



ORGEL

Proxy Voting Policy

Orgel Wealth Management may accept the authority to vote proxies on a client's behalf. In these cases, Orgel Wealth Management has adopted and implemented written policies and procedures designed to vote client securities in the best interest of clients.

SUMMARY OF PROXY VOTING POLICIES AND PROCEDURES

Orgel Wealth Management's policy generally requires proxies to be voted in a manner that serves the best economic interests of clients and avoids the influence of conflicts of interest. Orgel Wealth Management has adopted the Egan-Jones voting principles and guidelines, which embody the positions and factors Orgel Wealth Management generally considers important in casting proxy votes. The proxy voting guidelines address a variety of individual topics, including, among others, election of directors, compensation of officers and directors, stock distributions, corporate restructurings, mergers, new classes or series of mutual fund shares, social issues, and various shareholder proposals. In general:

- Directors should be accountable to shareholders, and management should be accountable to directors.
- Information on the company supplied to shareholders should be transparent.
- Shareholders should be treated fairly and equitably according to the principle of one share, one vote.

HOW PROXIES ARE VOTED

To facilitate the proxy voting process, Orgel Wealth Management retains the services of Broadridge Financial Solutions, Inc. (Broadridge), an unaffiliated service provider. Broadridge receives the proxy voting materials, votes proxies pursuant to the Egan-Jones voting guidelines adopted by Orgel Wealth Management, and makes the proxy voting record available to Orgel Wealth Management and its clients. To provide oversight, Orgel Wealth Management reviews the services of Broadridge and the proxy voting guidelines of Egan-Jones.

CONFLICTS OF INTEREST

Orgel Wealth Management does not engage in investment banking or any other activity that is likely to create a potential conflict of interest. In addition, because applicable client proxies are voted by Broadridge pursuant to the pre-determined Egan-Jones voting guidelines, Orgel Wealth Management generally does not make an actual determination of how to vote a particular proxy, and, therefore, proxies voted on behalf of clients will generally not reflect conflicts of interest. Orgel Wealth Management also does not allow employees to sit on the board of directors of any public company without senior management approval. To the extent that such conflicts occur, Orgel Wealth Management will generally follow the recommendation of the proxy voting service to help ensure that the best interests of its clients are not subordinated to Orgel Wealth Management's interests.

OBTAINING INFORMATION

Applicable clients may request information regarding how their proxies were voted and may also request a copy of Orgel Wealth Management's proxy voting policy and procedures by contacting Orgel Wealth Management. Except as otherwise required by law, Orgel Wealth Management has a general policy of not disclosing proxy voting records to an unaffiliated third party.