REALLOCATION COMMENTARY



Strategy Based Investing Portfolios

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SBI Fund Replacement

We are replacing a fund in the strategic portion of the Strategy Based Growth and Moderate models.

At the portfolio level we use and diversify among strategies that have been among the better performers the last 42 years. At the fund selection level, we selected managers that have behaviors that behavioral finance research has found to be associated with superior performance, such as:

- » Low correlation with an index
- » High active share (percent of the portfolio that is different from its benchmark index)
- » Fewer holdings
- » Holdings that are similar to strategy peers
- » Focused (using very few elements for security selection)

Funds are rated on these and some other behaviors and assigned a diamond rating (DR), or strategy consistency. DR1 is the least strategy consistent, DR5 is the most strategy consistent. In the most recent monthly update, Athena, the sub-advisor, detected that one fund had dropped to DR3. It was replaced with a DR5 fund in the same Competitive Position strategy, managed by the same advisor.

Past performance does not guarantee future results.

Opinions and forecasts regarding sectors, industries, companies, countries and/or themes, and portfolio composition and holdings, are all subject to change at any time, based on market and other conditions, and should not be construed as a recommendation of any specific security, industry or sector.

Investing in securities involves inherent risks, including the risk that you can lose the value of your investment. There is no assurance that the investment process will consistently lead to successful results. Strategy Based Investing involves risks and uncertainties and does not quarantee better performance or lower costs than other investment methodologies.

ICON is the investment adviser to mutual funds in which the Portfolios invest and receives a management fee from the Funds for its advisory services.

Please visit ICON online at ICONAdvsers.com or call 1-800-828-4881 for the most recent copy of ICON's Form ADV, Part 2. Please read Form ADV, Part 2 carefully before investing.