Navellier Custom Mix Illustration



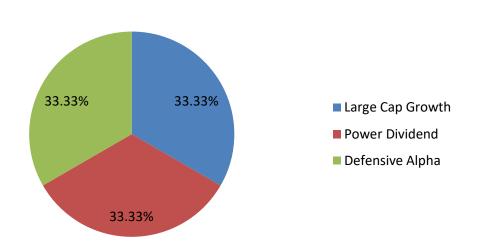


Custom Mix



Supplemental Information

Custom Mix

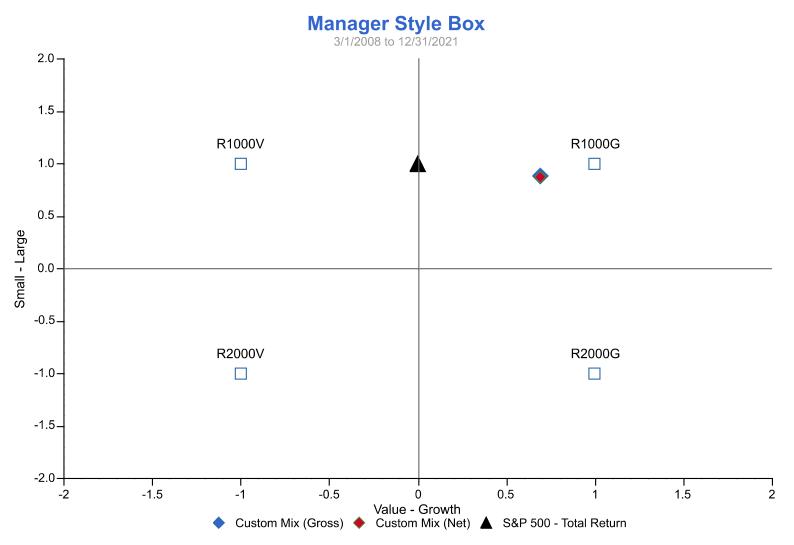


Custom Mix	% Allocation
Large Cap Growth	33.33%
Power Dividend	33.33%
Defensive Alpha	33.33%

Style Box



Supplemental Information



Cumulative Return Chart

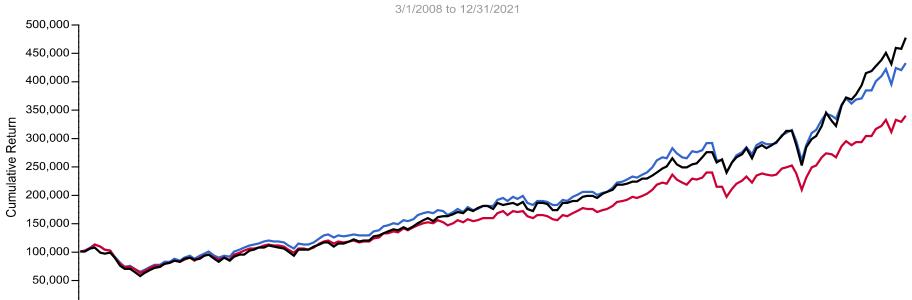
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Supplemental Information

Cumulative Return Chart



Performance Table - 33.33% Large Cap Growth/33.33% Power Dividend/33.33% Defensive Alpha

Custom Mix (Gross) - Cumulative Return — Custom Mix (Net) - Cumulative Return — S&P 500 - Total Return - Cumulative Return

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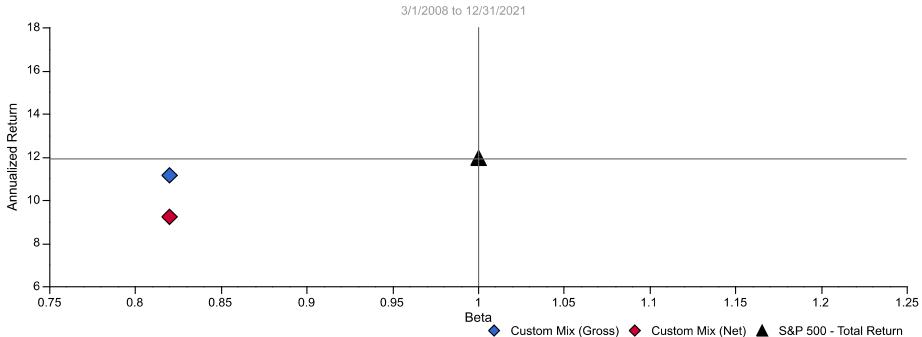
	Portf	olio Performan	Vs Benchmark					
	Annualized Cumulative Return (%) Return (%)		Annualized Excess Return (%)	Cumulative Excess Return (%)	Info Ratio	Significance Level (%)	Explained Variance (%)	
Custom Mix (Gross)	11.15	331.86	14.07	-0.79	-44.27	-0.12	67.27	79.41
Custom Mix (Net)	9.21	238.12	14.07	-2.74	-138.01	-0.42	93.06	78.91

Beta vs. Annualized Return



Supplemental Information

Beta vs. Annualized Return



Risk-Return Table - 33.33% Large Cap Growth/33.33% Power Dividend/33.33% Defensive Alpha

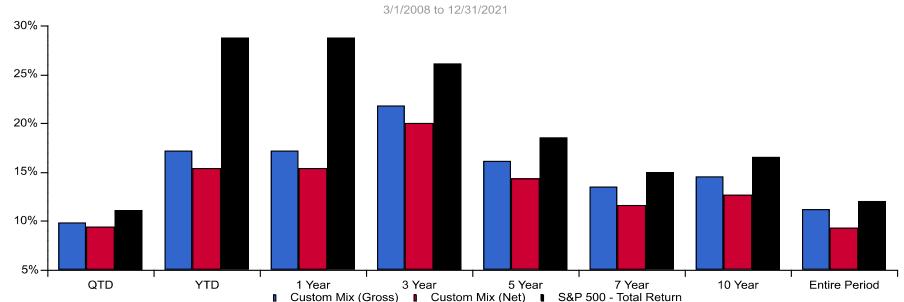
			.					
	Return (%)	Std. Dev. (%)	Downside Risk (%)	Beta	Alpha	R-Squared	Sharpe Ratio	Observs.
Custom Mix (Gross)	11.15	14.07	9.24	0.82	1.27	83.19	0.75	166
Custom Mix (Net)	9.21	14.07	9.49	0.82	-0.49	82.78	0.61	166
S&P 500 - Total Return	11.94	15.57	10.40	1.00	0.00	100.00	0.73	166

Multi-Horizon Annualized Return Chart



Supplemental Information

Multi-Horizon Chart: Annualized Return



33.33% Large Cap Growth/33.33% Power Dividend/33.33% Defensive Alpha Mix vs Benchmark: Through December 31, 2021

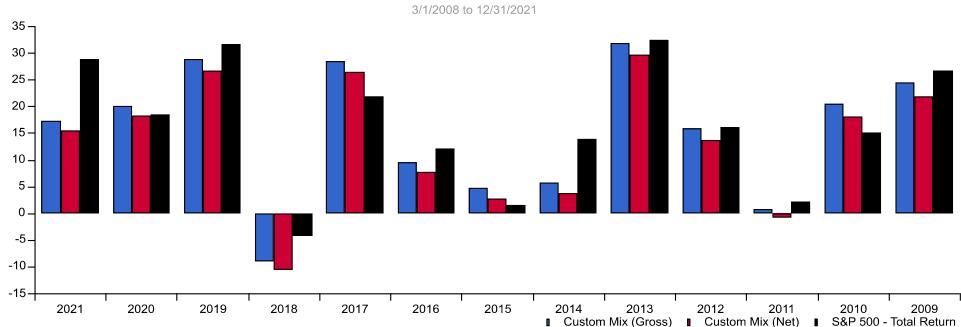
	QTD	YTD	1 Year	3 Year	5 Year	7 Year	10 Year	Analysis Period		
Custom Mix (Gross)	9.74%	17.18%	17.18%	21.80%	16.09%	13.43%	14.54%	11.15%		
Custom Mix (Net)	9.34%	15.39%	15.39%	19.95%	14.25%	11.56%	12.60%	9.21%		
S&P 500 - Total Return	11.03%	28.71%	28.71%	26.07%	18.47%	14.93%	16.55%	11.94%		

Calendar Year Return



Supplemental Information

Calendar Year Return 3/1/2008 to 12/31/2021



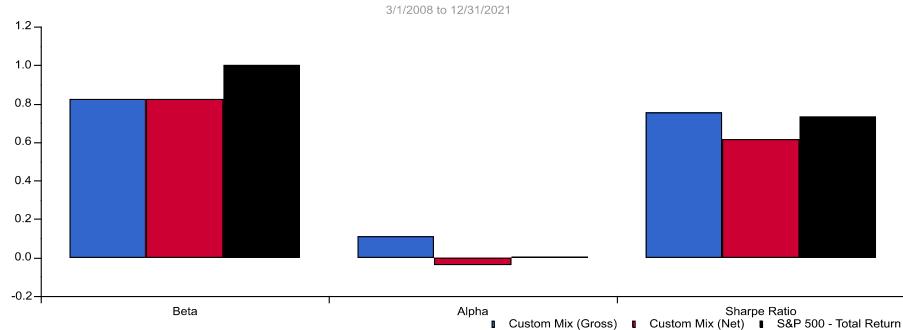
Calendar	Calendar Year Return - 33.33% Large Cap Growth/33.33% Power Dividend/33.33% Defensive Alpha													
2021 2020 2019 2018 2017 2016 2015 2014 2013 2012 2011 2010 200											2009			
Custom Mix (Gross)	17.18%	19.87%	28.63%	-9.06%	28.29%	9.49%	4.66%	5.58%	31.75%	15.70%	0.69%	20.34%	24.34%	
Custom Mix (Net)	15.39%	18.25%	26.50%	-10.71%	26.33%	7.59%	2.67%	3.63%	29.49%	13.56%	-1.05%	17.99%	21.83%	
S&P 500 - Total Return	28.71%	18.40%	31.49%	-4.38%	21.83%	11.96%	1.38%	13.69%	32.39%	16.00%	2.11%	15.06%	26.46%	

Multi-Statistic Chart



Supplemental Information

Multi-Statistic Chart



Description	Anlzd Return	Anlzd StdDev	Beta	Alpha	R-Squared	Sharpe Ratio	Sortino Ratio	Upside Capture %	Downside Capture %	# Observ
Custom Mix (Gross)	11.15	14.07	0.82	0.11	83.19	0.75	1.21	84.35	85.23	166
Custom Mix (Net)	9.21	14.07	0.82	-0.04	82.78	0.61	0.97	79.29	88.25	166
S&P 500 - Total Return	11.94	15.57	1.00	0.00	100.00	0.73	1.15	100.00	100.00	166

Disclosures



Disclosures

FactSet Disclosure: Navellier does not independently calculate the statistical information included in the attached report. The calculation and the information are provided by FactSet, a company not related to Navellier. Although information contained in the report has been obtained from FactSet and is based on sources Navellier believes to be reliable, Navellier does not guarantee its accuracy, and it may be incomplete or condensed. The report and the related FactSet sourced information are provided on an "as is" basis. The user assumes the entire risk of any use made of this information. Investors should consider the report as only a single factor in making their investment decision. The report is for informational purposes only and is not intended as an offer or solicitation for the purchase or sale of a security. FactSet sourced information is the exclusive property of FactSet. Without prior written permission of FactSet, this information may not be reproduced, redisseminated or used to create any financial products. The custom mix is a hypothetical strategy, not a previously existing strategy that has ever been used to actually manage client assets. It is a possible investment strategy that may be used in the future. The performance figures and graphs used for the custom mix herein are not the actual performance of the custom mix strategy presented herein but rather, are the purely hypothetical, backward-looking performance of how a custom mix strategy would possibly have performed if such a strategy had existed and was applied, having a client's investment invested 33.3% in our Large Cap Growth strategy, 33.3% in our Power Dividend strategy and 33.3% in our Defensive Alpha strategies. The hypothetical performance figures and graphs set forth herein were calculated based on how our Large Cap Growth, Power Dividend and Defensive Alpha strategies actually performed while actively managing our clients' assets invested in those strategies, in verified compliance with GIPS standards. Thus, while the hypothetica

Index Disclosure: The S&P 500 Index consists of 500 stocks chosen for market size, liquidity and industry group representation. It is a market value weighted index with each stock's weight in the index proportionate to its market value. The reported returns reflect a total return for each quarter inclusive of dividends. Presentation of index data does not reflect a belief by Navellier that any stock index constitutes an investment alternative to any Navellier equity strategy presented in these materials, or is necessarily comparable to such strategies and an investor cannot invest directly in an index. Among the most important differences between the indexes and Navellier strategies are that the Navellier equity strategies may (1) incur material management fees, (2) concentrate investments in relatively few ETFs, industries, or sectors, (3) have significantly greater trading activity and related costs, and (4) be significantly more or less volatile than the indexes. All indexes are unmanaged and performance of the indices includes reinvestment of dividends and interest income, unless otherwise noted, are not illustrative of any particular investment and an investment cannot be made in any index.

General Disclosure: FactSet is the source for returns of strategies presented in this presentation other than Navellier products. Although taken from sources believed to be reliable, Navellier makes no representation for the strategies and does not guarantee the accuracy of the returns. The strategies are included based on the advisor's and/or client's request.

Potential investors should consult with their financial adviser before investing in any Navellier Investment Product.

Blend Disclosure



Important Disclosures

As a matter of normal and important disclosures to you, as a potential investor, please consider the following: The hypothetical performances presented in the accompanying charts and graphs are not based on any actual securities trading, portfolio, or accounts, and should be considered mere "paper" or proforma performance results based on Navellier's research. The performance results presented herein are based on a hypothetical mix of the Navellier Defensive Alpha, Large Cap Growth and the Navellier Power Dividend composites. For the net performance results presented please see important disclosures on the GIPS sheets below.

As a matter of important disclosure regarding the hypothetical results presented in the accompanying charts and graphs, the following factors must be considered when evaluating the performance figures presented:

- 1) Historical or illustrated results presented herein do not necessarily indicate future performance; Investment in securities involves significant risk and has the potential for partial or complete loss of funds invested.
- 2) The results presented were generated during a period of generally improving economic conditions in the U.S. and positive market performance. There can be no assurance that these favorable market conditions will occur again in the future. Navellier has no data regarding actual performance in different economic or market cycles or conditions.
- 3) The results portrayed reflect the reinvestment of dividends and other income.
- 4) The results portrayed include any investment advisory fees, administrative fees, or transaction expenses, or other expenses that a client would have paid or actually paid In some cases. Please see Gips disclosure.
- 5) LIMITATIONS INHERENT IN HYPOTHETICAL RESULTS: The performance results presented are a hypothetical portfolio, not an actually funded portfolio, and may not reflect the impact that material economic and market factors might have had on the adviser's decision making if the adviser were actually managing clients' money, and thus present returns which are greater than what a potential investor would have experienced for the time period. The results are presented for informational purposes only The performance results should be considered mere 'paper' or pro forma performance results. The results do not represent actual funded trades and may not reflect actual prices paid or received for actual funded trades.
- 6) The reported performances of hypothetical portfolios presented in the accompanying charts and graphs do not reflect the performance results of Navellier's actually funded and traded Investment Products.
- 7) In most cases, the adviser's clients would have had investment results materially lower than the results portrayed in these hypothetical results.

NAVELLIER DEFENSIVE ALPHA COMPOSITE

Reporting Currency U.S. Dollar

Year	Firm Assets (\$M)	Composite Assets (\$M)	Number of Accounts	Composite Pure Gross Return (%)	Composite Net Return (%) ¹	S&P 500 Index Return (%)	Composite Dispersion (%)	Composite 3-Yr Std Dev (%)	S&P 500 index 3-Yr Std Dev (%)
2020	635	148	425	21.96	18.99	18.40	1.17	16.17	18.53
2019	688	106	336	27.72	24.62	31.49	0.58	14.10	11.93
2018	674	82	328	-3.49	-5.89	-4.38	0.52	13.37	10.80
2017	835	122	363	34.89	31.64	21.83	0.52	11.26	9.92
2016	771	99	324	5.46	2.86	11.96	0.37	11.84	10.59
2015	1,118	43	196	9.52	6.83	1.38	0.46	12.29	10.47
2014	2,107	39	190	-3.09	-5.49	13.69	0.29	11.45	8.97
2013	2,322	42	173	26.41	23.33	32.39	0.28	10.66	11.94
2012	3,412	9	50	14.51	11.70	16.00	0.93	11.95	15.09
2011	2,728	0.8	2	-3.69	-6.08	2.11	N/A ²	13.21	18.71

^{&#}x27;To calculate the net-of-fee return, the highest annual bundled advisory fee, 2.50%, we believe a client would incur was applied to the composite's before-fees returns on a monthly basis.

- 1. Compliance Statement Navellier & Associates Inc. claims compliance with the Global investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Navellier & Associates Inc. has been independently verified for the periods January 1, 1995 through December 31, 2020. A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards. Verification provides assurance on whether the firm's policies and procedures related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. The Navellier Defensive Alpha Composite has had a performance examination for the periods January 1, 2015 through December 31, 2020. The verification and performance examination reports are available upon request."
- 2. Definition of Firm Navellier & Associates, Inc. is a registered investment adviser established in 1987. Registration does not imply a certain level of skill or training. Navellier & Associates, Inc. manages a variety of equity assets for primarily U.S. and Canadian institutional and retail clients. The firm's list of composite descriptions as well as information regarding the firm's policies for valuing investments, calculating performance, and preparing GIPS reports are available upon request.
- 3. Composite Description The composite creation date is September 30, 2012. The composite was redefined August 1, 2012, to include both wrap and non-wrap accounts as the wrap track record is shown for 2011 - part of 2012. The Navellier Defensive Alpha Composite includes all discretionary Defensive Alpha equity accounts managed with similar objectives for a full month, including those accounts no longer with the firm. The composite includes both accounts that do and do not charge a wrap fee. The strategy is designed for aggressive investors seeking capital appreciation while controlling downside risk. The portfolio invests in a select group of companies across a broad capitalization range. Typically, the
- portfolio holds up to 20 stocks and can build a defensive cash position of up to 100%. The portfolio has demonstrated a high level of historical turnover; therefore, it should not be considered tax-efficient. It is also unlikely to generate any long-term capital gains. The portfolio typically trades more frequently than other Navellier offerings. At any given time, the strategy may hold American Depositary Receipts (ADRs) in percentages according to its model. Performance figures that are net of fees are calculated using a 2.50% annualized advisory fee, which is the highest bundled advisory fee we believe a client would incur with a brokerage firm or other financial intermediary. The advisory fee, which is applied monthly, includes a management fee and custodian/brokerage fees accounting for transaction/brokerage costs and foreign withholding taxes. Beginning August 1, 2012 "pure" gross-offees returns do not reflect the deduction of any trading costs, fees, or expenses, and are presented only as supplemental information. Prior to August 1, 2012, gross-of-fees returns reflect the deduction of transaction costs/commissions, but do not reflect the deduction of any investment management fees. Performance results are total returns and include the reinvestment of all income, including dividends. Valuations and returns are computed and stated in U.S. Dollars. The composite inception date is March 1, 2008.
- 4. Management Fees The management fee schedule for accounts ranges from 0.30% to 1.25% of assets under management; however, some incentive fee, fixed fee, and fulcrum fee accounts may be included. Fees are negotiable, and not all accounts included in the composite are charged the same rate. See the above table for the portion of the composite comprised of bundled fee accounts. Wrap fee schedules are provided by independent wrap sponsors and are available upon request from the respective wrap sponsor. Wrap fees generally range from 100 to 200 basis points and include custody, trading expenses, and other expenses associated with the management of the account. There are zero commissions accounts included in the composite. The client is referred to the firm's Form ADV Part 2A for a full disclosure of the fee schedule.
- **5. Composite Dispersion -** If applicable, the dispersion of annual returns is measured

- by the standard deviation across assetweighted portfolio level gross returns represented within the composite for the full year.
- **6. Benchmark -** The primary benchmark for the composite is the S&P 500 Index. The S&P 500 consists of 500 stocks chosen for market size, liquidity and industry group representation. It is a market value weighted index with each stock's weight in the index proportionate to its market value. The reported returns reflect a total return for each quarter inclusive of dividends. The asset mix of the composite may not be precisely comparable to the presented indices. Presentation of index data does not reflect a belief by the Firm that the S&P 500 Index, or any other index, constitutes an investment alternative to any investment strategy presented in these materials or is necessarily comparable to such strategies.
- 7. General Disclosure GIPS® is a registered trademark of CFA Institute. CFA Institute does not endorse or promote this organization, nor does it warrant the accuracy or quality of the content contained herein. The three-year annualized standard deviation measures the variability of the gross composite and the benchmark returns over the preceding 36-month period. Actual results may differ from composite results depending upon the size of the account, custodian related costs, the inception date of the account and other factors. Past performance does not guarantee future results. Investment in equity strategies involves substantial risk and has the potential for partial or complete loss of funds invested. Results presented include reinvestment of all dividends and other earnings. The securities identified and described do not represent all of the securities purchased, sold, or recommended for client accounts. It should not be assumed that any securities recommendations made by Navellier & Associates, Inc. in the future will be profitable or equal the performance of securities made in this report. A list of recommendations made by Navellier & Associates, Inc. for the preceding twelve months is available upon request.

²N/A information is not statistically meaningful due to an insufficient number of portfolios in the composite for the entire year. Wrap performance beyond 10 years available upon request.

NAVELLIER POWER DIVIDEND COMPOSITE

Reporting Currency U.S. Dollar

Year	Firm Assets (\$M)	Composite Assets (\$M)	Number of Accounts	% of Composite Non-fee Paying	Composite Pure Gross Return (%)	Composite Net Return (%)	Russell 3000® Index Return (%)	S&P 500 Index Return (%)	Composite Dispersion (%)	Composite 3-Yr Std Dev (%)	Russell 3000® Index 3-Yr Std Dev (%)	S&P 500 Index 3-Yr Std Dev (%)
2020	635	69	220	0	5.35	4.69	20.89	18.40	0.91	16.76	19.41	18.53
2019	688	76	243	0	25.04	23.16	31.02	31.49	0.39	24.62	12.21	11.93
2018	674	5	52	0	-11.35	-12.83	-5.24	-4.38	0.16	11.16	11.18	10.80
2017	835	13	77	0	15.26	14.16	21.13	21.83	0.25	8.46	10.09	9.92
2016	771	12	61	0	18.64	16.78	12.74	11.96	0.18	9.41	10.88	10.59
2015	1,118	2	21	0	5.83	3.81	0.48	1.38	0.19	10.18	10.58	10.47
2014	2,107	3	21	0	6.54	4.99	12.56	13.69	0.12	10.35	9.29	8.97
2013	2,322	1	8	0	35.76	34.14	33.55	32.39	0.33	12.86	12.53	11.94
2012	3,412	1	4	17	24.14	22.17	16.42	16.00	N/A¹	15.64	15.73	15.09
2011	2,728	2	5	7	-1.02	-2.16	1.03	2.11	N/A¹	19.39	19.35	18.71

Wrap performance beyond 10 years available upon request.

- 1. Compliance Statement Navellier & Associates Inc. claims compliance with the Global investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Navellier & Associates Inc. has been independently verified for the periods January 1, 1995 through December 31, 2020. A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards. Verification provides assurance on whether the firm's policies and procedures related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. The Navellier Power Dividend Composite has had a performance examination for the periods January 1, 2015 through December 31, 2020. The verification and performance examination reports are available upon request."
- 2. Definition of Firm Navellier & Associates, Inc. is a registered investment adviser established in 1987. Registration does not imply a certain level of skill or training. Navellier & Associates, Inc. manages a variety of equity assets for primarily U.S. and Canadian institutional and retail clients. The firm's list of composite descriptions as well as information regarding the firm's policies for valuing investments, calculating performance, and preparing GIPS reports are available upon request.
- 3. Composite Description The composite creation date is March 31, 2006. As of October 1, 2019, the Navellier Power Dividend strategy was redefined to include both wrap and institutional accounts to more broadly market the strategy. Prior to this date, only wrap accounts were included in the composite. The Power Dividend Composite name changed from the Power Dividend Wrap Composite to the Power Dividend Composite. The Navellier Power Dividend Composite includes all discretionary Power Dividend equity accounts and are managed with similar objectives for a full month, including those accounts no longer with the firm. The strategy is designed for aggressive investors seeking to capitalize on the best opportunities within the group of publicly traded companies that pay dividends. The strategy invests in U.S. listed securities with market capitalizations greater than \$250 million that pay dividends. Statistical measures may be used in an attempt to identify unusual price movements in individual stock prices, which may result in higher-
- than-average turnover and cash positions for the portfolio. At any given time, the strategy may hold up to 15% in American Depositary Receipts (ADRs). Stocks in the strategy typically exhibit positive return on equity and positive return on assets, usually have higher free cash flow than what they pay in dividends, and are usually growing dividends faster than the rate of inflation. Typically, the strategy invests in approximately 15 to 30 stocks. The strategy may invest in smaller capitalization stocks that may trade fewer shares than larger capitalization stocks; the liquidity risk among these types of stocks may increase the strategy's risk. Performance figures that are net of fees take into account advisory fees, wrap fees, foreign withholding tax, and any brokerage fees or commissions that have been deducted from the account. "Pure" gross-of-fees returns do not reflect the deduction of any trading costs, fees, or expenses, and are presented only as supplemental information. Performance results are total returns and include the reinvestment of all income, including dividends. The composite inception date is January 1, 2006. Valuations and returns are computed and stated in U.S. Dollars.
- 4. Management Fees The management fee schedule for accounts ranges from 0.30% to 1.25% of assets under management; however, some incentive fee, fixed fee, and fulcrum fee accounts may be included. Wrap fee schedules are provided by independent wrap sponsors and are available upon request from the respective wrap sponsor. Wrap fees generally range from 100 to 200 basis points and include custody, trading expenses, and other expenses associated with the management of the account. There are zero commissions accounts included in the composite. The client is referred to the firm's Form ADV Part 2A for a full disclosure of the fee schedule. Net performance is calculated using actual fees.
- **5. Composite Dispersion** If applicable, the dispersion of annual returns is measured by the standard deviation across asset-weighted portfolio level gross returns represented within the composite for the full year.
- **6. Benchmark** The primary benchmark for the composite is the Russell 3000® Index. The Russell 3000® Index measures the performance of the 3,000 largest U.S. companies based on total market capitalization, which represents approximately 98% of the investable U.S. equity market. The secondary benchmark for the composite is the Standard & Poor 500 Index ("S&P 500 Index"). The S&P 500 Index measures the performance of approximately 500

companies listed on U.S. stock exchanges selected by Standard & Poor. These indices are considered reasonable measures of the general performance of the broad U.S. equity market. The returns for the Russell 3000® and S&P 500 indices include the reinvestment of any dividends. The asset mix of Navellier Power Dividend equity accounts may not be precisely comparable to the presented indices. Presentation of index data does not reflect a belief by the Firm that the Russell 3000® or S&P 500 indices, or any other index, constitutes an investment alternative to any investment strategy presented in these materials or is necessarily comparable to such strategies. As of June 2012, the Russell 3000 Index is listed as the primary benchmark because it is a better representation of the investment strategy. The S&P 500 Index has replaced the Russell 1000 Index as the secondary benchmark.

7. General Disclosure – GIPS® is a registered trademark of CFA Institute. CFA Institute does not endorse or promote this organization, nor does it warrant the accuracy or quality of the content contained herein. The three-year annualized standard deviation measures the variability of the gross composite and the benchmark returns over the preceding 36-month period. Actual results may differ from composite results depending upon the size of the account, custodian related costs, the inception date of the account and other factors. Past performance does not guarantee future results. Investment in equity strategies involves

resurts. Investment in equity strategies involves substantial risk and has the potential for partial or complete loss of funds invested. Results presented include reinvestment of all dividends and other earnings. The securities identified and described do not represent all of the securities purchased, sold, or recommended for client accounts. It should not be assumed that any securities recommendations made by Navellier & Associates, Inc. in the future will be profitable or equal the performance of securities made in this report. A list of recommendations made by Navellier & Associates, Inc. for the preceding twelve months is available upon request.

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¹N/A information is not statistically meaningful due to an insufficient number of portfolios in the composite for the entire year.

NAVELLIER LARGE CAP GROWTH COMPOSITE

Reporting Currency U.S. Dollar

Year	Firm Assets (\$M)	Composite Assets (\$M)	Number of Accounts	Composite Pure Gross Return (%)	Composite Net Return (%)	Russell 1000 [®] Growth Index Return (%)	S&P 500 Index Return (%)	Composite Dispersion (%)	Composite 3-Yr Std Dev (%)	Russell 1000® Growth Index 3-Yr Std Dev (%)	S&P 500 Index 3-Yr Std Dev(%)
2020	635	126	296	33.27	31.97	38.49	18.40	0.90	20.97	19.64	18.53
2019	688	94	223	32.71	31.33	36.39	31.49	1.03	15.98	13.07	11.93
2018	674	35	119	-12.57	-13.72	-1.51	-4.38	0.51	14.55	12.13	10.80
2017	835	68	143	35.25	33.60	30.21	21.83	0.69	10.66	10.54	9.92
2016	771	102	255	4.66	3.42	7.08	11.96	0.35	11.12	11.15	10.59
2015	1,118	327	990	-1.57	-2.89	5.67	1.38	0.35	11.22	10.70	10.47
2014	2,107	538	2,028	13.29	11.51	13.05	13.69	0.51	9.91	9.59	8.97
2013	2,322	528	2,132	32.85	30.84	33.48	32.39	0.48	10.45	12.18	11.94
2012	3,412	475	2,313	8.47	6.80	15.26	16.00	0.32	14.25	15.66	15.09
2011	2,728	474	2,416	6.64	4.99	2.64	2.11	0.50	17.12	17.76	18.71

Wrap performance beyond 10 years available upon request.

- 1. Compliance Statement Navellier & Associates Inc. claims compliance with the Global investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Navellier & Associates Inc. has been independently verified for the periods January 1, 1995 through December 31, 2020. A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards. Verification provides assurance on whether the firm's policies and procedures related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. The Navellier Large Cap Growth Composite has had a performance examination for the periods September 1, 1998 through December 31, 2020. The verification and performance examination reports are available upon request."
- 2. Definition of Firm Navellier & Associates, Inc. is a registered investment adviser established in 1987. Registration does not imply a certain level of skill or training. Navellier & Associates, Inc. manages a variety of equity assets for primarily U.S. and Canadian institutional and retail clients. The firm's list of composite descriptions as well as information regarding the firm's policies for valuing investments, calculating performance, and preparing GIPS reports are available upon request.
- 3. Composite Description The composite creation date is March 31, 2005. As of October 1, 2019, the Navellier Large Cap Growth strategy was redefined to include both wrap and institutional accounts to more broadly market the strategy. Prior to this date, only wrap accounts were included in the composite. The Large Cap Growth Composite name changed from the Large Cap Growth Wrap Composite to the Large Cap Growth Composite. The Navellier Large Cap Growth Composite includes all discretionary Large Cap Growth equity accounts that are managed with similar objectives for a full month, including those accounts no longer with the firm. The strategy is designed for aggressive investors seeking capital appreciation from wellestablished companies and seeks to achieve the highest possible returns while controlling risk. The strategy invests in U.S. listed securities with

- market capitalizations greater than \$1 billion. At any given time, the strategy may hold up to 15% in American Depositary Receipts (ADRs). Typically, the strategy invests in approximately 40-50 stocks that pass Navellier's stringent quantitative and fundamental criteria. Performance figures that are net of fees take into account advisory fees, wrap fees, foreign withholding tax and any brokerage fees or commissions that have been deducted from the account. "Pure" gross-of-fees returns do not reflect the deduction of any trading costs, fees, or expenses, and are presented only as supplemental information. Performance results are total returns and include the reinvestment of all income, including dividends. The composite inception date is September 1, 1998. Valuations and returns are computed and stated in U.S. Dollars.
- 4. Management Fees The management fee schedule for accounts ranges from 0.30% to 1.25% of assets under management; however, some incentive fee, fixed fee, and fulcrum fee accounts may be included. Fees are negotiable, and not all accounts included in the composite are charged the same rate. Wrap fee schedules are provided by independent wrap sponsors and are available upon request from the respective wrap sponsor. Wrap fees generally range from 100 to 200 basis points and include custody, trading expenses, and other expenses associated with the management of the account. There are zero commissions accounts included in the composite. The client is referred to the firm's Form ADV Part 2A for a full disclosure of the fee schedule. Net performance is calculated using actual fees.
- **5. Composite Dispersion** If applicable, the dispersion of annual returns is measured by the standard deviation across asset-weighted portfolio level gross returns represented within the composite for the full year.
- **6. Benchmark** The primary benchmark for the composite is the Russell 1000® Growth Index. The Russell 1000® Growth Index measures the performance of those Russell 1000 companies with higher price-to-book ratios and higher forecasted growth values. The secondary benchmark for the composite is the S&P 500 Index, which measures the performance of the 500 leading companies in leading industries of the U.S. economy, focuses on the large cap segment of the market, with approximately 75% coverage of U.S. equities. These

- indices are considered reasonable measures of the performance of the large cap, growth oriented U.S. companies. The returns for the Russell 1000® Growth and S&P 500 indices include the reinvestment of any dividends. The asset mix of large cap growth equity accounts may not be precisely comparable to the presented indices. Presentation of index data does not reflect a belief by the Firm that the Russell 1000® Growth or S&P 500 indices, or any other index, constitutes an investment alternative to any investment strategy presented in these materials or is necessarily comparable to such strategies.
- 7. General Disclosure GIPS® is a registered trademark of CFA Institute. CFA Institute does not endorse or promote this organization, nor does it warrant the accuracy or quality of the content contained herein. The three-year annualized standard deviation measures the variability of the gross composite and the benchmark returns over the preceding 36-month period. Actual results may differ from composite results depending upon the size of the account, custodian related costs, the inception date of the account and other factors. Past performance does not guarantee future results. Investment in equity strategies involves substantial risk and has the potential for partial or complete loss of funds invested. Results presented include reinvestment of all dividends and other earnings. The securities identified and described do not represent all of the securities purchased, sold, or recommended for client accounts. It should not be assumed that any securities recommendations made by Navellier & Associates, Inc. in the future will be profitable or equal the performance of securities made in this report. A list of recommendations made by Navellier & Associates, Inc. for the preceding twelve months is available upon request.

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