

GIPS REPORT

Fundametrics® International Developed Small-Cap Equity Composite

Year End	Annual Performance Results				Composite Assets			Total Firm Assets (billions)
	Composite Gross	Composite Net	FTSE Developed International Small Cap ex-US (total return)	Composite Dispersion	Number of Portfolios	Value of Assets (millions)	Non-fee Paying	
2020	10.35%	10.35%	10.80%	N.A.	<=5	2	100%	1.255
2021	18.78%	18.78%	12.44%	N.A.	<=5	3	100%	1.300

3-Year Annualized Standard Deviation		
	Composite Gross	FTSE Developed International Small Cap ex-US (total return)
2020	N.A.	N.A.
2021	N.A.	N.A.

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

A complete list and descriptions of composites is available.

The Firm's list of broad distribution pooled funds is available on request.

DISCLAIMERS

- (a) Past performance is no guarantee of future results, and all investments are subject to risk of loss.
 (b) **Please read the notes and disclosures that follow as they are an integral part of this presentation.**

(1) THE FIRM

For the purpose of complying with the Global Investment Performance Standards (GIPS), the "Firm" is defined as CornerCap Investment Counsel, Inc. ("CornerCap"), an independent investment advisor registered under the Investment Advisers Act of 1940, specializing in equity management for mutual funds, separate clients, wrap accounts, and institutional clients.

(2) GIPS® PERFORMANCE STANDARDS

CornerCap claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. CornerCap has been independently verified for the periods January 1, 2002 through December 31, 2019. The verification report(s) is/are available upon request. 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. Verification does not provide assurance on the accuracy of any specific performance report.

Policies for valuing portfolios, calculating performance, and preparing GIPS Reports are available upon request.

(3) BASIS OF COMPOSITE PRESENTATION

CornerCap includes all fee-paying, discretionary equity portfolios with a market value greater than \$100,000 in its composite performance calculations.

Accounts no longer under management are included in the historical composites for the periods they were under management and are excluded in the month of termination.

The annual composite dispersion presented is an asset-weighted, gross-of-fees standard deviation calculated for the accounts that were in the composite the entire year.

(4) SIGNIFICANT ACCOUNTING POLICIES

Performance calculations have been prepared on a daily basis for each portfolio. The daily returns are linked and asset weighted to calculate annual composite total returns.

Valuations and returns are computed and stated in U.S. dollars. The rates of return are not indicative of future performance. The qualitative circumstances surrounding the financial securities environment should be considered.

(5) FUNDAMETRICS® INTERNATIONAL DEVELOPED SMALL-CAP EQUITY COMPOSITE

The Fundametrics® International Developed Small-Cap Equity Composite was created December 31, 2019, based on an inception date of December 31, 2019. The composite contains fully discretionary accounts that invest primarily in international equity developed markets, following a buy and sell philosophy driven by a strict adherence to the advisor's quantitative research. For comparison purposes it is measured against the FTSE Developed Small-Cap (ex-US) Total Return Index.

(6) MANAGEMENT FEES

Gross performance results for the Fundametrics® International Developed Small-Cap Equity Composite have been calculated before management fees. Net performance results have been calculated using actual management fees.

Fundametrics® International Developed Small-Cap Equity Institutional Accounts

- 1.00% on the first \$10,000,000
- 0.90% on the next \$10,000,000
- 0.85% on the balance over \$20,000,000

Standard Private Accounts

- 1.00% on the first \$3,000,000 of assets under management
- 0.75% on the next \$7,000,000 of assets under management
- 0.50% over \$10,000,000 of assets under management
- (Non-Profit Fee Schedule: 0.85% on the 1st Tier)
- (Sub-Advisor Fee Schedule: 0.75% on the 1st Tier)

Actual investment fees incurred by clients may vary.

Returns are presented gross and net of management fees and include the reinvestment of all income.

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