



Form ADV Part 2A - Brochure

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This brochure provides information about the qualifications and business practices of Edinburgh Partners North America, Inc. If you have any questions about the contents of this brochure, please contact us at (925) 472 6744. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Additional information about Edinburgh Partners North America, Inc. is also available at the SEC’s website at www.adviserinfo.sec.gov.

Edinburgh Partners North America, Inc. is a registered investment adviser with the SEC. Registration of an investment adviser does not imply any level of skill or training.

May 2018

2 Material Changes

There have been three material changes to report since our last filing in March 2017.

Section 4 – Edinburgh Partners Limited created a new subsidiary, Edinburgh Partners EM GP LLP. This new subsidiary is described in the corporate structure section. In addition, Edinburgh Partners was purchased by Franklin Resources Inc, operating as Templeton Investments on May 1, 2018.

Section 12 – Following the implementation of Markets in Financial Instruments Directive II (MiFID II), research practices have changed. This is reflected in this section.

3 Contents

ITEM 2 – MATERIAL CHANGES	2
ITEM 3 – CONTENTS	3
ITEM 4 – ADVISORY BUSINESS	4
ITEM 5 – FEES AND COMPENSATION	5
ITEM 6 – PERFORMANCE BASED FEES AND SIDE BY SIDE MANAGEMENT	6
ITEM 7 – TYPES OF CLIENTS	6
ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS	6
ITEM 9 – DISCIPLINARY INFORMATION.....	8
ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS.....	8
ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING	10
ITEM 12 – BROKERAGE PRACTICES.....	11
ITEM 13 – REVIEW OF ACCOUNTS	12
ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION	13
ITEM 15 – CUSTODY.....	13
ITEM 16 – INVESTMENT DISCRETION.....	13
ITEM 17 – VOTING CLIENT SECURITIES.....	14
ITEM 18 – FINANCIAL INFORMATION	14
ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS.....	14

4 Advisory Business

Edinburgh Partners North America, Inc.

Edinburgh Partners North America, Inc. (“EPNA”) was incorporated in Delaware in October 2007.

EPNA’s principal office and place of business is currently located at, Cityplace Tower, 525 Okeechobee Boulevard, West Palm Beach, Florida from which it performs activities relating to research and portfolio management duties. EPNA has an office in California which performs activities relating to client services and business development for US and Canadian clients and prospective clients of its parent company – Edinburgh Partners Limited (“EPL”).

EPNA is registered as an investment adviser with the Securities and Exchange Commission.

EPNA is a wholly owned subsidiary of Edinburgh Partners Limited (EPL) which is a company incorporated in Scotland in 2003. EPL is a directly owned subsidiary of Franklin Resources, Inc. (“Franklin Resources”). Franklin Resources, a holding company that, together with its various subsidiaries is referred to as Franklin Templeton Investments,[®] a global investment management organization offering investment services under the Franklin,[®] Templeton,[®] Mutual Series,[®] Bissett,[®] Fiduciary Trust,[™] Darby,[®] Balanced Equity Management[™], K2[®] and LibertyShares[™] brand names. Franklin Templeton Investments, through current and predecessor subsidiaries, has been engaged in the investment management and related services business since 1947.

The common stock of Franklin Resources is traded on the New York Stock Exchange (“NYSE”) under the ticker symbol “BEN,” and is included in the Standard & Poor’s 500 Index.

Edinburgh Partners is an equity manager with expertise in global, international, European and emerging market equities. EPL has four direct subsidiaries; EPNA, Theseus Investment Partners Ltd, which is a dormant company and Edinburgh Partners AIFM Limited, which is the Alternative Investment Fund Manager (AIFM) for two UK listed Investment Trusts and the Emerging Markets Portfolio LP (3c7 Fund) and Edinburgh Partners EM GP LLC, which is a US entity established to set up the Fund. EPL and its four subsidiaries collectively form the Edinburgh Partners Group (“Edinburgh Partners”).

Advisory Service

EPNA’s focus is long-only, long-term equity management, based on absolute valuation. The goal is to provide clients with superior long-term returns. EPNA believes the creation of value for its clients fundamentally depends upon the quality and experience of the investment team. It believes the ability to take a long-term view provides the foundation for creating higher returns for clients.

Please refer to Item 8, **Methods of Analysis, Investment Strategies and Risk of Loss**, for additional details.

Potential or actual conflicts of interest may arise in the allocation of investment opportunities among client’s accounts. Please refer to **Item 11, Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**, for additional details.

Services of Affiliates

Franklin Templeton Investments operates its investment management business through Edinburgh Partners, as well as through multiple affiliates, some of which are registered with non-U.S. regulatory authorities and some of which are registered with multiple regulatory authorities.

Please refer to **Item 10, Other Financial Industry Activities and Affiliations** for additional details.

Tailoring

EPNA is able to tailor its advisory services to individual client restrictions, provided these are practicable and consistent with the intended strategy. The investment restrictions are documented within the client's Investment Management Agreement. Whilst all strategies are managed using the same investment philosophy, the composition and performance of portfolios will be different due to the client imposed restrictions.

Wrap fee programs

EPNA does not participate in wrap fee programs.

Assets under management

As of 28 February 2018, EPNA currently managed or advised on \$181m of assets.

5 Fees and Compensation

Segregated account fees

The fee schedule for discretionary investment management accounts is the same across all strategies. The minimum amount for a discretionary account is \$75 million. Fees can be negotiated under certain circumstances.

Separate Account Fee Schedule	
First \$150 million	0.75%
\$150 million - \$225 million	0.65%
\$225 million - \$400 million	0.55%
Over \$400million	0.50%
This fee excludes Custody and performance verification	

Performance fees are available; please see Item 6, **Performance Based Fees**, for additional information.

Discretionary account clients select their own custodian and will incur charges imposed by the custodian.

Billing

All fee billing arrangements are detailed in the client's Investment Management Agreement. Fees are billed monthly or quarterly in arrears. The client's Investment Management Agreement details how the fee is calculated. Accounts terminated during a period will be charged a pro-rated fee.

Other fees or expenses

Clients will incur brokerage and other transaction costs. This includes but is not limited to FX related charges, transfer taxes, wire transfer and other fees and taxes on brokerage accounts and securities transactions. Please refer to Item 12, **Brokerage Practice**, for additional information in relation to selecting brokers for client transactions and their compensation (e.g. commissions).

Advanced payment

Not applicable.

Compensation for sale of securities or other investment products

Neither EPNA nor any of its supervised persons accepts compensation for the sale of securities or other investment products

6 Performance Based Fees and Side-by-Side Management

Performance fees are available as long as they are permitted under applicable laws and regulations, including the Investment Advisers Act of 1940 (the “Advisers Act”).

The performance related element would be calculated gross of the flat fee. This fee excludes custody, but includes all other services.

While such fee arrangements could create an incentive for EPNA to recommend investments which may be riskier or more speculative than those which would be recommended under a different arrangement, EPNA has designed and implemented procedures to avoid favoring higher fee paying accounts over other accounts. These procedures ensure that all clients are treated equally and ensure the fair allocation of investment opportunities across all client accounts.

Please refer to Item 11, ***Code of Ethics, Participation or Interest in Client Transactions and Personal Trading***, for additional information.

7 Types of Clients

EPNA provides investment advisory services for institutional clients, including public and corporate pensions, registered investment companies, pooled investment vehicles and sub-advisory accounts. The minimum account size for a separate account is \$75million; however, this can be waived at our discretion.

8 Methods of Analysis, Investment Strategies and Risk of Loss

Methods of analysis and investment strategies

EPNA uses the same investment philosophy and method of security analysis across all investment strategies. The firm manages global and european strategies which are long-only equity strategies.

Our investment approach is long-term (five years) and focused on absolute valuation. We believe that concentrated portfolios have the highest probability of generating good returns. To follow this approach we believe portfolios must not only be concentrated but also contain enough stocks to be adequately diversified.

We aim to identify and buy undervalued companies and have the patience to hold them until share prices reflect their long-term earnings potential. Instead of being pushed off-course by short-term reactions, fear of being different from the crowd or a particular index, our judgments are based purely on long-term analysis of prospective risk and reward. It is a long-term approach, by definition contrarian, but for the patient investor we believe it is the most reliable way to achieve superior returns over the medium to long-term.

Portfolio managers and analysts operate on behalf of Edinburgh Partners, with research being made available to all portfolio managers.

Sifting of Stocks – Stocks that are overvalued or with too much potential risk are excluded. Our in-house research demonstrates that companies with high year five Price to Earnings Ratios (“PE”) provide low or negative real returns. If the historic PE is improbably high in relation to the likely rate of profit growth, it is unlikely that research coverage would be initiated.

Detailed Analysis & Research Template – Each investment team member produces detailed research on stocks within their own sectors using a common template which comprises five years’ historic figures and five years’ forecasts. This template is supported by more detailed financial models which generate a series of income statements, balance sheets and cash flow statements. The standardization of the research output provides discipline by forcing an expression of views numerically and also includes standard metrics to facilitate comparisons across sectors and countries. Analysts must also present a best and worst case scenario around their central forecasts, thereby forcing a clear assessment and quantification of the risks associated with each investment opportunity – the greater the range of potential earnings outcomes, the greater the risk in holding the stock.

Research Meeting – Once a research document has been prepared by an analyst, it is distributed to the rest of the team and presented at the weekly research meeting. All assumptions must be made explicit and will be scrutinized by the other analysts at this point. The team discusses each analyst’s recommendations and agrees on the rating each stock should receive – Buy; Hold; Sell or Watch.

Buy/Hold/Sell List – Only contains stocks that have been reviewed by the investment team.

Portfolio Construction & Management – Portfolios are only constructed from stocks on the approved Buy or Hold List. Although we operate a team-based approach, each portfolio is monitored and managed by a named portfolio manager. While portfolio managers have some discretion, there are clear limits in place to ensure that portfolios with similar objectives and guidelines are largely the same, irrespective of who manages them.

Risk Management – EPNA has a framework in place with targets for coverage, tracking error and style factors between portfolios with a similar benchmark. Guidelines become tighter as time progresses. Data is monitored on a monthly basis and the results are discussed at the portfolio meeting and distributed to the portfolio managers.

Sell Discipline – When a stock approaches the upper limit of our acceptable valuation range, its risk/reward balance is reviewed for potential sale across all accounts.

Material risks

All of the firm’s investment strategies involve a risk of loss that clients should be prepared to bear. All products are subject to market and currency risk and may result in the decrease in value of the investment.

The following is a description of the material risks that EPNA’s strategies are exposed to:

Diversification risk

A portfolio that holds fewer stocks than other similarly mandated accounts can result in larger movements in the portfolio value.

Counterparty risk

Counterparty risk is the risk that arises due to a failure of a counterparty's ability to meet its obligations. A portfolio is be exposed to counterparty risk through third parties with whom it trades.

Currency risk

Currency risk arises where the currencies in which a portfolio's investments are traded decline in value relative to the U.S. dollar. Currency rates can fluctuate for a number of reasons and the value of a portfolio will rise or fall as a result.

Custody risk

Clients are responsible for selecting and appointing their own custodians.

Securities held by custodians will be at risk where there is a failure of the custodian or any sub-custodian. Clients are also subject to the risk that the assets held by the custodian are not held in accordance with contractual requirements.

Equity markets risk

The value of equities will rise or fall due to general market conditions or factors affecting a particular sector. These conditions or factors may not be specifically related to a particular company.

Investment risk

Active management involves absolute and relative risk. Absolute risk is the risk that the fund falls in value. Relative risk is the risk of poor performance relative to benchmark. A portfolio considered to be diversified could still underperform.

Investment style risk

Different investment styles such as 'growth' or 'value' can move in or out of favour with investors. As a result a portfolio's performance may at times be worse than the performance of other portfolio's that invest more broadly or that have different investment styles.

Liquidity Risk

Some markets, exchanges or securities in which a portfolio invests can, on occasion, prove to be illiquid and prices could be highly volatile. This affects the price and time at which a portfolio liquidates positions to meet funding requirements. This may result in difficulty calculating a fair market value for an investment.

Recommendations of particular types of securities

EPNA mainly recommends equity securities. The material risks involved have been explained above.

9 Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of EPNA or the integrity of EPNA's management. EPNA has no information applicable to this item.

10 Other Financial Industry Activities and Affiliations

EPL is a wholly-owned subsidiary of Franklin Resources Inc, a holding company that together with its various subsidiaries is referred to as Franklin Templeton Investments.

EPNA focuses exclusively on investment advisory services. The firm manages a long-only equity strategy.

Furthermore, EPL has four direct subsidiaries; Edinburgh Partners North America, Inc. (EPNA), which is a registered investment adviser to sub funds of Edinburgh Partners Opportunities Fund (EPOF) a Dublin based UCITS Company and performs activities relating to sales and client services for US and Canadian clients of Edinburgh Partners; Edinburgh Partners AIFM Ltd (EPAL), which acts as AIFM for the Investment Trusts managed by Edinburgh Partners, ; Edinburgh Partners EM GP LLC, which is a US entity established to set up the Edinburgh Partners Emerging Markets Portfolio LP (a 3c7 Fund) and Theseus Investment Partners Limited, a dormant company.

Please refer to **Item 4, Advisory Business**, for additional information. Recognized conflicts of interest are discussed in **Item 6, Performance-Based Fees and Side-By-Side Management** and **Item 11, Code of Ethics, Participation or Interest in Client Transactions and Personal Trading** and **Item 12, Brokerage Practice**.

Registration as a broker-dealer

Neither EPNA nor any of its management persons have registered or have an application pending to register as a broker-dealer.

Other registrations

Neither EPNA nor any of its management persons have registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Affiliations

EPNA is a wholly owned subsidiary of EPL which is a private company limited by shares and was incorporated in Scotland in 2003. EPL has three other wholly-owned subsidiaries, Theseus Investment Partners Ltd, a dormant company, Edinburgh Partners AIFM Limited and Edinburgh Partners EM GP LLC.

EPL acts as an investment adviser to Edinburgh Partners Opportunities Fund plc; an Irish registered Investment Company with variable capital. EPNA is appointed as a sub-adviser to four sub-funds of Edinburgh Partners Opportunities Fund plc. Edinburgh Partners AIFM Limited is the investment adviser to two closed-ended UK listed Investment Trusts (Edinburgh Partners Global Opportunities Trust plc and The European Investment Trust plc) and to the Edinburgh Partners Emerging Markets Portfolio LP (3C7 Fund).

Edinburgh Partners operates a conflicts of interest policy, which is designed to ensure that the firms always act in the best interests of our clients. Please refer to Item 11, **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**, for additional information.

EPNA receives compensation from EPL for providing to EPL client referrals, client servicing and marketing activities with respect to certain of EPL's U.S. based clients.

Recommendations

EPNA does not recommend or select other investment advisers for clients.

II Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Edinburgh Partners has adopted a Code of Ethics in compliance with Rule 204A-1 describing the standards of business conduct expected by employees and the fiduciary duty owed to clients. The Code of Ethics includes provisions relating to the personal trading, inducements, ethical conduct and conflicts of interest. All staff must acknowledge the terms of the Code of Ethics annually or as amended.

EPNA will purchase or sell securities on behalf of its clients in which EPNA, its affiliates and/or clients directly or indirectly have a position of interest. In all circumstances, transactions for its clients will be consistent with the client mandate. All Directors, employees and associated persons are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, Directors and employees are permitted to trade for their own accounts in securities which are recommended to and/or purchased for EPNAs' clients.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of Directors and employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the personal dealing rules applied via the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interests of EPNA's clients. In addition the personal dealing rules referred to under the Code categorise all Directors and staff as access persons. The personal dealing rules require all employees to report their holdings to the Chief Compliance Officer on an annual basis and in addition, all transactions require pre-clearance by the Chief Compliance Officer. The personal dealing rules place a restriction on short term trading (currently 60 days).

Nonetheless, because the personal dealing rules in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee.

Employee trading is continually monitored under the compliance monitoring program to reasonably prevent conflicts of interest between EPNA and its clients.

We are happy to provide a copy of the Code of Ethics on request.

Conflicts of interest

EPNA has a duty to take all reasonable steps to identify and to prevent or manage conflicts of interest which can arise between a firm, its employees and its clients as well as those conflicts which exist between different clients of the firm.

Conflicts of interest have the to arise across EPNA's activities. The firm has a series of policies and procedures designed to identify, prevent and manage conflicts of interest. In addition, the firm maintains a conflicts matrix. The policies and procedures in place include:

- Insider Dealing and Market Abuse

Edinburgh Partners has an Insider Dealing and Market Abuse policy which is set out within the Compliance manual which all members of staff attest to annually. It is also included in Regulatory training for new staff and is further enforced via the Personal Account Dealing policy and the use of a restricted list.

- Personal Account Dealing

Edinburgh Partners has a Personal Account Dealing policy, and these rules are signed off as understood by all staff on an annual basis. Permission has to be sought for any deal prior to dealing and permission is only granted for a limited time period. Edinburgh Partners maintains a list of restricted stocks, at no time can any employee place a personal trade in any stock from this restricted list.

- Inducements

Edinburgh Partners has an Inducements policy. All permissible gifts, entertainment and minor non-monetary benefits provided or received by Edinburgh Partners staff are subject to the Inducements policy. With the exception of very minor amounts, no entertainment or gifts may be accepted or provided without permission. All relevant items of gifts or hospitality are required to be recorded in a central log.

- Anti-Bribery

Edinburgh Partners has a zero tolerance policy towards bribery and has a commitment to provide business in a fair, open and honest manner. An Anti-bribery policy is in place which prohibits all staff from offering, promising, giving, requesting or accepting a bribe.

- Broker Research

Edinburgh Partners carries out internal research and supplements this through the use of research produced by third parties. Edinburgh Partners has a separate Research policy which sets out how the firm uses and pays for research through a client funded research payment account or through its own resources. This is explained further below.

- Aggregation and Allocation of Client Orders

In order to ensure as fair treatment as possible for clients, Edinburgh Partners execution policy ensures that a strict order priority system is utilised. No portfolio manager can place an order for a stock which is already being worked until the first order is completed unless there are exceptional circumstances which are closely defined. The allocation of a deal is undertaken on a pro rata basis with the only exceptions being for de minimis orders for clients. In these circumstances the random allocation facility within the front office system is utilised.

- Cross Trades

Edinburgh Partners may effect cross trades where it is permitted by a client's agreement and it complies with Edinburgh Partners policies and procedures. Cross trades present a conflict because the firm represents the interests of both buyer and seller and there could be an incentive to favour one client over another due to differing factors (e.g. fee arrangements). Edinburgh Partners will not undertake a cross trade for any ERISA clients. For any other clients, cross trades can be undertaken but only via an external broker, at mid-market price and rationale is documented as to fairness to both parties.

12 Brokerage Practices

It is our belief that the execution of a transaction has two principal elements. Firstly, the security has to be priced at a sufficient discount to our estimate of fair value. Secondly, we aim to ensure that the execution itself is done on the best possible terms. There is often a trade-off between the price of a security relative to the volume of the security traded. For purchases the price of the security is important in so far as the price paid must at all times be below our valuation indicated target.

EPNA provides its clients' transactions to EPL for execution. EPL deals with approved brokers only on an agency basis. The choice of broker and method of trading is dictated by the portfolio

manager's view of which broker he considers will be able to fulfil the trade in the timeliest and most efficient manner taking into account price, cost and likelihood of completion and settlement.

A central list of approved brokers is maintained within the front office system and is reviewed on a regular basis by our Broker Review Committee. The Broker Review Committee comprises of a portfolio manager and senior representatives from Operations and Regulatory and Operational Risk. In order for a broker to be put forward for the approved broker list the Broker Review Committee must be satisfied that the broker can provide the best possible result on a consistent basis.

Research

From January 1, 2018 we moved to execution-only commission rates for equity trading from the previous 'bundled' format whereby client dealing commission was used to pay for both permitted research services in addition to execution services.

EP does receive allowable research goods and services that are consistent with applicable regulatory requirements of the United Kingdom, Canada and the United States. These services can be used without payment to the research provider as long as they meet a number of criteria to allow them to be classified as 'minor non-monetary benefits'. Third party research which is not a minor non-monetary benefit is paid for in accordance with our Research policy. Research providers are paid through a client funded Research Payment Account (RPA) or through our own resources.

Brokerage for client referrals

EPNA does not enter into referral arrangements which are any arrangements in which we pay or receive a fee with regard to the referral of a client to or from us.

Client-directed brokerage

We accept client directed brokerage as long as the broker is on the approved broker list. However, this will affect the commission rate and could impact the price at which the trade is executed. In addition, we may not be able to participate in block or aggregated trades.

Aggregation

Please refer to Item 11, ***Code of Ethics, Participation or Interest in Client Transactions and Personal Trading***, for additional information.

We are happy to provide a copy of the Execution Policy on request.

13 Review of Accounts

It is the policy of Edinburgh Partners to operate in line with its fiduciary obligations. For each client, their portfolio restriction details are loaded into the front office system. This system reviews the restrictions each time a new order is entered. Any potential breach would be highlighted to the portfolio manager who is responsible for determining what action to take. Some breaches are able to be overridden, depending on how the restriction has been set up. The Regulatory and Operational Risk department monitors daily the use of overrides.

In addition, the Regulatory and Operational Risk department runs a daily exception report from the front office system, highlighting any clients where restrictions have been exceeded.

On a monthly basis each portfolio manager is required to review and complete a month end checklist to confirm that all trades during the period have been within client mandate. These checks are reviewed by the Regulatory and Operational Risk department.

Investment strategy review

The portfolio managers have access to the risk mitigation tools described in Item 8, **Methods of Analysis, Investment Strategies and Risk of Loss**, at all times for day to day portfolio management tasks.

In addition, the risk/reward profile of portfolios is formally reviewed on a monthly basis by product type. The data for these portfolio reviews is independently produced by the Applied Research Department and the Performance Department.

The Portfolio Review Group is led by the Chief Executive of EPL and comprises the Chair of each of the Edinburgh Partners product areas.

Client Oversight

All clients have a designated client service director to act as their main point of contact.

Client reporting

Clients are provided with monthly valuations and quarterly accounting and investment, ESG and Proxy voting reports. Portfolio commentary is typically available on a quarterly basis.

14 Client Referrals and Other Compensation

EPNA provides client servicing and marketing services to EPL for which EPL compensates EPNA. This arrangement between EPNA and EPL commenced in 2007.

EPNA does not have any referral arrangements with consultants that primarily serve as advisers to our clients. However, Edinburgh Partners does maintain a number of relationships with consultants or their affiliates. Such consultants provide information in their databases, select potential managers for their clients, and monitor our performance as investment manager after appointment.

Edinburgh Partners participates in consultant forums. We pay a fee to be a member and attend conferences (which we pay a reduced rate to attend). We also attend various industry conferences at which consultants attend.

15 Custody

EPNA does not provide or arrange custody services and clients of EPNA directly appoint their own custodians. If clients seek our advice, EPNA is willing to discuss our experience with the various custodians. The client's custodian will provide statements directly to the client. We urge our clients to compare the custodial statement with the periodic reports provided by EPNA.

16 Investment Discretion

EPNA receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions of the clients for which we advise. For registered investment companies, EPNA's authority to trade securities may also be limited by certain federal securities

and tax laws which require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to us in writing.

17 Voting Client Securities

EPNA exercises voting authority over proxies (where we have been given discretion by our clients) with respect to securities held by its clients. EPNA has proxy voting policies and procedures which are designed to ensure proxies are voted in the best interests of clients and are in accordance with Rule 206(4)-6 of the Advisers Act and other legislative requirements. The guiding principles in performing this service are to make proxy voting decisions which favor proposals that will tend to maximize a company's shareholder value and are free from the influence of conflicts of interest. All votes will be instructed through our proxy voting agent, ISS, who, in conjunction with the client's custodian, will ascertain the voting entitlement of the shares held and effect the voting as required.

This policy does not apply in any instance where a client has not granted EPNA discretionary voting authority either because the client has retained voting discretion; or granted discretion to a third party or directed EPNA to vote proxies in a particular manner.

We are happy to provide a copy of Edinburgh Partners proxy voting policies and procedures upon request and provide clients with information about how we voted any proxies on behalf of their account(s).

18 Financial Information

EPNA has no financial commitment which impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding in the last ten years.

A copy of Edinburgh Partners audited financial statements is available on request. There is no payment required to receive the firm's financial statements.

19 Requirements for State-Registered Advisers

Not applicable.