State: North Carolina	Country: United States	ZIP+4/Postal Code: 28202

If this address is a private residence, check this box: ☐

Telephone Number: (704) 805-7200	Facsimile number, if any:
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This is (check one):

☐ one of your branch offices or affiliates.

☒ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS LLC.

Name of entity where books and records are kept:
BARINGS

Number and Street 1: 3RD FLOOR, BUILDING 3 NO 1 BALLSBRIDGE		Number and Street 2: 126 PEMBROKE ROAD	
City: DUBLIN 4	State:	Country: Ireland	ZIP+4/Postal Code: D04-EP27

If this address is a private residence, check this box: ☐

Telephone Number: 35314869700	Facsimile number, if any:
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This is (check one):

☒ one of your branch offices or affiliates.

☐ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 AND RELEVANT UK FINANCIAL CONDUCT AUTHORITY (FCA) RECORD KEEPING REQUIREMENTS ARE ARCHIVED AT IRON MOUNTAIN.

Name of entity where books and records are kept:
PROOFPOINT, INC.

Number and Street 1: 100 BROOK DRIVE		Number and Street 2: GREEN PARK	
City: READING	State:	Country: United Kingdom	ZIP+4/Postal Code: RG2 6UJ

If this address is a private residence, check this box: ☐

Telephone Number: 4401184025900	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
THIS LOCATION IS USED AS A DEPOSITORY FOR EMAIL ARCHIVING AND ELECTRONIC MESSAGING

Name of entity where books and records are kept:
BLOOMBERG

Number and Street 1: 731 LEXINGTON AVENUE		Number and Street 2:	
City: NEW YORK	State: New York	Country: United States	ZIP+4/Postal Code: 10017

If this address is a private residence, check this box: ☐

Telephone Number: 212-318-2000	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 AND RELEVANT UK FINANCIAL CONDUCT AUTHORITY (FCA) RECORD KEEPING REQUIREMENTS ARE ARCHIVED AT IRON MOUNTAIN.

Name of entity where books and records are kept:
INFOSHREAD

Number and Street 1: 3 CRAFTSMAN ROAD		Number and Street 2:	
City: EAST WINDSOR	State: Connecticut	Country: United States	ZIP+4/Postal Code: 06088

If this address is a private residence, check this box: ☐

Telephone Number: 888-800-1552	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
THIS LOCATION IS USED TO STORE PAPER RECORDS FOR THE SPRINGFIELD OFFICE AND RECORDS OF REAL ESTATE SECURITIES TRANSACTIONS AND MORTGAGE LOAN FILES. THIS LOCATION IS ALSO USED AS AN OFF-SITE DEPOSITORY FOR ELECTRONIC BACK-UPS OF COMPANY DATA FOR DISASTER RECOVERY PURPOSES.

Name of entity where books and records are kept:
BARINGS LLC

Number and Street 1: 1295 STATE STREET		Number and Street 2:	
City: SPRINGFIELD	State: Massachusetts	Country: United States	ZIP+4/Postal Code: 01111

If this address is a private residence, check this box: ☐

Telephone Number:
(860) 509 2200

Facsimile number, if any:

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
ISS

Number and Street 1:
702 KING FARM BOULEVARD

City:
ROCKVILLE

State:
Maryland

Country:
United States

Number and Street 2:
SUITE 300

ZIP+4/Postal Code:
20850

If this address is a private residence, check this box: ☐

Telephone Number:
646-680-6350

Facsimile number, if any:

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
EXTERNAL VENDOR USED TO PROCESS FIRM'S PROXY VOTING

Name of entity where books and records are kept:
RESTORE PLC

Number and Street 1:
UNIT 5

City:
REDHILL

State:

Country:
United Kingdom

Number and Street 2:
REDHILL DISTRIBUTION CENTRE

ZIP+4/Postal Code:
RH1 5DY

If this address is a private residence, check this box: ☐

Telephone Number:
4401708 527 60

Facsimile number, if any:
01708 527651

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
RESTORE PLC IS A THIRD PARTY UNAFFILIATED RECORD KEEPER USED TO RETAIN CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 THAT ARE NO LONGER REQUIRED TO BE KEPT ON-SITE. SUCH BOOKS AND RECORDS ARE ARCHIVED AT RESTORE PLC.

Name of entity where books and records are kept:

Number and Street 1:
35/F, GLOUCESTER TOWER15 QUEEN'S ROAD, CENTRAL
City:
HONG KONG

State:

Number and Street 2:

Country: ZIP+4/Postal Code:
Hong Kong

If this address is a private residence, check this box: ☐

Telephone Number: Facsimile number, if any:
+852 2841 1411

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARING ASSET MANAGEMENT (ASIA) LIMITED.

Name of entity where books and records are kept:
BARINGS AUSTRALIA PTY LTD

Number and Street 1: Number and Street 2:
60 CASTLEREAGH STREET LEVEL 19,SUITE 19.02
City: State: Country: ZIP+4/Postal Code:
SYDNEY Australia 02000

If this address is a private residence, check this box: ☐

Telephone Number: Facsimile number, if any:
6129002117

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: Number and Street 2:
175 BEARFOOT ROAD
City: State: Country: ZIP+4/Postal Code:
NORTHBOROUGH Massachusetts United States 01532

If this address is a private residence, check this box: ☐

Telephone Number: Facsimile number, if any:
978-671-6400

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Name of entity where books and records are kept:
PROOFPOINT, INC.

Number and Street 1: 892 ROSS DRIVE		Number and Street 2:	
City: SUNNYVALE	State: California	Country: United States	ZIP+4/Postal Code: 94089

If this address is a private residence, check this box: ☐

Telephone Number: 408-517- 4710	Facsimile number, if any:
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This is (check one):

☐ one of your branch offices or affiliates.

☒ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
THIS LOCATION IS USED AS A DEPOSITORY FOR EMAIL ARCHIVING

Name of entity where books and records are kept:
BLACKROCK

Number and Street 1: P.O. BOX 978884		Number and Street 2:	
City: DALLAS	State: Texas	Country: United States	ZIP+4/Postal Code: 75397

If this address is a private residence, check this box: ☐

Telephone Number: 1-212-810-5800	Facsimile number, if any:
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This is (check one):

☐ one of your branch offices or affiliates.

☒ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
ALLGRESS

Number and Street 1: 111 LINDBERGH AVE		Number and Street 2: SUITE F	
City: LIVERMORE	State: California	Country: United States	ZIP+4/Postal Code: 94551

If this address is a private residence, check this box: ☐

Telephone Number: 925-579-0002	Facsimile number, if any:
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This is (check one):

☐ one of your branch offices or affiliates.

- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 1100 KENNEDY ROAD		Number and Street 2:	
City: WINDSOR	State: Connecticut	Country: United States	ZIP+4/Postal Code: 06095

If this address is a private residence, check this box: ☐

Telephone Number: 860-298-3415	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
BROADRIDGE FINANCIAL SOLUTIONS LTD.

Number and Street 1: 193 MARSH WALL		Number and Street 2:	
City: LONDON	State:	Country: United Kingdom	ZIP+4/Postal Code: E14 9SG

If this address is a private residence, check this box: ☐

Telephone Number: +442075513839	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 RELATING TO APPLICANT'S PROXY VOTING ACTIVITIES ARE MAINTAINED BY BROADRIDGE FINANCIAL SOLUTIONS LTD.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 96 HIGH STREET		Number and Street 2:	
City: NORTH BILLERICA	State: Massachusetts	Country: United States	ZIP+4/Postal Code: 01862

If this address is a private residence, check this box: ☐

Telephone Number:1-800-934-3453

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
1515 WASHINGTON STREET

City:
BRAINTREE

State:
Massachusetts

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
02184

If this address is a private residence, check this box: ☐

Telephone Number:1-800-934-3453

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
20 EASTERN PARK RD

City:
EAST HARTFORD

State:
Connecticut

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
06108

If this address is a private residence, check this box: ☐

Telephone Number:1-800-934-3453

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
2009 COUNTRY CLUB DRIVE

Number and Street 2:

City:
CARROLLTON

State:
Texas

Country:
United States

ZIP+4/Postal Code:
75006

If this address is a private residence, check this box: ☐

Telephone Number:
1-800-934-3453

Facsimile number, if any:

This is (check one):

☐ one of your branch offices or affiliates.

☒ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.

CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
2604 W 13TH STREET

Number and Street 2:

City:
CHICAGO

State:
Illinois

Country:
United States

ZIP+4/Postal Code:
60608

If this address is a private residence, check this box: ☐

Telephone Number:
1-800-934-3453

Facsimile number, if any:

This is (check one):

☐ one of your branch offices or affiliates.

☒ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
2211 W PERSHING RD

Number and Street 2:

City:
CHICAGO

State:
Illinois

Country:
United States

ZIP+4/Postal Code:
60608

If this address is a private residence, check this box: ☐

Telephone Number:
1-800-934-3453

Facsimile number, if any:

This is (check one):

☐ one of your branch offices or affiliates.

☒ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 (INCLUDING RECORDS RELATING TO THE FIRM'S REAL ESTATE GROUP AND ITS FORMER SUBSIDIARY, BARINGS REAL ESTATE ADVISERS LLC (F/K/A CORNERSTONE REAL ESTATE ADVISERS LLC)).

Name of entity where books and records are kept:
BARINGS KAOHSIUNG

Number and Street 1: MINQUAN 1ST ROAD XINXING DIST.		Number and Street 2: 21F.-1, NO.251	
City: KAOHSIUNG	State:	Country: Taiwan, Republic of China	ZIP+4/Postal Code: 800

If this address is a private residence, check this box: ☐

Telephone Number: 886 7 2298868	Facsimile number, if any:
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This is (check one):

☒ one of your branch offices or affiliates.

☐ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT.

Name of entity where books and records are kept:
BARINGS SINGAPORE PTE. LTD

Number and Street 1: 1 WALLICH STREET,		Number and Street 2: #25-01, GUOCO TOWER	
City: SINGAPORE	State:	Country: Singapore	ZIP+4/Postal Code: 078881

If this address is a private residence, check this box: ☐

Telephone Number: +65 6433 0300	Facsimile number, if any:
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This is (check one):

☒ one of your branch offices or affiliates.

☐ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940

Name of entity where books and records are kept:
BARINGS JAPAN LIMITED

Number and Street 1: 7F KYOBASHI EDOGRAND		Number and Street 2: 2-2-1, KYOBASHI, CHUO-KU	
City: TOKYO	State:	Country: Japan	ZIP+4/Postal Code: 104-0031

If this address is a private residence, check this box: ☐

Telephone Number: +813 4565 1000	Facsimile number, if any:
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- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940

Name of entity where books and records are kept:
BROADRIDGE

Number and Street 1: PO BOX 416423		Number and Street 2:	
City: BOSTON	State: Massachusetts	Country: United States	ZIP+4/Postal Code: 02241

If this address is a private residence, check this box: ☐

Telephone Number: 631-254-7400	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
BROADRIDGE INVESTOR COMMUNICATIONS SOLUTIONS, INC. STORE FIRM'S PROXY CARDS, RESEARCH RECOMMENDATIONS AND PROXY VOTING RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 331 S. SWIFT ROAD		Number and Street 2:	
City: ADDISON	State: Illinois	Country: United States	ZIP+4/Postal Code: 60101

If this address is a private residence, check this box: ☐

Telephone Number: 800-934-3453	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
BARINGS LLC

Number and Street 1: 20 OLD BAILEY		Number and Street 2:	
City: LONDON	State:	Country: United Kingdom	ZIP+4/Postal Code: EC4M 7BF

If this address is a private residence, check this box: ☐

Telephone Number:
4402076286000

Facsimile number, if any:

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 AND RELEVANT UK FINANCIAL CONDUCT AUTHORITY (FCA) RECORD KEEPING REQUIREMENTS ARE ARCHIVED AT IRON MOUNTAIN.

Name of entity where books and records are kept:
FIS DATA SYSTEM INC/ PTA

Number and Street 1:
601 RIVERSIDE AVE

City:
JACKSONVILLE

State:
Florida

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
32204

If this address is a private residence, check this box: ☐

Telephone Number:
781-238-0900

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
FIS/PTA USES THIS LOCATION TO ELECTRONICALLY STORE ALL THE FIRM'S CODE OF ETHICS RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940

Name of entity where books and records are kept:
ISS (SWITCH LTD.) 2

Number and Street 1:
7315 S DECATUR BLVD

City:
LAS VEGAS

State:
Nevada

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
89118

If this address is a private residence, check this box: ☐

Telephone Number:
6466806350

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
ISS HOSTS ITS WEB APPLICATION AND SERVICES USING A PAIR OF DATACENTERS IN THE UNITED STATES (US) WHICH PROVIDE PRIMARY AND RECOVERY SERVICES, BOTH SITES ARE IN LAS VEGAS, NEVADA

Name of entity where books and records are kept:

Number and Street 1:
14901 FAA BLVD

City:
FORT WORTH

State:
Texas

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
76155

If this address is a private residence, check this box: ☐

Telephone Number:
8662970224

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
BACKUP DATA CENTER

Name of entity where books and records are kept:
NAVEX GLOBAL

Number and Street 1:
5500 MEADOWS ROAD

City:
LAKE OSWEGO

State:
Oregon

Country:
United States

Number and Street 2:
SUITE 500

ZIP+4/Postal Code:
97035

If this address is a private residence, check this box: ☐

Telephone Number:
8662970224

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CORPORATE OFFICE/BACKUP DATA CENTER FOR ETHICSPPOINT

Name of entity where books and records are kept:
REDBOX

Number and Street 1:
UNIT E3

City:
SUNBURY-ON-THAMES,

State:

Country:
United Kingdom

Number and Street 2:
BROOKLANDS CLOSE

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Telephone Number:
4401159377100

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☒ other.

Briefly describe the books and records kept at this location.

Name of entity where books and records are kept:
ISS (SWITCH LTD.) 1

Number and Street 1:
5225 W CAPOVILLA AVENUE

City:
LAS VEGAS

State:
Nevada

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
89118

If this address is a private residence, check this box: ☐

Telephone Number:
6466806350

Facsimile number, if any:

This is (check one):
☐ one of your branch offices or affiliates.
☒ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
BACKUP DATA CENTER

Name of entity where books and records are kept:
BARINGS

Number and Street 1:
UNTERLINDAU 29

City:
FRANKFURT

State:

Country:
Germany

Number and Street 2:
2ND FLOOR

ZIP+4/Postal Code:
60323

If this address is a private residence, check this box: ☐

Telephone Number:
490696681220

Facsimile number, if any:

This is (check one):
☒ one of your branch offices or affiliates.
☐ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT.

Name of entity where books and records are kept:
LIQUIDMETRIX

Number and Street 1:
ICON 4TH FLOOR

City:
LONDON

State:

Country:
United Kingdom

Number and Street 2:

ZIP+4/Postal Code:
SE1 9BG

If this address is a private residence, check this box: ☐

Telephone Number:
442034325612

Facsimile number, if any:

This is (check one):
☐ one of your branch offices or affiliates.

- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
EXTERNAL VENDOR USED TO CONDUCT MARKET ABUSE SURVEILLANCE AND REVIEWS.

Name of entity where books and records are kept:
BARINGS LLC

Number and Street 1: 10 FAN PIER BLVD		Number and Street 2: 9TH FLOOR	
City: BOSTON	State: Massachusetts	Country: United States	ZIP+4/Postal Code: 02210

If this address is a private residence, check this box: ☐

Telephone Number: (617) 761-3800	Facsimile number, if any:
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- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS LLC.

Name of entity where books and records are kept:
BARINGS

Number and Street 1: BIBLIOTEKSGATAN 3		Number and Street 2: FLOOR 4, SUITE 0244M	
City: STOCKHOLM	State:	Country: Sweden	ZIP+4/Postal Code: 111 43

If this address is a private residence, check this box: ☐

Telephone Number: 46(0)851819150	Facsimile number, if any:
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- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT.

Name of entity where books and records are kept:
BARINGS

Number and Street 1: 10 RUE DES PYRAMIDES		Number and Street 2:	
City: PARIS	State:	Country: France	ZIP+4/Postal Code: 75001

If this address is a private residence, check this box: ☐

Telephone Number:
330153936000

Facsimile number, if any:

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT.

Name of entity where books and records are kept:
BARINGS

Number and Street 1:
RUE DU MARCHÉ 28,

City:
1204 GENEVA

State:

Country:
Switzerland

Number and Street 2:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Telephone Number:
41(0)22591110

Facsimile number, if any:

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:
BARINGS

Number and Street 1:
PASEO DE LA CASTELLANA 95

City:
MADRID

State:

Country:
Spain

Number and Street 2:
9TH FLOOR - C

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Telephone Number:
34 91 737 0407

Facsimile number, if any:

- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:
BARINGS

Number and Street 1:
VIA FATEBENEFRATELLI 10

City:
MILAN

State:

Country:
Italy

Number and Street 2:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Telephone Number:
39 0249 760219

Facsimile number, if any:

This is (check one):
☒ one of your branch offices or affiliates.
☐ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:
BARINGS

Number and Street 1:
FRAUENSTRASSE 30,

City:
80469 MUNICH

State:

Country:
Germany

Number and Street 2:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Telephone Number:
49(0)89210256

Facsimile number, if any:

This is (check one):
☒ one of your branch offices or affiliates.
☐ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:
BARINGS

Number and Street 1:
29 EULJI-RO,

City:
SEOUL

State:

Country:
Korea, South

Number and Street 2:
7TH FLOOR

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Telephone Number:
822 3788 0500

Facsimile number, if any:

This is (check one):
☒ one of your branch offices or affiliates.
☐ a third-party unaffiliated recordkeeper.
☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940
ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:
BARINGS

Number and Street 1: 77 BLOOR STREET WEST		Number and Street 2: SUITE 657	
City: TORONTO ONTARIO	State:	Country: Canada	ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Telephone Number: 1(416) 6457045	Facsimile number, if any:
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This is (check one):

☒ one of your branch offices or affiliates.

☐ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940
ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:
BARINGS

Number and Street 1: BAHNHOFPLATZ 1		Number and Street 2:	
City: 8001 ZÜRICH	State:	Country: Switzerland	ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Telephone Number: 41(0)432156770	Facsimile number, if any:
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This is (check one):

☒ one of your branch offices or affiliates.

☐ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940
ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:
BARINGS

Number and Street 1: AL MARYAH ISLAND, ABU DHABI GLOBAL MARKET SQUARE,		Number and Street 2: AL SILA TOWER, 24TH FLOOR, P.O. BOX 128666	
City: ABU DHABI	State:	Country: United Arab Emirates	ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Telephone Number: +971(2)6948600	Facsimile number, if any:
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- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:
ARTEMIS, A BARINGS COMPANY

Number and Street 1: 2000 AVENUE OF THE STARS		Number and Street 2:	
City: LOS ANGELES	State: California	Country: United States	ZIP+4/Postal Code: 90067

If this address is a private residence, check this box: ☐

Telephone Number: (323) 843-8353	Facsimile number, if any:
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- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:
ARTEMIS, A BARINGS COMPANY

Number and Street 1: 888 SEVENTH AVENUE		Number and Street 2: 30TH FLOOR	
City: NEW YORK	State: New York	Country: United States	ZIP+4/Postal Code: 10019

If this address is a private residence, check this box: ☐

Telephone Number: (202) 370-7450	Facsimile number, if any:
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- This is (check one):
- ☒ one of your branch offices or affiliates.
 - ☐ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:
ARTEMIS, A BARINGS COMPANY

Number and Street 1: 5404 WISCONSIN AVENUE		Number and Street 2: SUITE 1150 10TH FLOOR	
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City:	State:	Country:	ZIP+4/Postal Code:
CHEVY CHASE	Maryland	United States	20815

If this address is a private residence, check this box: ☐

Telephone Number:	Facsimile number, if any:
(202) 370-7450	

This is (check one):

☒ one of your branch offices or affiliates.

☐ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.

CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:			
ARTEMIS, A BARINGS COMPANY			
Number and Street 1:		Number and Street 2:	
THE HARDIN BUILDING, 1380 WEST PACES FERRY RD		3RD FLOOR SUITE 3100	
City:	State:	Country:	ZIP+4/Postal Code:
ATLANTA	Georgia	United States	30327

If this address is a private residence, check this box: ☐

Telephone Number:	Facsimile number, if any:
(202) 370-7450	

This is (check one):

☒ one of your branch offices or affiliates.

☐ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.

CERTAIN BOOKS AND RECORDS RELATING TO APPLICANT'S INVESTMENT ADVISORY BUSINESS AND REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940 ARE KEPT AT THE OFFICE OF BARINGS.

Name of entity where books and records are kept:			
IRON MOUNTAIN			
Number and Street 1:		Number and Street 2:	
13379 JURUPA AVE			
City:	State:	Country:	ZIP+4/Postal Code:
FONTANA	California	United States	92337

If this address is a private residence, check this box: ☐

Telephone Number:	Facsimile number, if any:
1-800-934-3453	

This is (check one):

☐ one of your branch offices or affiliates.

☒ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.

CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
16028 MARQUARDT AVE

Number and Street 2:
OPM #001825

City: CERRITOS
State: California

Country: United States
ZIP+4/Postal Code: 90703

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453
Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
6935 FLANDERS DR

Number and Street 2:

City: SAN DIEGO
State: California

Country: United States
ZIP+4/Postal Code: 92121-2975

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453
Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
8661 KERNS ST

Number and Street 2:

City: SAN DIEGO
State: California

Country: United States
ZIP+4/Postal Code: 92154-6286

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453
Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 1070 KENNEDY ROAD		Number and Street 2:	
City: WINDSOR	State: Connecticut	Country: United States	ZIP+4/Postal Code: 06095

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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This is (check one):

☐ one of your branch offices or affiliates.

☒ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 200 COMMERCIAL ST		Number and Street 2:	
City: WATERTOWN	State: Connecticut	Country: United States	ZIP+4/Postal Code: 06795

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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This is (check one):

☐ one of your branch offices or affiliates.

☒ a third-party unaffiliated recordkeeper.

☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 13700 NW 2ND ST		Number and Street 2:	
City: SUNRISE	State: Florida	Country: United States	ZIP+4/Postal Code: 33325

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 2625 W ROOSEVELT RD		Number and Street 2:	
City: CHICAGO	State: Illinois	Country: United States	ZIP+4/Postal Code: 60608

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 2425 S HALSTED ST		Number and Street 2:	
City: CHICAGO	State: Illinois	Country: United States	ZIP+4/Postal Code: 60608

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
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- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 4175 CHANDLER DR CHICAGO DISTRICT O		Number and Street 2:	
City: HANOVER PARK	State: Illinois	Country: United States	ZIP+4/Postal Code: 60133

If this address is a private residence, check this box: ☐

Telephone Number:1-800-934-3453

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
1301 S ROCKWELL ST

City:
CHICAGO

State:
Illinois

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
60608

If this address is a private residence, check this box: ☐

Telephone Number:1-800-934-3453

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
7605 DORSEY RUN RD STE A

City:
JESSUP

State:
Maryland

Country:
United States

Number and Street 2:

ZIP+4/Postal Code:
20794

If this address is a private residence, check this box: ☐

Telephone Number:1-800-934-3453

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
5104 CHIN PAGE RD

Number and Street 2:

City:	State:	Country:	ZIP+4/Postal Code:
DURHAM	North Carolina	United States	27703

If this address is a private residence, check this box: ☐

Telephone Number:	Facsimile number, if any:
1-800-934-3453	

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:	Number and Street 2:		
2012 TW ALEXANDER DR			
City:	State:	Country:	ZIP+4/Postal Code:
DURHAM	North Carolina	United States	27703

If this address is a private residence, check this box: ☐

Telephone Number:	Facsimile number, if any:
1-800-934-3453	

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:	Number and Street 2:		
6100-P HARRIS TECHNOLOGY BLVD			
City:	State:	Country:	ZIP+4/Postal Code:
CHARLOTTE	North Carolina	United States	28269

If this address is a private residence, check this box: ☐

Telephone Number:	Facsimile number, if any:
1-800-934-3453	

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
6100 HARRIS TECH BLVD

City:
CHARLOTTE

State:
North Carolina

Number and Street 2:
STE A

Country:
United States

ZIP+4/Postal Code:
28269

If this address is a private residence, check this box: ☐

Telephone Number:
1-800-934-3453

Facsimile number, if any:

This is (check one):

- ☐ one of your branch offices or affiliates.
- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
218 W YARD RD

City:
FEURA BUSH

State:
New York

Number and Street 2:

Country:
United States

ZIP+4/Postal Code:
12067

If this address is a private residence, check this box: ☐

Telephone Number:
1-800-934-3453

Facsimile number, if any:

This is (check one):

- ☐ one of your branch offices or affiliates.
- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1:
37 HURDS CORNERS RD

City:
PAWLING

State:
New York

Number and Street 2:

Country:
United States

ZIP+4/Postal Code:
12564

If this address is a private residence, check this box: ☐

Telephone Number:
1-800-934-3453

Facsimile number, if any:

This is (check one):

- ☐ one of your branch offices or affiliates.
- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: ROUTE 9W SOUTH 10-15		Number and Street 2:	
City: PORT EWEN	State: New York	Country: United States	ZIP+4/Postal Code: 12466

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
-------------------------------------	---------------------------

This is (check one):

- ☐ one of your branch offices or affiliates.
- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: ROUTE 9W SOUTH 16		Number and Street 2:	
City: PORT EWEN	State: New York	Country: United States	ZIP+4/Postal Code: 12466

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
-------------------------------------	---------------------------

This is (check one):

- ☐ one of your branch offices or affiliates.
- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 15333 HEMPSTEAD RD		Number and Street 2:	
City: HOUSTON	State: Texas	Country: United States	ZIP+4/Postal Code: 77040

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
-------------------------------------	---------------------------

This is (check one):

- ☐ one of your branch offices or affiliates.

- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 2630 CENTER ST		Number and Street 2:	
City: HOUSTON	State: Texas	Country: United States	ZIP+4/Postal Code: 77007

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
-------------------------------------	---------------------------

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 1110 S 3800 W STE 300		Number and Street 2:	
City: SALT LAKE CITY	State: Utah	Country: United States	ZIP+4/Postal Code: 84104

If this address is a private residence, check this box: ☐

Telephone Number: 1-800-934-3453	Facsimile number, if any:
-------------------------------------	---------------------------

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

Name of entity where books and records are kept:
IRON MOUNTAIN

Number and Street 1: 1665 S 5350 W		Number and Street 2:	
City: SALT LAKE CITY	State: Utah	Country: United States	ZIP+4/Postal Code: 84104

If this address is a private residence, check this box: ☐

Telephone Number:
1-800-934-3453

Facsimile number, if any:

- This is (check one):
- ☐ one of your branch offices or affiliates.
 - ☒ a third-party unaffiliated recordkeeper.
 - ☐ other.

Briefly describe the books and records kept at this location.
CERTAIN BOOKS AND RECORDS REQUIRED BY SECTION 204 OF THE INVESTMENT ADVISERS ACT OF 1940.

SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

List the name and country, in English, of each *foreign financial regulatory authority* with which you are registered. You must complete a separate Schedule D Section 1.M. for each *foreign financial regulatory authority* with whom you are registered.

Name of Country/*Foreign Financial Regulatory Authority*:
Canada - Manitoba Securities Commission

Other:

Name of Country/*Foreign Financial Regulatory Authority*:
Canada - Quebec, Financial Markets Authority

Other:

Name of Country/*Foreign Financial Regulatory Authority*:
United Kingdom - Financial Conduct Authority

Other:

Item 2 SEC Registration / Reporting

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2.A. only if you are applying for SEC registration or submitting an *annual updating amendment* to your SEC registration. If you are filing an *umbrella registration*, the information in Item 2 should be provided for the *filing adviser* only.

A. To register (or remain registered) with the SEC, you must check **at least one** of the Items 2.A.(1) through 2.A.(12), below. If you are submitting an *annual updating amendment* to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). [Part 1A Instruction 2](#) provides information to help you determine whether you may affirmatively respond to each of these items.

You (the adviser):

- ☒ (1) are a **large advisory firm** that either:

(a) has regulatory assets under management of \$100 million (in U.S. dollars) or more; or

(b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent *annual updating amendment* and is registered with the SEC;
- ☐ (2) are a **mid-sized advisory firm** that has regulatory assets under management of \$25 million (in U.S. dollars) or more but less than \$100 million (in U.S. dollars) and you are either:

(a) not required to be registered as an adviser with the *state securities authority* of the state where you maintain your *principal office and place of business*; or

(b) not subject to examination by the *state securities authority* of the state where you maintain your *principal office and place of business*;

Click [HERE](#) for a list of states in which an investment adviser, if registered, would not be subject to examination by the state securities authority.
- ☐ (3) Reserved
- ☒ (4) have your *principal office and place of business* **outside the United States**;
- ☒ (5) are **an investment adviser (or subadviser) to an investment company** registered under the Investment Company Act of 1940;
- ☒ (6) are **an investment adviser to a company which has elected to be a business development company** pursuant to section 54 of the Investment Company Act of 1940 and has not withdrawn the election, and you have at least \$25 million of regulatory assets under management;

- ☐ (7) are a **pension consultant** with respect to assets of plans having an aggregate value of at least \$200,000,000 that qualifies for the exemption in rule 203A-2(a);
- ☐ (8) are a **related adviser** under rule 203A-2(b) that *controls*, is *controlled* by, or is under common *control* with, an investment adviser that is registered with the SEC, and your *principal office and place of business* is the same as the registered adviser;

If you check this box, complete [Section 2.A.\(8\) of Schedule D](#).
- ☐ (9) are an **adviser** relying on rule 203A-2(c) because you **expect to be eligible for SEC registration within 120 days**;

If you check this box, complete [Section 2.A.\(9\) of Schedule D](#).
- ☐ (10) are a **multi-state adviser** that is required to register in 15 or more states and is relying on rule 203A-2(d);

If you check this box, complete [Section 2.A.\(10\) of Schedule D](#).
- ☐ (11) are an **Internet adviser** relying on rule 203A-2(e);

If you check this box, complete [Section 2.A.\(11\) of Schedule D](#).
- ☐ (12) have **received an SEC order** exempting you from the prohibition against registration with the SEC;

If you check this box, complete [Section 2.A.\(12\) of Schedule D](#).
- ☐ (13) are **no longer eligible** to remain registered with the SEC.

State Securities Authority Notice Filings and State Reporting by Exempt Reporting Advisers

C. Under state laws, SEC-registered advisers may be required to provide to *state securities authorities* a copy of the Form ADV and any amendments they file with the SEC. These are called *notice filings*. In addition, *exempt reporting advisers* may be required to provide *state securities authorities* with a copy of reports and any amendments they file with the SEC. If this is an initial application or report, check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to direct your *notice filings* or reports to additional state(s), check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to your registration to stop your *notice filings* or reports from going to state(s) that currently receive them, uncheck the box(es) next to those state(s).

Jurisdictions

☐ AL	☐ IL	☐ NE	☐ SC
☐ AK	☐ IN	☐ NV	☐ SD
☐ AZ	☐ IA	☐ NH	☐ TN
☐ AR	☐ KS	☐ NJ	☐ TX
☐ CA	☐ KY	☐ NM	☐ UT
☐ CO	☐ LA	☐ NY	☐ VT
☐ CT	☐ ME	☐ NC	☐ VI
☐ DE	☐ MD	☐ ND	☐ VA
☐ DC	☐ MA	☐ OH	☐ WA
☐ FL	☐ MI	☐ OK	☐ WV
☐ GA	☐ MN	☐ OR	☐ WI
☐ GU	☐ MS	☐ PA	☐ WY
☐ HI	☐ MO	☐ PR	
☐ ID	☐ MT	☐ RI	

If you are amending your registration to stop your notice filings or reports from going to a state that currently receives them and you do not want to pay that state's notice filing or report filing fee for the coming year, your amendment must be filed before the end of the year (December 31).

SECTION 2.A.(8) Related Adviser

If you are relying on the exemption in rule 203A-2(b) from the prohibition on registration because you *control*, are *controlled* by, or are under common *control* with an investment adviser that is registered with the SEC and your *principal office and place of business* is the same as that of the registered adviser, provide the following information:

Name of Registered Investment Adviser

CRD Number of Registered Investment Adviser

SEC Number of Registered Investment Adviser

-

SECTION 2.A.(9) Investment Adviser Expecting to be Eligible for Commission Registration within 120 Days

If you are relying on rule 203A-2(c), the exemption from the prohibition on registration available to an adviser that expects to be eligible for SEC registration within 120 days, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the

required representations. You must make both of these representations:

☐ I am not registered or required to be registered with the SEC or a *state securities authority* and I have a reasonable expectation that I will be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective.

☐ I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section 203A(a) of the Advisers Act from registering with the SEC.

SECTION 2.A.(10) Multi-State Adviser

If you are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.

If you are applying for registration as an investment adviser with the SEC, you must make both of these representations:

☐ I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the *state securities authorities* in those states.

☐ I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the *state securities authorities* of those states.

If you are submitting your *annual updating amendment*, you must make this representation:

☐ Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15 states to register as an investment adviser with the *state securities authorities* in those states.

SECTION 2.A.(11) Internet Adviser

If you are relying on rule 203A-2(e), the Internet adviser exemption from the prohibition on registration, you are required to make a representation about your eligibility for SEC registration. By checking the appropriate box, you will be deemed to have made the required representation.

If you are applying for registration as an investment adviser with the SEC or changing your existing Item 2 response regarding your eligibility for SEC registration, you must make this representation:

☐ I will provide investment advice on an ongoing basis to more than one client exclusively through an *operational interactive website*.

If you are filing an annual updating amendment to your existing registration and are continuing to rely on the Internet adviser exemption for SEC registration, you must make this representation:

☐ I have provided and will continue to provide investment advice on an ongoing basis to more than one client exclusively through an *operational interactive website*.

SECTION 2.A.(12) SEC Exemptive Order

If you are relying upon an SEC *order* exempting you from the prohibition on registration, provide the following information:

Application Number:
803-

Date of *order*:

Item 3 Form of Organization

If you are filing an *umbrella registration*, the information in Item 3 should be provided for the *filing adviser* only.

- A. How are you organized?
- ☒ Corporation
- ☐ Sole Proprietorship
- ☐ Limited Liability Partnership (LLP)
- ☐ Partnership
- ☐ Limited Liability Company (LLC)
- ☐ Limited Partnership (LP)
- ☐ Other (specify):

If you are changing your response to this Item, see [Part 1A Instruction 4](#).

- B. In what month does your fiscal year end each year?
DECEMBER

- C. Under the laws of what state or country are you organized?
- | | |
|-------|----------------|
| State | Country |
| | United Kingdom |

If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or

Item 4 Successions

Yes

No

A.

Are you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., form of organization or state of incorporation)?

If "yes", complete Item 4.B. and [Section 4 of Schedule D](#).

B.

Date of Succession: (MM/DD/YYYY)

If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See [Part 1A Instruction 4](#).

SECTION 4 Successions

No Information Filed

Item 5 Information About Your Advisory Business - Employees, Clients, and Compensation

Responses to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. [Part 1A Instruction 5.a.](#) provides additional guidance to newly formed advisers for completing this Item 5.

Employees

If you are organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).

A.

Approximately how many *employees* do you have? Include full- and part-time *employees* but do not include any clerical workers.

504

B.

(1)

Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?

168

(2)

Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?

0

(3)

Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?

0

(4)

Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?

0

(5)

Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?

0

(6)

Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?

3

In your response to Item 5.B.(6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on your behalf.

Clients

If you responses to Items 5.C. and 5.D. do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

C.

(1)

To approximately how many *clients* for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?

0

(2)

Approximately what percentage of your *clients* are non-*United States persons*?

34%

D.

For purposes of this Item 5.D., the category "*individuals*" includes *trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.*

The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, do not answer (1)(d) or (3)(d) below.

Indicate the approximate number of your *clients* and amount of your total regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of *client*. If you have fewer than 5 *clients* in a particular category (other than (d), (e), and (f)) you may check Item 5.D.(2) rather than respond to Item 5.D.(1).

The aggregate amount of regulatory assets under management reported in Item 5.D.(3) should equal the total amount of regulatory assets under management reported in Item 5.F.(2)(c) below.

If a *client* fits into more than one category, select one category that most accurately represents the *client* to avoid double counting *clients* and assets. If you advise a registered investment company, business development company, or pooled investment vehicle, report those assets in categories (d), (e), and (f) as applicable.

Type of <i>Client</i>	(1) Number of <i>Client(s)</i>	(2) Fewer than 5 <i>Clients</i>	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than <i>high net worth individuals</i>)		☐	\$
(b) <i>High net worth individuals</i>		☐	\$
(c) Banking or thrift institutions	1	☒	\$ 1,799,812
(d) Investment companies	11		\$ 585,052,109
(e) Business development companies	3		\$ 553,809,686
(f) Pooled investment vehicles (other than investment companies and business development companies)	12		\$ 3,164,062,536
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	8	☐	\$ 766,231,012
(h) Charitable organizations		☐	\$
(i) State or municipal <i>government entities</i> (including government pension plans)		☐	\$
(j) Other investment advisers		☐	\$
(k) Insurance companies	11	☐	\$ 17,498,834,878
(l) Sovereign wealth funds and foreign official institutions		☐	\$
(m) Corporations or other businesses not listed above	1	☒	\$ 0
(n) Other:		☐	\$

Compensation Arrangements

E. You are compensated for your investment advisory services by (check all that apply):

- ☒ (1) A percentage of assets under your management
- ☐ (2) Hourly charges
- ☐ (3) Subscription fees (for a newsletter or periodical)
- ☒ (4) Fixed fees (other than subscription fees)
- ☐ (5) Commissions
- ☒ (6) *Performance-based fees*
- ☐ (7) Other (specify):

Item 5 Information About Your Advisory Business - Regulatory Assets Under Management

Regulatory Assets Under Management

			Yes	No
F. (1)	Do you provide continuous and regular supervisory or management services to securities portfolios?		☒	☐
(2)	If yes, what is the amount of your regulatory assets under management and total number of accounts?			
		U.S. Dollar Amount	Total Number of Accounts	
Discretionary:	(a)	\$ 22,569,790,033	(d)	47
Non-Discretionary:	(b)	\$ 0	(e)	0
Total:	(c)	\$ 22,569,790,033	(f)	47

Part 1A Instruction 5.b. explains how to calculate your regulatory assets under management. You must follow these instructions carefully when completing this Item.

(3)	What is the approximate amount of your total regulatory assets under management (reported in Item 5.F.(2)(c) above) attributable to <i>clients</i> who are non- <i>United States persons</i> ?
	\$ 2,124,826,995

Item 5 Information About Your Advisory Business - Advisory Activities

Advisory Activities

G. What type(s) of advisory services do you provide? Check all that apply.

- ☐ (1) Financial planning services

- ☒

(2)

Portfolio management for individuals and/or small businesses
- ☒

(3)

Portfolio management for investment companies (as well as "business development companies" that have made an election pursuant to section 54 of the Investment Company Act of 1940)
- ☒

(4)

Portfolio management for pooled investment vehicles (other than investment companies)
- ☒

(5)

Portfolio management for businesses (other than small businesses) or institutional *clients* (other than registered investment companies and other pooled investment vehicles)
- ☐

(6)

Pension consulting services
- ☒

(7)

Selection of other advisers (including *private fund* managers)
- ☐

(8)

Publication of periodicals or newsletters
- ☐

(9)

Security ratings or pricing services
- ☐

(10)

Market timing services
- ☒

(11)

Educational seminars/workshops
- ☐

(12)

Other(specify):

Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report the 811 or 814 number of the investment company or investment companies to which you provide advice in [Section 5.G.\(3\) of Schedule D](#).

H. If you provide financial planning services, to how many *clients* did you provide these services during your last fiscal year?

- ☒

0
- ☐

1 - 10
- ☐

11 - 25
- ☐

26 - 50
- ☐

51 - 100
- ☐

101 - 250
- ☐

251 - 500
- ☐

More than 500
- If more than 500, how many?
- (round to the nearest 500)

In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

I.

(1) Do you participate in a *wrap fee program*?

Yes

No

(2) If you participate in a *wrap fee program*, what is the amount of your regulatory assets under management attributable to acting as:

(a) *sponsor* to a *wrap fee program*

\$

(b) portfolio manager for a *wrap fee program*?

\$

(c) *sponsor* to and portfolio manager for the same *wrap fee program*?

\$

If you report an amount in Item 5.I.(2)(c), do not report that amount in Item 5.I.(2)(a) or Item 5.I.(2)(b).

If you are a portfolio manager for a wrap fee program, list the names of the programs, their sponsors and related information in [Section 5.I.\(2\) of Schedule D](#).

If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2).

J.

(1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?

Yes

No

(2) Do you report *client* assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management?

Yes

No

K.

Separately Managed Account *Clients*

Yes

No

(1) Do you have regulatory assets under management attributable to *clients* other than those listed in Item 5.D.(3)(d)-(f) (separately managed account *clients*)?

Yes

No

If yes, complete [Section 5.K.\(1\) of Schedule D](#).

(2) Do you engage in borrowing transactions on behalf of any of the separately managed account *clients* that you advise?

Yes

No

If yes, complete [Section 5.K.\(2\) of Schedule D](#).

(3) Do you engage in derivative transactions on behalf of any of the separately managed account *clients* that you advise?

Yes

No

If yes, complete [Section 5.K.\(2\) of Schedule D](#).

(4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management?

☒☐

If yes, complete [Section 5.K.\(3\) of Schedule D](#) for each custodian.

L. Marketing Activities

	Yes	No
(1) Do any of your <i>advertisements</i> include:		
(a) Performance results?	☒	☐
(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	☒	☐
(c) <i>Testimonials</i> (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	☐	☒
(d) <i>Endorsements</i> (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	☐	☒
(e) <i>Third-party ratings</i> ?	☒	☐
(2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of <i>testimonials</i> , <i>endorsements</i> , or <i>third-party ratings</i> ?	☒	☐
(3) Do any of your <i>advertisements</i> include <i>hypothetical performance</i> ?	☒	☐
(4) Do any of your <i>advertisements</i> include <i>predecessor performance</i> ?	☒	☐

SECTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies

If you check Item 5.G.(3), what is the SEC file number (811 or 814 number) of each of the registered investment companies and business development companies to which you act as an adviser pursuant to an advisory contract? You must complete a separate Schedule D Section 5.G.(3) for each registered investment company and business development company to which you act as an adviser.

SEC File Number
811 - 03153

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

Series ID	<i>Parallel Managed Account</i> Regulatory assets under management
S000029199	\$ 168,736,095

SEC File Number
811 - 08690

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

Series ID	<i>Parallel Managed Account</i> Regulatory assets under management
S000003779	\$ 528,724,937
S000003785	\$ 126,010,972
S000003791	\$ 839,119,965
S000003793	\$ 69,669,643

SEC File Number
811 - 21714

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

Series ID	<i>Parallel Managed Account</i> Regulatory assets under management
S000003833	\$ 43,616,369
S000003834	\$ 179,309,741
S000028329	\$ 173,839
S000028330	\$ 106,968,707

SEC File Number
811 - 22562

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number
811 - 23703

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

Series ID	<i>Parallel Managed Account</i> Regulatory assets under management
S000072762	\$ 249,905
S000072763	\$ 133,443,719
S000072764	\$ 8,118
S000072765	\$ 128,696,502

SEC File Number
814 - 00733

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SEC File Number
814 - 01348

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

SEC File Number
814 - 01397

Provide the regulatory assets under management of all *parallel managed accounts* related to a registered investment company (or series thereof) or business development company that you advise.

No Information Filed

SECTION 5.I.(2) *Wrap Fee Programs*

No Information Filed

SECTION 5.K.(1) *Separately Managed Accounts*

After subtracting the amounts reported in Item 5.D.(3)(d)-(f) from your total regulatory assets under management, indicate the approximate percentage of this remaining amount attributable to each of the following categories of assets. If the remaining amount is at least \$10 billion in regulatory assets under management, complete Question (a). If the remaining amount is less than \$10 billion in regulatory assets under management, complete Question (b).

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment* . Mid-year is the date six months before the end of year date. Each column should add up to 100% and numbers should be rounded to the nearest percent.

Investments in derivatives, registered investment companies, business development companies, and pooled investment vehicles should be reported in those categories. Do not report those investments based on related or underlying portfolio assets. Cash equivalents include bank deposits, certificates of deposit, bankers' acceptances and similar bank instruments.

Some assets could be classified into more than one category or require discretion about which category applies. You may use your own internal methodologies and the conventions of your service providers in determining how to categorize assets, so long as the methodologies or conventions are consistently applied and consistent with information you report internally and to current and prospective clients. However, you should not double count assets, and your responses must be consistent with any instructions or other guidance relating to this Section.

(a)	Asset Type	Mid-year	End of year
	(i) Exchange-Traded Equity Securities	6 %	4 %
	(ii) Non Exchange-Traded Equity Securities	0 %	0 %
	(iii) U.S. Government/Agency Bonds	0 %	0 %
	(iv) U.S. State and Local Bonds	0 %	0 %
	(v) <i>Sovereign Bonds</i>	1 %	1 %
	(vi) Investment Grade Corporate Bonds	48 %	49 %
	(vii) Non-Investment Grade Corporate Bonds	17 %	17 %
	(viii) Derivatives	0 %	0 %
	(ix) Securities Issued by Registered Investment Companies or Business Development Companies	0 %	0 %
	(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	0 %	0 %
	(xi) Cash and Cash Equivalents	0 %	1 %
	(xii) Other	28 %	28 %

Generally describe any assets included in "Other"
COLLATERALIZED MORTGAGE LOANS, BANK LOANS, AND PARTNERSHIPS.

(b)	Asset Type	End of year
	(i) Exchange-Traded Equity Securities	%
	(ii) Non Exchange-Traded Equity Securities	%

(iii) U.S. Government/Agency Bonds	%
(iv) U.S. State and Local Bonds	%
(v) Sovereign Bonds	%
(vi) Investment Grade Corporate Bonds	%
(vii) Non-Investment Grade Corporate Bonds	%
(viii) Derivatives	%
(ix) Securities Issued by Registered Investment Companies or Business Development Companies	%
(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	%
(xi) Cash and Cash Equivalents	%
(xii) Other	%

Generally describe any assets included in "Other"

SECTION 5.K.(2) Separately Managed Accounts - Use of Borrowingsand Derivatives

☐ No information is required to be reported in this Section 5.K.(2) per the instructions of this Section 5.K.(2)

If your regulatory assets under management attributable to separately managed accounts are at least \$10 billion, you should complete Question (a). If your regulatory assets under management attributable to separately managed accounts are at least \$500 million but less than \$10 billion, you should complete Question (b).

(a) In the table below, provide the following information regarding the separately managed accounts you advise. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise. End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of *borrowings* for the accounts included in column 1.

In column 3, provide aggregate *gross notional value* of derivatives divided by the aggregate regulatory assets under management of the accounts included in column 1 with respect to each category of derivatives specified in 3(a) through (f).

You may, but are not required to, complete the table with respect to any separately managed account with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

(i) Mid-Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings	(3) Derivative Exposures					
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative	(c) Credit Derivative	(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10 %	\$ 1,075,035,184	\$	0 %	0 %	3.6 %	0 %	0 %	0 %
10-149 %	\$	\$	0 %	0 %	0 %	0 %	0 %	0 %
150 % or more	\$ 7,441	\$	382,470 %	0 %	0 %	0 %	0 %	0 %

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(ii) End of Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings	(3) Derivative Exposures					
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative	(c) Credit Derivative	(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10 %	\$ 1,103,621,530	\$	0 %	0 %	3.5 %	0 %	0 %	0 %
10-149 %	\$	\$	0 %	0 %	0 %	0 %	0 %	0 %
150 % or more	\$ 2,350	\$	999,999.99 %	0 %	0 %	0 %	0 %	0 %

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(b)

In the table below, provide the following information regarding the separately managed accounts you advise as of the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of *borrowings* for the accounts included in column 1.

You may, but are not required to, complete the table with respect to any separately managed accounts with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings
Less than 10 %	\$ 0	\$ 0
10-149 %	\$ 0	\$ 0
150 % or more	\$ 0	\$ 0

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

SECTION 5.K.(3) Custodians for Separately Managed Accounts

Complete a separate Schedule D Section 5.K.(3) for each custodian that holds ten percent or more of your aggregate separately managed account regulatory assets under management.

(a)

Legal name of custodian:
CITIGROUP GLOBAL MARKETS INC.

(b)

Primary business name of custodian:
CITIGROUP GLOBAL MARKETS INC.

(c)

The location(s) of the custodian's office(s) responsible for *custody* of the assets :

City:
NEW YORK

State:
New York

Country:
United States

(d)

Is the custodian a *related person* of your firm?

Yes

No

(e)

If the custodian is a broker-dealer, provide its SEC registration number (if any)
8 - 8177

(f)

If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)
E57ODZWZ7FF32TWEFA76

(g)

What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?
\$ 11,053,659,685

Item 6 Other Business Activities

In this Item, we request information about your firm's other business activities.

A.

You are actively engaged in business as a (check all that apply):

☐

(1)

broker-dealer (registered or unregistered)

☐

(2)

registered representative of a broker-dealer

☒

(3)

commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

☐

(4)

futures commission merchant

☐

(5)

real estate broker, dealer, or agent

☐

(6)

insurance broker or agent

☐

(7)

bank (including a separately identifiable department or division of a bank)

☐

(8)

trust company

☐

(9)

registered municipal advisor

☐

(10)

registered security-based swap dealer

☐

(11)

major security-based swap participant

- ☐ (12) accountant or accounting firm
- ☐ (13) lawyer or law firm
- ☐ (14) other financial product salesperson (specify):

If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete [Section 6.A. of Schedule D](#).

	Yes	No
1. The company has a policy on environmental protection.		
2. The company has a policy on social responsibility.		
3. The company has a policy on ethical behavior.		
4. The company has a policy on employee safety.		
5. The company has a policy on customer privacy.		
6. The company has a policy on financial transparency.		
7. The company has a policy on community engagement.		
8. The company has a policy on sustainable sourcing.		
9. The company has a policy on waste management.		
10. The company has a policy on energy conservation.		
11. The company has a policy on water conservation.		
12. The company has a policy on carbon footprint reduction.		
13. The company has a policy on renewable energy usage.		
14. The company has a policy on green building design.		
15. The company has a policy on eco-friendly packaging.		
16. The company has a policy on responsible marketing.		
17. The company has a policy on fair labor practices.		
18. The company has a policy on diversity and inclusion.		
19. The company has a policy on equal opportunity.		
20. The company has a policy on anti-discrimination.		
21. The company has a policy on harassment prevention.		
22. The company has a policy on whistleblower protection.		
23. The company has a policy on conflict resolution.		
24. The company has a policy on dispute resolution.		
25. The company has a policy on arbitration.		
26. The company has a policy on mediation.		
27. The company has a policy on alternative dispute resolution.		
28. The company has a policy on legal compliance.		
29. The company has a policy on regulatory adherence.		
30. The company has a policy on industry standards.		
31. The company has a policy on international trade laws.		
32. The company has a policy on export controls.		
33. The company has a policy on import regulations.		
34. The company has a policy on customs procedures.		
35. The company has a policy on trade agreements.		
36. The company has a policy on intellectual property rights.		
37. The company has a policy on patent law.		
38. The company has a policy on trademark law.		
39. The company has a policy on copyright law.		
40. The company has a policy on contract law.		
41. The company has a policy on tort law.		
42. The company has a policy on criminal law.		
43. The company has a policy on civil law.		
44. The company has a policy on administrative law.		
45. The company has a policy on constitutional law.		
46. The company has a policy on international law.		
47. The company has a policy on maritime law.		
48. The company has a policy on aviation law.		
49. The company has a policy on space law.		
50. The company has a policy on cyber law.		
51. The company has a policy on digital privacy.		
52. The company has a policy on data security.		
53. The company has a policy on information technology.		
54. The company has a policy on software development.		
55. The company has a policy on hardware manufacturing.		
56. The company has a policy on network infrastructure.		
57. The company has a policy on cloud computing.		
58. The company has a policy on artificial intelligence.		
59. The company has a policy on machine learning.		
60. The company has a policy on robotics.		
61. The company has a policy on automation.		
62. The company has a policy on industrial design.		
63. The company has a policy on product development.		
64. The company has a policy on quality control.		
65. The company has a policy on testing and validation.		
66. The company has a policy on certification.		
67. The company has a policy on accreditation.		
68. The company has a policy on ISO standards.		
69. The company has a policy on CE marking.		
70. The company has a policy on RoHS compliance.		
71. The company has a policy on REACH regulation.		
72. The company has a policy on WEEE directive.		
73. The company has a policy on ELV directive.		
74. The company has a policy on LVD directive.		
75. The company has a policy on EMC directive.		
76. The company has a policy on RED directive.		
77. The company has a policy on MDD directive.		
78. The company has a policy on IECEx certification.		
79. The company has a policy on ATEX certification.		
80. The company has a policy on UL certification.		
81. The company has a policy on CSA certification.		
82. The company has a policy on TUV certification.		
83. The company has a policy on BSI certification.		
84. The company has a policy on DNV certification.		
85. The company has a policy on Lloyd's Register certification.		
86. The company has a policy on Bureau Veritas certification.		
87. The company has a policy on SGS certification.		
88. The company has a policy on Intertek certification.		
89. The company has a policy on TÜV certification.		
90. The company has a policy on VDE certification.		
91. The company has a policy on CE mark.		
92. The company has a policy on RoHS mark.		
93. The company has a policy on REACH mark.		
94. The company has a policy on WEEE mark.		
95. The company has a policy on ELV mark.		
96. The company has a policy on LVD mark.		
97. The company has a policy on EMC mark.		
98. The company has a policy on RED mark.		
99. The company has a policy on MDD mark.		
100. The company has a policy on IECEx mark.		
101. The company has a policy on ATEX mark.		
102. The company has a policy on UL mark.		
103. The company has a policy on CSA mark.		
104. The company has a policy on TUV mark.		
105. The company has a policy on BSI mark.		
106. The company has a policy on DNV mark.		
107. The company has a policy on Lloyd's Register mark.		
108. The company has a policy on Bureau Veritas mark.		
109. The company has a policy on SGS mark.		
110. The company has a policy on Intertek mark.		
111. The company has a policy on TÜV mark.		
112. The company has a policy on VDE mark.		
113. The company has a policy on CE mark.		
114. The company has a policy on RoHS mark.		
115. The company has a policy on REACH mark.		
116. The company has a policy on WEEE mark.		
117. The company has a policy on ELV mark.		
118. The company has a policy on LVD mark.		
119. The company has a policy on EMC mark.		
120. The company has a policy on RED mark.		
121. The company has a policy on MDD mark.		
122. The company has a policy on IECEx mark.		
123. The company has a policy on ATEX mark.		
124. The company has a policy on UL mark.		
125. The company has a policy on CSA mark.		
126. The company has a policy on TUV mark.		
127. The company has a policy on BSI mark.		
128. The company has a policy on DNV mark.		
129. The company has a policy on Lloyd's Register mark.		
130. The company has a policy on Bureau Veritas mark.		
131. The company has a policy on SGS mark.		
132. The company has a policy on Intertek mark.		
133. The company has		

- | | | | | |
|----|-----|---|-----------------------|----------------------------------|
| B. | (1) | Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)? | ☐ | ☒ |
| | (2) | If yes, is this other business your primary business? | ☐ | ☐ |

If "yes," describe this other business on [Section 6.B.\(2\) of Schedule D](#), and if you engage in this business under a different name, provide that name.

[illegible]

- (3) Do you sell products or provide services other than investment advice to your advisory *clients*? ☐ Yes ☐ No

If "yes," describe this other business on [Section 6.B.\(3\) of Schedule D](#), and if you engage in this business under a different name, provide that name.

(3) Do you sell products or provide services other than investment advice to your advisory *clients*? ☒ ☐

SECTION 6.A. Names of Your Other Businesses

No Information Filed

SECTION 6.B.(2) Description of Primary Business

Describe your primary business (not your investment advisory business):

If you engage in that business under a different name, provide that name:

SECTION 6.B.(3) Description of Other Products and Services

Describe other products or services you sell to your *client*. You may omit products and services that you listed in Section 6.B.(2) above.

PARTICIPATE IN CORPORATE FINANCE TRANSACTIONS FOCUSED ON LEVERAGED BUY-OUTS, CORPORATE ACQUISITIONS AND RECAPITALIZATIONS, WITH A FOCUS ON MIDDLE-MARKET COMPANIES; ADVISORY SERVICES FOR INSTITUTIONAL CLIENTS IN GLOBAL REAL ESTATE DEBT/EQUITY MARKETS

If you engage in that business under a different name, provide that name:

Item 7 Financial Industry Affiliations

In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your *clients*.

- A. This part of Item 7 requires you to provide information about you and your *related persons*, including foreign affiliates. Your *related persons* are all of your *advisory affiliates* and any *person* that is under common *control* with you.

You have a *related person* that is a (check all that apply):

- ☒ (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)
 - ☒ (2) other investment adviser (including financial planners)
 - ☐ (3) registered municipal advisor
 - ☐ (4) registered security-based swap dealer
 - ☐ (5) major security-based swap participant
 - ☒ (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
 - ☐ (7) futures commission merchant
 - ☒ (8) banking or thrift institution
 - ☒ (9) trust company
 - ☒ (10) accountant or accounting firm
 - ☒ (11) lawyer or law firm
 - ☒ (12) insurance company or agency
 - ☐ (13) pension consultant
 - ☒ (14) real estate broker or dealer
 - ☒ (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
 - ☒ (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).

Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.

For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete [Section 7.A. of Schedule D](#).

You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.

You must complete [Section 7.A. of Schedule D](#) for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

SECTION 7.A. Financial Industry Affiliations

Complete a separate Schedule D Section 7.A. for each *related person* listed in Item 7.A.

1. Legal Name of *Related Person*:
BARING FUND MANAGERS LIMITED

2. Primary Business Name of *Related Person*:
BARING FUND MANAGERS LIMITED

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4. *Related Person's*
(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)
(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
(b) ☐ other investment adviser (including financial planners)
(c) ☐ registered municipal advisor
(d) ☐ registered security-based swap dealer
(e) ☐ major security-based swap participant
(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g) ☐ futures commission merchant
(h) ☐ banking or thrift institution
(i) ☐ trust company
(j) ☐ accountant or accounting firm
(k) ☐ lawyer or law firm
(l) ☐ insurance company or agency
(m) ☐ pension consultant
(n) ☐ real estate broker or dealer
(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?
(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:
Number and Street 1: Number and Street 2:
City: State: Country: ZIP+4/Postal Code:
If this address is a private residence, check this box: ☐

9. (a) If the *related person* is an investment adviser, is it exempt from registration?
(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?
(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority

United Kingdom - Financial Conduct Authority	
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	
12. Do you and the <i>related person</i> share the same physical location?	
1. Legal Name of <i>Related Person</i> : BARINGS AUSTRALIA PROPERTY PTY LTD	
2. Primary Business Name of <i>Related Person</i> : BARINGS AUSTRALIA PROPERTY PTY LTD	
3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - or Other	
4. <i>Related Person's</i> (a) CRD Number (if any): (b) CIK Number(s) (if any): No Information Filed	
5. <i>Related Person</i> is: (check all that apply) (a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer (b) ☒ other investment adviser (including financial planners) (c) ☐ registered municipal advisor (d) ☐ registered security-based swap dealer (e) ☐ major security-based swap participant (f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) ☐ futures commission merchant (h) ☐ banking or thrift institution (i) ☐ trust company (j) ☐ accountant or accounting firm (k) ☐ lawyer or law firm (l) ☐ insurance company or agency (m) ☐ pension consultant (n) ☐ real estate broker or dealer (o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	
6. Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?	
7. Are you and the <i>related person</i> under common <i>control</i> ?	
8. (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	
(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets: Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: ☐	
9. (a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	
(b) If the answer is yes, under what exemption?	
10. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	
(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.	
Name of Country/English Name of Foreign Financial Regulatory Authority	
Australia - Australian Securities and Investments Commission	
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	
12. Do you and the <i>related person</i> share the same physical location?	

1. Legal Name of *Related Person*:
MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY

2. Primary Business Name of *Related Person*:
MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4. *Related Person's*

(a) *CRD* Number (if any):

(b) CIK Number(s) (if any):

CIK Number
225602
1306394

5. *Related Person* is: (check all that apply)

- (a)

☐

broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b)

☐

other investment adviser (including financial planners)
- (c)

☐

registered municipal advisor
- (d)

☐

registered security-based swap dealer
- (e)

☐

major security-based swap participant
- (f)

☒

commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g)

☐

futures commission merchant
- (h)

☐

banking or thrift institution
- (i)

☐

trust company
- (j)

☐

accountant or accounting firm
- (k)

☐

lawyer or law firm
- (l)

☒

insurance company or agency
- (m)

☐

pension consultant
- (n)

☐

real estate broker or dealer
- (o)

☐

sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p)

☐

sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

☒ ☐

7. Are you and the *related person* under common *control*?

☒ ☐

8. (a)

Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

☐ ☒

(b)

If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

☐ ☐

(c)

If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

☐ ☐

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?

☒ ☐

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

Name of Country/English Name of <i>Foreign Financial Regulatory Authority</i>
Other - HONG KONG - OFFICE OF THE COMMISSIONER OF INSURANCE - HONG KONG

11. Do you and the *related person* share any *supervised persons*?

☐ ☒

12. Do you and the *related person* share the same physical location?

☐ ☒

1.

Legal Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS HEALTHCARE FUND II SIDECAR-C GP, LLC

2.

Primary Business Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS HEALTHCARE FUND II SIDECAR-C GP, LLC

3.

Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4.

Related Person's

(a)

CRD Number (if any):

(b)

CIK Number(s) (if any):

No Information Filed

5.

Related Person is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☐ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☐ insurance company or agency

(m) ☐ pension consultant

(n) ☐ real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6.

Do you *control* or are you *controlled* by the *related person*?

Yes

No

7.

Are you and the *related person* under common *control*?

Yes

No

8.

(a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Yes

No

9.

(a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

Yes

No

10.

(a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

Yes

No

11.

Do you and the *related person* share any *supervised persons*?

Yes

No

12.

Do you and the *related person* share the same physical location?

Yes

No

1.

Legal Name of *Related Person*:

MML BAY STATE LIFE INSURANCE COMPANY

2.

Primary Business Name of *Related Person*:

MML BAY STATE LIFE INSURANCE COMPANY

3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. Related Person's

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

CIK Number
924777

5. Related Person is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☒ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☐ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☒ insurance company or agency

(m) ☐ pension consultant

(n) ☐ real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes

No

6. Do you control or are you controlled by the related person?

7. Are you and the related person under common control?

8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Yes

No

9. (a) If the related person is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the related person registered with a foreign financial regulatory authority ?

(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.

No Information Filed

11. Do you and the related person share any supervised persons?

12. Do you and the related person share the same physical location?

1. Legal Name of Related Person:

JEFFERIES FINANCE LLC

2. Primary Business Name of Related Person:

JEFFERIES FINANCE LLC

3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

801 - 74480

or

Other

4. Related Person's

(a) CRD Number (if any):

162264

(b) CIK Number(s) (if any):

CIK Number

1898590

5. Related Person is: (check all that apply)

(a) ☐

broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☒

other investment adviser (including financial planners)

(c) ☐

registered municipal advisor

(d) ☐

registered security-based swap dealer

(e) ☐

major security-based swap participant

(f) ☐

commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐

futures commission merchant

(h) ☐

banking or thrift institution

(i) ☐

trust company

(j) ☐

accountant or accounting firm

(k) ☐

lawyer or law firm

(l) ☐

insurance company or agency

(m) ☐

pension consultant

(n) ☐

real estate broker or dealer

(o) ☒

sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☒

sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you control or are you controlled by the related person?

Yes

No

7. Are you and the related person under common control?

Yes

No

8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?

Yes

No

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?

Yes

No

(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

9. (a) If the related person is an investment adviser, is it exempt from registration?

Yes

No

(b) If the answer is yes, under what exemption?

Yes

No

10. (a) Is the related person registered with a foreign financial regulatory authority ?

Yes

No

(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.

No Information Filed

11. Do you and the related person share any supervised persons?

Yes

No

12. Do you and the related person share the same physical location?

Yes

No

1. Legal Name of Related Person:

BARINGS SWITZERLAND SARL

2. Primary Business Name of Related Person:

BARINGS SWITZERLAND SARL

3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. Related Person's

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☒ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☐ insurance company or agency

(m) ☐ pension consultant

(n) ☐ real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*?

Yes

No

7. Are you and the *related person* under common *control*?

Yes

No

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

Yes

No

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

Yes

No

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

Yes

No

(b) If the answer is yes, under what exemption?

Yes

No

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?

Yes

No

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

Yes

No

12. Do you and the *related person* share the same physical location?

Yes

No

1. Legal Name of *Related Person*:

BARINGS AUSTRALIA ASSET MANAGEMENT PTY LTD

2. Primary Business Name of *Related Person*:

BARINGS AUSTRALIA ASSET MANAGEMENT PTY LTD

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☒ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

- Yes No**



○ ○

If this address is a private residence, check this box: ☐

Yes No



C.M. LIFE INSURANCE COMPANY

Primary Business Name of *Related Party*
C.M. LIFE INSURANCE COMPANY

—

Other

(a) *CRD* Number (if any):

No Information Filed

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

(c)  registered municipal advisor

(d)  registered security-based swap dealer

(e) major security-based swap participant

(f) ☒ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) futures commission merchant

(h) banking or thrift institution

(i) trust company

- Yes No**

Number and Street 2:

State:

ZIP+4/Postal Code:

Yes No



• •



BARINGS OVERSEAS INVESTMENT FUND MANAGEMENT (SHANGHAI) LIMITED

BARINGS OVERSEAS INVESTMENT FUND MANAGEMENT (SHANGHAI) LIMITED

—

Other

(a) *CRD* Number (if any):

No Information Filed

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(c) ☐ registered municipal advisor

(d) registered security-based swap dealer

(e) major security-based swap participant

(f) ☐ commodity pool operator or commodity

(g) futures commission merchant

(h) ☐ banking or thrift institution

(i) trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☐ insurance company or agency

(m)  pension consultant

(n) real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

6.

Do you *control* or are you *controlled* by the *related person*?

7.

Are you and the *related person* under common *control*?

8.

(a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

City:

State:

If this address is a private residence, check this box: ☐

Number and Street 2:

Country:

ZIP+4/Postal Code:

Yes

No

9.

(a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10.

(a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority
Canada - Alberta Securities Commission
Canada - British Columbia Securities Commission
Canada - Manitoba Securities Commission
Canada - Nova Scotia Securities Commission
Canada - Ontario Securities Commission
Canada - Prince Edward Island, Securities Office
Canada - Quebec, Financial Markets Authority
Canada - Saskatchewan Financial Services Commission
Other - CANADA - NEW BRUNSWICK FINANCIAL AND CONSUMER SERVICES COMMISSION

11.

Do you and the *related person* share any *supervised persons*?

12.

Do you and the *related person* share the same physical location?

1.

Legal Name of *Related Person*:

BARINGS LLC

2.

Primary Business Name of *Related Person*:

BARINGS LLC

3.

Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

801 - 241

or

Other

4.

Related Person's

(a) *CRD* Number (if any):

106006

(b) CIK Number(s) (if any):

CIK Number
9015

5.

Related Person is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☒ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☒ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☐ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

- Yes No**



Number and Street 2:

State:

ZIP+4/Postal Code:

Yes No



Do you and the *related person* share any *supervised persons*? 6 0



BARING ASSET MANAGEMENT LIMITED

BARINGS

802 - 114253

Other

(a) CRD Number (if any):

299118

CIK Number

1606779

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

☒

- (d) ☐ registered security-based swap dealer
- (e) ☐ major security-based swap participant
- (f) ☒ commodity pool operator or commodity
- (g) ☐ futures commission merchant
- (h) ☐ banking or thrift institution
- (i) ☐ trust company
- (j) ☐ accountant or accounting firm
- (k) ☐ lawyer or law firm
- (l) ☐ insurance company or agency
- (m) ☐ pension consultant
- (n) ☐ real estate broker or dealer
- (o) ☒ sponsor or syndicator of limited partne
- (p) ☒ sponsor, general partner, managing m



Number and Street 2:

State:

ZIP+4/Postal Code:

Yes No



Name of Country/English Name of <i>Foreign Financial Regulatory Authority</i>
China, People's Republic of - China Securities Regulatory Commission
Dubai - Dubai Financial Services Authority
Other - ABU DHABI - FINANCIAL SERVICES REGULATORY AUTHORITY (FSRA)
United Kingdom - Financial Conduct Authority

BARINGS SINGAPORE PTE. LTD

BARINGS SINGAPORE PTE. LTD

-
or
Other

(a) CRD Number (if any):

No Information Filed

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

- Yes No**

If this address is a private residence, check this box: ☐

Yes No



Singapore - Monetary Authority of Singapore



BARING INTERNATIONAL FUND MANAGERS (IRELAND) LIMITED

BARING INTERNATIONAL FUND MANAGERS (IRELAND) LIMITED

802 - 114742

Other

(a) *CRD* Number (if any):

300157

No Information Filed

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(c) ☐ registered municipal advisor

(d) registered security-based swap dealer

(e) major security-based swap participant

(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

- Yes No



e ○ ○

Yes No





(n) real estate broker or dealer

- | 6. | Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ? | Yes ☐ | No ☒ | | | | | |
|--|--|--------------------------------------|-------------------------------------|--|--|---|---------------------------|-------------------------------------|
| 7. | Are you and the <i>related person</i> under common <i>control</i> ? | Yes ☒ | No ☐ | | | | | |
| 8. | <div style="margin-bottom: 10px;">(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i>?</div> <div style="margin-bottom: 10px;">(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i>?</div> <div style="margin-bottom: 10px;">(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets:</div> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> Number and Street 1:
 City: _____ State: _____
 If this address is a private residence, check this box: ☐ </div> <div style="width: 45%;"> Number and Street 2:
 Country: _____ ZIP+4/Postal Code: _____ </div> </div> | | | Yes ☐ | No ☒ | | | |
| 9. | <div style="margin-bottom: 10px;">(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?</div> <div style="margin-bottom: 10px;">(b) If the answer is yes, under what exemption?</div> | | | Yes ☐ | No ☒ | | | |
| 10. | <div style="margin-bottom: 10px;">(a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?</div> <div style="margin-bottom: 10px;">(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.</div> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #f2f2f2;"> <th style="padding: 5px;">Name of Country/English Name of Foreign Financial Regulatory Authority</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">China, People's Republic of - China Securities Regulatory Commission</td> </tr> <tr> <td style="padding: 5px;">Other - ASSET MANAGEMENT ASSOCIATION OF CHINA</td> </tr> </tbody> </table> | | | Name of Country/English Name of Foreign Financial Regulatory Authority | China, People's Republic of - China Securities Regulatory Commission | Other - ASSET MANAGEMENT ASSOCIATION OF CHINA | Yes ☐ | No ☒ |
| Name of Country/English Name of Foreign Financial Regulatory Authority | | | | | | | | |
| China, People's Republic of - China Securities Regulatory Commission | | | | | | | | |
| Other - ASSET MANAGEMENT ASSOCIATION OF CHINA | | | | | | | | |
| 11. | Do you and the <i>related person</i> share any <i>supervised persons</i> ? | Yes ☐ | No ☒ | | | | | |
| 12. | Do you and the <i>related person</i> share the same physical location? | Yes ☐ | No ☒ | | | | | |

1. Legal Name of <i>Related Person</i> :	BARING ASSET MANAGEMENT (ASIA) LIMITED
2. Primary Business Name of <i>Related Person</i> :	BARING ASSET MANAGEMENT (ASIA) LIMITED
3. <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	801 - 56176
	or
	Other
4. <i>Related Person's</i>	
(a) CRD Number (if any):	108513
(b) CIK Number(s) (if any):	
	CIK Number
	1624302
5. <i>Related Person is:</i> (check all that apply)	
(a) ☐	broker-dealer, municipal securities dealer, or government securities broker or dealer
(b) ☒	other investment adviser (including financial planners)
(c) ☐	registered municipal advisor
(d) ☐	registered security-based swap dealer
(e) ☐	major security-based swap participant
(f) ☐	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g) ☐	futures commission merchant
(h) ☐	banking or thrift institution
(i) ☐	trust company
(j) ☐	accountant or accounting firm
(k) ☐	lawyer or law firm
(l) ☐	insurance company or agency
(m) ☐	pension consultant
(n) ☐	real estate broker or dealer
(o) ☐	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
(p) ☒	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6.

Do you *control* or are you *controlled* by the *related person*?

7.

Are you and the *related person* under common *control*?

8.

(a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

City:

State:

If this address is a private residence, check this box: ☐

Number and Street 2:

Country:

ZIP+4/Postal Code:

9.

(a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

FOREIGN PRIVATE ADVISER EXEMPTION - SECTION 203(B)(3) OF THE INVESTMENT ADVISERS ACT

10.

(a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

Name of Country/English Name of <i>Foreign Financial Regulatory Authority</i>
Hong Kong - Securities and Futures Commission
South Korea - Financial Supervisory Commission / Financial Supervisory Service

11.

Do you and the *related person* share any *supervised persons*?

12.

Do you and the *related person* share the same physical location?

1.

Legal Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS CREDIT OPPORTUNITIES FUND GP, LLC

2.

Primary Business Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS CREDIT OPPORTUNITIES FUND GP, LLC

3.

Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4.

Related Person's

(a) *CRD* Number (if any):

(b) *CIK* Number(s) (if any):

No Information Filed

5.

Related Person is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☐ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☐ insurance company or agency

(m) ☐ pension consultant

(n) ☐ real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6.

Do you *control* or are you *controlled* by the *related person*?

1.

Legal Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS CREDIT OPPORTUNITIES FUND GP, LLC

2.

Primary Business Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS CREDIT OPPORTUNITIES FUND GP, LLC

3.

Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4.

Related Person's

(a) *CRD* Number (if any):

(b) *CIK* Number(s) (if any):

No Information Filed

5.

Related Person is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☐ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☐ insurance company or agency

(m) ☐ pension consultant

(n) ☐ real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6.

Do you *control* or are you *controlled* by the *related person*?

7.

Are you and the *related person* under common *control*?

8.

(a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

City:

State:

Number and Street 2:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Yes

No

9.

(a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10.

(a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11.

Do you and the *related person* share any *supervised persons*?

12.

Do you and the *related person* share the same physical location?

1.

Legal Name of *Related Person*:
ARTEMIS REAL ESTATE PARTNERS FUND IV GP, LLC

2.

Primary Business Name of *Related Person*:
ARTEMIS REAL ESTATE PARTNERS FUND IV GP, LLC

3.

Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4.

Related Person's

(a) *CRD* Number (if any):

(b) *CIK* Number(s) (if any):

No Information Filed

5.

Related Person is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☐ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☐ insurance company or agency

(m) ☐ pension consultant

(n) ☐ real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes

No

6.

Do you *control* or are you *controlled* by the *related person*?

7.

Are you and the *related person* under common *control*?

8.

(a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(b)

If the answer is yes, under what exemption?

10.

(a)

Is the *related person* registered with a *foreign financial regulatory authority* ?

(b)

If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11.

Do you and the *related person* share any *supervised persons*?

12.

Do you and the *related person* share the same physical location?

1.

Legal Name of *Related Person*:
GREAT FALLS ADVISORS, LLC

2.

Primary Business Name of *Related Person*:
GREAT FALLS ADVISORS, LLC

3.

Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4.

Related Person's
(a) *CRD* Number (if any):

(b) *CIK* Number(s) (if any):

No Information Filed

5.

Related Person is: (check all that apply)
(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
(b) ☐ other investment adviser (including financial planners)
(c) ☐ registered municipal advisor
(d) ☐ registered security-based swap dealer
(e) ☐ major security-based swap participant
(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g) ☐ futures commission merchant
(h) ☐ banking or thrift institution
(i) ☐ trust company
(j) ☒ accountant or accounting firm
(k) ☐ lawyer or law firm
(l) ☐ insurance company or agency
(m) ☐ pension consultant
(n) ☐ real estate broker or dealer
(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
(p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes

No

6.

Do you *control* or are you *controlled* by the *related person*?

7.

Are you and the *related person* under common *control*?

8.

(a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:
Number and Street 1: Number and Street 2:
City: State: Country: ZIP+4/Postal Code:
If this address is a private residence, check this box: ☐

Yes

No

9.

(a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10.

(a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11.

Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

☐

☒

1. Legal Name of *Related Person*:

BARING SICE (TAIWAN) LIMITED

2. Primary Business Name of *Related Person*:

BARING SICE (TAIWAN) LIMITED

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) *CRD* Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)
- (a) ☐

broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b) ☒

other investment adviser (including financial planners)
- (c) ☐

registered municipal advisor
- (d) ☐

registered security-based swap dealer
- (e) ☐

major security-based swap participant
- (f) ☐

commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g) ☐

futures commission merchant
- (h) ☐

banking or thrift institution
- (i) ☐

trust company
- (j) ☐

accountant or accounting firm
- (k) ☐

lawyer or law firm
- (l) ☐

insurance company or agency
- (m) ☐

pension consultant
- (n) ☐

real estate broker or dealer
- (o) ☐

sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p) ☒

sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*?

☐

☒

7. Are you and the *related person* under common *control*?

☒

☐

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

☐

☒

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

☐

☐

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1: Number and Street 2:

City: State: Country: ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

☒

☐

(b) If the answer is yes, under what exemption?

FOREIGN PRIVATE ADVISER EXEMPTION - SECTION 203(B)(3) OF THE INVESTMENT ADVISERS ACT

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?

☒

☐

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority
Other - TAIWAN - SECURITIES INVESTMENT TRUST AND CONSULTING ASSOCIATION
Taiwan - Financial Supervisory Commission

11. Do you and the *related person* share any *supervised persons*?

☐

☒

12. Do you and the *related person* share the same physical location?

☐

☒

GRYPHON CAPITAL INVESTMENTS PTY LTD

3.

Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4.

Related Person's

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5.

Related Person is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☒ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☐ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☐ insurance company or agency

(m) ☐ pension consultant

(n) ☐ real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6.

Do you control or are you controlled by the related person?

Yes

No

7.

Are you and the related person under common control?

Yes

No

8.

(a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:

Number and Street 1:

City:

State:

Number and Street 2:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

9.

(a) If the related person is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

Yes

No

10.

(a) Is the related person registered with a foreign financial regulatory authority ?

(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority

Australia - Australian Securities and Investments Commission

11.

Do you and the related person share any supervised persons?

Yes

No

12.

Do you and the related person share the same physical location?

Yes

No

1.

Legal Name of Related Person:

MASSMUTUAL PRIVATE WEALTH & TRUST, FSB

2.

Primary Business Name of Related Person:

MASSMUTUAL PRIVATE WEALTH & TRUST, FSB

3.

Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. Related Person's

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

CIK Number
1103653

5. Related Person is: (check all that apply)

(a)

☐

broker-dealer, municipal securities dealer, or government securities broker or dealer

(b)

☐

other investment adviser (including financial planners)

(c)

☐

registered municipal advisor

(d)

☐

registered security-based swap dealer

(e)

☐

major security-based swap participant

(f)

☐

commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g)

☐

futures commission merchant

(h)

☒

banking or thrift institution

(i)

☒

trust company

(j)

☐

accountant or accounting firm

(k)

☐

lawyer or law firm

(l)

☐

insurance company or agency

(m)

☐

pension consultant

(n)

☐

real estate broker or dealer

(o)

☐

sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p)

☐

sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you control or are you controlled by the related person?

Yes

No

7. Are you and the related person under common control?

Yes

No

8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?

Yes

No

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?

Yes

No

(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

9. (a) If the related person is an investment adviser, is it exempt from registration?

Yes

No

(b) If the answer is yes, under what exemption?

10. (a) Is the related person registered with a foreign financial regulatory authority ?

Yes

No

(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.

No Information Filed

11. Do you and the related person share any supervised persons?

Yes

No

12. Do you and the related person share the same physical location?

Yes

No

1. Legal Name of Related Person:

BARINGS AUSTRALIA PTY LTD

2. Primary Business Name of Related Person:

BARINGS AUSTRALIA PTY LTD

3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

802 - 80559

or

Other

4. Related Person's

(a) CRD Number (if any):

169697

(b)CIK Number(s) (if any):

No Information Filed

5. Related Person is: (check all that apply)

(a)☐broker-dealer, municipal securities dealer, or government securities broker or dealer

(b)☒other investment adviser (including financial planners)

(c)☐registered municipal advisor

(d)☐registered security-based swap dealer

(e)☐major security-based swap participant

(f)☐commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g)☐futures commission merchant

(h)☐banking or thrift institution

(i)☐trust company

(j)☐accountant or accounting firm

(k)☐lawyer or law firm

(l)☐insurance company or agency

(m)☐pension consultant

(n)☐real estate broker or dealer

(o)☒sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p)☒sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you control or are you controlled by the related person?

Yes

No

7. Are you and the related person under common control?

Yes

No

8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?

Yes

No

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?

Yes

No

(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:

Number and Street 1:Number and Street 2:

City:State:Country:ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Yes

No

9. (a) If the related person is an investment adviser, is it exempt from registration?

Yes

No

(b) If the answer is yes, under what exemption?

EXEMPT REPORTING ADVISER - SECTION 203(M) OF THE INVESTMENT ADVISERS ACT

10. (a) Is the related person registered with a foreign financial regulatory authority ?

Yes

No

(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority
Australia - Australian Securities and Investments Commission

11. Do you and the related person share any supervised persons?

Yes

No

12. Do you and the related person share the same physical location?

Yes

No

1. Legal Name of Related Person:

BARING ASSET MANAGEMENT KOREA LIMITED

2. Primary Business Name of Related Person:

BARING ASSET MANAGEMENT KOREA LIMITED

3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. Related Person's

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. Related Person is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☒ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☐ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☐ insurance company or agency

(m) ☐ pension consultant

(n) ☐ real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes

No

6. Do you control or are you controlled by the related person?

7. Are you and the related person under common control?

8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:

Number and Street 1:Number and Street 2:

City:State:Country:ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Yes

No

9. (a) If the related person is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

FOREIGN PRIVATE ADVISER EXEMPTION - SECTION 203(B)(3) OF THE INVESTMENT ADVISERS ACT

10. (a) Is the related person registered with a foreign financial regulatory authority ?

(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.

Name of Country/English Name of Foreign Financial Regulatory Authority

South Korea - Financial Supervisory Commission / Financial Supervisory Service

11. Do you and the related person share any supervised persons?

12. Do you and the related person share the same physical location?

1. Legal Name of Related Person:

ARTEMIS REAL ESTATE PARTNERS FUND III GP, LLC

2. Primary Business Name of Related Person:

ARTEMIS REAL ESTATE PARTNERS FUND III GP, LLC

3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. Related Person's

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. Related Person is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

6. Do you *control* or are you *controlled* by the *related person*? Yes ☐ No ☒

7. Are you and the *related person* under common *control*? Yes ☒ No ☐

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*? Yes ☐ No ☒

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*? Yes ☐ No ☒

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1: _____ Number and Street 2: _____

City: _____ State: _____ Country: _____ ZIP+4/Postal Code: _____

If this address is a private residence, check this box: ☐

9. (a) If the *related person* is an investment adviser, is it exempt from registration? Yes ☐ No ☒

(b) If the answer is yes, under what exemption? _____

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ? Yes ☐ No ☒

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered. _____

No Information Filed

11. Do you and the *related person* share any *supervised persons*? Yes ☐ No ☒

12. Do you and the *related person* share the same physical location? Yes ☐ No ☒

1. Legal Name of *Related Person*:
BARINGS (U.K.) LIMITED
2. Primary Business Name of *Related Person*:
BARINGS (U.K.) LIMITED
3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
802 - 75339
or
Other
4. *Related Person's*
(a) CRD Number (if any):
158277
(b) CIK Number(s) (if any):
No Information Filed
5. *Related Person is:* (check all that apply)
- (a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b) ☒ other investment adviser (including financial planners)
- (c) ☐ registered municipal advisor
- (d) ☐ registered security-based swap dealer
- (e) ☐ major security-based swap participant
- (f) ☒ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g) ☐ futures commission merchant
- (h) ☐ banking or thrift institution
- (i) ☐ trust company

- Yes No**

Yes No



e ○ ○

Yes No

☐ ☐

Yes No

(c)

If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

City:

If this address is a private residence, check this box: ☐

Number and Street 2:

Country:

ZIP+4/Postal Code:

Yes

No

9.

(a)

If the *related person* is an investment adviser, is it exempt from registration?

(b)

If the answer is yes, under what exemption?

10.

(a)

Is the *related person* registered with a *foreign financial regulatory authority* ?

(b)

If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11.

Do you and the *related person* share any *supervised persons*?

12.

Do you and the *related person* share the same physical location?

1.

Legal Name of *Related Person*:

MASSMUTUAL ASCEND LIFE INSURANCE COMPANY

2.

Primary Business Name of *Related Person*:

MASSMUTUAL ASCEND LIFE INSURANCE COMPANY

3.

Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4.

Related Person's

(a)

CRD Number (if any):

(b)

CIK Number(s) (if any):

No Information Filed

5.

Related Person is: (check all that apply)

(a)

☐

broker-dealer, municipal securities dealer, or government securities broker or dealer

(b)

☐

other investment adviser (including financial planners)

(c)

☐

registered municipal advisor

(d)

☐

registered security-based swap dealer

(e)

☐

major security-based swap participant

(f)

☐

commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g)

☐

futures commission merchant

(h)

☐

banking or thrift institution

(i)

☐

trust company

(j)

☐

accountant or accounting firm

(k)

☐

lawyer or law firm

(l)

☒

insurance company or agency

(m)

☐

pension consultant

(n)

☐

real estate broker or dealer

(o)

☐

sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p)

☐

sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6.

Do you *control* or are you *controlled* by the *related person*?

7.

Are you and the *related person* under common *control*?

8.

(a)

Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b)

If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c)

If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

City:

If this address is a private residence, check this box: ☐

Number and Street 2:

Country:

ZIP+4/Postal Code:

9.

(a)

If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:
ARTEMIS REAL ESTATE PARTNERS HEALTHCARE FUND I GP, LLC

2. Primary Business Name of *Related Person*:
ARTEMIS REAL ESTATE PARTNERS HEALTHCARE FUND I GP, LLC

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
(b) ☐ other investment adviser (including financial planners)
(c) ☐ registered municipal advisor
(d) ☐ registered security-based swap dealer
(e) ☐ major security-based swap participant
(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g) ☐ futures commission merchant
(h) ☐ banking or thrift institution
(i) ☐ trust company
(j) ☐ accountant or accounting firm
(k) ☐ lawyer or law firm
(l) ☐ insurance company or agency
(m) ☐ pension consultant
(n) ☐ real estate broker or dealer
(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

City:

If this address is a private residence, check this box: ☐

State:

Country:

Number and Street 2:

ZIP+4/Postal Code:

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS INCOME & GROWTH FUND II SEPARATE ACCOUNT GP, LLC

2. Primary Business Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS INCOME & GROWTH FUND II SEPARATE ACCOUNT GP, LLC

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) *CRD* Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☐ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☐ insurance company or agency

(m) ☐ pension consultant

(n) ☐ real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

7. Are you and the *related person* under common *control*?

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1: Number and Street 2:

City: State: Country: ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS INCOME AND GROWTH FUND II GP, LLC

2. Primary Business Name of *Related Person*:
ARTEMIS REAL ESTATE PARTNERS INCOME AND GROWTH FUND II GP, LLC

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4. *Related Person's*
(a) *CRD* Number (if any):

(b) *CIK* Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)
(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
(b) ☐ other investment adviser (including financial planners)
(c) ☐ registered municipal advisor
(d) ☐ registered security-based swap dealer
(e) ☐ major security-based swap participant
(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g) ☐ futures commission merchant
(h) ☐ banking or thrift institution
(i) ☐ trust company
(j) ☐ accountant or accounting firm
(k) ☐ lawyer or law firm
(l) ☐ insurance company or agency
(m) ☐ pension consultant
(n) ☐ real estate broker or dealer
(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you *control* or are you *controlled* by the *related person*?
7. Are you and the *related person* under common *control*?
8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?
(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?
(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:
Number and Street 1: Number and Street 2:
City: State: Country: ZIP+4/Postal Code:
If this address is a private residence, check this box: ☐

9. (a) If the *related person* is an investment adviser, is it exempt from registration?
(b) If the answer is yes, under what exemption?
10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?
(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?
12. Do you and the *related person* share the same physical location?

1. Legal Name of *Related Person*:
ARTEMIS REAL ESTATE PARTNERS INCOME AND GROWTH FUND GP, LLC

2. Primary Business Name of *Related Person*:
ARTEMIS REAL ESTATE PARTNERS INCOME AND GROWTH FUND GP, LLC

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-
or
Other

4. Related Person's

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. Related Person is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☐ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☐ insurance company or agency

(m) ☐ pension consultant

(n) ☐ real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

6. Do you control or are you controlled by the related person?

Yes No

7. Are you and the related person under common control?

Yes No

8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' assets:

Number and Street 1: Number and Street 2:

City: State: Country: ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

9. (a) If the related person is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

Yes No

10. (a) Is the related person registered with a foreign financial regulatory authority ?

(b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.

No Information Filed

Yes No

11. Do you and the related person share any supervised persons?

Yes No

12. Do you and the related person share the same physical location?

Yes No

1. Legal Name of Related Person:
COUNTERPOINTE INVESTMENT MANAGEMENT LLC

2. Primary Business Name of Related Person:
COUNTERPOINTE INVESTMENT MANAGEMENT LLC

3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
801 - 132763
or
Other

4. Related Person's
(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b) ☒ other investment adviser (including financial planners)
- (c) ☐ registered municipal advisor
- (d) ☐ registered security-based swap dealer
- (e) ☐ major security-based swap participant
- (f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g) ☐ futures commission merchant
- (h) ☐ banking or thrift institution
- (i) ☐ trust company
- (j) ☐ accountant or accounting firm
- (k) ☐ lawyer or law firm
- (l) ☐ insurance company or agency
- (m) ☐ pension consultant
- (n) ☐ real estate broker or dealer
- (o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p) ☐ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

6. Do you *control* or are you *controlled* by the *related person*?

☐ ☒

7. Are you and the *related person* under common *control*?

☒ ☐

8. (a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

☐ ☒

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

☐ ☐

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Yes No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

☐ ☒

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?

☐ ☒

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

☐ ☒

12. Do you and the *related person* share the same physical location?

☐ ☒

1. Legal Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS HEALTHCARE FUND III GP, LLC

2. Primary Business Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS HEALTHCARE FUND III GP, LLC

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) *CRD* Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b) ☐ other investment adviser (including financial planners)
- (c) ☐ registered municipal advisor
- (d) ☐ registered security-based swap dealer
- (e) ☐ major security-based swap participant
- (f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (g) ☐ futures commission merchant
- (h) ☐ banking or thrift institution
- (i) ☐ trust company
- (j) ☐ accountant or accounting firm
- (k) ☐ lawyer or law firm
- (l) ☐ insurance company or agency
- (m) ☐ pension consultant
- (n) ☐ real estate broker or dealer
- (o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes No

○ ○

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
If this address is a private residence, check this box: ☐			

Yes No



No Information Filed

☐ ☐

1. Legal Name of *Related Person*:
ARTEMIS REAL ESTATE PARTNERS HEALTHCARE FUND III SIDECAR-C GP, LLC

2. Primary Business Name of *Related Person*:
ARTEMIS REAL ESTATE PARTNERS HEALTHCARE FUND III SIDECAR-C GP, LLC

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4. *Related Person's*

(a) CRD Number (if any):

(b) CIK Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

- (a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
- (b) ☐ other investment adviser (including financial planners)
- (c) ☐ registered municipal advisor
- (d) ☐ registered security-based swap dealer
- (e) ☐ major security-based swap participant
- (f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g)	☐	futures commission merchant		
(h)	☐	banking or thrift institution		
(i)	☐	trust company		
(j)	☐	accountant or accounting firm		
(k)	☐	lawyer or law firm		
(l)	☐	insurance company or agency		
(m)	☐	pension consultant		
(n)	☐	real estate broker or dealer		
(o)	☐	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
(p)	☒	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ?			☐ ☒
7.	Are you and the <i>related person</i> under common <i>control</i> ?			☒ ☐
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?			☐ ☒
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?			☐ ☐
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets:			
	Number and Street 1:		Number and Street 2:	
	City:	State:	Country:	ZIP+4/Postal Code:
	If this address is a private residence, check this box: ☐			
			Yes	No
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?			☐ ☒
	(b) If the answer is yes, under what exemption?			
10.	(a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?			☐ ☒
	(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.			
	No Information Filed			
11.	Do you and the <i>related person</i> share any <i>supervised persons</i> ?			☐ ☒
12.	Do you and the <i>related person</i> share the same physical location?			☐ ☒

1.	Legal Name of <i>Related Person</i> :	ARTEMIS CLP PORTFOLIO CO-INVEST GP, LLC
2.	Primary Business Name of <i>Related Person</i> :	ARTEMIS CLP PORTFOLIO CO-INVEST GP, LLC
3.	<i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	- or Other
4.	<i>Related Person's</i>	
	(a) <i>CRD</i> Number (if any):	
	(b) <i>CIK</i> Number(s) (if any):	No Information Filed
5.	<i>Related Person</i> is: (check all that apply)	
(a)	☐	broker-dealer, municipal securities dealer, or government securities broker or dealer
(b)	☐	other investment adviser (including financial planners)
(c)	☐	registered municipal advisor
(d)	☐	registered security-based swap dealer
(e)	☐	major security-based swap participant
(f)	☐	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g)	☐	futures commission merchant
(h)	☐	banking or thrift institution
(i)	☐	trust company
(j)	☐	accountant or accounting firm
(k)	☐	lawyer or law firm
(l)	☐	insurance company or agency

(m)

(n)

(o)

(p)

pension consultant

real estate broker or dealer

sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes

No

6.

Do you *control* or are you *controlled* by the *related person*?

7.

Are you and the *related person* under common *control*?

8.

(a)

Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b)

If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c)

If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

Yes

No

9.

(a)

If the *related person* is an investment adviser, is it exempt from registration?

(b)

If the answer is yes, under what exemption?

10.

(a)

Is the *related person* registered with a *foreign financial regulatory authority* ?

(b)

If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11.

Do you and the *related person* share any *supervised persons*?

12.

Do you and the *related person* share the same physical location?

1.

Legal Name of *Related Person*:

ARTEMIS HEALTHCARE FUND III SENIORS HOUSING SIDECAR-R GP, LLC

2.

Primary Business Name of *Related Person*:

ARTEMIS HEALTHCARE FUND III SENIORS HOUSING SIDECAR-R GP, LLC

3.

Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4.

Related Person's

(a)

CRD Number (if any):

(b)

CIK Number(s) (if any):

No Information Filed

5.

Related Person is: (check all that apply)

(a)

☐

broker-dealer, municipal securities dealer, or government securities broker or dealer

(b)

☐

other investment adviser (including financial planners)

(c)

☐

registered municipal advisor

(d)

☐

registered security-based swap dealer

(e)

☐

major security-based swap participant

(f)

☐

commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g)

☐

futures commission merchant

(h)

☐

banking or thrift institution

(i)

☐

trust company

(j)

☐

accountant or accounting firm

(k)

☐

lawyer or law firm

(l)

☐

insurance company or agency

(m)

☐

pension consultant

(n)

☐

real estate broker or dealer

(o)

☐

sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p)

☒

sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes

No

6.

Do you *control* or are you *controlled* by the *related person*?

7.

Are you and the *related person* under common *control*?

8.

(a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+ 4/Postal Code:

If this address is a private residence, check this box: ☐

Yes

No

9.

(a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10.

(a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11.

Do you and the *related person* share any *supervised persons*?

12.

Do you and the *related person* share the same physical location?

1.

Legal Name of *Related Person*:
ARTEMIS SENIORS SMA-R, GP, LLC

2.

Primary Business Name of *Related Person*:
ARTEMIS SENIORS SMA-R, GP, LLC

3.

Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
-
or
Other

4.

Related Person's
(a) *CRD* Number (if any):

(b) *CIK* Number(s) (if any):

No Information Filed

5.

Related Person is: (check all that apply)
(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer
(b) ☐ other investment adviser (including financial planners)
(c) ☐ registered municipal advisor
(d) ☐ registered security-based swap dealer
(e) ☐ major security-based swap participant
(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
(g) ☐ futures commission merchant
(h) ☐ banking or thrift institution
(i) ☐ trust company
(j) ☐ accountant or accounting firm
(k) ☐ lawyer or law firm
(l) ☐ insurance company or agency
(m) ☐ pension consultant
(n) ☐ real estate broker or dealer
(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes

No

6.

Do you *control* or are you *controlled* by the *related person*?

7.

Are you and the *related person* under common *control*?

8.

(a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for

your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

City:

If this address is a private residence, check this box: ☐

Number and Street 2:

Country:

State:

ZIP+4/Postal Code:

Yes

No

9.

(a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

☐

☒

10.

(a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

☐

☒

11.

Do you and the *related person* share any *supervised persons*?

☐

☒

12.

Do you and the *related person* share the same physical location?

☐

☒

1. Legal Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS HEALTHCARE FUND II GP, LLC

2. Primary Business Name of *Related Person*:

ARTEMIS REAL ESTATE PARTNERS HEALTHCARE FUND II GP, LLC

3. *Related Person's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)

-

or

Other

4. *Related Person's*

(a) *CRD* Number (if any):

(b) *CIK* Number(s) (if any):

No Information Filed

5. *Related Person* is: (check all that apply)

(a) ☐ broker-dealer, municipal securities dealer, or government securities broker or dealer

(b) ☐ other investment adviser (including financial planners)

(c) ☐ registered municipal advisor

(d) ☐ registered security-based swap dealer

(e) ☐ major security-based swap participant

(f) ☐ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)

(g) ☐ futures commission merchant

(h) ☐ banking or thrift institution

(i) ☐ trust company

(j) ☐ accountant or accounting firm

(k) ☐ lawyer or law firm

(l) ☐ insurance company or agency

(m) ☐ pension consultant

(n) ☐ real estate broker or dealer

(o) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

(p) ☒ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

Yes

No

6.

Do you *control* or are you *controlled* by the *related person*?

☐

☒

7.

Are you and the *related person* under common *control*?

☒

☐

8.

(a) Does the *related person* act as a qualified custodian for your *clients* in connection with advisory services you provide to *clients*?

(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the *related person* and thus are not required to obtain a surprise examination for your *clients'* funds or securities that are maintained at the *related person*?

(c) If you have answered "yes" to question 8.(a) above, provide the location of the *related person's* office responsible for *custody* of your *clients'* assets:

Number and Street 1:

City:

If this address is a private residence, check this box: ☐

Number and Street 2:

Country:

State:

ZIP+4/Postal Code:

☐

☒

☐

☐

Yes

No

9. (a) If the *related person* is an investment adviser, is it exempt from registration?

(b) If the answer is yes, under what exemption?

10. (a) Is the *related person* registered with a *foreign financial regulatory authority* ?

(b) If the answer is yes, list the name and country, in English of each *foreign financial regulatory authority* with which the *related person* is registered.

No Information Filed

11. Do you and the *related person* share any *supervised persons*?

12. Do you and the *related person* share the same physical location?

Item 7 Private Fund Reporting

Yes No

B. Are you an adviser to any *private fund*?

If "yes," then for each private fund that you advise, you must complete a [Section 7.B.\(1\) of Schedule D](#), except in certain circumstances described in the next sentence and in Instruction 6 of the [Instructions to Part 1A](#). If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete [Section 7.B.\(2\) of Schedule D](#).

In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or designation in place of the fund's name.

SECTION 7.B.(1) Private Fund Reporting

Funds per Page: 15 Total Funds: 1

A. PRIVATE FUND

Information About the Private Fund

1. (a) Name of the *private fund*:

BARING INVESTMENT SERIES, LLC

(b) *Private fund* identification number:

(include the "805-" prefix also)

805-6671750845

2. Under the laws of what state or country is the *private fund* organized:

State:

Delaware

Country:

United States

3. (a) Name(s) of General Partner, Manager, Trustee, or Directors (or *persons* serving in a similar capacity):

No Information Filed

(b) If filing an *umbrella registration*, identify the *filing adviser* and/or *relying adviser(s)* that sponsor(s) or manage(s) this *private fund*.

No Information Filed

4. The *private fund* (check all that apply; you must check at least one):

☐ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940

☒ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940

5. List the name and country, in English, of each *foreign financial regulatory authority* with which the *private fund* is registered.

No Information Filed

6. (a) Is this a "master fund" in a master-feeder arrangement?

(b) If yes, what is the name and *private fund* identification number (if any) of the feeder funds investing in this *private fund*?

No Information Filed

Yes No

Yes No

- (c) Is this a "feeder fund" in a master-feeder arrangement?
- (d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests?

Name of *private fund*:

Private fund identification number:
(include the "805-" prefix also)

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions:

No Information Filed

NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

Yes No

8. (a) Is this *private fund* a "fund of funds"?

NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also *private funds* or registered investment companies.

(b) If yes, does the *private fund* invest in funds managed by you or by a *related person*?

Yes No

9. During your last fiscal year, did the *private fund* invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?
10. What type of fund is the *private fund*?

hedge fund

liquidity fund

private equity fund

real estate fund

securitized asset fund

venture capital fund

Other *private fund*: EQUITY FUND

NOTE: For definitions of these fund types, please see [Instruction 6 of the Instructions to Part 1A](#).

11. Current gross asset value of the *private fund*:

\$ 1,725,000,000

Ownership

12. Minimum investment commitment required of an investor in the *private fund*:

\$ 5,000,000

NOTE: Report the amount routinely required of investors who are not your *related persons* (even if different from the amount set forth in the organizational documents of the fund).
13. Approximate number of the *private fund's* beneficial owners:

27
14. What is the approximate percentage of the *private fund* beneficially owned by you and your *related persons*:

0%
15. (a) What is the approximate percentage of the *private fund* beneficially owned (in the aggregate) by funds of funds:

0%

Yes No

(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to *qualified clients*?
16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:

0%

(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?

☒ ☐

Yes

No

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private fund's* investors?

☐ ☒

Yes

No

Report Not Yet Received

If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is available.

Prime Broker

Yes

No

24. (a) Does the *private fund* use one or more prime brokers?

☐ ☒

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the *private fund* uses. If the *private fund* uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No Information Filed

Custodian

Yes

No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets?

☒ ☐

If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

Additional Custodian Information : 1 Record(s) Filed.

If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the *private fund* uses. If the *private fund* uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

(b) Legal name of custodian:
THE NORTHERN TRUST COMPANY

(c) Primary business name of custodian:
NORTHERN TRUST COMPANY

(d) The location of the custodian's office responsible for *custody* of the *private fund's* assets (city, state and country):

City:CHICAGO

State:Illinois

Country:United States

(e) Is the custodian a *related person* of your firm?

☐ ☒

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):
-
CRD Number (if any):

(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)
6PTKHDJ8HDUF78PFWH30

Administrator

Yes

No

26. (a) Does the *private fund* use an administrator other than your firm?

☒ ☐

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the *private fund* uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.

Additional Administrator Information : 1 Record(s) Filed.

SECTION 7.B.(2) Private Fund Reporting

1.

Name of the *private fund*:
BARINGS CAPITAL SOLUTIONS PERPETUAL FUND (CA), LP

2.

Private fund identification number:
(include the "805-" prefix also)
805-1520402233

3.

Name and SEC File number of adviser that provides information about this *private fund* in Section 7.B.(1) of Schedule D of its Form ADV filing
Name:
BARINGS LLC
SEC File Number:
801 - 241

4.

Are your *clients* solicited to invest in this *private fund*?

In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

Yes

No

1.

Name of the *private fund*:
BARINGS CAPITAL SOLUTIONS PERPETUAL FUND (DE), LP

2.

Private fund identification number:
(include the "805-" prefix also)
805-1454078997

3.

Name and SEC File number of adviser that provides information about this *private fund* in Section 7.B.(1) of Schedule D of its Form ADV filing
Name:
BARINGS LLC
SEC File Number:
801 - 241

4.

Are your *clients* solicited to invest in this *private fund*?

In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

Yes

No

1.

Name of the *private fund*:
BARINGS EMERGING GENERATION FUND II, LP

2.

Private fund identification number:
(include the "805-" prefix also)
805-4004003678

3.

Name and SEC File number of adviser that provides information about this *private fund* in Section 7.B.(1) of Schedule D of its Form ADV filing
Name:
BARINGS LLC
SEC File Number:

801 - 241

YesNo

4.

Are your *clients* solicited to invest in this *private fund*?

In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

1.

Name of the *private fund*:

BARINGS EMERGING GENERATION FUND, LP

2.

Private fund identification number:
(include the "805-" prefix also)

805-9351050443

3.

Name and SEC File number of adviser that provides information about this *private fund* in Section 7.B.(1) of Schedule D of its Form ADV filing

Name:
BARINGS LLC
SEC File Number:
801 - 241

4.

Are your *clients* solicited to invest in this *private fund*?

In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

1.

Name of the *private fund*:

BARINGS GLOBAL CREDIT FUND (LUX) SCSP, SICAV-SIF

2.

Private fund identification number:
(include the "805-" prefix also)

805-3891127030

3.

Name and SEC File number of adviser that provides information about this *private fund* in Section 7.B.(1) of Schedule D of its Form ADV filing

Name:
BARING INTERNATIONAL FUND MANAGERS (IRELAND) LIMITED
SEC File Number:
802 - 114742

4.

Are your *clients* solicited to invest in this *private fund*?

In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

1.

Name of the *private fund*:

BARINGS GLOBAL INVESTMENT FUNDS 2 PLC

2.

Private fund identification number:
(include the "805-" prefix also)

805-5544246402

3.

Name and SEC File number of adviser that provides information about this *private fund* in Section 7.B.(1) of Schedule D of its Form ADV filing

Name:

BARINGS LLC

SEC File Number:

801 - 241

Yes

No

4.

Are your *clients* solicited to invest in this *private fund*?

In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

1.

Name of the *private fund*:

BARINGS GLOBAL SPECIAL SITS CREDIT 4 (DE) L.P.

2.

Private fund identification number:
(include the "805-" prefix also)

805-1653545045

3.

Name and SEC File number of adviser that provides information about this *private fund* in Section 7.B.(1) of Schedule D of its Form ADV filing

Name:

BARINGS LLC

SEC File Number:

801 - 241

Yes

No

4.

Are your *clients* solicited to invest in this *private fund*?

In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

1.

Name of the *private fund*:

BARINGS INFRA SECONDARIES & SOLUTIONS FUND II LLC

2.

Private fund identification number:
(include the "805-" prefix also)

805-3556489964

3.

Name and SEC File number of adviser that provides information about this *private fund* in Section 7.B.(1) of Schedule D of its Form ADV filing

Name:

BARINGS LLC

SEC File Number:

801 - 241

Yes

No

4.

Are your *clients* solicited to invest in this *private fund*?

In answering this question, disregard feeder funds' investment in a master fund. For purposes of this question, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.

Item 8 Participation or Interest in *Client* Transactions

Like Item 7, Item 8 requires you to provide information about you and your *related persons*, including foreign affiliates.

A. Do you or any <i>related person</i> :		Yes	No
(1)	buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?	☒	☐
(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?	☒	☐
(3)	recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	☒	☐

B. Do you or any <i>related person</i> :		Yes	No
(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	☒	☐
(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	☒	☐
(3)	recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	☒	☐

C. Do you or any <i>related person</i> have <i>discretionary authority</i> to determine the:		Yes	No
(1)	securities to be bought or sold for a <i>client's</i> account?	☒	☐
(2)	amount of securities to be bought or sold for a <i>client's</i> account?	☒	☐
(3)	broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?	☒	☐
(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	☒	☐

E. Do you or any *related person* recommend brokers or dealers to *clients*?

F. If you answer "yes" to E. above, are any of the brokers or dealers *related persons*?

G.	(1) Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	☒	☐
	(2) If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	☐	☐

H. (1) Do you or any *related person*, directly or indirectly, compensate any *person* that is not an *employee* for *client* referrals? ☒ ☐

(2) Do you or any *related person*, directly or indirectly, provide any *employee* compensation that is specifically related to obtaining *clients* for the firm (cash or non-cash compensation in addition to the *employee's* regular salary)? ☒ ☐

I. Do you or any *related person*, including any *employee*, directly or indirectly, receive compensation from any *person* (other than you or any *related person*) for *client referrals*?

In your response to Item 8.I., do not include the regular salary you pay to an employee.

In responding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or received from (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.

In this Item, we ask you whether you or a *related person* has *custody* of *client* (other than *clients* that are investment companies registered under the Investment Company Act of 1940) assets and about your custodial practices.

		Yes	No
A.	(1) Do you have <i>custody</i> of any advisory <i>clients</i> ':		
	(a) cash or bank accounts?	☒	☐
	(b) securities?	☒	☐

If you are registering or registered with the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from your clients' accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption that you are not operationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person.

(2) If you checked "yes" to Item 9.A.(1)(a) or (b), what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for which you have <i>custody</i> :	
U.S. Dollar Amount	Total Number of <i>Clients</i>

(a) \$ 0

(b) 0

If you are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you provide to clients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.(2).

- B.

(1)

In connection with advisory services you provide to *clients*, do any of your *related persons* have *custody* of any of your advisory *clients*':

(a)

cash or bank accounts?

Yes

No

(b)

securities?

Yes

No
- You are required to answer this item regardless of how you answered Item 9.A.(1)(a) or (b).
- (2)

If you checked "yes" to Item 9.B.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which your *related persons* have *custody*:
- | | |
|----------------------|--------------------------------|
| U.S. Dollar Amount | Total Number of <i>Clients</i> |
| (a) \$ 1,446,628,351 | (b) 15 |
- C.

If you or your *related persons* have *custody* of *client* funds or securities in connection with advisory services you provide to *clients*, check all the following that apply:

(1)

A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage.

☒

(2)

An *independent public accountant* audits annually the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the investors in the pools.

☒

(3)

An *independent public accountant* conducts an annual surprise examination of *client* funds and securities.

☐

(4)

An *independent public accountant* prepares an internal control report with respect to custodial services when you or your *related persons* are qualified custodians for *client* funds and securities.

☐
- If you checked Item 9.C.(2), C.(3) or C.(4), list in [Section 9.C. of Schedule D](#) the accountants that are engaged to perform the audit or examination or prepare an internal control report. (If you checked Item 9.C.(2), you do not have to list auditor information in [Section 9.C. of Schedule D](#) if you already provided this information with respect to the private funds you advise in [Section 7.B.\(1\) of Schedule D](#)).
- D.

Do you or your *related person(s)* act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*?

(1)

you act as a qualified custodian

Yes

No

(2)

your *related person(s)* act as qualified custodian(s)

Yes

No
- If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be identified in [Section 7.A. of Schedule D](#), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.
- E.

If you are filing your *annual updating amendment* and you were subject to a surprise examination by an *independent public accountant* during your last fiscal year, provide the date (MM/YYYY) the examination commenced:

F.

If you or your *related persons* have *custody* of *client* funds or securities, how many *persons*, including, but not limited to, you and your *related persons*, act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*?

5
- SECTION 9.C. Independent Public Accountant
- No Information Filed
- Item 10 Control Persons
- In this Item, we ask you to identify every *person* that, directly or indirectly, *controls* you. If you are filing an *umbrella registration*, the information in Item 10 should be provided for the *filing adviser* only.
- If you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.
- A.

Does any *person* not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, *control* your management or policies?

Yes

No
- If yes, complete [Section 10.A. of Schedule D](#).
- B.

If any *person* named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of

SECTION 10.A. Control Persons

No Information Filed

SECTION 10.B. Control Person Public Reporting Companies

No Information Filed

Item 11 Disclosure Information

In this Item, we ask for information about your disciplinary history and the disciplinary history of all your *advisory affiliates*. We use this information to determine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the *filing adviser* and all *relying advisers* under an *umbrella registration*.

Your *advisory affiliates* are: (1) all of your current *employees* (other than *employees* performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any *person* performing similar functions); and (3) all *persons* directly or indirectly *controlling* you or *controlled* by you. If you are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your *advisory affiliates* are.

If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.

You must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.

	Yes	No
Do any of the events below involve you or any of your <i>supervised persons</i> ?	☐	☒
For "yes" answers to the following questions, complete a Criminal Action DRP:		
A. In the past ten years, have you or any <i>advisory affiliate</i> :	Yes	No
(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any <i>felony</i> ?	☐	☒
(2) been <i>charged</i> with any <i>felony</i> ?	☐	☒
<i>If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to charges that are currently pending.</i>		
B. In the past ten years, have you or any <i>advisory affiliate</i> :		
(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	☐	☒
(2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)?	☐	☒
<i>If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) to charges that are currently pending.</i>		

For "yes" answers to the following questions, complete a Regulatory Action DRP:		Yes	No
C.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:		
(1)	<i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission?	☐	☒
(2)	<i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of SEC or CFTC regulations or statutes?	☐	☒
(3)	<i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	☐	☒
(4)	entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with <i>investment-related</i> activity?	☐	☒
(5)	imposed a civil money penalty on you or any <i>advisory affiliate</i> , or <i>ordered</i> you or any <i>advisory affiliate</i> to cease and desist from any activity?	☐	☒
D.	Has any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> :		
(1)	ever <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission, or been dishonest, unfair, or unethical?	☐	☒
(2)	ever <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of <i>investment-related</i> regulations or statutes?	☒	☐
(3)	ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	☐	☒
(4)	in the past ten years, entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with an <i>investment-related</i> activity?	☒	☐
(5)	ever denied, suspended, or revoked your or any <i>advisory affiliate's</i> registration or license, or otherwise prevented you or any <i>advisory affiliate</i> , by <i>order</i> ,	☐	☒

from associating with an *investment-related* business or restricted your or any *advisory affiliate's* activity?

E. Has any *self-regulatory organization* or commodities exchange ever:

- (1) *found* you or any *advisory affiliate* to have made a false statement or omission? ☐ ☒
- (2) *found* you or any *advisory affiliate* to have been *involved* in a violation of its rules (other than a violation designated as a "*minor rule violation*" under a plan approved by the SEC)? ☐ ☒
- (3) *found* you or any *advisory affiliate* to have been the cause of an *investment-related* business having its authorization to do business denied, suspended, revoked, or restricted? ☐ ☒
- (4) disciplined you or any *advisory affiliate* by expelling or suspending you or the *advisory affiliate* from membership, barring or suspending you or the *advisory affiliate* from association with other members, or otherwise restricting your or the *advisory affiliate's* activities? ☐ ☒

F. Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any *advisory affiliate* ever been revoked or suspended?

G. Are you or any *advisory affiliate* now the subject of any regulatory *proceeding* that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?

For "yes" answers to the following questions, complete a Civil Judicial Action DRP:

		Yes	No
H.	(1) Has any domestic or foreign court:		
	(a) in the past ten years, <i>enjoined</i> you or any <i>advisory affiliate</i> in connection with any <i>investment-related</i> activity?	☐	☒
	(b) ever <i>found</i> that you or any <i>advisory affiliate</i> were <i>involved</i> in a violation of <i>investment-related</i> statutes or regulations?	☐	☒
	(c) ever dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you or any <i>advisory affiliate</i> by a state or <i>foreign financial regulatory authority</i> ?	☐	☒
	(2) Are you or any <i>advisory affiliate</i> now the subject of any civil <i>proceeding</i> that could result in a "yes" answer to any part of Item 11.H.(1)?	☐	☒

Item 12 Small Businesses

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

Answer this Item 12 only if you are registered or registering with the SEC **and** you indicated in response to Item 5.F.(2)(c) that you have regulatory assets under management of less than \$25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from SEC to state registration.

For purposes of this Item 12 only:

- Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of *clients*. In determining your or another *person's* total assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).
- *Control* means the power to direct or cause the direction of the management or policies of a *person*, whether through ownership of securities, by contract, or otherwise. Any *person* that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent or more of the profits, of another *person* is presumed to *control* the other *person*.

	Yes	No
A. Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	☐	☐

If "yes," you do not need to answer Items 12.B. and 12.C.

B. Do you:

(1) *control* another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year? ☐ ☐

(2) *control* another *person* (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year? ☐ ☐

C. Are you:

(1) *controlled* by or under common *control* with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F. (2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year? ☐ ☐

(2) *controlled* by or under common *control* with another *person* (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year? ☐ ☐

Schedule A

Direct Owners and Executive Officers

1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
2. Direct Owners and Executive Officers. List below the names of:
 - (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer(Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
 - (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);

- Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
- (c) if you are organized as a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
- (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
- (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
3. Do you have any indirect owners to be reported on Schedule B? ☒ Yes ☐ No
4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
6. Ownership codes are: NA - less than 5% B - 10% but less than 25% D - 50% but less than 75%
 A - 5% but less than 10% C - 25% but less than 50% E - 75% or more
7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
- (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
- (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Title or Status	Date Title or Status Acquired MM/YYYY	Ownership Code	Control Person	PR	CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
DINERMAN, JILL, ELYSE	I	DIRECTOR	09/2019	NA	Y	N	7207184
WILLIAMS, RHIAN, CATRIN	I	SECRETARY	05/2022	NA	Y	N	7715293
SUTHERLAND, ALEXANDER, CAMPBELL	I	DIRECTOR	10/2021	NA	Y	N	7715549
KEMP, KATHERINE, LOUISE	I	DIRECTOR	07/2023	NA	Y	N	7800874
HORNE, MARTIN, SCOTT	I	DIRECTOR	07/2023	NA	Y	N	7800875
PHILLIPS, CHARLOTTE, MICHELLE	I	DIRECTOR	10/2024	NA	Y	N	8066521
EVANS, NICHOLAS, EMRYS	I	CHIEF COMPLIANCE OFFICER	05/2022	NA	N	N	6460536

Schedule B

Indirect Owners

1. Complete Schedule B only if you are submitting an initial application or report. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
- (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;
- For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
- (b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
- (c) in the case of an owner that is a trust, the trust and each trustee; and
- (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
6. Ownership codes are: C - 25% but less than 50% E - 75% or more
 D - 50% but less than 75% F - Other (general partner, trustee, or elected manager)
7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
- (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
- (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Entity in Which Interest is Owned	Status	Date Status Acquired MM/YYYY	Ownership Code	Control Person	PR	CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
MASSMUTUAL HOLDING LLC	DE	MM ASSET MANAGEMENT HOLDING LLC	SOLE MEMBER	02/2012	E	Y	N	
MASSACHUSETTS MUTUAL LIFE INSURANCE	DE	MASSMUTUAL	SOLE	06/1995	E	Y	N	

COMPANY		HOLDING LLC	MEMBER					
MM ASSET MANAGEMENT HOLDING LLC	DE	BARINGS LLC	SOLE MEMBER	02/2012	E	Y	N	
BARINGS LLC	DE	BARINGS GUERNSEY LIMITED	SOLE MEMBER	03/2004	E	Y	N	106006
BARINGS EUROPE LIMITED	DE	BARINGS GUERNSEY LIMITED	SOLE MEMBER	12/2017	E	Y	N	
BARINGS GUERNSEY LIMITED	FE	BARINGS EUROPE LIMITED	SOLE MEMBER	06/2017	E	Y	N	
BARINGS ASSET MANAGEMENT LIMITED	FE	BARINGS EUROPE LIMITED	SOLE MEMBER	04/2019	E	Y	N	

Schedule D - Miscellaneous

You may use the space below to explain a response to an Item or to provide any other information.

Schedule R

No Information Filed

DRP Pages

CRIMINAL DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)

GENERAL INSTRUCTIONS

This Disclosure Reporting Page (DRP ADV) is an ☐ INITIAL **OR** ☒ AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G. of Form ADV.

Regulatory Action

Check item(s) being responded to:

- ☐ 11.C(1)
- ☐ 11.C(2)
- ☐ 11.C(3)
- ☐ 11.C(4)
- ☐ 11.C(5)
- ☐ 11.D(1)
- ☒ 11.D(2)
- ☐ 11.D(3)
- ☒ 11.D(4)
- ☐ 11.D(5)
- ☐ 11.E(1)
- ☐ 11.E(2)
- ☐ 11.E(3)
- ☐ 11.E(4)
- ☐ 11.F.
- ☐ 11.G.

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

- ☐ You (the advisory firm)
- ☐ You and one or more of your *advisory affiliates*
- ☒ One or more of your *advisory affiliates*

If this DRP is being filed for an *advisory affiliate*, give the full name of the *advisory affiliate* below (for individuals, Last name, First name, Middle name). If the *advisory affiliate* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate box.

ADV DRP - ADVISORY AFFILIATE

CRD
Number:

Registered: ☐ Yes ☒ No

Name: MASSACHUSETTS MUTUAL LIFE

This *advisory affiliate* is ☒ a Firm ☐ an Individual

INSURANCE COMPANY
(For individuals, Last, First, Middle)

- ☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* is no longer associated with the adviser.
- ☐ This DRP should be removed from the ADV record because: (1) the event or *proceeding* occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an *exempt reporting adviser* with the SEC and the event was resolved in the adviser's or *advisory affiliate's* favor.

If you are registered or registering with a *state securities authority* , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.

- ☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

B. If the *advisory affiliate* is registered through the IARD system or *CRD* system, has the *advisory affiliate* submitted a DRP (with Form ADV, BD or U-4) to the IARD or *CRD* for the event? If the answer is "Yes," no other information on this DRP must be provided.

- ☐ Yes
- ☒ No

NOTE: The completion of this form does not relieve the *advisory affiliate* of its obligation to update its IARD or *CRD* records.

PART II

1. Regulatory Action initiated by:

☐ SEC ☐ Other Federal ☒ State ☐ SRO ☐ Foreign

(Full name of regulator, *foreign financial regulatory authority*, federal, state, or *SRO*)

STATE OF CONNECTICUT INSURANCE DEPARTMENT
2. Principal Sanction:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanctions:
3. Date Initiated (MM/DD/YYYY):

10/03/2017 ☒ Exact ☐ Explanation

If not exact, provide explanation:
4. Docket/Case Number:

MC 18-87
5. *Advisory Affiliate* Employing Firm when activity occurred which led to the regulatory action (if applicable):
6. Principal Product Type:

Insurance

Other Product Types:
7. Describe the allegations related to this regulatory action (your response must fit within the space provided):

THE STATE OF CONNECTICUT INSURANCE DEPARTMENT CONDUCTED A MARKET CONDUCT EXAMINATION FOR THE PERIOD JANUARY 1, 2014 THROUGH DECEMBER 31, 2016 OF MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY ("MASSMUTUAL"). MASSMUTUAL IS THE PARENT OF MML INVESTMENT ADVISERS, LLC. AT THE CONCLUSION OF THE EXAMINATION, THE STATE OF CONNECTICUT INSURANCE DEPARTMENT ALLEGED THAT MASSMUTUAL VIOLATED SUBSECTIONS 38A-15 AND 38A-702M OF THE CONNECTICUT GENERAL STATUTES.
8. Current Status?

☐ Pending ☐ On Appeal ☒ Final
9. If on appeal, regulatory action appealed to (SEC, *SRO*, Federal or State Court) and Date Appeal Filed:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

10. How was matter resolved:

Stipulation and Consent
11. Resolution Date (MM/DD/YYYY):

04/26/2019 ☒ Exact ☐ Explanation

If not exact, provide explanation:

12. Resolution Detail:

A. Were any of the following Sanctions *Ordered* (check all appropriate items)?

- ☒ Monetary/Fine Amount: \$ 61,000.00
- ☐ Revocation/Expulsion/Denial
- ☐ Censure
- ☐ Bar
- ☐ Disgorgement/Restitution
- ☐ Cease and Desist/Injunction
- ☐ Suspension

B. Other Sanctions *Ordered*:

Sanction detail: if suspended, *enjoined* or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an *advisory affiliate*, date paid and if any portion of penalty was waived:
MASSMUTUAL AGREED TO PROVIDE THE STATE OF CONNECTICUT INSURANCE DEPARTMENT WITH A SUMMARY OF ACTIONS TAKEN TO COMPLY WITH THE RECOMMENDATIONS IN THE MARKET CONDUCT REPORT WITHIN 90 DAYS AND MASSMUTUAL AGREED TO PAY A FINE IN THE AMOUNT OF \$61,000.

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).

DURING THE PERIOD UNDER EXAMINATION (JANUARY 1, 2014-DECEMBER 31, 2016), THE STATE OF CONNECTICUT INSURANCE DEPARTMENT ALLEGED THAT MASSMUTUAL, IN CERTAIN INSTANCES, FAILED TO FOLLOW ESTABLISHED PRACTICES AND PROCEDURES TO ENSURE COMPLIANCE WITH STATUTORY REQUIREMENTS RESULTING IN: 35 PRODUCERS ACTING AS AGENTS WITHOUT BEING APPOINTED; 1 INSTANCE WHERE IT FAILED TO RETURN PREMIUM IN A TIMELY MANNER; 5 INSTANCES WHERE IT FAILED TO PROVIDE DOCUMENTATION FOR REGULATORY REVIEW; AND 1 INSTANCE WHERE IT FAILED TO RESPOND TIMELY TO A WRITTEN REQUEST FOR INFORMATION.

GENERAL INSTRUCTIONS

This Disclosure Reporting Page (DRP ADV) is an ☐ INITIAL **OR** ☒ AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G. of Form ADV.

Regulatory Action

Check item(s) being responded to:

- ☐ 11.C(1)
- ☐ 11.C(2)
- ☐ 11.C(3)
- ☐ 11.C(4)
- ☐ 11.C(5)
- ☐ 11.D(1)
- ☒ 11.D(2)
- ☐ 11.D(3)
- ☒ 11.D(4)
- ☐ 11.D(5)
- ☐ 11.E(1)
- ☐ 11.E(2)
- ☐ 11.E(3)
- ☐ 11.E(4)
- ☐ 11.F.
- ☐ 11.G.

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP.

PART I

- A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):
- ☐ You (the advisory firm)
- ☐ You and one or more of your *advisory affiliates*
- ☒ One or more of your *advisory affiliates*

If this DRP is being filed for an *advisory affiliate*, give the full name of the *advisory affiliate* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate box.

ADV DRP - ADVISORY AFFILIATE

CRD
Number:

This *advisory affiliate* is ☒ a Firm ☐ an Individual

Registered:

☐ Yes ☒ No

Name:

MASSACHUSETTS MUTUAL LIFE
INSURACE COMPANY
(For individuals, Last, First, Middle)

- ☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* is no longer associated with the adviser.
- ☐ This DRP should be removed from the ADV record because: (1) the event or *proceeding* occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an *exempt reporting adviser* with the SEC and the event was resolved in the adviser's or *advisory affiliate's* favor.

If you are registered or registering with a *state securities authority* , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred

more than ten years ago.

☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

B. If the *advisory affiliate* is registered through the IARD system or *CRD* system, has the *advisory affiliate* submitted a DRP (with Form ADV, BD or U-4) to the IARD or *CRD* for the event? If the answer is "Yes," no other information on this DRP must be provided.

☐ Yes

☒ No

NOTE: The completion of this form does not relieve the *advisory affiliate* of its obligation to update its IARD or *CRD* records.

PART II

1. Regulatory Action initiated by:

☐ SEC

☐ Other Federal

☒ State

☐ SRO

☐ Foreign

(Full name of regulator, *foreign financial regulatory authority*, federal, state, or *SRO*)

MARYLAND INSURANCE ADMINISTRATION

2. Principal Sanction:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanctions:

3. Date Initiated (MM/DD/YYYY):

04/12/2022

☒ Exact

☐ Explanation

If not exact, provide explanation:

4. Docket/Case Number:

MIA-2023-04-018

5. *Advisory Affiliate* Employing Firm when activity occurred which led to the regulatory action (if applicable):

6. Principal Product Type:

Insurance

Other Product Types:

7. Describe the allegations related to this regulatory action (your response must fit within the space provided):

IN 2003 THE INSURED PURCHASED A FLEXIBLE PREMIUM ADJUSTABLE LIFE INSURANCE POLICY WITH A FACE AMOUNT \$500,000. IT WAS ALLEGED THAT MASSMUTUAL RAISED THE PREMIUMS AND CHANGED AND CANCELLED THE POLICY WITHOUT NOTIFYING THE INSURED. THE INSURED FURTHER ALLEDGED THAT THE AGENT DID NOT EXPLAIN THAT THE PREMIUM WOULD BE ADJUSTED ANNUALLY AND THAT THE AGENT MISREPRESENTED THE PRODUCT.

8. Current Status?

☐ Pending

☐ On Appeal

☒ Final

9. If on appeal, regulatory action appealed to (SEC, *SRO*, Federal or State Court) and Date Appeal Filed:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

10. How was matter resolved:

Order

11. Resolution Date (MM/DD/YYYY):

04/26/2023

☒ Exact

☐ Explanation

If not exact, provide explanation:

12. Resolution Detail:

A. Were any of the following Sanctions *Ordered* (check all appropriate items)?

☒ Monetary/Fine Amount: \$ 1,000.00

☐ Revocation/Expulsion/Denial

☐ Censure

☐ Bar

☐ Disgorgement/Restitution

☐ Cease and Desist/Injunction

☐ Suspension

B. Other Sanctions *Ordered*:

Sanction detail: if suspended, *enjoined* or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total

amount, portion levied against you or an *advisory affiliate*, date paid and if any portion of penalty was waived:
THE MARYLAND INSURANCE COMMISSION ENTERED AN ORDER AGAINST MASSMUTUAL, AND WITHIN 30 DATS OF THE DATE OF ORDER, MASSMUTUAL WILL PAY AN ADMINISTRATIVE PENALTY OF \$1,000.

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).
- THE STATE OF MARYLAND DETERMINED THAT MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY ("MASSMUTUAL") VIOLATED THE CODE OF MARYLAND REGULATIONS ("COMAR") 31.09.15.11 AND THEREFORE SUBSECTION 4-113 OF THE INSURANCE ARTICLE BY FAILING TO SEND ANNUAL REPORTS TO AN INSURED IN 2020 AND 2021. THE ADMINISTRATION DID NOT FIND A VIOLATION BY MASSMUTUAL IN ITS OTHER ACTIONS COMPLAINED BY COMPLAINANT. THE MARYLAND INSURANCE COMMISSION ENTERED AN ORDER AGAINST MASSMUTUAL, AND WITHIN 30 DAYS OF THE DATE OF THE ORDER, MASSMUTUAL WILL PAY AN ADMINISTRATIVE PENALTY OF \$1,000.

GENERAL INSTRUCTIONS

This Disclosure Reporting Page (DRP ADV) is an ☐ INITIAL **OR** ☒ AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G. of Form ADV.

Regulatory Action

Check item(s) being responded to:

- ☐ 11.C(1)
- ☐ 11.C(2)
- ☐ 11.C(3)
- ☐ 11.C(4)
- ☐ 11.C(5)
- ☐ 11.D(1)
- ☒ 11.D(2)
- ☐ 11.D(3)
- ☒ 11.D(4)
- ☐ 11.D(5)
- ☐ 11.E(1)
- ☐ 11.E(2)
- ☐ 11.E(3)
- ☐ 11.E(4)
- ☐ 11.F.
- ☐ 11.G.

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP.

PART I

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

- ☐ You (the advisory firm)
- ☐ You and one or more of your *advisory affiliates*
- ☒ One or more of your *advisory affiliates*

If this DRP is being filed for an *advisory affiliate*, give the full name of the *advisory affiliate* below (for individuals, Last name, First name, Middle name).
If the *advisory affiliate* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate box.

ADV DRP - ADVISORY AFFILIATE

CRD
Number:

This *advisory affiliate* is ☒ a Firm ☐ an Individual

Registered: ☐ Yes ☒ No

Name: MASSACHUSETTS MUTUAL LIFE
INSURACE COMPANY
(For individuals, Last, First, Middle)

- ☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* is no longer associated with the adviser.
- ☐ This DRP should be removed from the ADV record because: (1) the event or *proceeding* occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an *exempt reporting adviser* with the SEC and the event was resolved in the adviser's or *advisory affiliate's* favor.

If you are registered or registering with a *state securities authority* , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.

- ☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

- B. If the *advisory affiliate* is registered through the IARD system or *CRD* system, has the *advisory affiliate* submitted a DRP (with Form ADV, BD or U-4) to the IARD or *CRD* for the event? If the answer is "Yes," no other information on this DRP must be provided.
- ☐ Yes ☒ No

NOTE: The completion of this form does not relieve the *advisory affiliate* of its obligation to update its IARD or *CRD* records.

PART II

1. Regulatory Action initiated by:

☐ SEC ☐ Other Federal ☒ State ☐ SRO ☐ Foreign

(Full name of regulator, *foreign financial regulatory authority*, federal, state, or SRO)

STATE OF WASHINGTON OFFICE OF THE INSURANCE COMMISSIONER

2. Principal Sanction:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanctions:

3. Date Initiated (MM/DD/YYYY):

05/26/2022 ☐ Exact ☒ Explanation

If not exact, provide explanation:

DATE OF 2021 ANNUAL CERTIFICATION PROVIDED TO THE OFFICE OF THE INSURANCE COMMISSIONER ON 5/26/2022, WITH AN EXPLANATION.

4. Docket/Case Number:

23-0147

5. *Advisory Affiliate* Employing Firm when activity occurred which led to the regulatory action (if applicable):

6. Principal Product Type:

Insurance

Other Product Types:

LONG TERM CARE

7. Describe the allegations related to this regulatory action (your response must fit within the space provided):

MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY MUST CERTIFY ANNUALLY TO THE OFFICE OF THE INSURANCE COMMISSIONER ("OIC") THE INSURANCE PRODUCERS THAT ARE SELLING, SOLICITING OR NEGOTIATING THE COMPANY'S LONG TERM CARE ("LTC") INSURANCE PRODUCTS HAVE COMPLETED LTC REQUIREMENTS. THE CERTIFICATION IS REQUIRED TO BE SUBMITTED ANNUALLY TO THE OIC OR BEFORE MARCH 31ST. MASSACHUSETTS MUTUALS LIFE INSURANCE COMPANY WAS GRANTED AN EXTENSION TO FILE ITS 2021 ANNUAL CERTIFICATION REPORT BY MAY 31, 2022. THE STATE OF WASHINGTON OIC ALLEGED THAT MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY FAILED TO VERIFY THAT TWO INSURANCE PRODUCERS HAD RECEIVED THE REQUIRED LTC TRAINING BEFORE THEY WERE PERMITTED TO SELL, SOLICIT, OR OTHERWISE NEGOTIATE THE SALE OF THE COMPANY'S LTC INSURANCE PRODUCTS. BY FAILING TO VERIFY THE TRAINING, IT WAS ALLEGED THAT THE COMPANY VIOLATED RCW 48.83.130(4), JUSTIFYING THE IMPOSITION OF A FINE UNDER RCW 48.83.160.

8. Current Status? ☐ Pending ☐ On Appeal ☒ Final

9. If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

10. How was matter resolved:

Decision & Order of Offer of Settlement

11. Resolution Date (MM/DD/YYYY):

09/08/2023 ☒ Exact ☐ Explanation

If not exact, provide explanation:

12. Resolution Detail:

A. Were any of the following Sanctions *Ordered* (check all appropriate items)?

☒ Monetary/Fine Amount: \$ 10,000.00

☐ Revocation/Expulsion/Denial

☐ Censure

☐ Bar

☐ Disgorgement/Restitution

☐ Cease and Desist/Injunction

☐ Suspension

B. Other Sanctions *Ordered*:

THE COMPANY (MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY) ACKNOWLEDGED ITS DUTY TO COMPLY FULLY WITH THE APPLICABLE LAWS OF THE STATE OF WASHINGTON AND CONSENTED TO THE ENTRY OF THE ORDER, WAIVED ANY AND ALL HEARING OR OTHER PROCEDURAL RIGHTS, AND FURTHER ADMINISTRATIVE OR JUDICIAL CHALLENGES TO THE ORDER. BY AGREEMENT OF THE COMPANY AND THE INSURANCE COMMISSIONER, A FINE OF \$10,000 IS REQUIRED TO BE PAID WITHIN 30 DAYS. THE COMPANY UNDERSTOOD AND AGREED THAT ANY FURTHER FAILURE TO COMPLY WITH THE STATUTES AND/OR REGULATIONS THAT ARE THE SUBJECT OF THE ORDER WOULD CONSTITUTE GROUNDS FOR FURTHER PENALTIES WHICH MAY BE IMPOSED IN DIRECT RESPONSE TO FURTHER VIOLATIONS.

Sanction detail: if suspended, *enjoined* or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an *advisory affiliate*, date paid and if any portion of penalty was waived:

BY FAILING TO VERIFY THAT TWO INSURANCE PRODUCERS HAD RECEIVED THE REQUIRED LTC TRAINING BEFORE PERMITTING TO SELL, SOLICIT, OR OTHERWISE NEGOTIATE THE SALE OF THE COMPANY'S LTC INSURANCE PRODUCTS, THE COMPANY VIOLATED RCW 48.23.130(4), JUSTIFYING THE IMPOSITION OF A FINE OF \$10,000 AGAINST MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY UNDER RCW 48.83.160. THE COMPANY HAS PAID THE FINE.

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).

MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY MUST CERTIFY ANNUALLY TO THE OFFICE OF THE INSURANCE COMMISSIONER ("OIC") THE INSURANCE PRODUCERS THAT ARE SELLING, SOLICITING OR NEGOTIATING THE COMPANY'S LONG TERM CARE ("LTC") INSURANCE PRODUCTS HAVE COMPLETED LTC REQUIREMENTS. THE CERTIFICATION IS REQUIRED TO BE SUBMITTED ANNUALLY TO THE OIC OR BEFORE MARCH 31ST. MASSACHUSETTS MUTUALS LIFE INSURANCE COMPANY WAS GRANTED AN EXTENSION TO FILE ITS 2021 ANNUAL CERTIFICATION REPORT BY MAY 31, 2022. MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY SUBMITTED THE CERTIFICATION ON MAY 26, 2022, WHICH REVEALED THAT IT SELF-DISCLOSED THAT TWO PRODUCERS SOLD THREE LTC POLICIES TO WASHINGTON CONSUMERS ON BEHALF OF THE COMPANY AND THE PRODUCERS WERE NOT IN COMPLIANCE WITH THE LTC EDUCATION REQUIREMENTS AT THE TIME OF THE SALES. RCW 48.83.130(4) REQUIRES ISSUERS TO OBTAIN VERIFICATION THAT A PRODUCER RECEIVES TRAINING BEFORE ETHE PRODUCERS IS PERMITTED TO SELL, SOLICIT OR NEGOTIATE THE ISSUER'S LTC INSURANCE PRODUCTS. WAC 284-17-262(1) PROVIDES THAT EACH ISSUER THAT HAS LTC POLICES APPROVED FOR SALE IN WA MUST CERTIFY ANNUAL THAT ALL OF ITS PRODUCERS HAVE (A) COMPLETED THE 8 HR. ONE TIME LTC EDUCATION TRAINING COURSE REQUIRED BY RCW 48.83.130(1) (A)(I) PRIOR TO SELLING, SOLICITING, OR NEGOTIATING THE COMPANY'S LTC COVERAGE IN WA; AND (B) IF DUE, COMPLETED THE REQUIRED 4 HOUR LTC CE REQUIREMENT IMPOSED BY RCS 48.83.130(2)(B). BY FAILING TO VERIFY THAT TWO PRODUCERS HAD RECEIVED THE REQUIRED LONG-TERM CARE TRAINING PRIOR TO SELLING, SOLICITING OR NEGOTIATING THE SALE OF THE COMPANY'S INSURANCE PRODUCTS, IT WAS ALLEGED THAT THE COMPANY HAS VIOLATED RCW 48.83.130(4) JUSTIFYING A FINE UNDER RCW 48.83.160. THE INSURANCE COMMISSIONER CONSENTED TO SETTLE THE MATTER IN CONSIDERATION OF THE COMPANY'S PAYMENT OF A FINE AND UPON SUCH TERMS AND CONDITIONS, INCLUDING (1) THE COMPANY ACKNOWLEDGES THE DUTY TO COMPLY FULLY WITH THE APPLICABLE LAWS OF THE STATE OF WASHINGTON; AND (2) THE COMPANY CONSENTED TO THE ENTRY OF THE ORDER. BY AGREEMENT, THE INSURANCE COMMISSIONER IMPOSED A FINE IN THE AMOUNT OF \$10,000 TO BE PAID WITHIN 30 DAYS.

GENERAL INSTRUCTIONS

This Disclosure Reporting Page (DRP ADV) is an ☐ INITIAL **OR** ☒ AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G. of Form ADV.

Regulatory Action

Check item(s) being responded to:

- | | | | | |
|----------------------------------|---|----------------------------------|---|----------------------------------|
| ☐ 11.C(1) | ☐ 11.C(2) | ☐ 11.C(3) | ☐ 11.C(4) | ☐ 11.C(5) |
| ☐ 11.D(1) | ☒ 11.D(2) | ☐ 11.D(3) | ☒ 11.D(4) | ☐ 11.D(5) |
| ☐ 11.E(1) | ☐ 11.E(2) | ☐ 11.E(3) | ☐ 11.E(4) | |
| ☐ 11.F. | ☐ 11.G. | | | |

Use a separate DRP for each event or *proceeding* . The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

One event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the same event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP.

PART I

- A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):
- ☐ You (the advisory firm)
- ☐ You and one or more of your *advisory affiliates*
- ☒ One or more of your *advisory affiliates*

If this DRP is being filed for an *advisory affiliate*, give the full name of the *advisory affiliate* below (for individuals, Last name, First name, Middle name). If the *advisory affiliate* has a *CRD* number, provide that number. If not, indicate "non-registered" by checking the appropriate box.

ADV DRP - ADVISORY AFFILIATE

CRD	This <i>advisory affiliate</i> is ☒ a Firm ☐ an Individual
Number:	
Registered:	☐ Yes ☒ No
Name:	MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY (For individuals, Last, First, Middle)

- ☐ This DRP should be removed from the ADV record because the *advisory affiliate(s)* is no longer associated with the adviser.
- ☐ This DRP should be removed from the ADV record because: (1) the event or *proceeding* occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an *exempt reporting adviser* with the SEC and the event was resolved in the adviser's or *advisory affiliate's* favor.

If you are registered or registering with a *state securities authority* , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred

more than ten years ago.

This *DRP* should be removed from the *ADV* record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:

B.

If the *advisory affiliate* is registered through the *IARD* system or *CRD* system, has the *advisory affiliate* submitted a *DRP* (with Form *ADV*, *BD* or *U-4*) to the *IARD* or *CRD* for the event? If the answer is "Yes," no other information on this *DRP* must be provided.

Yes

No

NOTE: The completion of this form does not relieve the *advisory affiliate* of its obligation to update its *IARD* or *CRD* records.

PART II

1.

Regulatory Action initiated by:

SEC

Other Federal

State

SRO

Foreign

(Full name of regulator, *foreign financial regulatory authority*, federal, state, or *SRO*)

STATE OF DELAWARE INSURANCE COMMISSIONER

2.

Principal Sanction:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanctions:

3.

Date Initiated (MM/DD/YYYY):

03/31/2024

Exact

Explanation

If not exact, provide explanation:

FINAL EXAMINATION REPORT

4.

Docket/Case Number:

DOCKET NO. 5635

5.

Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):

6.

Principal Product Type:

Insurance

Other Product Types:

7.

Describe the allegations related to this regulatory action (your response must fit within the space provided):

IT WAS ALLEGED THAT MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY’S PRACTICES AND PROCEDURES DID NOT COMPLY WITH STATUTORY AND REGULATORY PROVISIONS: 18 DEL ADMIN. C.§1203-4.0 LIFE INSURANCE SOLICITATION DEFINITIONS; 18 DEL. ADMIN C. §1204-5.2 DUTIES OF AGENTS AND BROKERS; 18 DEL. C. §1204.7.1 DUTIES OF INSURERS THAT USE AGENTS OR BROKERS; 18 DEL. ADMIN. C. §1204-7.4 STANDARDS FOR BASIC ILLUSTRATIONS.

8.

Current Status?

Pending

On Appeal

Final

9.

If on appeal, regulatory action appealed to (SEC, *SRO*, Federal or State Court) and Date Appeal Filed:

If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.

10.

How was matter resolved:

Stipulation and Consent

11.

Resolution Date (MM/DD/YYYY):

05/08/2025

Exact

Explanation

If not exact, provide explanation:

12.

Resolution Detail:

A.

Were any of the following Sanctions *Ordered* (check all appropriate items)?

Monetary/Fine Amount: \$ 133,500.00

Revocation/Expulsion/Denial

Censure

Bar

Disgorgement/Restitution

Cease and Desist/Injunction

Suspension

B.

Other Sanctions *Ordered*:

RESPONDENT SHALL IMMEDIATELY IMPLEMENT CORRECTIVE ACTIONS FOR ANY AND ALL EXCEPTIONS AND RECOMMENDATIONS INCLUDED IN THE FINAL EXAMINATION REPORT AND SHALL REPORT THE COMPLETION OF THE CORRECTIVE ACTIONS TO THE DEPARTMENT WITHIN 30 DAYS OF THE DATE OF THE CONSENT ORDER

Sanction detail: if suspended, *enjoined* or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an *advisory affiliate*, date paid and if any portion of penalty was waived:
MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY PAID AN ADMINISTRATIVE PENALTY OF \$133,500.00 ON MAY 6, 2025. NO PORTION OF THE ADMINISTRATIVE PENALTY WAS WAIVED.

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).
- THE DEPARTMENT, THROUGH ITS EXAMINERS, CONDUCTED A TARGET MARKET CONDUCT EXAMINATION OF MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY'S AFFAIRS AND PRACTICES AS OF MARCH 31, 2024. THE DEPARTMENT PROVIDED MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY WITH A VERIFIED WRITTEN REPORT OF THE EXAMINATION AND MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY REVIEWED AND PROVIDED THE DEPARTMENT WITH COMMENTS ON THE EXAMINATION REPORT. THE DEPARTMENT THROUGH ITS EXAMINERS PREPARED A FINAL REPORT OF THE EXAMINATION DATED AS OF MARCH 31, 2024 (THE FINAL EXAMINATION REPORT). THE FINAL EXAMINATION REPORT CONCLUDED THAT MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY'S PRACTICES AND PROCEDURES DID NOT COMPLY WITH STATUTORY AND REGULATORY PROVISIONS. MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY ACCEPTED THE FINAL EXAMINATION REPORT AND WAIVED ANY RIGHT TO A HEARING AND AGREED THAT THE DEPARTMENT MAY FILE THE FINAL EXAMINATION REPORT WITHOUT ANY FURTHER MODIFICATIONS. MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY PAID AN ADMINISTRATIVE PENALTY FOR THE VIOLATIONS IN THE AMOUNT OF \$133,500.00 ON MAY 6, 2025. THE DEPARTMENT WILL POST A COPY OF THE FINAL EXAMINATION REPORT AND THE STIPULATION AND CONSENT ON THE DEPARTMENT'S PUBLIC WEBSITE. WITHIN 1 YEAR OF THE DATE OF THE FINAL EXAMINATION REPORT, THE DEPARTMENT MAY RE-EXAMINE THE EXCEPTIONS AND RECOMMENDATIONS IN THE FINAL EXAMINATION REPORT AND DETERMINE WHETHER THE CORRECTIVE ACTIONS WERE APPROPRIATE, PROPERLY IMPLEMENTED AND EFFECTIVE.

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

Part 2

Exemption from brochure delivery requirements for SEC-registered advisers

SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you from delivering a brochure to *all* of your advisory clients, you do not have to prepare a brochure.

Are you exempt from delivering a brochure to all of your clients under these rules?

Yes

No

If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)
366458	BARING INTERNATIONAL INVESTMENT LIMITED PART 2A	Pension plans/profit sharing plans, Foundations/charities, Private funds or pools

Part 3

CRS	Type(s)	Affiliate Info	Retire
There are no CRS filings to display.			

Execution Pages

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your *principal office and place of business* and any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are submitting a *notice filing*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:

Date: MM/DD/YYYY

Printed Name:

Title:

Adviser *CRD* Number:

105724

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding* or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of any state in which you are submitting a *notice filing*.

2. Appointment and Consent: Effect on Partnerships

If you are organized as a partnership, this irrevocable power of attorney and consent to service of process will continue in effect if any partner withdraws from or is admitted to the partnership, provided that the admission or withdrawal does not create a new partnership. If the partnership dissolves, this irrevocable power of attorney and consent shall be in effect for any action brought against you or any of your former partners.

3. *Non-Resident* Investment Adviser Undertaking Regarding Books and Records

By signing this Form ADV, you also agree to provide, at your own expense, to the U.S. Securities and Exchange Commission at its principal office in Washington D.C., at any Regional or District Office of the Commission, or at any one of its offices in the United States, as specified by the Commission, correct, current, and complete copies of any or all records that you are required to maintain under Rule 204-2 under the Investment Advisers Act of 1940. This undertaking shall be binding upon you, your heirs, successors and assigns, and any *person* subject to your written irrevocable consents or powers of attorney or any of your general partners and *managing agents*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:

Date: MM/DD/YYYY

MELISSA LAGRANT

03/26/2026

Printed Name:

Title:

MELISSA LAGRANT

CHIEF COMPLIANCE OFFICER AND MANAGING DIRECTOR

Adviser *CRD* Number:

105724