



Required Disclosures for the 2020 GIPS® Advertising Guidelines Applicable for Composites and Limited Distribution Pooled Funds

When advertising to attract investors to become prospective clients, GIPS compliant firms have 3 options:

- 1) Don't mention GIPS compliance.
- 2) Mention GIPS compliance and include a GIPS Report.
- 3) Mention GIPS compliance and follow the abbreviated disclosure requirements of the GIPS Advertising Guidelines.

When selecting option 3, firms are required to include the following disclosures and statistics in their advertisements.

Advertisements without Performance must include:

- The GIPS compliance statement for advertisements: "[Insert name of Firm] claims compliance with the Global Investment Performance Standards (GIPS®)."
- The following 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."
- How a prospective client can obtain GIPS-compliant performance information for the firm's strategies and products.
 - *EXAMPLE: "To receive a GIPS Report and/or our firm's list of composite/pooled fund descriptions please email your request to info@xyz.com."*

Advertisements with Performance must include:

- All required disclosures from "Advertisements without Performance" above.
- Composite or pooled fund total returns according to one of the following options:
 - Time-Weighted Returns:
 1. 1-, 3-, and 5-year annualized Time-Weighted Returns through the most recent period with the period end date clearly identified (and since inception if in existence for less than five years).
 2. Period-to-date (i.e., year-to-date for the current year) composite or pooled fund returns in addition to either:
 - a) 1-, 3-, and 5-year annualized Time-Weighted Returns through the same period as presented in the corresponding GIPS Report (and since inception if in existence for less than five years), or
 - b) 5 years of annual Time-Weighted Returns through the same period as presented in the corresponding GIPS Report (or for each annual period since composite inception if less than 5 years).
 3. The annualized Time-Weighted Returns for the total period that includes all periods presented in the corresponding GIPS Report through either:
 - a) The most recent period end, or
 - b) The most recent annual period end.
 - Money-Weighted returns:
 4. The since-inception annualized (for periods longer than one year) or non-annualized (for periods less than one year) Money-Weighted Returns through either:
 - a) The most recent period end, or
 - b) The most recent annual period end.
- Whether returns are presented gross and/or net of fees.
- Benchmark total returns, calculated with the same methodology, in the same currency, for the same periods for which the composite return is presented, if the corresponding GIPS Report includes benchmark returns.
- A disclosure or other indication of reporting currency. All performance must be expressed in the same currency.
 - *EXAMPLE: "The U.S. Dollar is the currency used to express performance."*
- If the GIPS Report conforms with laws and/or regulations that conflict with the requirements of the GIPS standards and the manner in which the laws and/or regulations conflict with the GIPS standards.
 - *EXAMPLE: "Local regulations require the use of settlement date accounting instead of trade date accounting, which differs from the requirements of the GIPS standards. To comply with local regulations our performance is calculated based on settlement date accounting for all trades."*

For more information about the GIPS standards, investment performance, or Longs Peak's services, please contact Sean P. Gilligan, CFA, CPA, CIPM at sean@longspeakadvisory.com or +1.720.917.9621.