Important Information about Investment Managers and Trading Practices

Correspondent Services

This document provides important information regarding the RBC Capital Markets, LLC ("RBC CM", "we," "us," or "our") Resource II program, a separately managed account wrap fee program ("Program").

Current and prospective RBC CM Program clients ("client(s)", "you" or "your") should fully understand the trading practices employed by RBC CM and investment managers available through the Program.

RBC Capital Markets, LLC Resource II Program

In the Resource II program, client accounts are managed by one or more professional investment managers participating in the Program. Traditionally, investment managers available through the Program exercise discretion. These investment managers exercise discretion by not only creating and maintaining an investment portfolio, but also selecting the broker/dealer(s) they execute trade orders with. Once a trade order has been filled, the investment manager provides instructions for the allocation of shares to client accounts. Clients may provide instructions to the investment manager to direct all orders for their account to a specific broker/dealer.

Alternatively, through this Program, we offer model portfolios, managed by us as overlay manager. Under this arrangement, investment managers will provide a model portfolio of securities and we, as overlay manager, manage the account in accordance with those models. When an investment manager provides a model portfolio it is a model portfolio provider and we act as overlay manager, we exercise discretion and are responsible for trade execution.

Best Execution Obligations

As investment advisers registered with the Securities and Exchange Commission ("SEC"), investment managers and overlay managers (collectively, "Manager(s)"), including RBC CM, have a fiduciary obligation to seek "best execution" of client trade orders. In meeting this obligation, a Manager must execute securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances. In assessing whether this standard is met, a Manager should consider the full range and quality of a broker/dealer's services when placing trades with them. These considerations may include, but are not limited to: price/yield competitiveness, execution capability and quality, commission rates, market impact, financial responsibility, operational efficiency, responsiveness to the adviser, knowledge of the relevant asset class/sector/specific security in which the adviser is transacting business, and other factors, as deemed appropriate. A Manager fulfills its duty of best execution not by obtaining the best price or the lowest commission rate, as is often assumed to be the case, but rather, by establishing and maintaining a process through which the Manager assures that it is giving due attention to each of the many factors affecting the quality of execution of client trades. Additionally, the perceptions of what constitutes best execution in any given instance may vary.

Trade Aggregation and Rotation Practices

Investment managers may participate in other wrap fee programs sponsored by firms other than RBC CM. In addition, investment managers may manage institutional and other accounts not part of a wrap fee program. Frequently, investment managers place orders to purchase or sell the same security for a number of clients invested in a particular investment strategy. Instead of effecting similar trades through a number of different broker/dealers, an investment manager may decide to aggregate such trades into a block trade that is executed through one broker/dealer. This practice may enable the investment manager to obtain a more favorable execution than would otherwise be available if the trades were not aggregated. As an aggregated order is executed, securities are allocated to clients in a fair and equitable manner over time, taking into consideration the interests of each client. Using block trades may also assist the investment manager in potentially avoiding an adverse impact on the prices of a security that could result from simultaneously placing a number of separate, successive or competing trades.

Alternatively, an investment manager may utilize a trade rotation where one group of clients may have a transaction effected before or after another group of the investment manager's clients. Clients should be aware that an investment manager's trade rotation practices may at times result in a trade being effected for a client's account that occurs near or at the end of the investment manager's rotation and, in such event, the client's trade will significantly bear the market price impact, if any, of those trades executed earlier in the manager's trade rotation, and, as a result, the client may receive a less favorable net price for the trade.

Additional information regarding an investment manager's trade aggregation and rotation practices may be found in the investment manager's Form ADV Part 2A (Brochure).

RBC Capital Markets, LLC as Overlay Manager

As overlay manager, RBC CM will effect securities transactions to conform to revisions in the model portfolios as soon as practicable after they are received, subject to any written client-specific investment guidelines, such as security restrictions. However, delays may occur between the communication of model revisions and the execution of securities transactions for the account. As overlay manager, RBC CM intends to manage an account so that the estimated investment performance does not substantially deviate from the model portfolio(s), provided client-specific investment guidelines make it practicable to do so.

Trades of securities to be sold or purchased in accounts over which RBC CM has investment discretion may be aggregated, consistent with our duty to seek best execution for our clients. Trades are aggregated and allocated in a manner that is equitable and consistent with our fiduciary duties to our clients. Each participating account receives the average price for the aggregated order. Aggregated orders may include RBC CM employee and/or employee-related accounts.

Investment Managers and Trading Away

If investment managers trade away from RBC CM with other broker/dealers, you should understand that commissions, mark-ups, spreads, and other transactional charges for transactions not effected through RBC CM are charged to you by the executing broker/dealer, whereas the Program fees assessed by RBC CM covers these costs when the trade is effected through RBC CM. The executing broker/dealers net these commissions, mark-ups, spreads and other transactional charges into the purchase or sale price of the trades and would not be delineated from the purchase or sale price found on your RBC CM trade confirmation, monthly transaction summary or statement. RBC CM does not restrict an investment manager's ability to trade away, as the responsibility to determine the suitability of trading away from RBC CM falls under the investment manager's expertise in trading the securities in their portfolio and their individual fiduciary duty to you. RBC CM does not evaluate whether an investment manager is meeting its best execution obligation when trading away. You should understand that RBC CM is not a party to transactions that are traded away from RBC CM and we are not in a position to negotiate the price or transaction related charge(s) with the executing broker/dealer.

Some investment managers have historically executed nearly all client trades with broker/dealers other than RBC CM. Some investment managers have executed some, if not all, trades that were a result of changes to their investment strategies with firms other than RBC CM while executing most, if not all, account maintenance trades (ex. trades need to invest a deposit or generate cash for withdrawal) with RBC CM . In some situations, trades done away from RBC CM are executed by other broker/dealers without any additional commissions, mark-ups, spreads and other transactional charges. However, in other situations, commissions, mark-ups, spreads and other transactional charges may be assessed. These costs are in addition to the Program fee paid to RBC CM. As a result investment managers who execute trades with broker/dealers other than RBCWM may be more costly to clients than investment managers who primarily submit trades to RBC CM for execution. Clients should review the investment manager's Form ADV Part 2A (Brochure) for more information related to an investment manager's trading practices and consider this information carefully before selecting an investment manager. In particular, clients should carefully consider any additional trading costs they may incur before selecting an investment manager to manage their account.

The table on the next page, that includes data supplied to us by each investment manager that traded away from RBC CM in calendar year 2016, reflects the frequency and number of trades done away from RBC CM as well as the additional cost of these trades, if any. The information provided below is based solely on what each investment manager provided to RBC CM. This data has not been independently verified by RBC CM. Please note that the information provided reflects historical data and may not be indicative of the current trade away frequency, amount of trades or cost of these trades.

Please note that this table does not include fixed income investment managers nor does it include equity and balanced investment managers available in the Resource II program that did not trade away from RBC CM in calendar year 2016.

Equity and Balanced Investment Strategies			
Investment Manager /Investment Strategy	**Dollar-Weighted Percentage of Client Trades Stepped Out**	**Average Additional Costs Incurred by Clients Participating in those Trades[1]**	**Number of Client Trades that were Stepped Out**
Brandes Investment Partners			
Global Value ADR	73.91%	1.42 cps/14.03 bps[2]	85
Global Balanced	35.88%	1.36 cps/13.97 bps[2]	52
International Value ADR	74.59%	1.16 cps/13.43 bps[2]	180
US Value Equity	18.05%	1.43 cps	10
ClearBridge Investments			
Multi Cap Growth	31.98%	0-2 cps	39
Invesco Advisers			
U.S. REITS	78.4%	None	2,655
Kirr, Marbach & Company			
All Cap Equity	100%	None	61
Metropolitan West Capital Management			
Large Cap Intrinsic Value	Not available	None	5
NWQ Investment Management Company			
Large Cap Value Balanced	76%	1-2 cps	207
Large Cap Value	76%	1-2 cps	191
Oak Ridge Investments			
All Cap Growth	22%	3-5 cps	1
Small to Mid Cap Growth	97%	3-5 cps	46
RiverFront Investment Group			
Conservative Income Builder	93.9%	Unknown[3]	116
Dynamic Equity Income	88.6%	Unknown[3]	126
Global Allocation	91.9%	Unknown[3]	124
Global Growth	87.5%	Unknown[3]	110
Moderate Growth and Income	91.2%	Unknown[3]	137
Schafer Cullen Capital Management			
High Dividend Value Equity	6.85%	None	1
International High Dividend Value ADR	16.28%	None	16
Small Cap Value	1.96%	None	2
Snow Capital Management			
All Cap Value	9.6%	1-2 cps	3
Large Cap Value	1.7%	1-2 cps	1
Thornburg Investment Management			
International ADR	81.5%	2.65 cps	248
U.S. Equity Strategy	32.8%	2.8 cps	21
WCM Investment Management			
Focused Growth International ADR	6.3%	1.5 cps	57

[1] Additional cost is expressed in terms of cents per share ("cps") unless otherwise indicated. In some instances, the additional cost is expressed in terms of an average of basis points ("bps").
[2] Brandes:
- For securities executed in U.S. and Canada markets commissions are cents per share
- For securities executed in other markets commission are in basis points

[3] RiverFront: **If the compensation referenced above reflects an "unknown" amount, this number represents step-out transactions that included, but were not limited to, trades that were executed as risk trades, working orders, or bond trades where there was no disclosed markup/markdown. In these instances, the undisclosed markup or markdown is netted into the price the client receives. Since the executing broker does not provide data regarding the dollar amount of the markup or markdown, we have listed the costs for these trades as "unknown". Please see http://www.riverfrontig.com/advisors/wrap-fee-trading-disclosures/ for more information on RiverFront's wrap fee trading disclosures.

Foreign securities: additional costs incurred when purchasing foreign securities that are assessed by the foreign exchange. Additional fees may include, but are not limited to: exchange fees, taxes, conversion fees and currency translation costs. For example, when "ordinary shares" are purchased on a foreign exchange (which may charge a fee or tax on the trade) and are converted to American Depositary Receipts ("ADR"), the depository bank may charge a fee to convert the ordinary shares to ADRs and in doing so, there may be currency translation costs associated with the conversion.

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