

The February Conversation(s)

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Then – February 2020

As my wife Michele and I settled on the evening of February 20, 2020, we found ourselves deep in conversation over the shrouded, troubling coronavirus news from China. How could a nation four times as populous as the U.S. seemingly manage to control the outbreak, particularly as we drew parallels to influenza and its effects on the U.S. annually? An avid reader, the pandemic reminded her – too much – of Stephen King's "The Stand." Our Spidey-sense was this thing is a whole lot worse than the public was being led to believe.

Question Authority rang true again, and LOUDLY. R.E.M.'s "It's the End of the World as We Know It" melodiously played somewhere – everywhere – in the air.

The Investment Conversation

HS Management Partners (HSMP) has commented extensively in quarterly letters and thought pieces (see www.hsmanage.com and our [LinkedIn](#) page) about market impacts and how we've attempted to navigate the health calamity of our lives. What matters now is what's ahead.

Our in-house conversations two years ago surrounded how best to protect the health of our employees and the capital of our clients in a pandemic ravaged world. Market prognostications were not grounded in historical precedent.

We relied, as always, on our individual and collective judgement. Amid the universally shared personal concerns for family and friends, we had a responsibility to maintain a calmness in the face of the maelstrom regarding the stewardship of client assets.

Michael Lewis, in “The Premonition,” refers to the general ability to make reasoned judgements with imperfect information as Trained Intuition. Trained Intuition describes the approach we take to situations unknown. Coupled with our investment framework, Trained Intuition adds a dimension that allows us to assess conditions and position client portfolios accordingly.

For the Investment Team at HSMP – which includes members who've been at it for five decades – crises are not a novelty: we'd experienced the '87 Crash, Gulf War, dot-com bubble, 9/11, and Great Financial Crisis (soon after we established the Firm) prior to the tragedy of the global pandemic.

The first step in keeping our wits was to lean on the principles ingrained in our playbook. On reflection, we appreciate that our playbook anchored us, bridging the uncertainty of yesterday to the promise of tomorrow.

And the presence of business model disruption all about us – amplified by the pandemic – only served to affirm the relevance of our core investment tenets: identify business models that satisfy the qualitative criteria we prize; assemble a concentrated portfolio of 20-25 such securities capable of growing the earnings and cash flow stream in a consistent, visible manner over time; and adhere to a strong valuation discipline.

We Didn't Start the Fire

As we reflect on the twenty-four months between now and then, and what tomorrow holds, I've been thinking a lot about the world as we now know it, and Billy Joel's prescient words ring true:

“We didn't start the fire,

It was always burning

Since the world's been turning...”

We are living in arguably the most disruptive chapter of my generation, the Baby Boomers. Unparalleled dislocation is occurring in so many vital aspects of the shared human experience that it is mind-bending to process the implications of any single development – let alone the sum of the myriad shifts – and where the arc of our journey is pointing.

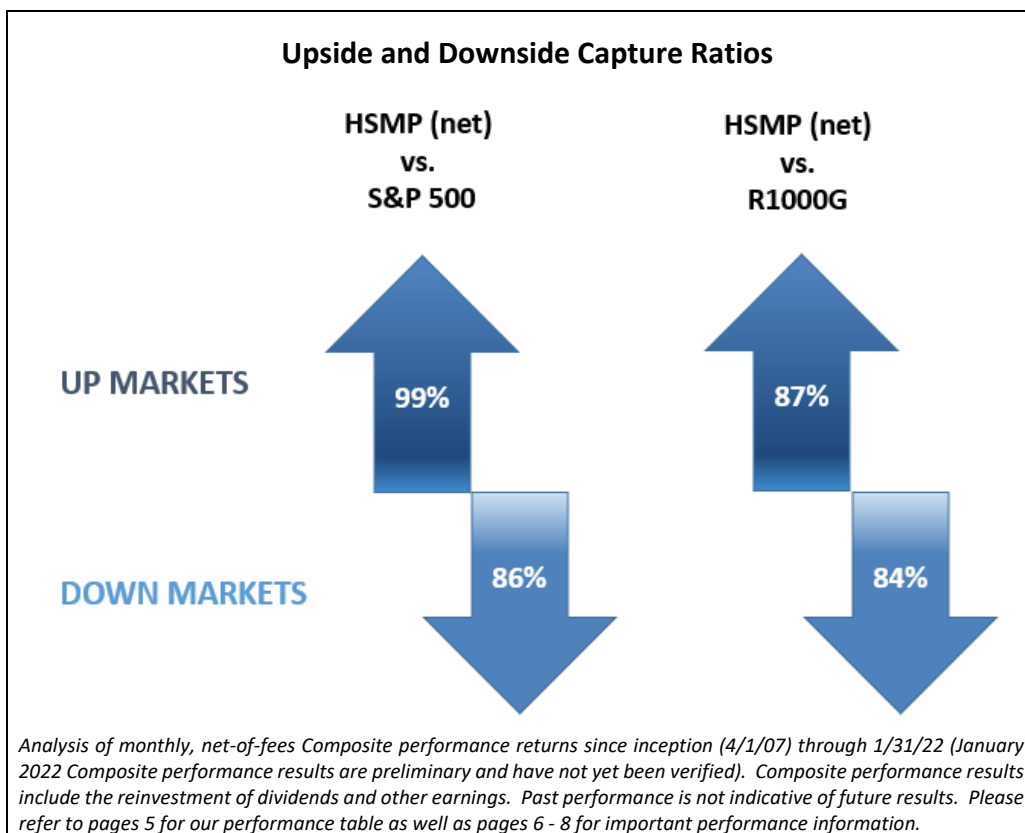
Medical, technological, social, political, business enterprise, and environmental standards, among others, are being ignored, challenged, revised, rewritten, upended at a pace that is breathtaking in scope, rapid in adoption, and yet complex and accordingly hard to understand in real time.

This year we've observed concept companies large on vision and short on cash flow, crypto, meme stocks, SPAC's and all manner of aggressively underwritten instruments fall, fires no longer simmering out-of-sight.

A recent Washington Post article, citing an index compiled by the Economist Intelligence Unit of London, found less than half the world's population is governed by some form of democracy, a record low. The fictionalization of facts – the core of what to trust and what and who to believe – introduces a curve to the convexity of disruptive elements that invites chaos in a world parched with a thirst for order, stability and routine.

Add more than a touch of inflation here, a dash of excessive asset class bubbles there, and no small dose of geopolitical tension – China/Taiwan, Russia/Ukraine, Turkey/Iran – and the cocktail of disruption is potent.

The heat for market participants is measured when the market is under duress. The year-to-date pattern is a reminder of the harrowing six-week interval from mid-February 2020 to March 23, 2020. Our performance over time is a compilation of our upside / downside capture ratio. Essentially, the ratio is a monthly measure of our participation in up markets and the extent to which our strategy has preserved capital in down markets.



We've experienced far fewer instances where the market declined than advanced in a given month since inception (over the 178 months since the inception of our performance track record to 1/31/22, the market

has advanced in 120 and 113 months while declining 58 and 65 months based on S&P 500® and Russell 1000® Growth indices, respectively). We have managed to capture a good portion of the upside while preserving capital reasonably effectively in down markets, and that has yielded what we consider a respectable net-of-fee since inception Composite performance as shown in the performance table on the next page.

As a purveyor of client assets, we are not equipped to put out the infernos...we are charged to understand where the combustion may spread, which may be contained, and positioning client portfolios in a way that attempts to embrace the enterprise/business solutions to distance our client's scarce capital from the rage.

Now - February 2022

Two years later, Michele and I are of course pondering family first and dreams big and small. The 24/7 news cycle – recounting global cases, vaccination rates, fatalities – is a daily reminder of the dinner conversation a few years back. Gradually the conversations are centered on moving ahead with the plans we'd made – maybe, just maybe, the 40th wedding anniversary trip to the Amalfi Coast set for April 2020 will become a reality in April 2023.

At HSMP, the conversations are continuous. The thoughts and contributions from talented team members offering unique perspectives enrich the portfolio decision making process. Discussions about business models, valuations, economic trends and the best application of scarce client capital has served as a hallmark of our approach since the beginning. Immersive dialogue will remain long after the commemoration of our fifteen-year anniversary at the close of the current quarter.

Tomorrow - February 2024

The next twenty-four months are sure to pass more quickly than the last, if for no other reason than I hope it is filled with more pre-pandemic normalcy, more love, more civility, more compassion, more laughter, more joy given what the pandemic cruelly exorcised.

What is Mr. Market telling us now – today – about tomorrow? Ah, if we only knew...for our role, and that of financial managers of all asset class varieties, is to make investment decisions today with an imperfect gaze at tomorrow, issuing judgements based on the history that has yet to be written. A bit daunting until you appreciate the exercise is a journey without a destination, a space odyssey with only a launch point. And so, we do what we do, disavowing perfection as a framework for one that provides room for us to do good.

As shown in the table below, our so-called body of work – our since inception performance – is one we are proud of, and is the manifestation of what our work has wrought over the nearly fifteen years since our asset management practice began.

Total Performance						
	1 Year <i>Annualized</i>	3 Years <i>Annualized</i>	5 Years <i>Annualized</i>	10 Years <i>Annualized</i>	<i>Since Inception</i> 4/1/07 <i>Annualized</i>	<i>Since Inception</i> 4/1/07 <i>Cumulative</i>
HSMP Composite (Net)	23.8%	21.9%	18.9%	17.4%	13.3%	536.6%
S&P 500® Index	23.3%	20.7%	16.8%	15.4%	10.3%	330.4%
Russell 1000® Growth Index	17.5%	26.4%	22.3%	18.0%	13.1%	521.7%

Composite preliminary performance (net-of-fees) since inception (4/1/07) through 1/31/22 (preliminary performance has not yet been verified). Composite performance results include the reinvestment of dividends and other earnings. Past performance is not indicative of future results. Please refer to pages 6 - 8 for important performance information.

Clairvoyant limitations aside, we at HSMP have consistently applied the same investment principles over the long-term. And our belief is that those foundational elements will serve our clients as well twenty-four months from now as they did twenty-four months ago.

And somewhere – everywhere – *The Start of the World as We Know It* serenades the crowd.

HS Management Partners, LLC
Concentrated Quality Growth Composite
GIPS® Report

Year End	Firm Assets (millions)	Composite Assets (USD) (millions) Number of Accounts		Performance Results					3-Year Annualized Std Deviation		
				Composite		S&P 500®	Russell 1000® Growth	Composite Dispersion (Std Dev)	Composite Gross	S&P 500®	Russell 1000® Growth
				Gross	Net						
2021	3,927	3,813	281	31.43%	30.51%	28.71%	27.60%	.64	19.31	17.17	18.17
4Q21	3,927	3,813	281	10.76%	10.57%	11.03%	11.64%	.56	19.31	17.17	18.17
3Q21	3,650	3,554	285	-1.14%	-1.32%	0.58%	1.16%	.09	19.88	18.55	19.91
2Q21	3,791	3,695	284	10.65%	10.46%	8.55%	11.93%	.05	19.51	18.26	19.52
1Q21	3,559	3,425	277	8.47%	8.29%	6.17%	0.94%	.07	19.49	18.14	19.14
2020	3,491	3,341	284	14.70%	13.88%	18.40%	38.49%	.14	19.75	18.53	19.64
2019	3,566	3,478	280	38.12%	37.13%	31.49%	36.39%	1.13	11.29	11.93	13.07
2018	3,145	2,967	259	-4.42%	-5.07%	-4.38%	-1.51%	.28	10.04	10.80	12.12
2017	4,028	3,840	236	33.87%	33.06%	21.83%	30.21%	.46	9.61	9.92	10.54
2016	3,446	3,269	199	6.92%	6.25%	11.96%	7.08%	.10	10.72	10.59	11.15
2015	3,143	3,014	176	3.94%	3.32%	1.38%	5.67%	.81	11.03	10.48	10.70
2014	3,295	3,193	148	13.06%	12.39%	13.69%	13.05%	.26	9.85	8.98	9.59
2013	2,392	2,298	136	31.76%	31.04%	32.39%	33.48%	.09	12.26	11.94	12.18
2012	1,622	1,616	94	28.86%	28.16%	16.00%	15.26%	.15	13.82	15.09	15.66
2011	884	880	72	5.55%	5.00%	2.11%	2.64%	.11	15.81	18.70	17.76
2010	531	528	46	17.13%	16.44%	15.06%	16.71%	.28	19.54	21.85	22.11
2009	292	290	32	35.91%	35.06%	26.46%	37.21%	.33			
2008**	172	152	27	(34.49%)	(34.80%)	(37.00%)	(38.44%)	N.A.			
2007*	-	6	5 or fewer	16.84%	16.08%	4.83%	10.51%	N.A.			

* Performance shown for 2007 is from April 1, 2007 through December 31, 2007.

** HS Management Partners, LLC charges its fees quarterly in arrears and therefore no significant fees were charged to client accounts in the first quarter of 2008. Had a modeled fee of 0.90% per annum been applied, the net of fee return for the first quarter of 2008 would be (10.82%).

N.A. - Information is not statistically meaningful due to an insufficient number of portfolios (5 or fewer) in the Composite for the entire year.

The HS Management Partners Concentrated Quality Growth Composite includes all fully discretionary, actively managed, fee paying accounts which employ our style of investing in 20-25 quality growth businesses. These accounts must have a market value exceeding \$500,000 at the time of initial inclusion in the Composite and have a market value exceeding \$300,000 to maintain inclusion.

Accounts that have contributions/withdrawals of greater than 10% of their market value (at the time of the cash flow) shall be excluded from Composite membership. Accounts that are not actively managed according to the intended strategy are excluded at the end of the last full day in which they last met the inclusion criteria. Accounts are reinstated into the Composite on the first day after the account again meets our inclusion criteria. Prior to April 1, 2009, our inclusion and exclusion criteria were applied on a monthly basis, rather than daily. There are accounts paying zero commissions included in the Composite. Additional information regarding the treatment of significant cash flows is available upon request. Also available upon request are policies for valuing investments, calculating performance, and preparing GIPS Reports.

For benchmark purposes, the Composite is compared to the S&P 500® and Russell 1000® Growth indices, however, the Composite may contain securities not represented in either or both indices. The HS Management Partners Concentrated Quality Growth Composite was created January 1, 2008 (the inception date of the Composite was April 1, 2007). Prior to January 1, 2008 the accounts in the Composite were non-fee paying individual accounts managed by Harry Segalas in accordance with HS Management Partners' investment policies, becoming HS Management Partners accounts in December 2007.

The Composite Dispersion presented is an asset-weighted standard deviation calculated using gross performance results for accounts included within the Composite for the entire period. In addition, gross performance results are used to calculate the 3-year annualized standard deviation.

HS Management Partners, LLC claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. HS Management Partners, LLC has been independently verified for the period January 1, 2008 through December 31, 2021. 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, 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 Concentrated Quality Growth Composite has had a performance examination for the periods January 1, 2008 through December 31, 2021. The verification and performance examination reports are available upon request.

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The performance track record from April 1, 2007 through December 31, 2007 has been examined by Ashland Partners & Company, LLP and meets the portability requirements of the GIPS® standards. A copy of their report is available upon request.

HS Management Partners, LLC is an independent SEC registered investment advisor (SEC registration does not imply a certain level of skill or training). The Firm maintains a complete list and description of composites, which is available upon request. Results are based on fully discretionary accounts under management, including those accounts no longer with the Firm. Past performance is not indicative of future results.

The U.S. Dollar is the currency used to express performance. When international ordinary shares or ADRs are held in portfolios in the Composite, performance is shown net of foreign withholding taxes. Returns are presented gross and net of management fees and include the reinvestment of all income. Net of fee performance was calculated using actual management fees. Prior to January 1, 2008, a representative fee of 0.90% annually was applied to the individual accounts in the Composite managed by Harry Segalas. Additional information regarding the policies for calculating and reporting returns is available upon request. Policies governing compliance with the GIPS® Standards were followed in establishing HS Management Partners' performance record and the accounts to be included therein. In that regard, certain individual accounts managed by Harry Segalas were excluded from the Composite because of material differences in the management style of those accounts and HS Management Partners' investment policies. The GIPS® standards were applied retroactively for the purposes of computing 2007 performance and are being applied prospectively in a consistent manner.

Investment advisory fees are charged as a percentage of an account's assets under management. The annual fee schedule for accounts that are at least \$10 million under management is as follows: 0.90% on first \$25 million, 0.70% on next \$25 million and 0.50% on the balance. Accounts below \$10 million pay the greater of 1% or \$10,000. Actual investment advisory fees may deviate from the above fee schedule at the Firm's sole discretion. Please refer to our Form ADV for more information related to our fees.

IMPORTANT DISCLOSURES

This piece represents our opinion as of 2/22/2022 based on our understanding of market conditions and publicly available information. This piece is written from the perspective of our Composite holdings, performance, and estimated metrics, and it does not refer to any specific client account (client accounts can have higher or lower performance and can have some but not all of the holdings in our Composite). When we use Composite, we mean our HS Management Partners Concentrated Quality Growth Composite, and when we use the portfolio/our portfolio/your portfolio(s), we mean client portfolios in general from our Composite perspective (see below regarding differences between the Composite and client portfolios/accounts and differences between client portfolios/accounts themselves). Composite performance is presented net-of-fees (net of actual investment advisory fees and trading costs) and includes the reinvestment of dividends and other earnings. The performance shown here should not be taken as an indication of how the Composite or a client account will perform in the future; past performance is not indicative of and does not guarantee future results. This piece has forward-looking statements that are by their nature uncertain and based on our assumptions (such as when we refer to possible/future/estimated earnings, market conditions, or portfolio/client portfolio outlook). There is no assurance that forward-looking statements will prove to be accurate as actual results and future events can differ, even materially, from our assumptions. While we believe that our investment strategy will produce desired returns, we do not guarantee that this will be the case, or that we can provide any margin of safety, any actual client experience, any profit or protection against loss whatsoever, or that we will achieve our investment objectives or be successful implementing our strategy. Investing in securities involves significant risks, including the risk of loss of the original amount invested. The following is a summary of some material risks, not all risks, applicable to our investment strategy and advisory business, listed alphabetically.

- **Active Management Risk.** Active management is key to our investment strategy, and we take an incremental trading approach. This increases trading, which in turn increases trading commissions and/or other transaction costs, fees and expenses that will reduce client returns/performance. Portfolio turnover can also result in short-term capital gains, which can reduce the after-tax return for taxable clients.
- **Catastrophic Events, Civil Disturbances, Health Crises, Wars, Natural Disasters, Terrorist Attacks, Environmental Calamities, and Acts of God Risk.** All these events can significantly disrupt not only the economy and market conditions, but also exchanges, trading, our vendors' services, the performance of the companies in which we invest and their competitors, and our ability to carry out our investment advisory business, as well as making our employees, vendors and market participants more susceptible to cyberattacks
- **Concentration Risk.** Our investment strategy involves a high concentration in certain market sectors, industries, geographic regions, and number of issuers. A concentrated portfolio is subject to greater risk of loss and market impact than a more diversified account.
- **Consumer Discretionary, Consumer Staples and Technology Sectors Risk.** Our discretionary client portfolios are concentrated in these sectors, which are highly sensitive to rising inflation, increased interest rates, pandemics, wars, and other events that impact consumer confidence and behavior. The consumer discretionary and the technology sectors are especially tied to the strength of the economy. Moreover, the technology industry is very sensitive to rapid and often unforeseeable innovation and product obsolescence.
- **Cybersecurity and Other Technology Risk.** We rely heavily on technology to perform our functions and also share sensitive, confidential information with client consultants, investment advisers and custodians, as well as with other third-party service providers such as broker-dealers, software providers, network administrators, and other parties we engage in the client service, operations, legal/compliance, marketing, and Firm accounting areas, among other. Thus, client and Firm sensitive, confidential data on our network or on the networks of third parties with whom we have shared data are vulnerable to inadvertent disclosure and nefarious cyberattacks aiming to expose or exploit the data.
- **Equity Securities Risk.** We invest in equity securities, which involves several risks. Their value can decrease, potentially dramatically, in response to many factors (including general economic conditions, inflation, changes in interest rates, fluctuations in foreign currencies, and national or international political, social, governmental, tax, legal, regulatory and economic events, as well as natural disasters, environmental calamities, terrorist attacks, wars, and health crises such as epidemics or pandemics) that can negatively impact the economy in general or a particular company's financial situation, result in poor performance of some companies in certain geographical regions or economic sectors or industries, and/or adversely affect the stock market in general or overall market sentiment. Even under favorable market and industry conditions, a company's performance can be negatively impacted by internal factors, such as poor execution by company management, a cybersecurity attack or data breach, and a change in the demand for its products or services.
- **Foreign Security Risk.** Our discretionary client portfolios generally include foreign companies. Investing in foreign companies exposes clients to political, social, economic, legal and currency factors or other issues relevant to the corresponding foreign countries or regions.
- **General Economic and Market Conditions Risk.** The success of our Firm and the companies in which we invest will be affected by general economic and market conditions, such as inflation, interest rate fluctuations, a recession, the availability of credit, economic uncertainty, changes in laws, supply chain issues, labor shortages, trade barriers, currency exchange controls, energy and commodity prices, national and international political circumstances, natural disasters such as environmental calamities, and regional, national and global health crises.
- **Credit Risk.** Financial intermediaries and security issuers can experience adverse economic consequences, including impaired credit ratings, default, and bankruptcy or insolvency. All of which can cause adverse events, such as trading disruptions and credit events that can impair or erase a client's investment.
- **Legal, Tax, and Regulatory Risk.** We are a registered investment adviser regulated by the SEC. As a regulated entity, changes in laws or regulations can impact our ability to operate our business. In addition, legal, tax and regulatory developments can adversely affect the companies in which we invest or the regulatory or tax treatment of client gains.
- **Liquidity Risk.** In times of turbulent or uncertain market conditions liquidity risk for our client portfolio increases as there can be fewer market participants, or no market participant, willing to pay a stock price that is not deeply discounted from the price we paid when we invested in the stock, or willing to pay a stock price that we deem reasonable for the securities we own.
- **Low Cash Balances Risk.** Our investment strategy generally involves maintaining very low levels of cash (including cash equivalents selected by the client or the client's custodian) in client accounts, meaning client accounts are typically nearly fully invested. Therefore, client portfolios will likely be more impacted by market fluctuations than portfolios that are less invested and keep more cash available. In addition, client withdrawals of cash from an account will most likely require the sale of securities which can be at a time when prices are not favorable.
- **Market Capitalization Risk.** Although we typically invest in large capitalization companies, we have demonstrated a willingness to go down the capitalization scale. When moving down the capitalization scale, stock liquidity risk can significantly increase as the market for the stock can shrink and the stock price can decline, particularly in turbulent markets. In addition, small and mid-capitalization companies tend to be more volatile or vulnerable to adverse company specific or general economic conditions than large capitalization companies.
- **Material Non-public Information Risk.** There can be instances where we receive non-public information, voluntarily or involuntarily. In such cases, we will act in accordance with our policies and procedures relating to insider trading and determine whether the information constitutes material non-public information or is likely or possible to be considered so with the benefit of hindsight.
- **Reliance on Key Personnel Risk.** Our CIO and sole Portfolio Manager is considered a key person with respect to our investment strategy. Although other experienced Firm-partner members of the investment team can make investment decisions, the unforeseen absence of our CIO can impair our ability to successfully implement our investment strategy.

Refer to our Firm Brochure (at hsmanage.com/documents/ or upon request at 212-888-0060) for material risks applicable to our strategy and information regarding our Firm. The information here is solely for illustration/discussion, has not been tailored to any particular recipient, is subject to change without notice, should not be construed as a recommendation to buy or sell any particular security, and should not be used as basis for making investment decisions.

HSMP claims compliance with the Global Investment Performance Standards (GIPS®). HS Management Partners, LLC is an independent SEC registered investment adviser (SEC registration does not imply any certain level of skill or training). The HS Management Partners Concentrated Quality Growth Composite includes all fully discretionary, actively managed, investment advisory fee-paying accounts (even if they pay zero trading commissions), which employ our style of investing in 20-25 quality growth businesses and have a market value exceeding \$500,000 at the time of inclusion, and exceeding \$300,000 to maintain inclusion, in the Composite. The U.S. Dollar is the currency used to express performance. For more information or list of composite descriptions, please contact us at 212-888-0060. A copy of our fully compliant GIPS® Report is included in this piece.

Composite performance is presented net-of-fees (net of actual investment advisory fees and trading costs). Performance includes the reinvestment of dividends and other earnings. The upside (downside) capture ratios measure the Composite performance against the indices and were computed by dividing the cumulative annualized Composite return (net-of-fees) in months of positive (negative) index returns by the cumulative annualized return of the corresponding index for those same months. Except for the fully compliant GIPS® Report the upside/downside capture ratios chart and the performance table in this piece include January 2022 Composite performance which is preliminary and has not yet been verified. In any event the performance shown should not be taken as an indication of how the Composite or a client account will perform in the future. Past performance is not indicative of and does not guarantee future results. Composite results reflect accounts managed at another entity: prior to January 1, 2008, the accounts in the Composite were non-fee paying (non-investment-advisory fee-paying) individual accounts managed by Harry Segalas in accordance with HSMP's investment policies, becoming HSMP's accounts in December 2007. The Composite is compared to the Russell 1000® Growth Index (R1000G) and the S&P 500® Index (S&P 500) as benchmarks for market context. The R1000G is an unmanaged index that measures the performance of those Russell 1000® Index companies (largest 1,000 U.S. companies based on market capitalization) with higher price-to-book ratios and higher forecasted growth values. The S&P 500 is an unmanaged market capitalization-weighted index designed to measure performance of the broad domestic economy through changes in the aggregate market value of 500 stocks representing all major industries. There are meaningful differences between the Composite and each index that should be considered when comparing performance, such as in terms of composition, concentration and volatility (e.g., the Composite contains securities not represented in either index and is much more concentrated than either index in terms of companies and sectors; the average market capitalization of companies in the Composite will likely differ from that of either index; and market or economic conditions can affect positively/negatively the Composite's performance but not the indices to the same extent). In addition, neither index bears fees and expenses and investors cannot invest directly in either of them. Furthermore, we do not seek to mimic any market index in our investment approach and do not maintain limits on industry or sector weightings.

Although most discretionary client accounts are included in the Composite and dispersion is typically low over time, not all client accounts are in the Composite, and even for those in the Composite, there can be dispersion, particularly for small client accounts and also when viewed over narrow time periods. Small accounts generally experience higher dispersion from our Composite than large accounts primarily because they do not participate in trading, allocations, and aggregations to the same extent as large accounts given their size and that actual participation in trade orders depends, among other factors, on cash available in an account and on our imposed per-order share minimums, which typically range anywhere from 5 to 100 shares depending on the stock price. Also, while the investment merits of a given security drive our investment decisions, we take into consideration the tax status of an account or group of accounts in certain instances when practicable (that being said, we are not a tax-efficient focused adviser and do not provide tax advice, and clients should consult with their own separate tax advisors in this regard). In sum, client account holdings and performance can deviate from our Composite and/or from other client accounts (even within the same group and even different accounts of the same client), and also from the representative portfolio, for several reasons, such as: client restrictions, account type and size, timing and market conditions at an account's inception and contributions/withdrawals, timing and terms of trades, actual client investment advisory fees (or the lack thereof), and client directed brokerage/commission recapture instructions. Furthermore, under our sole investment strategy (HSMP Concentrated Quality Growth Equity strategy) we provide investment advice on a discretionary basis (we make all the investment decisions and trade the accounts) and also on a non-discretionary basis in the form of model portfolios for use in multimanager products (we do not make the final investment decisions nor trade the accounts); therefore, certain information here (including holdings, performance, Composite, and investment strategy implementation) is not applicable to model portfolio clients as we have no control and do not monitor the implementation (complete, partial or not at all) of model portfolios, and the performance of model portfolio clients is not attributable to us.

We typically build a concentrated portfolio with a hard cap on company names and with an aim to keeping clients' capital nearly fully invested. Our investment advice is limited to domestic and foreign equity securities of publicly traded companies. Client accounts generally hold 20-25 companies, although in certain circumstances they may hold more or less names. We do not maintain limits on industry or sector weightings, and while we do limit portfolio positions by company, clients' portfolios are likely to be significantly concentrated by sector, industry and/or geography, among other factors.

This document includes general information and has neither been tailored for any specific recipient nor consider your/anyone's particular investment needs. Accordingly, the information herein is not intended to cause HSMP to become a fiduciary within the meaning of the Investment Advisers Act of 1940, the Investment Company Act of 1940, Section 3(21)(A)(ii) of the Employee Retirement Income Security Act of 1974, or Section 4975(e)(3)(B) of the Internal Revenue Code of 1986—all as amended.

When we use HSMP, HS Management Partners, or Firm, we mean HS Management Partners, LLC.

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