

South Atlantic Capital Management Group, Inc.

Investment Management

December 31, 2021 Portfolio Review

COMPOSITE PERFORMANCE SUMMARY

South Atlantic Capital (SACMG) Core Equity Composite¹ versus S&P 500 and Russell 1000 Value
Annualized as of 12/31/2021

	1 Year	3 Years	5 Years	10 Years	15 Years	20 Years	Since Inception (1/1/1992)	Total Return Since Inception
SACMG Core Equity (gross)	30.19%	17.23%	15.16%	12.77%	10.37%	10.84%	13.32%	4145.91%
SACMG Core Equity (Net)	28.90%	16.07%	14.01%	11.67%	9.29%	9.76%	12.21%	3061.75%
S&P 500 ²	28.71%	26.03%	18.49%	16.57%	10.66%	9.52%	10.66%	1983.70%
Russell 1000 Value ³	25.16%	17.62%	11.17%	12.98%	7.51%	8.34%	10.28%	1775.83%

South Atlantic Capital is an independent investment adviser registered with the State of North Carolina and the Commonwealth of Virginia. South Atlantic Capital claims compliance with the Global Investment Performance Standards (GIPS®). The firm maintains a complete list and description of composites, as well as GIPS® Reports, which are available upon request by calling (910) 763-4113, or emailing info@southatlanticcap.com. All returns include reinvested dividends and interest. Past results are not indicative of future performance.

Attached is our most recent GIPS verification through December 31, 2021, including the GIPS Composite Report for our Core Equity Composite (as well as necessary disclosures).

“ARBITRAGE”

Arbitrage is defined as the simultaneous buying and selling of securities, currencies, or commodities in different markets or in derivative forms in order to take advantage of differing prices for the same asset. We think of what we do as a form of arbitrage. We buy a company from “participants” in the markets who have a short-term orientation (note I didn’t say “investors”), thus taking advantage of what a long-term investor would consider a discounted price. Essentially, we try to benefit from two simultaneous, but differing, views of the appropriate price for the same asset, one based on a short time horizon and another based on a long time horizon.

Consider the comments that follow. The first is from a justifiably highly regarded analyst who, on December 6th, essentially said Citigroup might be a good investment long term but that there are no short-term catalysts, so she downgraded the stock from overweight to equal weight. Analysts have a big influence on market prices in the short term.

Here is another comment from the Chairman of Lennar, who spoke about the short-term issues with their supply chain, but then he went on to lay out a very plausible analysis of why the stock is a good investment long-term. Predictably, the market’s first reaction was to focus entirely on the short-term risks. We believe a short-term focus in the markets is prevalent, which creates opportunities for our version of arbitrage.

Morgan Stanley analyst, Betsy Graseck, recently cut her rating on Citigroup from overweight to neutral on the lack of near-term catalysts. She went on to say, “the stock is cheap at .6x next year’s tangible book value per share and that new CEO Jane Frazier is taking strong, proactive action to boost returns closer to peers, but we believe those actions will take time to play out.” We have time for them to work through their plan since we have confidence it will generate attractive long-term returns from what we view as an overly discounted valuation of just .6x tangible book value.

Our view is that Citigroup has some strongly performing divisions with entrenched market positions as well as a few poorly performing international consumer businesses which the CEO is selling to free up capital and increase returns on capital. With their peers trading at over 2x tangible book value, from our point of view, placing too much emphasis on a problem that will be relatively short lived simply creates opportunity for long-term investors.

Lennar’s CEO mentioned in their fourth quarter earnings announcement that “The supply chain affects both land and construction and that will continue into the first quarter of 2022 and beyond. But as we enter the second half of the year, we expect that the supply chain disruption will be stabilized and mitigated by the greater number of starts that we have started, by the lessons learned and incorporated in our Builder of Choice relationships and by the simplicity embedded in our Everything’s Included offerings.”

Again, the market was driven by fears of the short-term issues more than the case for attractive long-term prospects, and the stock dropped 7.3% in the two days after earnings were announced. Comparatively, we think patient capital does well notwithstanding that Lennar’s short-term outlook is diminished by higher mortgage rates.

Best and Worst Performers in the 4th quarter 2021

TOP 5 PERFORMERS

Jackson Financial	63.0%
American Equity	32.9%
CF Industries	27.4%
Lennar	23.6%
AutoZone	23.5%

BOTTOM 5 PERFORMERS

Citigroup	(13.0%)
Prudential Plc	(12.1%)
Ardagh Metal Pkg.	(9.2%)
Fox Corp A	(8.0%)
Ardagh Metal P. Wts	(7.4%)

2021 Performance

We are certainly pleased with our 2021 performance, and in the 3rd quarter we earned our second quarterly PSN “Top Guns” award for the year. PSN is a database widely used by institutional investors searching for strongly performing asset managers who, ideally, have independently verified track records.

Other large cap asset managers on the database include Goldman Sachs, JPMorgan Asset Management, Oppenheimer and Alliance Bernstein among others. The Top Gun designation means that we were among the top 10 managers of the 206 Large Cap Value managers on PSN’s database for the quarter ended September 30, 2021.

While we are pleased with this recognition, and glad for our clients who suffered through 2020, we are most pleased with how our long-term returns stack up on the database. The PSN reports, which are on our website, show that since our Core Equity Composite’s inception (from January 1, 1992,

through December 31, 2021), our returns rank in the top 5th percentile both gross and net of fees out of the 35 Large Cap Value Managers who have been on the database since January 1, 1992.

For the universe of All Large Cap Managers (this includes growth, blend and value styles) on the database since January 1, 1992, our returns rank in the top 6% gross of fees and top 21% net of fees. There are 100 Domestic Large Cap managers who have been on the database since January 1, 1992.

We think it's worth noting that the S&P 500 index the managers are compared to on this database ranks in the 80th percentile. That means the index is outperformed by 80% of the managers on the database since January 1, 1992 and by 69% of managers on the database over the last 20 years. Most active managers underperform the index net of fees over time. In fact, according to S&P Dow Jones LLC, 90% of all domestic equity funds underperformed the S&P 1500 for the twenty years ended December 31, 2021. We think the unusually low ranking of the index in PSN's database indicates the quality of the managers on this database.

We attribute much of our performance to our focus on risk mitigation. Our "downside protection" statistics, or how we perform versus the market during a quarter of negative market returns, ranks us in the top 7% net of fees versus the other Large Cap managers on the database.

We think our track record reflects that we have been a good alternative for clients over time. Also, by going direct to the "portfolio manager," clients can avoid the multiple layers of fees that they sometimes incur when buying funds or hiring separate account managers through intermediaries. Lastly, we believe access to the person doing the research and directly responsible for deciding which companies to invest in provides significant value. Specifically, it creates conviction in the investments, which helps limit the emotional mistakes that can be so detrimental to returns, particularly when fear drives you to sell good investments in down markets.

RISKS

Returns for the last 5 years for the S&P 500 and Russell 1000 Value Index are outlined below.

	<u>Annualized as of 12/31/21</u>
S&P 500	18.49%
Russell 1000 Value	11.17%
South Atlantic Core Equity*	14.01%

*Net of fees

At year end, the S&P 500 traded at a historically high valuation of 20.6x forward earnings. This along with the threat of higher interest rates and higher inflation leads us to believe market returns for the next 5 years will not be as high as we've experienced over the past 5 years.

Since we are looking for our best twenty to twenty-five ideas to invest in, after taking the risks into account, how we feel about the market is really a separate question from how we feel about our portfolio companies. We feel optimistic about our prospective portfolio returns although, again, we don't feel that they will be as high as the last 5 years. We see more valuation risk in the overall market than we do in our portfolios, particularly considering the extremely high valuations for the companies that have driven the S&P 500's returns for the last 5 years. Our portfolios, meanwhile, are comprised of value-oriented stocks that have not seen the same valuation increases.

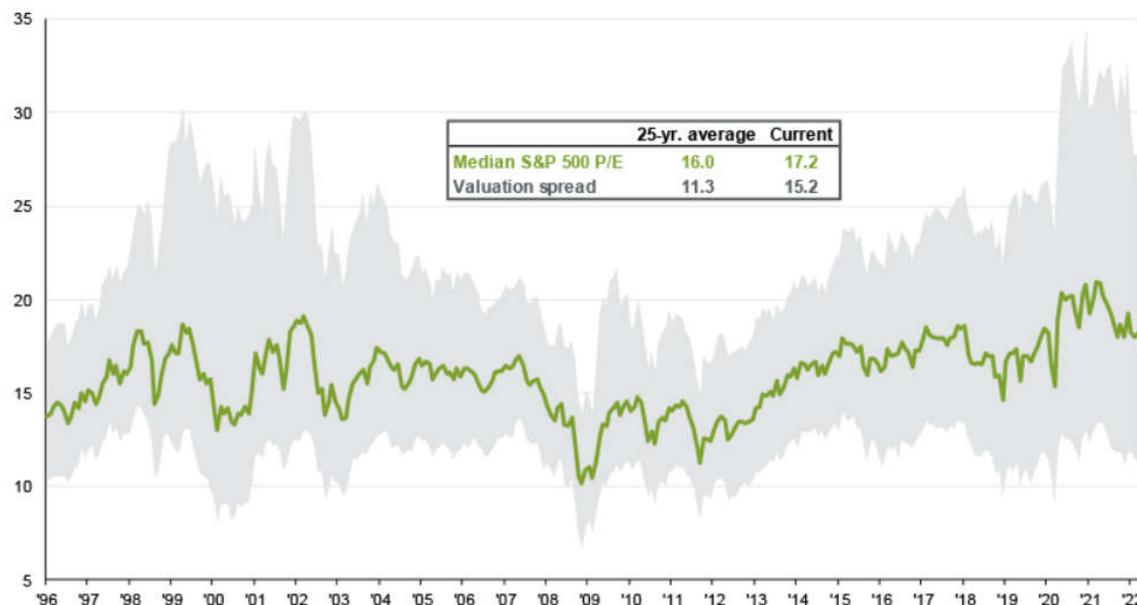
According to FactSet, JPMorgan Asset Management and Standard and Poor's, when you rank stocks based on price-to-earnings ratio, the average difference calculated monthly since December 1997 in

price earnings multiple between the 20th percentile stock and 80th percentile stock is 11, while earlier this year it was considerably higher at 19 (see the graph below). This is another clear indication of the unusually elevated valuation of growth stocks over the value stocks that we typically own. This is not bad news for our portfolios, as it suggests strong relative performance going forward. For example, if higher interest rates shine the light on those valuations that are too high, we feel the light will shine brightest on growth stocks or, by extension, the market as opposed to our portfolios.

S&P 500: Valuation dispersion

GTM U.S. 12

Valuation dispersion between the 20th and 80th percentile of S&P 500 stocks



Source: Compustat, FactSet, Standard & Poor's, J.P. Morgan Asset Management. Guide to the Markets - U.S. Data are as of April 30, 2022.

The market is a passive index which doesn't actively readjust its portfolio, while we are constantly looking to upgrade portfolio positions through risk mitigation. Theoretically, that means if big portions of the market are overvalued, the market can't avoid that risk since an index fund tracking the market is required to own all the stocks in the S&P 500 in an amount equal to their size relative to the size of the market whether the company is overvalued or not. We have more latitude to avoid overvalued stocks assuming we can accurately identify them. What I'm describing is much more easily said than done, but structurally we have more opportunity to avoid overvalued companies than a passive index fund tracking the S&P 500.

More on the Current Environment

In our view, it's a mistake from an investment perspective to get too engrossed in the events of the day, even one as significant as the war in Ukraine. In our experience, there is a natural tendency to exaggerate the long-term impact of such events, which can cause mistakes such as one that Howard Marks considers a Cardinal Sin of investing. The mistake he's referring to is overreacting to what are often short-term risks and selling, and consequently missing out on the miracle of long-term compounding of capital which you can't achieve if you're not invested. For a historical perspective,

here is a table from Glenview Trust Company demonstrating the market's resilience in the face of numerous geopolitical crises.

Stocks Usually Recover Quickly From Geopolitical Crisis

S&P 500 Performance After Geopolitical Events

Event	Start Date	1-Week	1-Month	3-Month	6-Month	1-Year
		Gain/Loss	Gain/Loss (%)	Gain/Loss (%)	Gain/Loss (%)	Gain/Loss (%)
Germany Invades France	May-40	-13.5	-25.8	-16.1	-6.0	-22.0
Pearl Harbor	December-41	-2.7	0.3	-9.0	-5.6	3.7
Korean War	June-50	-7.6	-8.7	1.2	4.9	11.2
Suez Canal Crisis	October-56	1.6	-4.3	-4.1	-1.4	-11.5
Cuban Missile Crisis	October-62	-1.9	7.6	17.2	24.5	32.0
JFK Assassinated	November-63	2.2	3.1	8.3	12.7	20.5
U.S. Bombs Cambodia	April-70	-2.9	-6.4	-4.9	2.0	27.9
Kent State Shootings	May-70	-2.5	-4.4	-4.1	2.2	26.8
Iranian Hostage Crisis	November-79	-1.0	3.2	11.4	3.0	25.9
USSR in Afghanistan	December-79	0.3	5.4	-7.8	6.4	25.7
Falkland Islands War	April-82	2.1	2.7	-3.7	5.8	34.5
Beirut Bombing	October-83	-1.6	0.1	0.7	-5.5	0.8
U.S. Invades Grenada	October-83	-1.5	0.6	-0.7	-5.5	0.7
U.S. Bombs Libya	April-86	3.1	0.1	0.3	-0.6	17.7
Invasion of Panama	December-89	-0.8	-3.7	-3.4	3.7	-6.9
Iraq Invades Kuwait	August-90	-3.3	-8.1	-13.5	-2.1	10.2
Gulf War	January-91	4.4	16.7	22.6	20.6	32.3
Gorbachev Coup	August-91	2.2	0.1	3.0	7.0	9.1
World Trade Center Bombing	February-93	1.1	1.9	2.5	4.2	5.4
Oklahoma City Bombing	April-95	1.3	2.8	11.3	16.1	27.0
U.S. Embassy Bombings - Africa	August-98	-1.4	-6.1	2.7	14.6	19.3
U.S.S. Cole Bombing - Yemen	October-00	-1.6	0.1	-4.7	-14.6	-19.6
WTC and Pentagon Attacks - 9/11	September-01	-4.9	-1.1	4.3	6.9	-16.7
Bali Nightclub Bombing	October-02	5.9	4.9	11.0	3.9	25.1
Iraq War	March-03	-0.5	2.1	15.7	17.4	28.4
Madrid Terror Attacks	March-04	0.0	1.9	1.6	-0.7	7.6
London Train Bombing	July-05	2.4	2.6	1.6	6.6	6.6
India, Israel & Lebanon Bombings	July-06	-2.8	-0.1	6.1	11.0	19.4
Russia Invades Ukraine (Crimea)	February-14	0.8	1.0	2.6	8.3	14.7
Mean		-0.8	-0.4	1.8	4.8	12.3
Median		-0.8	0.3	1.6	4.2	14.7
% Positive Return		41%	66%	62%	69%	83%

Most economies and companies benefit from positive underlying secular trends, and most securities have historically risen in most years and certainly over long periods of time. Population growth and productivity growth are important long-term trends to benefit from. We would add a medium-term trend that we think should benefit the U.S. versus other economies. That is, the increased geopolitical risk evidenced by the war in Ukraine will cause many companies to shorten their supply chains to be sourced in the U. S., where possible, although we believe this will take some time to play out. If you're looking for geopolitical security, the U. S. is the place to be.

The expected significant rise in interest rates due to the Fed's recent change in stance, which many feel is required to curb inflation, could easily cause a recession. This is not a primary concern of ours, though. According to David Kostin of Goldman Sachs, historically, the average recession causes a peak to trough drop in earnings for the S&P 500 of 13% followed by a 17% increase in the subsequent twelve months. Our priority continues to be investing in companies that we feel can generate long-term returns approximating 10% and believe they are financially strong enough to comfortably withstand and build long-term value during inevitable economic downturns. Our view is that a couple of our positions have witnessed an overreaction to the threat a recession holds to their long-term returns.

However, we don't feel the threat of significantly higher and sustained higher interest rates can be ignored. Interest rates are the gravitational pull that affects the valuations of all securities. The price an investor will pay for a company's future earnings, in order to achieve a competitive return versus the ten-year Treasury bond, is certainly less if rates on the ten-year Treasury are 4-5% versus when rates are 1.5%.

In terms of valuing potential companies to invest in, our process does not adjust upwards while rates are low. In other words, we didn't pay up for companies during the low interest rate environment of the last several years. Even so, we are thoroughly reviewing how higher rates could affect the long-term operating performance of certain positions. While we are confident that our portfolios are reasonably well protected from higher rates primarily by low valuations compared to earnings prospects, we still feel the need to review a few positions and our cash levels may go up as a result.

A useful example of working through both the risk of a recession and higher interest rates might be Discovery Communications. Before Netflix's announcement of fewer subscribers hurt Discovery's stock price, it had traded below our cost in large part due to the increased threat of a recession. Recession again is not a major concern to us if the company maintains the ability during a recession to make decisions that add to long-term value. After closely reviewing Discovery, which traded off when the threat of recession arose due to fears of what that would mean for their economically sensitive advertising revenues, we believe the stock has overreacted to that risk.

We looked back at 2020 earnings and found that, despite the severity of that recession, their advertising revenues were down by 5% and, by controlling overhead expenses, operating profit was down just 3% partly due to nominal growth from their more resilient subscription revenues. So, they were able to maintain the ability to launch their new streaming product which we think will be among the top 3 worldwide once they combine it with HBO+ through their recently completed merger with Warner Brothers.

That merger will change Discovery's revenue mix from being over 50% dependent on ad revenue to roughly 23%. They will become more dependent on more resilient subscription revenue as well as content revenue which includes Warner Brother's movie studio but also the longer-term licensing of movie and television production rights from Warner Brothers highly regarded production studios. Furthermore, regarding the risk of subscriber losses such as Netflix experienced recently, Discovery and Warner Brothers combined grew their subscribers by 5 million in the latest quarter despite pausing launches in several markets until their merger closed, and they could jointly market their streaming service which has not been offered in many markets.

Once some duplicative costs are taken out, like Discovery was able to achieve when they bought Scripps, we estimate free cash flow per share to be approximately \$3.70 per share for 2023. Even in a higher interest rate environment and looking at a potential recession's effect on their company, we expect attractive returns on this investment using what we think is a reasonable valuation of 12-14x free cash flow.

Previous Downturns

We feel that we invest with a defensive bias while trying to compound client capital over the long term. That approach, plus our view that the portfolios are well positioned for the risk of higher rates and higher inflation, leads us to the expectation that account values after adjusting for distributions will recover to January 1, 2022, levels faster than the market. We anticipate doing a few more tweaks to the portfolio, which will result in producing more income and further mitigate the risk of having to

sell quality investments at a bad time to fund distributions. It will be difficult to mitigate that risk if your annual distributions exceed 6% of account values at the beginning of the year.

Despite our view that we are well positioned, we expect volatility to last for a while, and during these periods underlying business value and operating performance will not always be reflected. We will review how our positions' operating performances are holding up against the various risks in the current environment in our next newsletter which we hope to have out shortly.

From an earlier newsletter, I have reiterated below information which illustrates how our defensive bias has made the process more manageable for clients through the three major market declines we've experienced since 1992. We think this has helped clients stay patient and build capital overtime.

2000-2002 Tech Bubble Collapse

- The S&P 500 peaked in late March 2000 and it hit its low around September 30, 2002.
- \$100,000 invested with us near the market peak (March 31, 2000) never showed a dip below that value at any month-end date during the entire bear market, and ended the period with about \$122,000. Meanwhile, an investor in the S&P 500 had only about \$56,000 at the market low in September 2002.

2008-2009 Great Recession

- The S&P 500 started its decline around September 30, 2007 and didn't begin to recover until March 2009 (a 1½-year "bear market").
- While South Atlantic and the S&P 500 both saw meaningful declines through the recession, our losses at each month-end along the way were less than that of the index, and our clients recovered their full beginning value much sooner.
- A \$100,000 investment with us had recovered its initial principal by September 30, 2009. That is, within 2 years of the start of the decline.
- The S&P 500, however, was still down about 27% at that point....and didn't reach its pre-bear market level until early 2013 (a nearly 5½ year wait)

2020 COVID market

- Stock values peaked in early February 2020.
- By February of 2021, a typical South Atlantic account would have recovered to its full value at the start of the pandemic.

We certainly appreciate your continued confidence in our firm. We would also like to once again remind you that, if you require funds in the next year significantly higher than 6% of your account, that makes it difficult to be 100% invested in equities.

Thanks for your continued confidence and please let us know if there has been any significant change to your financial position.

Eddie Nowell

DISCLOSURES

¹**Core Equity Composite** contains all fully discretionary accounts invested in equities excluding accounts that use significant leverage and, for comparative purposes, is measured against the total return for the S&P 500. It includes accounts managed for capital appreciation as well as accounts managed for a combination of capital appreciation and current income. The equity securities are generally large cap value-oriented U.S. equities. The portfolios also include equity securities that provide higher current income such as master limited partnerships, real estate investment trusts and similar securities that “pass through” most of their cash flow as distributions. The portfolios are invested in approximately 20-25 positions but have held fewer than 15 positions in the past.

²**S&P 500 Index** has been widely regarded as the best single gauge of the large cap U.S. equities market since the index was first published in 1957. The market-capitalization-weighted index has over U.S. \$11.2 trillion indexed or benchmarked, with indexed assets comprising approximately U.S. \$4.6 trillion of this total. The index includes 500 leading companies representing all major industries of the U.S. economy and captures approximately 80% of all U.S. equities. Returns include the reinvestment of dividends.

³**Russell Value 1000 Index** is also market-cap weighted and measures the performance of the large-cap “value” segment of the US equity universe. This index originated in 1987.

Returns are presented gross and net of management fees and include the reinvestment of all income. The U.S. Dollar is the currency used to express performance. Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request, as are GIPS Reports and lists and descriptions of South Atlantic Capital's composites, by emailing Info@SouthAtlanticCap.com or calling (910) 763-4113. Portfolio composition is subject to change at any time and references to specific securities, industries, and sectors in this letter are not recommendations to purchase or sell any particular security. Current and future portfolio holdings are subject to risk.

The discussion of our firm's investments and investment strategy (including current investment themes, the portfolio managers' research and investment process, and portfolio characteristics) represents the firm's investments and the views of the investment adviser, at the time of this letter, and are subject to change without notice.

Past results are not indicative of future investment performance. An investor should further understand that future results may represent losses for account holders.

EDWARD D. NOWELL

Edward D. Nowell is President, founder and sole portfolio manager of South Atlantic Capital Management Group, Inc.

Mr. Nowell has over thirty years of experience in the finance business. Prior to founding South Atlantic Capital, he worked in the structured finance department of Bankers Trust Company, New York as an Assistant Vice President. His primary responsibility was arranging bank financing for leveraged buyouts led by Kohlberg Kravis Roberts & Company and other leading private equity firms. During graduate school, he interned with Merrill Lynch's Institutional Capital Markets Group in New York. Later, he served as an institutional fixed income sales representative for Carolina Securities/Prudential Bache Securities and worked with Fox, Graham, and Mintz, Securities. Mr. Nowell graduated from the University of North Carolina with a B.S. in Economics and received his M.B.A. from the University of Virginia.

PHILLIP A. TITZER

Mr. Titzer is Chief Operating Officer & Compliance Officer of South Atlantic Capital Management Group, Inc.

Mr. Titzer joined South Atlantic Capital in March 2020, bringing twenty-four years of investing and business operations experience to the firm. As a CFA® charterholder on the advisor's investment committee, he adds additional valuation and investment management experience to the organization. Previously, Mr. Titzer was a portfolio manager and head of investment operations for The Edgar Lomax Company, a large-cap value equity manager in Alexandria, Virginia. There, he directed all research, trading and portfolio administration activities and, along with the firm's founder, managed the Edgar Lomax Value Fund (a mutual fund that earned Morningstar's highest rating of 5 Stars as of December 31, 2019) as well as high-net-worth and institutional separate accounts totaling approximately \$1.6 billion. Prior to that, he was a nuclear-trained submarine officer in the U.S. Navy, serving on the U.S.S. Kentucky (SSBN 737) and, later, as a combat control test & evaluation officer for Naval Sea Systems Command. Mr. Titzer holds a B.S. in Mechanical Engineering from Rose-Hulman Institute of Technology and an M.B.A. in Finance from George Mason University.

**South Atlantic Capital Management Group,
Inc.**

**Verification and Core Equity Composite
Performance Examination Report**

December 31, 2021





Verification and Performance Examination Report

Mr. Edward D. Nowell, President
South Atlantic Capital Management Group, Inc.

We have verified whether South Atlantic Capital Management Group, Inc. (the “Firm”) has, for the periods from October 1, 2016 through December 31, 2021, established policies and procedures for complying with the Global Investment Performance Standards (GIPS®) related to composite and pooled fund maintenance and the calculation, presentation, and distribution of performance that are designed in compliance with the GIPS standards, as well as whether these policies and procedures have been implemented on a firm-wide basis. 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. We have also examined the Firm’s Core Equity Composite for the periods from October 1, 2016 through December 31, 2021.

The Firm’s management is responsible for its claim of compliance with the GIPS standards, the design and implementation of its policies and procedures, and for the accompanying Core Equity Composite’s GIPS composite report. Our responsibilities are to be independent from the Firm and to express an opinion based on our verification and performance examination. We conducted this verification and performance examination in accordance with the required verification and performance examination procedures of the GIPS standards, which includes testing performed on a sample basis. We also conducted such other procedures as we considered necessary in the circumstances.

In our opinion, for the periods from October 1, 2016 through December 31, 2021, the Firm’s policies and procedures for complying with the GIPS standards related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been, in all material respects:

- Designed in compliance with the GIPS standards, and
- Implemented on a firm-wide basis.



A verification covering the periods from January 1, 1992 through September 30, 2016 was performed by another verification firm, whose report expressed an unqualified opinion thereon.

Also, in our opinion, the Firm has, in all material respects:

- Constructed the Core Equity Composite and calculated the Core Equity Composite's performance for the periods from October 1, 2016 through December 31, 2021 in compliance with the GIPS standards; and
- Prepared and presented the accompanying Core Equity Composite's GIPS composite report for the periods from October 1, 2016 through December 31, 2021 in compliance with the GIPS standards.

A performance examination of the Firm's Core Equity Composite covering the periods from January 1, 1992 through September 30, 2016 was performed by another verification firm, whose report expressed an unqualified opinion thereon.

This report does not relate to or provide assurance on any specific performance report of the Firm other than the Firm's accompanying Core Equity Composite's GIPS composite report, or on the operating effectiveness of the Firm's controls or policies and procedures for complying with the GIPS standards.

ACA Group

ACA Group, Performance Services Division

May 4, 2022

SOUTH ATLANTIC CAPITAL MANAGEMENT GROUP, INC.
CORE EQUITY COMPOSITE
GIPS COMPOSITE REPORT

Year End	Total Firm Assets (millions)	Composite Assets (USD) (millions)	Number of Accounts in Composite	Annual Performance Results Composite		S&P 500	Composite Dispersion	Three Year Annualized Ex-Post Standard Deviation	
				Gross	Net			Core Equity	S&P 500
2021	66.4	50.1	80	30.19%	28.90%	28.71%	0.95%	21.67%	17.17%
2020	52.8	38.1	71	-2.68%	-3.65%	18.40%	1.84%	22.02%	18.53%
2019	54.9	44.8	82	27.23%	25.96%	31.49%	1.11%	12.57%	11.93%
2018	46.1	36.2	77	1.52%	0.51%	-4.38%	0.72%	12.74%	10.80%
2017	41.6	37.6	77	23.79%	22.57%	21.83%	1.20%	13.43%	9.92%
2016	35.6	29.7	71	10.66%	9.56%	11.96%	1.63%	12.81%	10.59%
2015	42.0	23.4	70	(4.41%)	(5.36%)	1.38%	1.11%	11.57%	10.47%
2014	40.7	26.8	67	8.19%	7.16%	13.69%	0.98%	7.99%	8.97%
2013	37.2	23.1	55	26.97%	25.77%	32.39%	2.15%	9.88%	11.94%
2012	28.6	17.3	46	13.02%	11.94%	16.00%	1.69%	11.19%	15.09%
2011	25.3	15.2	42	3.63%	2.59%	2.11%	2.48%	15.55%	18.71%
2010	22.0	14.4	40	20.19%	19.00%	15.06%	3.42%	17.94%	21.85%
2009	18.6	13.0	36	46.20%	44.76%	26.46%	5.32%	17.26%	19.63%
2008	12.4	8.4	38	(25.98%)	(26.68%)	(37.00%)	2.30%	12.59%	15.08%
2007	17.4	11.9	37	(1.90%)	(2.82%)	5.49%	3.03%	9.31%	7.68%
2006	22.4	12.6	36	12.11%	11.12%	15.80%	2.52%	8.75%	6.82%
2005	12.4	10.8	33	0.78%	(0.16%)	4.91%	3.12%	11.08%	9.04%
2004	12.3	11.1	30	20.38%	19.25%	10.88%	3.37%	12.60%	14.86%
2003	9.2	8.5	23	35.31%	33.93%	28.68%	4.38%	13.67%	18.07%
2002	6.9	6.4	21	(3.21%)	(4.22%)	(22.10%)	6.43%	14.21%	18.55%
2001	7.6	6.7	17	5.18%	4.14%	(11.89%)	2.36%	14.06%	16.71%
2000	7.1	5.9	14	13.89%	12.86%	(9.10%)	3.77%	13.65%	17.42%
1999	6.4	5.4	13	8.94%	7.89%	21.04%	10.61%	12.67%	16.52%
1998	6.5	5.4	13	6.11%	4.93%	28.58%	5.60%	12.07%	16.01%
1997	5.1	4.7	11	41.04%	39.60%	33.36%	5.15%	11.12%	11.14%
1996	3.6	3.3	8	23.65%	22.40%	22.96%	3.34%	11.76%	9.58%
1995	2.9	2.7	6	48.47%	47.05%	37.58%	3.31%	10.46%	8.22%
1994	2.0	1.9	5	7.76%	6.69%	1.32%	8.02%	11.05%	7.95%
1993	1.8	1.7	4	23.26%	22.05%	10.08%	3.33%		
1992	1.3	1.2	3	13.88%	12.87%	7.62%	0.00%		

Core Equity Composite contains all fully discretionary accounts invested in equities excluding accounts that use significant leverage and, for comparative purposes, is measured against the total return for the S&P 500. It includes accounts managed for capital appreciation as well as accounts managed for a combination of capital appreciation and current income. The equity securities are generally large cap value-oriented U.S. equities. The portfolios also include equity securities that provide higher current income such as master limited partnerships, real estate investment trusts and similar securities that “pass through” most of their cash flow as distributions. The portfolios are invested in approximately 20-25 positions but have held fewer than 15 positions in the past. The minimum account size for this composite is \$50,000. The composite has an inception date of January 1, 1992. The Core Equity composite was created on March 1, 2011.

South Atlantic Capital Management Group, Inc. (“South Atlantic Capital”) claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. South Atlantic Capital has been independently verified by Ashland Partners & Company LLP for the periods January 1, 1992 to September 30, 2016 and by ACA Performance Services for the periods September 30,

2016 to 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 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.

The Core Equity Composite has had a performance examination for the periods January 1, 1992 to December 31, 2021. The verification and performance examination reports are available upon request by calling (910) 763-4113, or by emailing info@southatlanticcap.com.

South Atlantic Capital is an independent registered investment adviser registered with the State of North Carolina and the Commonwealth of Virginia. The firm maintains a complete list and description of composites and limited distributed pooled funds, as well as GIPS Reports, which are available upon request by calling (910) 763-4113, or by emailing info@southatlanticcap.com.

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Results are based on fully discretionary accounts under management, including those accounts no longer with the firm. Composite policy requires a three month, temporary removal of any portfolio incurring a client initiated external significant cash inflow of at least 25% of portfolio assets. The temporary removal of such an account occurs at the end of the prior month in which the external significant cash flow occurs and the account re-enters the composite at the end of the second full month after the cash flow. Effective 12/1/1992 - 7/1/2014, net of fee performance was calculated using actual management fees. In 2014, South Atlantic Capital switched to a new database reporting software and switched our composite fee calculation methodology to utilize model fees, using the highest fee in the composite, 1.0%, effective 7/1/2014 - Present. Additional information regarding the treatment of significant cash flows is available upon request. Composite returns represent investors domiciled primarily in the United States. Past performance is not indicative of future results.

The U.S. Dollar is the currency used to express performance. Returns are presented gross and net of management fees and include the reinvestment of all income. Returns are presented after trading expenses but before any applicable taxes. The annual composite dispersion presented is a size-weighted standard deviation calculated for the accounts in the composite the entire period. The annual dispersion and the standard deviation were calculated based on net returns prior to 12/31/2014, and gross of fees beginning 1/1/2015. Policies for valuing investments, calculating performance, and preparing GIPS Reports are available upon request, as are GIPS Reports and lists and descriptions of South Atlantic Capital's composites and limited distributed pooled funds, by emailing info@southatlanticcap.com or calling (910) 763-4113.

South Atlantic Capital's management fee schedule for accounts with assets up to \$5,000,000 is generally set at 1.0% per annum, and is negotiable for accounts with assets over \$5,000,000. Actual investment advisory fees incurred by clients may vary.