ROCKEFELLER
CAPITAL MANAGEMENT

# Investment Strategy Trade Execution Away Information
# Rockefeller Private Wealth Advisory Platform

Rockefeller Financial LLC, doing business as Rockefeller Capital Management ("RCM"), is a dually registered broker-dealer and investment adviser that is the sponsor of the Rockefeller Private Wealth Advisory Platform ("Platform"). As described in more detail in the Platform's Form ADV Wrap Fee Brochure, execution of securities transactions in Separately Managed Account ("SMA"), Unified Managed Accounts ("UMA") and Fund Strategist Portfolio Strategies is directed by either by individual Investment Manager ("Investment Managers") or a third-party firm RCM has retained for various administrative, investment advisory and/or other services, Envestnet Asset Management, Inc. and/or its affiliates (collectively, "Envestnet").

Transactions for the purchase and/or sale of securities and other investments for each client's accounts are generally placed through RCM's clearing broker-dealer, National Financial Services LLC or its affiliates ("NFS"), if the assets are custodied at NFS. However, if Envestnet or an Investment Manager reasonably believes in good faith, and consistent with applicable fiduciary standards, that another broker or dealer will provide better execution considering all factors including the net price, then it may trade through firms other than NFS. This is generally referred to as "trading away" or a "step-out trade." This includes the aggregation of the securities for more than one client utilizing another broker-dealer to obtain favorable execution to the extent permitted by law ("batch orders'). In the foregoing cases, clients may be subject to transaction costs and fees that are in addition to their wrap fees. Those additional costs or fees generally will be included in the net price of the security, and not reflected as a separate charge on your trade confirmations or account statements.

When Envestnet has trading authority, Envestnet will seek execution from another broker-dealer for fixed income securities generally when NFS is unable or unwilling to do so and only to sell fixed income positions a client contributes to an account that require liquidation to implement the selected investment strategy. For equity securities, Envestnet will generally seek execution from another broker-dealer for batch orders and American Depository Receipt transactions.

For various Strategies (including fixed income and balanced), the Investment Managers (and not Envestnet) have discretion over broker-dealer selection and execution and are responsible for meeting best execution obligations. For Strategies that primarily invest in fixed income or other securities for which a markup or markdown is charged by the executing broker-dealer, most or up to all trades will be executed through firms other than NFS.

A summary of trading away information for 2020 for various Strategies (column 1) is provided below. Column 2 identifies the dollar weighted percentage of transactions executed away from NFS; column 3 shows the additional costs, if any, incurred by RCM clients in 2020, expressed as an average of cents per share ("CPS") or basis points ("BPS"). The information is for calendar year 2020 and has not been independently verified by RCM. Neither Envestnet, Investment Managers nor RCM can represent that past trading away practices are indicative of current or future practices. For fixed income security liquidation transactions, Envestnet utilizes a vendor that charges service fees to assist with the transactions. In 2020, less than .5% of the Envestnet-traded fixed income securities transactions were executed at broker-dealers other than NFS, with per transaction service fees ranging from approximately $0 to $450. These service fees will apply to any Strategy where a client contributes fixed income securities and are not included in the cost data in Column 3 below.

For more information on the Platform's brokerage and other practices, please refer to the Platform's Form ADV Wrap Brochure, which is available at [www.rockco.com](http://www.rockco.com) or from your PWA.

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| Investment Strategy Name | Percentage of Transactions Executed Away from NFS: | Additional Costs (if any) - Average CPS or BPS: |
|---|---|---|
| Acadian International ADR Managed Account | 0.00% | 0 |
| ACR- Alpine Capital Research Equity Quality Return Managed Account | 11.03% | 0 |
| Affinity Active Mega Cap Managed Account | 0.00% | 0 |
| AB Strategic Research Managed Account | 0.00% | 0 |
| Alta Capital All Cap Quality Growth Managed Account | 0.00% | 0 |
| Alta Capital Large Cap Quality Growth Managed Account | 2.74% | 0 |
| Alta Capital SMID Managed Account | 0.96% | 0 |
| Pioneer Fundamental Growth Managed Account | 0.00% | 0 |
| Anchor All Cap Value Managed Account | 0.00% | 0 |
| Anchor Dividend Income Value Managed Account | 0.00% | 0 |
| Anchor Mid Cap Value Managed Account | 0.00% | 0 |
| Anchor Small Cap Value Managed Account | 0.00% | 0 |
| Aristotle International ADR Managed Account | 0.00% | 0 |
| Aristotle Value Equity Managed Account | 3.87% | 0 |
| ARK Disruptive Innovation Managed Account | 0.00% | 0 |
| Atlanta Capital High Quality Calvert Equity Managed Account | 0.00% | 0 |
| Atlanta Capital High Quality Select Equity Managed Account | 0.00% | 0 |
| Atlanta Capital High Quality Small Cap Managed Account | 0.00% | 0 |
| Atlanta Capital High Quality Small to Mid Cap Managed Account | 0.01% | 0 |
| Auour Instinct Global Equity Levered Strategy | 0.00% | 0 |
| Bahl & Gaynor Income Growth Managed Account | 0.00% | 0 |
| Bahl & Gaynor Large Cap Quality Growth Managed Account | 0.00% | 0 |
| Bahl & Gaynor Smig® (Small/Mid Cap Income Growth SMA) Managed Account | 0.00% | 0 |
| BlackRock 10/90 Target Allocation ETF Portfolio | 6.57% | 0 |
| BlackRock 20/80 Target Allocation ETF Portfolio | 13.79% | 0 |
| BlackRock 20/80 Target Allocation Tax-Aware ETF Portfolio | 3.39% | 0 |
| BlackRock 30/70 Target Allocation ETF Portfolio | 22.16% | 0 |
| BlackRock 40/60 Target Allocation ETF Portfolio | 22.99% | 0 |
| BlackRock 40/60 Target Allocation Tax-Aware ETF Portfolio | 9.39% | 0 |
| BlackRock 50/50 Target Allocation ETF Portfolio | 37.73% | 0 |
| BlackRock 50/50 Target Allocation Tax-Aware ETF Portfolio | 14.09% | 0 |
| BlackRock 60/40 Target Allocation ESG ETF Portfolio | 26.36% | 0 |
| BlackRock 60/40 Target Allocation ETF Portfolio | 28.85% | < .1 CPS |
| BlackRock 60/40 Target Allocation Tax-Aware ETF Portfolio | 10.96% | 0 |

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|---|---|---|
| BlackRock 70/30 Target Allocation ETF Portfolio | 23.93% | < .1 CPS |
| BlackRock 70/30 Target Allocation Tax-Aware ETF Portfolio | 59.38% | 0 |
| BlackRock 80/20 Target Allocation ESG ETF Portfolio | 31.16% | 0 |
| BlackRock 80/20 Target Allocation ETF Portfolio | 34.78% | < .1 CPS |
| BlackRock 80/20 Target Allocation Tax-Aware ETF Portfolio | 16.96% | 0 |
| BlackRock 90/10 Target Allocation ETF Portfolio | 22.70% | < .1 CPS |
| BlackRock Equity Dividend Managed Account | 0.00% | 0 |
| BlackRock Equity Target Allocation ESG ETF Portfolio | 0.00% | 0 |
| BlackRock Equity Target Allocation ETF Portfolio | 34.32% | < .1 CPS |
| BlackRock Fixed Income Target Allocation ETF Portfolio | 25.26% | 0 |
| BlackRock Fixed Income Target Allocation Tax-Aware ETF Portfolio | 0.66% | 0 |
| BlackRock Global Dividend Income ADR Managed Account | 0.00% | 0 |
| BlackRock Large Cap Core Managed Account | 0.00% | 0 |
| BlackRock Large Cap Value Managed Account | 0.00% | 0 |
| BlackRock Target Income Aggressive Portfolio | 7.00% | 0 |
| BlackRock Target Income ETF Aggressive Portfolio | 13.10% | 0 |
| BlackRock Target Income ETF Core Portfolio | 19.01% | < .1 CPS |
| BlackRock Target Income ETF High Portfolio | 15.96% | 0 |
| BNYM Walter Scott International Stock ADR Managed Account | 0.00% | 0 |
| Brandes Global Equity Value ADR Managed Account | 0.00% | 0 |
| Brandes International Equity Value ADR Managed Account | 0.00% | 0 |
| Brentview Dividend Growth Managed Account | 0.00% | 0 |
| Brookmont Core Dividend Equity Managed Account | 0.00% | 0 |
| Brookmont Dividend Growth Managed Account | 0.00% | 0 |
| Cambiar International ADR Managed Account | 13.38% | .2 CPS |
| Campbell Newman Dividend Growth Equity Managed Account | 0.00% | 0 |
| Capital Group Global Equity SMA | 1.08% | .1 CPS |
| Capital Group Global Growth SMA | 0.00% | 0 |
| Capital Group International Equity SMA | 0.00% | 0 |
| Capital Group International Growth SMA | 0.23% | 2.5 CPS |
| Capital Group U.S. Core SMA | 0.00% | 0 |
| Capital Group US Growth SMA | 0.00% | 0 |
| Capital Group World Dividend Growers SMA | 0.00% | 0 |
| CAIM Growth and Income Managed Account | 0.00% | 0 |
| Cohen & Steers Institutional & Exchange-Traded Preferred Securities SMA Managed Account | 0.00% | 0 |
| Cohen & Steers REIT Total Return Managed Account | 0.00% | 0 |

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| Columbia Contrarian Core Managed Account | 0.00% | 0 |
| Columbia Dividend Income Managed Account | 0.00% | 0 |
| Columbia Large Cap Growth Managed Account | 0.00% | 0 |
| Columbia Select Large Cap Growth Managed Account | 0.00% | 0 |
| Columbia Select Large Cap Value Managed Account | 0.00% | 0 |
| Congress Large Cap Growth Managed Account | 0.00% | 0 |
| Congress Mid Cap Growth Managed Account | 0.00% | 0 |
| Cushing Midstream Strategy | 0.00% | 0 |
| Cypress Capital US Opportunity (Moderate) | 0.00% | 0 |
| D.F. Dent All Cap Growth Managed Account | 0.62% | 0 |
| Davidson Multi-Cap Equity Managed Account | 0.00% | 0 |
| Davis International SMA Managed Account | 0.00% | 0 |
| Davis Large Cap Value Managed Account | 0.00% | 0 |
| Dearborn Core Rising Dividends Managed Account | 0.00% | 0 |
| Delaware Large Cap Value Managed Account | 0.00% | 0 |
| Diamond Hill Large Cap Managed Account | 0.00% | 0 |
| Eagle Mid Cap Growth Managed Account | 0.00% | 0 |
| Earnest Partners Mid Cap Core Managed Account | 0.00% | 0 |
| Earnest Partners Mid Cap Value Managed Account | 0.00% | 0 |
| Earnest Partners Small Cap Core Managed Account | 0.00% | 0 |
| Earnest Partners SMID Core Managed Account | 0.00% | 0 |
| Eaton Vance Large Cap Value Focused Managed Account | 0.00% | 0 |
| Eaton Vance Large Cap Value Managed Account | 0.00% | 0 |
| Epoch Global Equity Shareholder Yield ADR Managed Account | 0.25% | 0 |
| EquityCompass Global Leaders Managed Account | 0.09% | 0 |
| Fayez Sarofim & Co. Large Cap Core Managed Account | 0.00% | 0 |
| Federated Global Strategic Value Dividend Managed Account | 0.38% | 0 |
| Federated Strategic Value Dividend Managed Account | 0.16% | 0 |
| Fiera Small Cap Growth Managed Account | 0.00% | 0 |
| Fiera SMID Growth Managed Account | 0.00% | 0 |
| First Trust Small Cap Core Managed Account | 0.00% | 0 |
| Templeton Portfolio Advisors International Equity Managed Account | 0.00% | 0 |
| Geneva Capital US Small Cap Growth Managed Account | 0.00% | 0 |
| Glenmede Small Cap Core Managed Account | 0.00% | 0 |
| GLOBALT Environmental, Social and Governance (ESG) Managed Account | 0.00% | 0 |
| Goldman Sachs US Mid Cap Growth Managed Account | 0.00% | 0 |

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| Goldman Sachs US Strategic Growth Managed Account | 0.00% | 0 |
| Goldman Sachs S&P Dividend Income & Growth | 0.00% | 0 |
| Goldman Sachs S&P Enhanced Growth ETF (Non-GS) MAP | 0.00% | .1 CPS |
| Goldman Sachs S&P Growth ETF (Non-GS) MAP | 4.04% | .1 CPS |
| Goldman Sachs S&P Moderate ETF (Non-GS) MAP | 3.64% | .2 CPS |
| Goldman Sachs S&P Moderate Growth ETF MAP | 6.93% | .3 CPS |
| GW&K Small Cap Core Managed Account | 2.24% | 0 |
| Harding Loevner Global Equity ADR Managed Account | 0.00% | 0 |
| Harding Loevner International Equity ADR Managed Account | 0.00% | .5 CPS |
| Hilton Capital - Tactical Income (No K1) Managed Account | 4.35% | 0 |
| Hilton Capital - Tactical Income Managed Account | 0.00% | 0 |
| Invesco Comstock Managed Account | 11.21% | 0 |
| Invesco International Growth ADR Managed Account | 0.00% | 0 |
| Invesco US Real Estate Securities Managed Account | 1.46% | 0 |
| John Hancock AM Fundamental Large Cap Core Managed Account | 0.00% | 0 |
| JP Morgan Equity Income Managed Account | 0.00% | 0 |
| JP Morgan Growth Advantage Managed Account | 0.00% | 0 |
| Kayne Anderson Rudnick Small to Mid Cap Core Managed Account | 0.00% | .2 CPS |
| Lazard Emerging Markets Core Equity Select ADR Managed Account | 45.86% | 0 |
| Lazard Emerging Markets Equity Select ADR Managed Account | 0.00% | 0 |
| Lazard Global Equity Income ADR Managed Account | 0.00% | 0 |
| Lazard Global Equity Select Managed Account | 0.00% | 0 |
| Lazard International Equity Select Managed Account | 0.00% | .2 CPS |
| Lazard Int'l Equity Select w/Emerging Markets Managed Account | 5.61% | 0 |
| ClearBridge All Cap Growth Portfolios | 2.09% | 0 |
| ClearBridge Dividend Strategy Portfolios | 0.00% | 0 |
| ClearBridge International Growth ADR ESG Portfolios | 0.00% | 0 |
| ClearBridge International Growth ADR Portfolios | 0.00% | 0 |
| ClearBridge Large Cap Growth ESG Portfolios | 0.00% | 0 |
| ClearBridge Large Cap Growth Portfolios | 0.00% | 0 |
| ClearBridge Multi Cap Growth Portfolios | 0.00% | 0 |
| Loomis Sayles Large Cap Growth Managed Account | 0.00% | 0 |
| Lord Abbett Multi Cap Value Managed Account | 0.00% | 0 |
| M.D. Sass Relative Value Equity Managed Account | 0.00% | 0 |
| Madison Large Cap Equity Managed Account | 0.00% | 0 |
| Manning & Napier Equity-Oriented Managed Account | 0.00% | 0 |

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| MFS Growth Private Portfolio Managed Account | 0.94% | 0 |
| MFS International ADR Private Portfolio Managed Account | 0.00% | 0 |
| Morgan Stanley Applied Global Concentrated Equity Managed Account | 0.00% | 0 |
| Morgan Stanley Applied Global Core Equity Managed Account | 0.00% | 0 |
| Neuberger Berman Large Cap Disciplined Growth Managed Account | 0.00% | 0 |
| Neuberger Berman Rachlin Group Midstream Infrastructure [No K-1] Managed Account | 0.00% | 0 |
| Neuberger Berman Sustainable Equity Managed Account | 0.00% | 0 |
| New Frontier ETF Global Balanced Portfolio | 0.00% | 0 |
| New Frontier ETF Global Equity Portfolio | 0.00% | 0 |
| Nuveen (NAM) International Growth ADR Managed Account | 18.79% | 0 |
| Nuveen (NAM) Stable Growth Managed Account | 0.00% | 0 |
| Nuveen Emerging Markets (ADR) Managed Account | 0.00% | 0 |
| Nuveen International Equity (ADR) Managed Account | 0.00% | 0 |
| NWQ Large Cap Value Equity Managed Account | 0.00% | 0 |
| Oak Ridge All Cap Managed Account | 0.00% | 0 |
| O'Shaughnessy All Cap Core Managed Account | 0.00% | 0 |
| O'Shaughnessy Enhanced Dividend Managed Account | 0.00% | 0 |
| O'Shaughnessy Market Leaders Value Managed Account | 0.00% | 0 |
| O'Shaughnessy Small Cap Value Managed Account | 0.00% | 0 |
| Peregrine Large Cap Growth Managed Account | 0.00% | 0 |
| Polen Capital Focus Growth Managed Account | 0.00% | .1 CPS |
| Polen Global Growth ADR Managed Account | 7.40% | .4 CPS |
| Polen International Growth ADR Managed Account | 0.34% | 0 |
| Polen U.S. Small Company Growth Managed Account | 0.00% | 0 |
| Invesco PMC ActivePassive - Growth | 0.00% | 0 |
| Principal Edge Concentrated MidCap Equity Managed Account | 0.00% | 0 |
| Principal Edge SMA SMID Dividend Income Managed Account | 0.00% | 0 |
| Principal MidCap Equity Managed Account | 0.00% | 0 |
| Principal Real Estate Securities Managed Account | 0.00% | 0 |
| Renaissance International Equity ADR Managed Account | 0.00% | 0 |
| RHJ Small Cap Value Managed Account | 0.00% | 0 |
| RHJ SMID Cap Opportunities Managed Account | 0.00% | 0 |
| Richard Bernstein Advisors Global Aggressive ETF Strategy | 0.00% | 0 |
| Richard Bernstein Advisors Global Conservative ETF Strategy | 1.52% | 0 |
| Richard Bernstein Advisors Global Moderate ETF Strategy | 1.63% | 0 |

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| Richard Bernstein Advisors Global Risk-Balanced Moderate ETF Strategy | 1.32% | < .1 CPS |
| Richmond Capital Opportunistic Muni CEF Managed Account | 10.67% | 0 |
| Riverbridge All Cap Growth Managed Account | 0.00% | 0 |
| Riverbridge Smid Cap Growth Managed Account | 0.00% | 0 |
| RiverFront ETF Dynamic Equity Income Strategy | 0.00% | 0 |
| Rockefeller Global ESG Equity (ADR's Only) Managed Account | 0.00% | 0 |
| Rockefeller International Equity | 0.00% | 0 |
| Rockefeller U.S. Small Cap Equity Managed Account | 0.00% | < .1 CPS |
| Russell Inv Balanced Model Strategy (Class S) | 1.82% | 0 |
| Russell Inv Tax-Managed Balanced Model Strategy (Class S) | 0.00% | 0 |
| Russell Inv Tax-Managed Growth Model Strategy (Class S) | 0.00% | 0 |
| Salient MLP Managed Account | 0.00% | 0 |
| Sandhill Concentrated Equity Alpha (CEA) Managed Account | 0.00% | 0 |
| Santa Barbara Dividend Growth Managed Account | 0.00% | 0 |
| Santa Barbara Global Dividend Growth (ADR) Managed Account | 0.00% | 0 |
| Schafer Cullen Global High Dividend Value ADR Managed Account | 0.00% | 0 |
| Schafer Cullen High Dividend Value Equity Managed Account | 0.00% | 0 |
| Schafer Cullen International High Dividend ADR Managed Account | 0.00% | 4 CPS |
| Principal Spectrum Preferred Securities Managed Account | 0.00% | 0 |
| TCW Concentrated Core Managed Account | 0.00% | 0 |
| TCW Relative Value Mid Cap Managed Account | 0.00% | 0 |
| The London Co. Small Cap Core Managed Account | 0.00% | 0 |
| The London Company Income Equity Managed Account | 1.78% | 0 |
| The London Company Large Cap Managed Account | 1.97% | 0 |
| Thomas J. Herzfeld Balanced Managed Account | 0.00% | 0 |
| Thomas J. Herzfeld Fixed Income Managed Account | 0.00% | 0 |
| TS&W Mid Cap Value Managed Account | 0.00% | 0 |
| Thornburg International ADR Managed Account | 0.00% | 0 |
| Trillium Sustainable Opportunities Managed Account | 0.00% | 0 |
| Uniplan REIT Portfolio Managed Account | 0.00% | 0 |
| Vanguard Core 30% Equity / 70% Fixed Income Portfolio | 0.00% | 0 |
| Vanguard S&P 90% Equity / 10% Fixed Income Portfolio | 0.00% | 0 |
| Virtus AllianzGI Global Sustainability SMA | 0.01% | 0 |
| Virtus NFJ Dividend Value Managed Account | 100.00% | 0 |
| Wakefield Large Cap Equity Managed Account | 0.00% | 0 |
| WCA Rising Dividend Portfolio Managed Account | 0.00% | 0 |

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| WCA Victory Portfolio Managed Account | 4.18% | 0 |
| WCM Focused Growth International Managed Account | 0.10% | 1.6 CPS |
| WCM Quality Global Growth Managed Account | 0.00% | .5 CPS |
| Wedgewood Large Cap Focused Growth Managed Account | 10.14% | 0 |
| WestEnd Advisors Global Balanced Strategy | 6.31% | 0 |
| WestEnd Advisors Global Equity Strategy | 0.00% | .7 CPS |
| WestEnd Advisors Large Cap Core Equity Managed Account | 0.09% | 0 |
| Wilshire Global ETF Conservative Strategy | 0.16% | 0 |
| Winslow Capital Large Cap Growth Managed Account | 0.00% | 0 |
| Zacks All-Cap Core Strategy Managed Account | 0.00% | 0 |
| Zevenbergen Growth Equity Managed Account | 0.00% | 0 |