June 25, 2020

Client Relationship Summary

1. Introduction

Clark Capital Management Group, Inc. ("Clark Capital") is registered with the Securities and Exchange Commission as an investment adviser. The services offered and fees charged by an investment adviser differ from those of broker-dealers and it is important that you understand the differences. Free and simple tools are available to research investment adviser firms, broker-dealers, and their financial professionals at www.Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.[1]

2. Relationships and Services

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

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

More detailed information about our services is provided in Items 4, 7, 13 and 16 of our Form ADV Part 2A or Items 4 and 5 of our Form ADV Part 2A Appendix 1 (wrap fee program brochure), which are available here.

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

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

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

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

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

[1]This disclosure is provided to comply with the SEC's Form CRS disclosure requirements. It does not create or modify any agreement, relationship, or obligation between you and Clark Capital. Please consult your agreements with Clark Capital or Wrap Fee Program Sponsor for all terms and conditions controlling your account.

your account. Please make sure you understand what fees and costs you are paying.

More detailed information about our fees and costs is provided in Item 5 of our Form ADV Part 2A, and Item 4 of our Form ADV Part 2A Appendix 1 (wrap fee program brochure), which are available here.

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

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

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

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

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

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

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

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

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

4. Disciplinary History

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

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

5. Additional Information

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

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

Form ADV Part 2A Appendix 1
Wrap Fee Brochure

March 31, 2021

Part 2A Appendix 1 of Form ADV is our "Wrap Fee Brochure" as required by the Investment Advisers Act of 1940 and is a very important document between you as a client and Clark Capital Management Group, Inc. ("Clark Capital" or the "firm").

This Wrap Fee Brochure provides information about the qualifications and business practices of Clark Capital. If you have any questions about the contents of this Wrap Fee Brochure, please contact Conor Mullan at 215-618-8147 or at *cmullan@ccmg.com*. The information in this Wrap Fee Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any State Securities Authority.

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

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

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Item 2 – Material Changes

This Wrap Fee Brochure dated 03/31/2021 replaces the 03/30/20 version, which was the Firm's last annual update. There were no material changes to this Wrap Fee Brochure since the last annual update.

You may obtain a complete copy of this Wrap Fee Brochure, without charge, by downloading it from the SEC website as indicated on the prior page, or by contacting Advisor Support at 215-569-2224 or by email to advisorsupport@ccmg.com.

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Item 4 – Services, Fees and Compensation

OVERVIEW OF CLARK CAPITAL

Clark Capital is a registered independent investment advisor that has been managing investor assets since 1986. We are a closely held employee-owned business located in Philadelphia, Pennsylvania, with all significant owners currently employed by the firm in key management, operations, portfolio management and sales capacities. The controlling ownership of the firm resides with Harry Clark, our Executive Chairman.

Our advisory services are offered through a variety of channels, including: (1) wrap fee and dual contract managed account programs sponsored by third parties (collectively, "Third-Party Wrap Fee Programs"); (2) programs where we provide investment recommendations in the form of a model portfolio to third parties ("Model Delivery" or "Model Delivery Programs") (3) registered investment companies (the "Navigator Mutual Funds"); and (4) private clients through a turnkey asset management programs offered by Clark Capital ("Clark Capital Wrap Fee Programs"). As of 12/31/2020, the firm managed $22,873,868,256 in total assets, $17,305,230,507 of which were managed on a discretionary basis, and $5,568,637,749 of which were managed on a Model Delivery basis.

The information in this Wrap Fee Brochure is primarily related to the advisory services we provide through the Clark Capital Wrap Fee Programs. As of 12/31/20, the total assets in Clark Capital Wrap Fee Programs was $151,375,555. For more information on other services we offer, please read Clark Capital's Form ADV Part 2A and the prospectuses and relevant offering materials for the Navigator Mutual Funds.

OUR PHILOSOPHY

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

ADVISORY SERVICES

With over three decades experience providing wealth management solutions to investors, Clark Capital has navigated our clients' wealth through a variety of investment environments. There is no substitute for experience, and our seasoned team of portfolio managers strives to deliver on our investment management promise. We offer investment solutions to individuals, businesses, institutions, investment companies and financial services firms and their clients. These solutions are designed to be easy to implement and access. Portfolios may be customized to effectively meet clients' risk and return objectives.

Clark Capital generally has discretionary authority to manage accounts on behalf of our clients, which includes determining the securities to be bought or sold for a client's account and the amount of those securities, the broker or dealer to be used for purchase or sale of securities for a client's account, and the commission rates to be paid to a broker or dealer for a client's securities transactions. Also, you should note that we have full discretion to determine when your assets are invested, both when we begin to manage your account and upon receipt of additional contributions to your account.

MEETING THE NEEDS OF INDIVIDUAL INVESTORS

Prior to engaging us as an investment advisor, we will obtain information about your financial situation, investment objectives and risk comfort zone and suggest a potential investment in our wrap program. On the basis of the information that we receive from you, our portfolio team will review your situation and determine if the suggested program is suitable. We will then prepare an investment proposal for your review. If you accept the proposal, an Investment Advisory Agreement is completed and agreed to by you and Clark Capital. As such, our services will be based upon your individual needs, stated objectives and guidelines as set forth in these written agreements. We make all investment decisions on your account without your prior approval of each specific transaction; however, all such decisions are made within the boundaries of your stated objectives and guidelines and the terms of your agreement with us. As a client in one of these wrap fee programs, you generally have the ability to impose reasonable restrictions on the management of your account. In such instances and when feasible, Clark Capital will refrain from buying securities or types of securities in accordance with your restrictions. Annually, Clark Capital will contact you to evaluate the continuing suitability of the program.

CLARK CAPITAL'S WRAP FEE PROGRAMS

Clark Capital sponsors two Wrap Fee Programs: Navigator Unified Solutions and Navigator Personalized Unified Managed Account ("PUMA"). In Clark Capital's Wrap Fee Programs, our investment advisory services, the cost of transactions and custodial fees are all "wrapped" into a single annual Investment Advisory Fee based on the value of your portfolio. We help you select one of the investment strategies listed below based upon your individual needs, stated objectives and guidelines as set forth in written agreements between you and Clark Capital. The investment strategy descriptions provided below are general in nature and may be customized and/or include reasonable investment restrictions imposed by our clients. In certain instances, and when feasible, Clark Capital will refrain from buying certain securities or types of securities upon instruction from the client(s). We reserve the right to limit the availability of any particular investment strategy at any given time based on various factors including asset class capacity, pre-existing relationships, minimum account sizes, fees and distribution channels. Certain investment strategies may be available only in certain channels. Clark Capital manages Wrap Fee Program accounts according to the general investment strategies described below. Other customized strategies may be offered from time to time. Our services include, without limitation, management of equity, fixed income, balanced and other specialty investment portfolios.

NAVIGATOR UNIFIED SOLUTIONS

Navigator Unified Solutions (or "Unified Solutions") is a legacy program that is no longer offered to new clients. Navigator Unified Solutions is a unified managed account ("UMA") that is a core and explore asset allocation program that emphasizes diversification. Clark Capital combines multiple investment products, coordinates portfolio administration and allocates the assets of the portfolio at its sole discretion. From time to time, Clark Capital will reallocate portfolios. Portfolio allocations are selected from the following asset classes: U.S. equities, international equities, fixed income, and alternative investments. Portfolios are constructed drawing upon the following: mutual funds; exchange traded funds; fixed income securities; and alternative investments.

Core and explore asset allocation is employed in the segments of the portfolio holding U.S. equities, international equities, and fixed income. The core segment is focused upon market diversification across market capitalizations and styles and explore is focused upon economic sectors and world markets that are believed to have the potential of producing excess performance.

There are five risk-based portfolios to choose from in Unified Solutions:

- Level I: Level I portfolios seek to provide preservation of capital and inflation protection with current income. Capital appreciation is a secondary goal. These portfolios are designed for investors who have a low risk comfort zone and are willing to accept commensurate returns in exchange for asset preservation. Portfolios with a risk level of Level I are constructed of 20 to 30% U.S. equity, 5 to 15% international equity, 40 to 60% fixed income, 10 to 20% alternative assets, 2 to 12% global tactical (formerly known as global macro), and 0 to 15% cash.

- Level II: Level II portfolios seek to provide limited capital appreciation and modest current income with a secondary goal of capital preservation. These portfolios are for the investor who has a limited risk comfort zone and is willing to accept minimal volatility in exchange for modest wealth enhancement. Portfolios with a risk level of Level II are constructed of 20 to 45% U.S. equity, 10 to 20% international equity, 15 to 35% fixed income, 10 to 25% alternative assets, 5 to 15% global tactical (formerly known as global macro), and 0 to 15% cash.
- Level III: Level III portfolios seek to provide moderate capital appreciation and limited current income with a secondary goal of capital preservation. These portfolios are designed for investors who have a moderate risk comfort zone and are willing to accept limited volatility in exchange for moderate wealth enhancement. Portfolios with a risk level of Level III are constructed of 30 to 45% U.S. equity, 15 to 25% international equity, 5 to 20% fixed income, 10 to 25% alternative assets, 8 to 18% global tactical (formerly known as global macro), and 0 to 15% cash.

- Level IV: Level IV portfolios seek capital appreciation. These portfolios are designed for investors who have a high risk comfort zone and are willing to accept volatility in exchange for potential wealth enhancement. Current income is not a consideration. Portfolios with a risk level of Level IV are constructed of 35 to 55% U.S. equity, 20 to 30% international equity, 0 to 10% fixed income, 5 to 30% alternative assets, 10 to 20% global tactical (formerly known as global macro), and 0 to 15% cash.

- Level V: Level V portfolios seek to maximize capital appreciation. These portfolios are designed for investors who have a high risk comfort zone and are willing to accept more volatility in exchange for greater potential wealth enhancement. Current income is not a consideration. Portfolios with a risk level of Level V are constructed of 40 to 60% U.S. equity, 20 to 30% international equity, 0 to 10% fixed income, 5 to 30% alternative assets, 10 to 20% global tactical (formerly known as global macro), and 0 to 15% cash.

The minimum account size is $100,000. Portfolios are constructed to each risk level using the account components described below. Components selected for each portfolio vary with account size range. Account size ranges for each risk level are described under "Fees and Compensation."

NAVIGATOR PERSONALIZED UNIFIED MANAGED ACCOUNT ("PUMA")

With a Personalized Unified Managed Account ("PUMA") the client may choose to incorporate investment strategies featuring one or more of the account components listed below which utilize different investment styles, strategies, and investment vehicles in one managed account. Portfolio allocations are selected by the client from the following asset classes: U.S. equities, international equities, fixed income, and alternative investments. Sentry, an institutional hedging strategy, is also available. Portfolios draw upon the following: mutual funds; exchange traded funds; fixed income securities; and alternative investments including real estate, commodities, precious metals, currencies and absolute return/hedge strategies. The minimums for components of a PUMA are given below. The account must have a minimum size of $50,000 and must incorporate two or more components prior to adding an Alternative or Sentry component. Portfolios are constructed using the account components described below.

CORE U.S. EQUITY

Navigator All Cap Core U.S. Equity **Component Minimum $50,000**

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

Navigator All Cap Core U.S. Equity Hedged **Component Minimum $50,000**

The Navigator All Cap Core U.S. Equity Hedged portfolio is primarily invested in stocks of companies with market capitalizations generally falling between $300 million and $400 and also incorporates the Navigator Sentry Strategy which utilizes an allocation to volatility to hedge the portfolio in an attempt to mitigate downside risk. Our investment process is both quantitative and qualitative, incorporating proprietary models and analytical techniques that search for companies that we believe possess three characteristics: superior quality, attractive value and improving business prospects. By purchasing the undervalued shares of companies with a Durable Competitive Advantage whose businesses have accelerating momentum, we tend to benefit overtime as value increases and as the spread between price and value narrows. Our risk controls are sensitive to company and sector diversification to reduce both overall portfolio volatility and tracking error to the benchmark. The goal of the portfolio is to deliver consistent excess returns over a full market cycle at/or below benchmark volatility.

Navigator High Dividend Equity **Component Minimum $50,000**

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

Navigator Small Cap Core U.S. Equity **Component Minimum $50,000**

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

Navigator SMID Cap Core U.S. Equity **Component Minimum $50,000**

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

Navigator U.S. Equity Strategic Beta **Component Minimum $25,000**

Navigator U.S. Equity Strategic Beta is designed to provide broad U.S. equity market diversification by utilizing domestic equity exchange traded funds. The product is designed to invest using the major investment factors developed in academic finance using exchange traded funds, including market beta, value, momentum, size, quality, dividends, and volatility. The portfolio actively allocates towards factors that it favors, and underweights those it does not favor. The strategy seeks to provide capital appreciation over a market cycle with a focus on dividends in a broadly diversified domestic equity portfolio.

CORE INTERNATIONAL EQUITY

Navigator International Equity/ADR **Component Minimum $50,000**

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

Navigator International Equity Core **Component Minimum $25,000**

Navigator International Equity Core seeks to provide capital appreciation over a market cycle. The portfolio invests in broad based international equity exchange traded products and actively managed mutual funds by applying a fundamental investment approach. The diversified portfolio has the objective of providing broad-based international equity exposure. While limited strategic emphasis may be placed on emerging markets, broad diversification is always maintained. Portfolio construction employs a "top down" approach seeking wide diversity reflective of international markets. Construction of the portfolio begins with a rigorous due diligence process to select the mutual funds or exchange traded products. Due diligence focuses on long-term performance in up and down markets, style consistency, performance attribution and manager correlation. The process includes a detailed review by the Clark Capital Investment Committee for attributes such as manager tenure, investment processes, systems and trading capabilities, legal and compliance resources, and personnel and organizational structure.

Navigator International Equity Strategic Beta **Component Minimum $25,000**

The Navigator International Equity Strategic Beta was formerly known as Navigator International Equity Passive Core. Navigator International Equity Strategic Beta seeks to provide capital appreciation over a market cycle. The portfolio invests in broad based international equity exchange traded funds by applying a fundamental investment approach. The diversified portfolio has the objective of providing broad-based international equity exposure. Portfolio construction employs a passive "top down" approach seeking wide diversity reflective of international markets with limited turnover. Construction of the portfolio begins with a rigorous due diligence process to select the exchange traded products.

CORE FIXED INCOME

Navigator Tax-Free Fixed Income **Component Minimum $150,000**

Navigator Tax-Free Fixed Income is invested in very high credit quality (average quality is investment grade or better) individual tax-free municipal securities. The portfolio is constructed to control risk through maintaining duration in the portfolios (a measure of interest rate sensitivity) of between four and seven years. The strategy seeks to provide current income on a consistent basis by applying a fundamental investment approach. Active management in the portfolios seeks to provide returns to the stated benchmark through state, sector and security selection. Portfolio turnover will vary based on market opportunities such as tax loss harvesting and yield curve shifts.

Navigator Tax-Free Fixed Income Core **Component Minimum $25,000**

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

Navigator Taxable Fixed Income **Component Minimum $150,000**

Navigator Taxable Fixed Income is invested in corporate bonds, government bonds, mortgage securities and taxable municipal bonds. The portfolio is managed to opportunistically take advantage of changing expectations regarding the shape of the yield curve, credit spreads, and sector valuation. The average duration of the composite is maintained at the intermediate range of four to eight in order to limit interest rate risk, but bonds of longer maturities of 20 – 25 years may be purchased in order to build a higher yielding composite. The portfolio is generally fully invested and is appropriately diversified by sector, issuer, and credit quality. The portfolio seeks to provide current income.

Navigator Taxable Fixed Income Core **Component Minimum $25,000**

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

Navigator Ultra Short Bond Fund

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

TACTICAL U.S. EQUITY

Navigator U.S. Sector Opportunity **Component Minimum $25,000**

Navigator U.S. Sector Opportunity is primarily invested in U.S. sectors and industries through strategic rotation. The strategy has an unconstrained asset allocation policy and is allocated to the sectors and industries that we believe have the potential for producing exceptionally strong performance in the near future. A portfolio is constructed with a bias toward large cap equities and weighted to pursue maximum returns. The portfolio is actively managed; security weightings are adjusted to take advantage of emerging market opportunities as they arise to harvest gains as they mature. Portfolios are implemented using exchange traded products which provide diversification, limit specific security risk, and provide tax efficiencies. The strategy seeks to provide capital appreciation.

Navigator U.S. Style Opportunity **Component Minimum $25,000**

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

TACTICAL INTERNATIONAL EQUITY

Navigator Equity Hedged Fund **Component Minimum $25,000**

Navigator Equity Hedged Fund is an actively managed portfolio targeting U.S. equity styles, market capitalizations, and sectors and international countries and regions and incorporates the Navigator Sentry Strategy. The objective of this strategy is to provide capital appreciation with a secondary goal of capital preservation on a consistent basis by applying a disciplined quantitative investment approach. The strategy utilizes an allocation to volatility to hedge the equity portion in an attempt to limit risk.

Navigator Global Equity ETF **Component Minimum $50,000**

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

Navigator Global Equity ETF Hedged **Component Minimum $50,000**

The Navigator Global Equity ETF Hedged was formerly known as Navigator All Cap ETF Hedged and ETF with Sentry. Navigator Global Equity ETF Hedged is an actively managed portfolio targeting U.S. equity styles, market capitalizations, and sectors and international countries and regions and incorporates the Navigator Sentry Strategy. The portfolio invests in exchange traded products as they provide an efficient, low cost alternative to traditional mutual funds. The objective of this strategy is to provide capital appreciation with a secondary goal of capital preservation on a consistent basis by applying a disciplined quantitative investment approach.

Navigator Global Tactical **Component Minimum $25,000**

The Navigator Global Tactical was formerly known as Navigator Global Macro. Navigator Global Tactical is constructed from a wide range of investment opportunities including domestic and foreign equities, fixed income, real estate, commodities, precious metals and currencies. The objective is to provide investors with consistent, competitive investment returns over time by tactically capitalizing on a broad range of global market opportunities. The strategy uses Clark Capital's proprietary relative strength research to allow us to adapt to changing themes and is not biased to a traditional style, market capitalization approach or international country or region. The strategy seeks to provide capital appreciation through an unconstrained tactical allocation methodology in an effort to lower portfolio volatility and increase returns. The portfolio invests in exchange traded products, which provide diversification, limit specific security risk, and provide tax efficiencies. The strategy seeks to provide capital appreciation.

Navigator International Opportunity **Component Minimum $25,000**

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

ALTERNATIVE DIVERSIFIERS

Navigator Alternative **Component Minimum $25,000 ($10,000 in PUMA)**

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

Navigator Fixed Income Total Return **Component Minimum $25,000**

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

Navigator Sentry Managed Volatility Fund **Component Minimum $10,000**

Clark Capital serves as advisor to the Navigator Sentry Managed Volatility Fund, which is registered as an open-end investment company. The Fund strategy seeks to hedge the portfolio against significant market declines. Additional information about the Navigator Mutual Funds is available in the Funds' prospectus and SAI, which are available on the Funds' website (www.navigatorfund.com) or on the SEC's EDGAR database.

Navigator Tactical Fixed Income Fund **Component Minimum $25,000**

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

Portfolios Utilizing Global Equity ETF Separate Account Strategy

Navigator Global Balanced 20-80 **Component Minimum $100,000**

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

Navigator Global Balanced 40-60 **Component Minimum $100,000**

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

Navigator Global Balanced 60-40 **Component Minimum $100,000**

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

Navigator Global Balanced 80-20 **Component Minimum $100,000**

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

Hedged Portfolios May Utilize Global Equity ETF Separate Account Strategy or Navigator Equity Hedged Fund Based on Account Minimums Shown in Chart Below

Navigator Global Balanced 20-80 Hedged **Component Minimum. See Chart Below.**

Navigator Global Balanced 20-80 Hedged consists of portfolios with a 20% allocation to equity and 80% to fixed income. The portfolio provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component seeking to lower risk and reduce portfolio volatility. The equity allocation utilizes the Navigator Global ETF Hedged strategy which invests in exchange traded funds in U.S. equity styles, market capitalizations and styles, sectors and industry groups, and international countries and regions and also incorporates the Navigator Sentry Strategy which utilizes an allocation to volatility to hedge the portfolio in an attempt to mitigate downside risk. The fixed income allocation utilizes the Navigator Fixed Income Total Return Strategy which has an unconstrained allocation policy targeting high yield corporate, investment grade corporate, government, government agency and treasury fixed income sectors and cash and cash equivalents/money markets. Hedged portfolios may utilize Global Equity ETF separate account strategy or Navigator Equity Hedged Fund.

Navigator Global Balanced 40-60 Hedged **Component Minimum. See Chart Below.**

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

Navigator Global Balanced 60-40 Hedged **Component Minimum. See Chart Below.**

Navigator Global Balanced 60-40 Hedged consists of portfolios with a 60% allocation to equity and 40% to fixed income. The strategy provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component seeking to lower risk and reduce portfolio volatility. The equity allocation is invested in the Navigator Global Equity ETF Hedged (which invests in exchange traded funds in U.S. equity styles, market capitalizations and styles, sectors and industry groups, and international countries and regions) Navigator Sentry Strategy which utilizes an allocation to volatility to hedge the portfolio in an attempt to mitigate the downside risk. The fixed income allocation utilizes the Navigator Fixed Income Total Return Strategy. The fixed income allocation has an unconstrained allocation policy targeting high yield corporate, investment grade corporate, government, government agency and treasury fixed income sectors. Hedged portfolios may utilize Global Equity ETF separate account strategy or Navigator Equity Hedged Fund.

Navigator Global Balanced 80-20 Hedged **Component Minimum. See Chart Below.**

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

Global Balanced Hedged

Portfolio Options	**Component Minimum**
80% equity/20% fixed income	Navigator Global Balanced Hedged Separate Account Allocation: $100,000 Navigator Equity Hedged Mutual Fund Allocation: $25,000
60% equity/40% fixed income	Navigator Global Balanced Hedged Separate Account Allocation: $100,000 Navigator Equity Hedged Mutual Fund Allocation: $25,000
40 equity/60% fixed income	Navigator Global Balanced Hedged Separate Account Allocation: $100,000 Navigator Equity Hedged Mutual Fund Allocation: $25,000
20% equity/80% fixed income	Navigator Global Balanced Hedged Separate Account Allocation: $100,000 Navigator Equity Hedged Mutual Fund Allocation: $25,000

TRADITIONAL BALANCED SOLUTIONS

Navigator Traditional Balanced 60-40 **Component Minimum $150,000**

Navigator Traditional Balanced 60-40 is a portfolio consisting of 60% global equity and 40% U.S. fixed income. The strategy provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component. The equity allocation invests in exchange traded products in U.S. equity styles, market capitalizations and styles, and sectors and industry groups and international countries and regions. The fixed income allocation invests in individual fixed income securities, exchange traded products and mutual funds. Blending U.S. and international investments and fixed income may lower risk by reducing portfolio volatility. The strategy seeks to provide growth of capital with a secondary objective of current income on a consistent basis by applying a disciplined quantitative investment approach.

Navigator Traditional Balanced 60-40 Hedged **Component Minimum $150,000**

Navigator Traditional Balanced 60-40 Hedged is a portfolio consisting of 60% global equity and 40% U.S. fixed income. The strategy provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component. The equity allocation invests in exchange traded products in U.S. equity styles, market capitalizations and styles, and sectors and industry groups and international countries and regions. The fixed income allocation invests in individual fixed income securities, exchange traded products and mutual funds. Blending U.S. and international investments and fixed income may lower risk by reducing portfolio volatility. A hedging strategy is incorporated into the portfolio through the Navigator Sentry Managed Volatility Fund. The strategy seeks to provide growth of capital with a secondary objective of current income on a consistent basis by applying a disciplined quantitative investment approach.

Navigator Traditional Balanced 70-30 **Component Minimum $150,000**

Navigator Traditional Balanced 70-30 is a portfolio consisting of 70% global equity and 30% U.S. fixed income. The strategy provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component. The equity allocation invests in exchange traded products in U.S. equity styles, market capitalizations and styles, and sectors and industry groups and international countries and regions. The fixed income allocation invests in individual fixed income securities, exchange traded products and mutual funds. Blending U.S. and international investments and fixed income may lower risk by reducing portfolio volatility. The strategy seeks to provide growth of capital with a secondary objective of current income on a consistent basis by applying a disciplined quantitative investment approach.

Navigator Traditional Balanced 70-30 Hedged **Component Minimum $150,000**

Navigator Traditional Balanced 70-30 Hedged is a portfolio consisting of 70% global equity and 30% U.S. fixed income. The strategy provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component. The equity allocation invests in exchange traded products in U.S. equity styles, market capitalizations and styles, and sectors and industry groups and international countries and regions. The fixed income allocation invests in individual fixed income securities, exchange traded products and mutual funds. Blending U.S. and international investments and fixed income may lower risk by reducing portfolio volatility. Hedging is incorporated into the portfolio through the Navigator Managed Volatility Fund. The strategy seeks to provide growth of capital with a secondary objective of current income on a consistent basis by applying a disciplined quantitative investment approach.

Navigator Traditional Balanced 80-20 **Component Minimum $150,000**

Navigator Traditional Balanced 80-20 is a portfolio consisting of 80% equity and 20% fixed income. The strategy provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component. The equity allocation invests in exchange traded products in U.S. equity styles, market capitalizations and styles, and sectors and industry groups and international countries and regions. The fixed income allocation invests in individual fixed income securities, exchange traded products and mutual funds. Blending U.S. and international investments and fixed income may lower risk by reducing portfolio volatility. The strategy seeks to provide growth of capital with a secondary objective of current income on a consistent basis by applying a disciplined quantitative investment approach.

Navigator Traditional Balanced 80-20 Hedged **Component Minimum $150,000**

Navigator Traditional Balanced 80-20 is a portfolio consisting of 80% equity and 20% fixed income. The strategy provides targeted exposure to the U.S. equity market coupled with targeted international exposure and an actively managed fixed income component. The equity allocation invests in exchange traded products in U.S. equity styles, market capitalizations and styles, and sectors and industry groups and international countries and regions. The fixed income allocation invests in individual fixed income securities, exchange traded products and mutual funds. Blending U.S. and international investments and fixed income may lower risk by reducing portfolio volatility. Hedging is incorporated into the portfolio through the Navigator Sentry Managed Volatility Fund. The strategy seeks to provide growth of capital with a secondary objective of current income on a consistent basis by applying a disciplined quantitative investment approach.

Navigator Sentry

Navigator Sentry **Component Minimum $10,000**

The Sentry portfolio's objective is to provide a hedge component to a more broadly diversified portfolio in order to protect against large market declines. The strategy is designed to provide negative correlation to the market and is intended to be only a small allocation to a multi asset class allocation mix. The portfolio maintains its strategy by owning protection, normally in the form of S&P 500 put options, and attempts to control the cost of the hedge through active management and trading opportunistically.

Navigator Holding Account

Navigator Holding Account **Component Minimum $25,000**

Navigator Holding Accounts are invested in money market accounts and securities that are unmanaged.

Account Options

For both Unified Solutions and PUMA, clients may customize their account with the following options:

- **Active Core Allocation.** At the client's option, the core portion of the portfolio will utilize mutual funds.
- **Passive Core Allocation.** At the client's option, the core portion of the portfolio will utilize index exchange traded products allocated to replicate the market exposure of the account.
- **Sentry Strategy.** Clients may choose to have hedging incorporated into the portfolio. The hedging strategy is used in an effort to curb volatility and help limit portfolio loss during major market declines through the use of volatility exchange traded products and/or put options on the S&P 500. The strategy is implemented in the portfolio through the use of the Navigator Sentry Managed Volatility Fund.

FEES AND COMPENSATION

As a client, you should be aware that the wrap fee charged by Clark Capital could be higher (or lower) than those charged by others in the industry, and that it may be possible to obtain the same or similar services from other firms at lower rates. A client may be able to obtain some or all of the types of services available through Clark Capital's Wrap Fee Programs on an individual basis through other firms and, depending on the circumstances, the aggregate of any separately paid fees may be lower or higher than the annual fees shown below. The factors that impact the relative cost to clients in Clark Capital's Wrap Fee Programs include: the size of the account, the investment strategies selected for the account, customized options selected by the client (i.e., active core allocation, passive core allocation, hedging), the level of trading activity in the client's account with the custodian (the lower the activity, the less the client may benefit), and the level of trading away ("step-out") activity in the client's account from a client's custodian. For more information on the cost of trades that are traded away from the custodian, please see "Brokerage Practices" below.

Investment Advisory Fees

Clients pay a fee for our investment advisory services ("Investment Advisory Fee"). The range of Investment Advisory Fees you pay for our services are shown in the annual fee schedules below. The services we provide in exchange for our Investment Advisory Fee are also described below.

The Investment Advisory Fee is deducted quarterly in advance from your account by your custodian and is based on the assets in your account at the close of the prior quarter. At the inception of our relationship with you and each quarter thereafter, we notify your custodian of the amount of the Investment Advisory Fee due and payable to us. The custodian does not validate or check the Investment Advisory Fee or its calculation or the assets on which the fee is based. Your custodian will deduct the fee from your account or, if you have more than one account, you may arrange to have fees paid from an account you designate with our approval.

Each month, you will receive a statement directly from your custodian showing all transactions, positions and credits/debits into or from your account, including the Investment Advisory Fee deducted from your account. Quarterly, you will receive a statement from us that will show the allocation of your account, performance, portfolio value and changes in portfolio value, among other account details. You should compare the statements you receive from your custodian with the quarterly statement from Clark Capital and notify us immediately if you find discrepancies, or if you do not receive the monthly custodial statements.

The Investment Advisory Fee will not be adjusted if assets are withdrawn after the inception of a quarter. When you contribute additional assets to your account after the initial subscription date, the Investment Advisory Fee will be increased on a pro rata basis during the quarter in which additional assets are received. Notice of cancellation or termination of an account must be received within ten days of quarterly billing to request a refund. If a client's portfolio has an investment allocation to a mutual fund managed by Clark Capital, the fees will be adjusted to accommodate the investment advisory fee also to be paid by the mutual fund to Clark Capital to ensure that clients are not paying additional advisory fees to Clark Capital.

The Investment Advisory Fee covers the following services provided by Clark Capital: investment advice; portfolio allocations; account processing; client consultation; detailed account statements; and other services. The Investment Advisory Fee is also inclusive of custodial, clearing and brokerage services. The Investment Advisory Fee is a flat fee based on the amount of assets the client has under management and the level of the account according to the schedules below, subject to certain exceptions. The Investment Advisory Fee encompasses all portfolio components, except certain management fees and other operating fees and expenses incurred by mutual funds and exchange traded funds as disclosed in the prospectus for such funds. The Investment Advisory Fee may be negotiable.

Unified Solutions Fees

Unified Solutions Active Core Option

From:	**To:**	**Level I**	**Level II**	**Level III**	**Level IV**	**Level V**
Account minimum	$500,000	0.85%	1.00%	1.15%	1.15%	1.15%
$500,001	$750,000	0.75%	0.95%	1.10%	1.10%	1.10%
$750,001	$1,000,000	0.70%	0.85%	1.00%	1.00%	1.00%
Over $1,000,000		0.60%	0.80%	0.90%	0.90%	0.90%

Account levels are based upon risk determination and investment objectives.

Unified Solutions Passive Core Option

From:	**To:**	**Level 0**	**Level I**	**Level II**	**Level III**	**Level IV**	**Level V**

Account minimum	$250,000	0.70%	0.85%	1.00%	1.15%	1.15%	1.15%
$250,001	$500,000	0.60%	0.80%	0.90%	1.05%	1.05%	1.05%
$500,001	$750,000	0.50%	0.70%	0.85%	1.00%	1.00%	1.00%
$750,001	$1,000,000	0.45%	0.60%	0.75%	0.90%	0.90%	0.90%
Over $1,000,000		0.40%	0.55%	0.70%	0.85%	0.85%	0.85%

Account levels are based upon risk determination and investment objectives.

PUMA and Separate Account Fees

With a PUMA, the client may choose to incorporate investment strategies featuring one or more of the account components listed in Item 4 of this Wrap Fee Brochure which utilize different investment styles, strategies, and investment vehicles into one managed account. The account must have a minimum size of $50,000 and must incorporate two or more components. The Advisory fee will be a combination of the individual components' fee schedules as set forth below:

All Cap Core U.S. Equity
All Cap Core U.S. Equity Hedged
Alternative Strategy
Global Equity ETF
Global Tactical
Global Opportunity
High Dividend Equity
High Dividend Equity with Options or Customized
International Equity/ADR
International Opportunity
Small Cap Core U.S. Equity
SMID Cap Core U.S. Equity
Traditional Balanced
Traditional Balanced Hedged
U.S. Sector Opportunity
U.S. Style Opportunity

From:	To:	
Account minimum	$500,000	1.10%
$500,001	$750,000	1.00%
$750,001	$1,000,000	0.95%
Over $1,000,000		0.85%

Global Equity ETF Hedged

From:	To:	
Account minimum	$500,000	1.05%
$500,001	$750,000	0.95%
$750,001	$1,000,000	0.90%
Over $1,000,000		0.80%

Global Balanced

From:	To:	
Account minimum	$500,000	0.50%
$500,001	$750,000	0.40%
$750,001	$1,000,000	0.30%
Over $1,000,000		0.25%

* *Using Separate Account Allocation of Fixed Income Total Return*

Global Balanced Hedged*

From:	To:	

Account minimum	$500,000	0.00%
$500,001	$750,000	0.00%
$750,001	$1,000,000	0.00%
Over $1,000,000		0.00%

** Using the mutual fund Navigator Equity Hedged Fund and Navigator Tactical Fixed Income Fund. Clark Capital receives a fee for management of the funds from the Fund.*

Fixed Income Total Return

From:	To:	
Account minimum	$500,000	0.85%
$500,001	$750,000	0.70%
$750,001	$1,000,000	0.60%
Over $1,000,000		0.50%

International Equity Strategic Beta
U.S. Equity Strategic Beta
U.S. Equity Income Strategic Beta

From:	To:	
Account minimum	$500,000	0.50%
$500,001	$750,000	0.45%
$750,001	$1,000,000	0.40%
Over $1,000,000		0.35%

International Equity Core
U.S. Equity Income Core
U.S. Equity Core

From:	To:	
Account minimum	$500,000	0.75%
$500,001	$750,000	0.70%
$750,001	$1,000,000	0.65%
Over $1,000,000		0.60%

MultiStrategy
Taxable Fixed Income
Taxable Fixed Income Strategic Beta
Tax-Free Fixed Income
Tax-Free Fixed Income Core

From:	To:	
Account minimum	$500,000	0.50%
$500,001	$1,000,000	0.40%
$1,000,001	$3,000,000	0.30%
Over $3,000,000		0.25%

Holding Accounts

Asset Valuation:	
Account minimum	0.35%

Option Enhancement on Concentrated Equity

Asset Valuation:	

Variable	0.75%

See "Additional Fees" below for information on other potential fees.

ADDITIONAL FEES

The Investment Advisory Fees payable to us do not include all the fees you will pay when we manage your account. The following fees may be assessed depending upon your investment choice: (1) advisory fees and administrative fees charged by mutual funds and exchange traded products including the mutual funds and exchange traded products managed by Clark Capital (such as distribution fees, servicing fees, operating expenses and deferred sales charges); (2) wire transfer and electronic fund processing fees; (3) SEC or other regulatory fees; (4) brokerage commissions or other charges imposed by broker-dealers or entities other than the custodian if trades are stepped out to another broker-dealer (see "Brokerage Practices" below); or (5) other fees mandated by law.

Clark Capital serves as an advisor to the Navigator Mutual Funds. At times, and as described in this Wrap Fee Brochure, Clark Capital may invest a portion of the assets managed for Clark Capital Wrap Fee Program clients in one or more of the Navigator Mutual Funds. In those instances, the assets invested in a Navigator Mutual Fund will be subject to the applicable management fee imposed on Fund assets, as described in the Funds' prospectus. In order to address the economic incentive that Clark Capital may have in investing Clark Capital Wrap Fee Program client accounts in the Funds, the Investment Advisory Fee payable under Clark Capital's Wrap Fee Program is reduced to offset the management fee that Clark Capital will receive from the Funds. Assets invested in a Navigator Mutual Fund will also be subject to the other expenses described in the Funds' prospectuses, including any applicable distribution fees, administrative expenses, and other Fund operating expenses. Please refer to the Navigator Mutual Funds' prospectuses and statements of additional information for information on additional fees and expenses associated with those investments.

Item 5 – Account Requirements and Types of Clients

TYPES OF CLIENTS

We provide our services to a variety of clients in our Wrap Fee Programs including:

- Individuals, including high net worth individuals
- Trusts, estates and charitable organizations
- Corporations or other business entities not otherwise listed
- Pension and profit sharing plans (but not plan participants)
- State or municipal government entities
- Nonprofit entities
- Other investment advisers

ACCOUNT REQUIREMENTS/MINIMUMS

For accounts to be established on Clark Capital's Wrap Fee Programs, all required paperwork must be completed and assets must be forwarded or transferred to the client's custodian. Accounts must meet minimum size requirements as given in the description of each portfolio/strategy in Item 4 of this Brochure. This size requirement does not apply if the account drops below the minimum level solely due to market action.

Item 6 – Portfolio Manager Selection and Evaluation

Clark Capital is the only manager and sponsor in the Clark Capital Wrap Fee Programs. Clark Capital Wrap Fee Program accounts are managed by Clark Capital's portfolio management team and performance for accounts is calculated according to its GIPS® policies and procedures for the composite in which accounts are included. ACA Performance Services provides a third-party examination of composite performance.

Clark Capital Wrap Fee Program client accounts are managed exclusively by Clark Capital's portfolio managers. These individuals also manage accounts for other clients of Clark Capital, including clients in Third-Party Wrap Fee Programs. As a result, certain conflicts could arise. Clark Capital has established certain policies and procedures, such as trade aggregation and allocation procedures and a trade rotation strategy, to ensure that all clients are treated fairly.

In addition to the Clark Capital Wrap Fee Programs that we sponsor, we act as an investment adviser (or "sub-adviser") to Third-Party Wrap Fee Programs sponsored by independent financial services firms, such as banks, broker-dealers, and other investment advisers ("Program Sponsors"). The investment management services we provide through these Third-Party Wrap Fee Programs follow the same investment philosophy, investment process, and security selection offered in Clark Capital's Wrap Fee Programs. As an investment adviser to these Third-Party Wrap Fee Programs, we are compensated by the Program Sponsor with a portion of the wrap fee paid by the client.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Clark Capital does not charge performance-based fees (fees based on a share of capital gains or on capital appreciation of the funds or securities in your account). Clark Capital's wholly-owned affiliate, Navigator Asset Management LLC, is an SEC-registered investment adviser and manager of three hedge funds: the Clark FITR US Fund LP, a Delaware limited partnership ("FITR Onshore Fund"); Clark FITR US Master Fund LP, a Cayman Islands exempted limited partnership ("FITR Master Fund"); and Clark FITR Fund (Cayman) Ltd., a Cayman Islands exempted company ("FITR Offshore Fund") (collectively, the "FITR Hedge Funds"). Clark Capital also owns 100% of the General Partner of the FITR Hedge Funds, which receives performance-based compensation from the FITR Master Fund in the form of capital appreciation of the assets of the FITR Master Fund.

The management of different types of clients with different fee arrangements ("side-by-side" management) gives rise to certain conflicts of interest. The receipt of performance-based fees creates an incentive for Clark Capital (and its portfolio managers that manage the FITR Hedge Funds for Navigator Asset Management) to favor accounts that pay performance fees because compensation received from such clients is more directly tied to the performance of their accounts and can be more lucrative. For example, in certain situations, portfolio managers could have an incentive to allocate better-performing securities to those accounts subject to performance fees rather than to those which are not. Additionally, Clark Capital invests in the FITR Hedge Funds and its employees are permitted to invest in the FITR Hedge Funds, which also creates an incentive for Clark Capital and its employees to favor the FITR Hedge Funds over other client accounts. To address these conflicts, Clark Capital and Navigator Asset Management have both adopted policies and procedures designed to ensure that all clients are treated fairly and equitably over time. Moreover, Clark Capital and Navigator Asset Management's policies and procedures state that investment decisions are to be made in accordance with the fiduciary duties owed to each client account and without consideration of Clark Capital's (or either of their affiliates and personnel's) pecuniary, investment or other financial interests.

METHODS OF ANALYSIS

<u>Quantitative Analysis</u>

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

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

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

Fundamental Analysis

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

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

INVESTMENT OPTIONS

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

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

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

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

RISK OF LOSS

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

GENERAL RISKS

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

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

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

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

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

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

RISKS ASSOCIATED WITH STRATEGIES

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

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

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

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

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

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

RISK ASSOCIATED WITH SECURITIES AND INVESTMENTS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

PROXY VOTING

Clark Capital generally does not accept the authority to exercise the proxy voting right on behalf of advisory clients in Clark Capital's Wrap Fee Programs. You will receive proxies or other solicitations directly from your custodian. You should direct all questions about a particular proxy solicitation to your custodian. In certain circumstances, we may be required to vote proxies as part of our fiduciary duties to certain ERISA plans. In these instances, Clark Capital will vote proxies in a manner consistent with the best interests of the plan participants. Clients may request information on how proxies for ERISA plan shares were voted.

CLASS ACTION LAWSUITS

Clark Capital does not file forms in class action lawsuits.

Item 7 – Client Information Provided to Portfolio Managers

Clark Capital is the only manager in the Clark Capital Wrap Fee Programs. Clark Capital gathers client information such as guidelines, restrictions and suitability as part of the account opening process. This information is provided to the portfolio management team before the account is invested.

Item 8 – Client Contact with Portfolio Managers

There are no restrictions placed on clients' ability to contact and consult with Clark Capital or any members of its portfolio management team. You may contact Clark Capital to arrange for a consultation regarding the management of your account.

Item 9 – Additional Information

DISCIPLINARY INFORMATION

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

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

REGISTERED REPRESENTATIVES

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

CFTC REGISTRATION

Clark Capital's wholly owned affiliate, Navigator Asset Management, is registered as a commodity pool operator (a "CPO") with the Commodity Futures Trading Commission (the "CFTC") and a member of the National Futures Association (the "NFA"). Certain officers and employees of Clark Capital, who are also officers and employees of Navigator Asset Management, are registered with the CFTC as principals and/or associated persons.

INDUSTRY ACTIVITIES

GWLP

As described above, GWLP is a broker-dealer registered with FINRA and Steven Grant, Co-Head of Fixed Income, serves as President, Chief Executive Officer and Chief Financial Officer of GWLP. Additionally, Clark Capital shares common office space with GWLP. Clark Capital does not utilize GWLP for client accounts.

Portfolio Solutions

Certain individual owners of Clark Capital hold ownership interests in Portfolio Solutions, LLC, a company that holds a majority interest in GWLP.

Navigator Mutual Funds

Clark Capital serves as the investment adviser to the Navigator Mutual Funds. In certain cases, Clark Capital is authorized to invest a portion of an advisory client's assets in the Navigator Mutual Funds. As described in Item 4 of this Brochure, an investment advisory fee is payable to Clark Capital by a Program Sponsor when Navigator Mutual Funds are used in a client account, which is negotiated with and set by the Program Sponsor. This investment advisory fee will be lower than what Clark Capital would receive if Navigator Mutual Funds were not allocated to a client account to offset the management fees that Clark Capital will receive from the Navigator Mutual Funds. Clark Capital's overall compensation will depend, however, on the actual proportion of a client's account allocated to a Fund, which may vary over time. Furthermore, Clark Capital's overall compensation will generally be higher when a greater percentage of a client's assets are invested in a Navigator Mutual Fund. Wrap Fee Program clients should be aware that this presents a conflict of interest in that Clark Capital has a financial incentive to invest client assets in the Navigator Mutual Funds to earn higher compensation. Assets invested in a Navigator Mutual Fund will also be subject to the other expenses described in the Funds' prospectus, including any applicable distribution fees, administrative expenses, and other Fund operating expenses.

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

The Navigator Equity Hedged Fund. Clark Capital serves as advisor to the Navigator Equity Hedged Fund, which is registered as an open-end investment company. The investment management services we provide to the fund mirror the investment philosophy, investment process, and security selection of the Navigator Global Equity ETF Hedged portfolio. This fund is an option in the global balanced hedged accounts.

The Navigator Tactical Fixed Income Fund. Clark Capital serves as advisor to the Navigator Tactical Fixed Income Fund, which is an open-end investment company. The investment management services we provide to the fund mirror the investment mandate of the Navigator Fixed Income Total Return portfolio.

The Navigator Sentry Managed Volatility Fund. Clark Capital serves as advisor to the Navigator Sentry Managed Volatility Fund, which is registered as an open-end investment company. The investment management services we provide to the fund mirror the investment philosophy, investment process, and security selection of the Navigator Sentry portfolio. This fund will be used in all hedged portfolios.

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

As described in Item 4 of this Wrap Fee Brochure, the Navigator Mutual Funds may be used in client accounts, and Clark Capital will receive a management fee from the Funds when the Funds are used for client accounts. In order to address the economic incentive that Clark Capital may have in investing Clark Capital Wrap Fee Program client accounts in the Funds, our Investment Advisory Fee payable under Clark Capital's Wrap Fee Program is reduced to offset the management fee that Clark Capital will receive from the Funds. Assets invested in a Navigator Mutual Fund will also be subject to the other expenses described in the Funds' prospectuses, including any applicable distribution fees, administrative expenses, and other Fund operating expenses. Additional information about the Navigator Mutual Funds is available in the Funds' prospectus and SAI, which are available on the Funds' website (www.navigatorfund.com) or on the SEC's EDGAR database.

Navigator Asset Management LLC

Navigator Asset Management is an SEC-registered investment adviser established in 2019 to manage private hedge funds ("the FITR Hedge Funds") to which it, or an affiliate, serves as the sponsor. Navigator Asset Management is a wholly-owned subsidiary of Clark Capital. Navigator Asset Management will share certain personnel and other resources with Clark Capital through a contractual arrangement with Clark Capital. It is possible that Navigator Asset Management will share client information and other information with Clark Capital due to the overlap in personnel and shared office space. The FITR Hedge Funds do not invest in the Navigator Mutual Funds and, similarly, the Navigator Mutual Funds do not invest in the FITR Hedge Funds. Current or prospective clients that have separately managed accounts with Clark Capital and/or invest in the Navigator Funds may, however, become investors in the FITR Hedge Funds.

CODE OF ETHICS

Clark Capital has adopted a code of ethics pursuant to Rule 204A-1 under the Advisers Act (the "Code of Ethics") that governs a number of conflicts of interest that can arise when providing our advisory services to you. This Code of Ethics is designed to ensure we meet our fiduciary obligation to you, our client (or prospective client), to detect and prevent violations of securities laws, and to drive home a culture of compliance within Clark Capital. This Code of Ethics is distributed to each employee at the time of hire and when there are any material changes. On a quarterly basis, employees are required to attest that they have read, understood, and have observed the Code of Ethics. The Code is reinforced in monthly all-employee meetings, as necessary, and on-going monitoring of employee activity.

Our Code includes the following:

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

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

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

REVIEW OF ACCOUNTS

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

CLIENT REFERRALS AND OTHER COMPENSATION

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

BROKERAGE PRACTICES

BROKER-DEALER SELECTION

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

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

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

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

BROKER-DEALER SELECTION

When we manage client accounts in Clark Capital's Wrap Fee Program, all of the fees and costs to the client are wrapped into a single Investment Advisory Fee. This fee covers, among other things, client trading costs for transactions that are executed with your custodian bank. Trades that are executed with a broker-dealer other than the custodian are referred to as "step-out trades" or "trading away" from the custodian and generally result in additional trading costs to the client. We execute most model-following transactions (i.e., trades based on investment decisions for an entire model or strategy) away from the custodian for purposes of order aggregation. Furthermore, for clients where Clark Capital is managing fixed income securities, nearly all fixed income transactions are traded away from the custodian. We generally do not, however, step out small trades or trades that are not based on a change to our models, such as account openings and closings, new subscriptions, and redemptions.

When we trade away from the custodian, clients will typically incur additional trading costs, such as commissions, mark-ups or mark-downs or other transaction fees. These additional trading costs, however, are netted or imbedded in the price of the security, so clients will not be billed more than the stated Investment Advisory Fee on account of step out trades. Furthermore, we believe that trading away from custodians as described herein ultimately benefits all clients because the size of the block orders generally results in better execution than trading with the custodian. Specifically, by blocking client orders where feasible, we are often able to limit the market impact of our trades, achieve lower execution costs that are typically associated with larger orders, and minimize dispersion across our client accounts. (For additional information about order aggregation, please see "Trade Aggregation" below).

RESEARCH SERVICES AND OTHER SOFT DOLLAR BENEFITS

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

BROKERAGE FOR CLIENT REFERRALS

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

TRADE AGGREGATION

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

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

TRADE ROTATION

We manage assets for a variety of clients in various programs that use different custodians and broker-dealers for executing equity securities transactions. Accordingly, we use trade rotations designed to equitably execute transactions across all client accounts that we manage so that each group of clients can expect to receive executions at the beginning, middle and the end of the rotations over time. We follow one trade rotation schedule for client accounts where we have the discretion to trade, and another trade rotation for clients in programs where we do not have trading discretion (i.e., Model Delivery Programs). These two trade rotations are executed in parallel (or simultaneously) once our investment strategy models are updated and our trading desk is ready to trade, which we believe results in equitable treatment for all client accounts.

PRINCIPAL TRADING

Principal transactions are transactions in which an investment advisor acting as principal for its own account buys or sells any security for you or any other client. Clark Capital's policy and practice is not to engage in any principal transactions.

CROSS TRANSACTIONS – AGENCY CROSS TRANSACTIONS

A cross transaction occurs when an investment adviser causes one client to sell a security to another client in an arms-length transaction. Agency cross transactions are transactions in which an investment adviser acts as broker for both the client of the advisor and the party on the other side of the transaction. Clark Capital does not engage in any cross transactions or agency cross transactions.

TRADE ERRORS

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

CUSTODY

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

FINANCIAL INFORMATION

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

PRIVACY NOTICE

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

The Types of Personal Information We Collect

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

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

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

Why We May Need to Share Your Personal Information

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

How We Protect Your Personal Information

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

When You Can Limit Sharing

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

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

Definitions

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

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

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

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

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

Pursuant to ERISA Section 408(b)(2), we are furnishing the guide below, which provides important information that should be considered in connection with the services we provide to your ERISA plan ("Plan"). Should you have any questions about this guide or the information provided to you concerning Clark Capital's services or compensation, please do not hesitate to contact Denise Williams, our Chief Compliance Officer, at 215-569-2224.

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

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

Information Required under 408(b)(2)	**Specific Disclosure**	**Location(s) of Information**
	excess of the de minimis threshold established under the Department of Labor's regulations and guidance.	
Compensation that will be paid among Clark Capital and related parties.	Not applicable to the services provided by Clark Capital.	
Compensation Clark Capital will receive if you terminate this service agreement.		For information regarding compensation paid upon termination of services, please refer to the Investment Advisory Agreement executed between the Plan and Clark Capital and Clark Capital's Form ADV – Part 2A Appendix 1 Wrap Fee Brochure, Item 4 – Services, Fees and Compensation.
The cost to your Plan of recordkeeping services.	Not applicable to the services provided by Clark Capital.	

Form ADV Part 2B
Brochure Supplement
March 31, 2021

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

- K. Sean Clark, CFA
- David J. Rights
- Maira F. Thompson
- Jamie J. Mullen
- Anthony W. Soslow
- Jonathan A. Fiebach

The above individuals may be contacted at the address above.

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

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

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53rd Floor
1650 Market Street
Philadelphia, PA 19103
800.766.2264
www.ccmg.com

Phone 215-569-2224 Website: www.ccmg.com

K. Sean Clark, CFA, Chief Investment Officer, Born 1969

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

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

Other Business Activities: Mr. Clark is the Chief Investment Officer of Navigator Asset Management LLC ("NAMCO"), a SEC-registered investment adviser that is a wholly owned subsidiary of Clark Capital. As discussed in Clark Capital's Form ADV Part 2A, NAMCO manages hedge funds and receives performance-based compensation for its services, which creates an incentive for Clark Capital (and its portfolio managers) to favor these funds over Clark Capital accounts. To address this conflict, Clark Capital and NAMCO have both adopted policies and procedures designed to ensure that all clients are treated fairly and equitably over time. Mr. Clark devotes less than 10% of his time to NAMCO. He has no other investment-related outside business activities.

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

Supervision: Mr. Clark heads the Investment Committee. The Committee works as a team and meets weekly to review current security positions and consider the likelihood that each security will contribute to the investment objectives and risk profile of Clients. The models used in strategy management are continually fine-tuned to fit each strategy's objectives as conditions change. Mr. Clark is a member of, and reports directly to, the Clark Capital Executive Committee. His activities are also monitored by Clark Capital's CCO, Conor Mullan. Conor Mullan can be reached at cmullan@ccmg.com or 215-616-8147.

David J. Rights, Director of Research, Born 1945

Educational Background and Business Experience: Mr. Rights holds a degree in Electrical Engineering from Lehigh University. In the late 1970s, Mr. Rights turned his technical skills to the investment arena and began to develop economically based, quantitatively driven econometric models. He has also developed technical models used to enhance relative returns and reduce risk of exchange traded products and fund based products. Mr. Rights directs the ongoing research into securities selection and portfolio strategies used to enhance the Navigator investment programs. Mr. Rights was formerly President and Chief Investment Officer of RTE Asset Management, which merged with Clark Capital in 2005. Mr. Rights' FINRA license is held at Grant Williams, LP.

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

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

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

Supervision: Mr. Rights is a member of the Investment Committee and reports to K. Sean Clark. The Committee works as a team and meets weekly to review current security positions and consider the likelihood that each security will contribute to the investment objectives and risk profile of Clients. The models used in strategy management are continually fine-tuned to fit each strategy's objectives as conditions change. Mr. Rights' activities are also monitored by Clark Capital's CCO, Conor Mullan. Conor Mullan can be reached at cmullan@ccmg.com or 215-616-8147.

Maira F. Thompson, Senior Portfolio Manager, Born 1960

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

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

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

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

Supervision: Ms. Thompson is a member of the Investment Committee and reports to K. Sean Clark. The Committee works as a team and meets weekly to review current security positions and consider the likelihood that each security will contribute to the investment objectives and risk profile of Clients. The models used in strategy management are continually fine-tuned to fit each strategy's objectives as conditions change. Ms. Thompson's activities are also monitored by Clark Capital's CCO, Conor Mullan. Conor Mullan can be reached at cmullan@ccmg.com or 215-616-8147.

Jamie J. Mullen, Senior Portfolio Manager, Born 1959

Educational Background and Business Experience: Mr. Mullen manages the Navigator Taxable and Tax-Free Fixed Income Strategies. In addition, Mr. Mullen manages cover call options deployed on individual stocks and exchange traded funds and implements collar strategies on individual blocks of stocks. Mr. Mullen has over 25 years if experience with fixed income securities and extensive experience in dealing with mutual funds. He joined Clark Capital in 1999. Mr. Mullen received his degree from St. Joseph's University. Mr. Mullen's FINRA license is held at Grant Williams, LP.

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

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

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

Supervision: Mr. Mullen is a member of the Investment Committee and reports to K. Sean Clark. The Committee works as a team and meets weekly to review current security positions and consider the likelihood that each security will contribute to the investment objectives and risk profile of the Clients. The models used in strategy management are continually fine-tuned to fit each strategy's objectives as conditions change. Mr. Mullen's activities are also monitored by Clark Capital's CCO, Conor Mullan. Conor Mullan can be reached at cmullan@ccmg.com or 215-616-8147.

Anthony W. Soslow, CFA, Senior Portfolio Manager, Born 1965

Educational Background and Business Experience: Mr. Soslow graduated from the Wharton School of the University of Pennsylvania. He has over 30 years of portfolio management experience utilizing both a quantitative and fundamental process. From 1997 to 2013, Mr. Soslow was the President and Chief Investment Officer of Global Capital Management which he founded. He was cited as a Top Guns Manager in 2006 and 2007 and was named Manager of the Decade in 2011 by PSN. From 1986 through 1997, Mr. Soslow was Director of Portfolio Management at RTE Asset Management where he was responsible for portfolio management across all asset classes. Mr. Soslow has earned the Chartered Financial Analyst[2] (CFA) designation. He joined Clark Capital Management in 2013.

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

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

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

Supervision: Mr. Soslow is a member of the Investment Committee and reports to K. Sean Clark. The Committee works as a team and meets weekly to review current security positions and consider the likelihood of whether or not each security will contribute to the investment objectives and risk profile of Clients. The models used in strategy management are continually fine-tuned to fit each strategy's objectives as conditions change. Mr. Soslow's activities are also monitored by Clark Capital's CCO, Conor Mullan. Conor Mullan can be reached at cmullan@ccmg.com or 215-616-8147.

Jonathan A. Fiebach, SVP, Head of Cross Asset Management, Co-Head of Fixed Income, Born 1964

Educational Background and Business Experience: Mr. Fiebach is Clark Capital's Head of Cross Asset Management and Co-Head of Fixed Income. He is the lead manager of the Navigator Tactical Fixed Income Fund. Mr. Fiebach has over 30 years of experience as a trader and senior portfolio management leader in the institutional bond industry. Prior to joining Clark Capital, Mr. Fiebach was co-founder of Main Point Advisors where he was responsible for the implementation and management of non-traditional fixed income strategies. He joined Clark Capital in 2016. Mr. Fiebach received his Bachelor of Science degree from Albright College.

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

Other Business Activities: Mr. Fiebach is a Director of Navigator Asset Management LLC ("NAMCO"), a SEC-registered investment adviser that is a wholly owned subsidiary of Clark Capital. As discussed in Clark Capital's

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

Form ADV Part 2A, NAMCO manages hedge funds and receives performance-based compensation for its services, which creates an incentive for Clark Capital (and its portfolio managers) to favor these funds over Clark Capital accounts. To address this conflict, Clark Capital and NAMCO have both adopted policies and procedures designed to ensure that all clients are treated fairly and equitably over time. Mr. Fiebach devotes less than 10% of his time to NAMCO. He has no other investment-related outside business activities.

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

Supervision: Mr. Fiebach is a member of the Investment Committee and reports to K. Sean Clark. The Committee works as a team and meets weekly to review current security positions and consider the likelihood that each security will contribute to the investment objectives and risk profile of the Clients. The models used in strategy management are continually fine-tuned to fit each strategy's objectives as conditions change. Mr. Fiebach's activities are also monitored by Clark Capital's CCO, Conor Mullan. Conor Mullan can be reached at cmullan@ccmg.com or 215-616-8147.