

**Todd Asset Management LLC
Verification and Global Intrinsic Value Equity Income Composite
Performance Examination Report**

December 31, 2019



Verification and Performance Examination Report

Management Committee
Todd Asset Management LLC

We have verified whether Todd Asset Management LLC (the "Firm") (1) has complied with all the composite construction requirements of the Global Investment Performance Standards (GIPS®) on a firm-wide basis for the periods from April 1, 2017 through December 31, 2019, and (2) designed its policies and procedures to calculate and present performance in compliance with the GIPS standards as of December 31, 2019. We have also conducted a performance examination of the Firm's Global Intrinsic Value Equity Income Composite for the periods from April 1, 2017 through December 31, 2019. The Firm's management is responsible for compliance with the GIPS standards and the design of its policies and procedures and for the Global Intrinsic Value Equity Income Composite's compliant presentation. Our responsibility is to express an opinion based on our verification and performance examination. We conducted this verification and performance examination in accordance with the required verification and performance examination procedures of the GIPS standards. We also conducted such other procedures as we considered necessary in the circumstances.

In our opinion, the Firm has, in all material respects:

- Complied with all the composite construction requirements of the GIPS standards on a firm-wide basis for the periods from April 1, 2017 through December 31, 2019; and
- Designed its policies and procedures to calculate and present performance in compliance with the GIPS standards as of December 31, 2019.

A verification covering the periods from January 1, 2008 through March 31, 2017 was performed by another verification firm, whose report expressed an unqualified opinion thereon.

Also, in our opinion, the Firm has, in all material respects:

- Constructed the Global Intrinsic Value Equity Income Composite and calculated the Global Intrinsic Value Equity Income Composite's performance for the periods from April 1, 2017 through December 31, 2019 in compliance with the GIPS standards; and
- Prepared and presented the Global Intrinsic Value Equity Income Composite's accompanying compliant presentation for the periods from April 1, 2017 through December 31, 2019 in compliance with the GIPS standards.

A performance examination of the Firm's Global Intrinsic Value Equity Income Composite covering the periods from January 1, 2011 through March 31, 2017 was performed by another verification firm, whose report expressed an unqualified opinion thereon.

This report does not relate to or provide assurance on any composite compliant presentation of the Firm other than the Firm's Global Intrinsic Value Equity Income Composite.

Adviser Compliance Associates, LLC

Adviser Compliance Associates, LLC
ACA Performance Services Division
April 9, 2020

**TODD ASSET MANAGEMENT LLC
GLOBAL INTRINSIC VALUE EQUITY INCOME (GIVEI) COMPOSITE
ANNUAL DISCLOSURE PRESENTATION**

<u>Year</u>	<u>Annual Performance Results</u>			<u>Composite Dispersion</u>	<u>Composite 3 Year St Dev</u>	<u>MSCI ACWI NET 3 Year St Dev</u>	<u>Total Firm Assets (millions)</u>	<u>GIVEI Composite Assets</u>	
	<u>GIVEI Composite</u>		<u>MSCI ACWI NET Index</u>					<u>U.S.D. (millions)</u>	<u>Number of Accounts</u>
	<u>Gross</u>	<u>Net</u>							
2019	21.71%	21.00%	26.59%	0.4%	12.24%	11.22%	4,017	37	11
2018	-10.93%	-11.45%	-9.42%	0.5%	10.13%	10.47%	3,305	31	12
2017	19.57%	18.86%	23.97%	1.3%	9.78%	10.36%	3,839	37	13
2016	11.93%	11.27%	7.87%	0.2%	11.10%	11.06%	3,482	35	15
2015	-5.22%	-5.79%	-2.36%	0.1%	10.98%	10.79%	3,442	35	18
2014	4.98%	4.35%	4.16%	0.4%	9.41%	10.50%	3,720	41	22
2013	27.63%	26.87%	22.84%	0.4%	10.25%	13.94%	3,589	34	10
2012	14.45%	13.77%	16.13%	N.A.	*	*	3,239	4	Five or fewer
2011	7.45%	6.81%	-7.37%	N.A.	*	*	3,210	<1	Five or fewer

Annualized returns as of 12/31:

1 Year	21.71%	21.00%	26.59%
3 Year	9.03%	8.39%	12.44%
5 Year	6.58%	5.95%	8.41%
7 Year	9.12%	8.48%	9.73%
Since Inception (A)	9.51%	8.86%	8.37%

(A) Inception date is January 1, 2011.

N.A. Information is not statistically meaningful, or does not exist.

* The three-year annualized ex-post standard deviation of the composite and benchmark is not presented because 36 monthly returns are not available.

Past performance does not provide any guarantee of future performance, and one should not rely on the composite performance as an indication of future performance. Investment return and principal value of an investment will fluctuate so that the value of the account may be worth more or less than the original invested cost.

The accompanying disclosures are an integral part of this schedule.

The Global Intrinsic Value Equity Income Composite was created January 1, 2011 and contains fully discretionary, taxable, and tax-exempt accounts invested in a diversified portfolio of attractively valued domestic and international equity securities with a goal to seek dividend income along with growth of that income and capital appreciation. The international securities are internationally domiciled, US traded equity securities.

Todd Asset Management LLC (“TAM or the Firm”), formerly Todd-Veredus Asset Management LLC, is a registered investment advisor. Registration does not imply a certain level of skill or training. TAM began operations on June 1, 1998 as Veredus Asset Management LLC (“VAM”). Effective May 1, 2009, VAM combined with Todd Investment Advisors, Inc. (“TIA”). TIA (and its predecessors) was founded in 1967 by Bosworth M. Todd. Upon the combination of VAM and TIA in 2009, Veredus Asset Management LLC changed its name to Todd-Veredus Asset Management LLC (“TVAM”). On February 28, 2013, after a change in ownership involving some VAM unitholders, TVAM changed its name to Todd Asset Management LLC. The firm continues to offer the same strategies managed by individuals using the process founded under TIA.

TAM claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS® standards. The Firm has been independently verified for the periods January 1, 2008 through December 31, 2019. VAM was verified for the period July 1, 1989 through December 31, 2007 by a previous verifier. TIA’s compliance with the GIPS® standards has been verified for the period January 1, 1993 through April 30, 2009. Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS® standards on a firm-wide basis and (2) the firm’s policies and procedures are designed to calculate and present performance in compliance with the GIPS® standards. The Global Intrinsic Value Equity Composite has been examined for the periods January 1, 2011 through December 31, 2019. The verification and performance examination reports are available upon request.

TAM maintains a complete list and description of composites, which is available upon request. The Composite represents all eligible accounts managed using the strategy described. Accounts with social restrictions are not included in this Composite. Accounts are eligible for inclusion in the composite at the beginning of the first calendar quarter after the month of initial funding and upon being fully invested. Upon termination an account is not included in the composite as of the previous quarter end, historical performance on the account remains part of the composite.

The currency used to calculate and express performance is U.S. dollars. The performance is presented on a trade date basis, gross and net of management fees, and net of transaction costs and foreign withholding taxes. Performance is computed on a total rate of return with the reinvestment of all income. Net of fee performance was calculated using the applicable annual management fee schedule of 0.60% applied monthly. Actual investment advisory fees incurred by clients may vary. The annual composite dispersion is an equal-weighted standard deviation calculated for the accounts in the composite the entire year. Additional information regarding the firm’s policies and procedures for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

As of December 31, 2017, the primary benchmark was changed to the MSCI ACWI (net) from the MSCI ACWI (gross). The ACWI (net) is net of foreign taxes on dividends, which is in line with how the composite’s performance is computed.

The composite performance has been compared to the following unmanaged index. The index is not available for direct investment, it includes the reinvestment of dividends; it does not reflect management fees or transaction costs:

MSCI ACWI (Net) Index is a float-adjusted market capitalization index that is designed to measure the equity market performance of developed and emerging markets. The performance data was supplied by MSCI Barra.