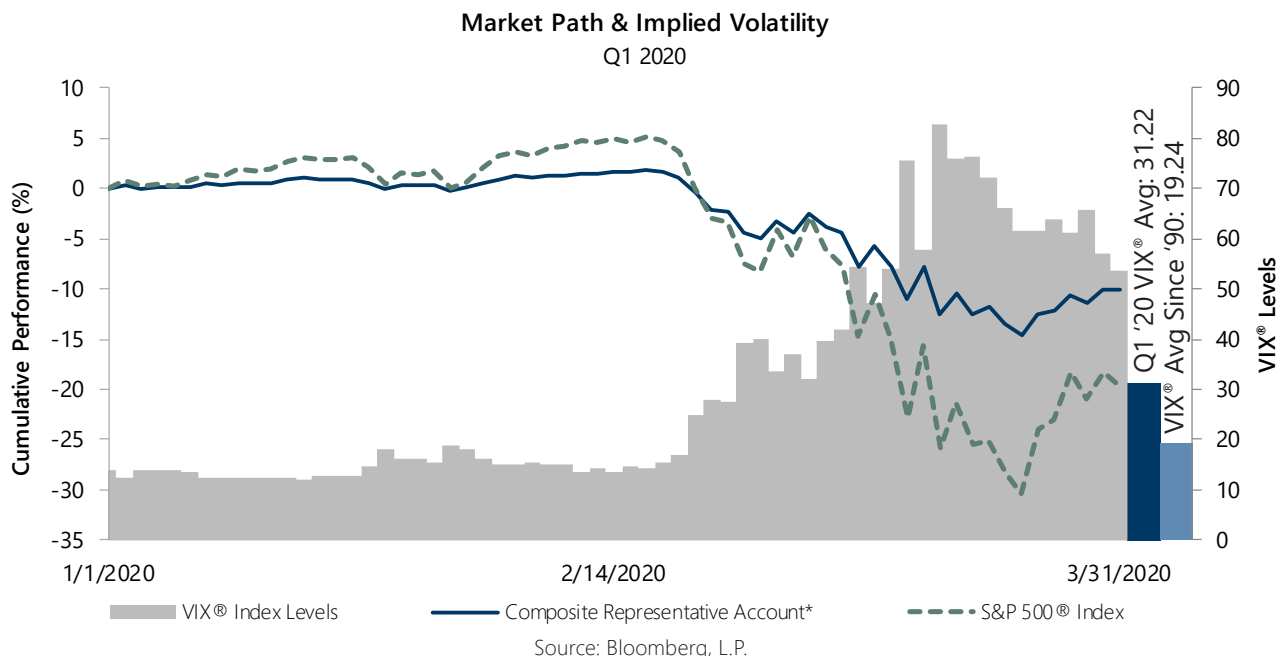


In Brief

- ◆ Gateway Index/RA Composite (the Composite) declined 9.95%, net of fees, in the first quarter compared to the 19.60% decline of the S&P 500® Index. The Bloomberg Barclays U.S. Aggregate Bond Index (the Agg) returned 3.15% for the quarter. (A GIPS® Composite Report is included with this Commentary).
- ◆ Equity markets entered bear market territory in the first quarter, defined as a decline of 20% or more, as the spread of COVID-19 led governments around the globe to take unprecedented steps in shutting down major portions of their economies in an effort to reduce the spread of the illness. The S&P 500® Index reached an intra-month low on March 23, after declining 33.79% from the market high on February 19. From March 23 through month end, the equity market staged a partial recovery of 15.57%.
- ◆ For the period February 19 through March 23, the Composite* declined 16.12%. During the partial recovery from March 23 through month end, the Composite returned 5.37%.
- ◆ Implied volatility, as measured by the Cboe® Volatility Index (the VIX®), averaged 31.22 in the first quarter of 2020, well above its historical average of 19.24. The first quarter closing high for the VIX® was 82.69 on March 16, its highest close in history and only slightly off its highest-ever intra-day value of 89.53 recorded on October 24, 2008. The intra-day high for the first quarter was 85.47 on March 18. The VIX® drifted lower to close the quarter at 53.54.
- ◆ The S&P 500® Index and the Composite had an annualized standard deviation of daily returns of 56.95% and 22.94% for the quarter, respectively. In a reversal from its trend, realized volatility – as measured by the annualized standard deviation of daily returns for the S&P 500® Index – exceeded average implied volatility for the quarter. The annualized standard deviation of the S&P 500® Index reached an all-time of 93.44% in March. The Composite dampened volatility significantly throughout the quarter and, in March, had an annualized standard deviation of 37.11%.
- ◆ By several measures, March was the most volatile month in equity market history. Equity markets have recovered from the losses incurred during volatile periods of the past — sometimes quickly, sometimes slowly. While the future path of the equity market remains uncertain, history suggests that after reaching extreme highs, volatility measures can persist at above-average levels for lengthy periods of time, regardless of market direction.



*The portfolio performance and annualized standard deviation reflected for the Composite are those measured by a representative account. This information represents supplemental information to the GIPS® Composite Report. This representative account was selected as it is the largest account in the Composite.

1: The BXMSM is a passive total return index designed to track the performance of a hypothetical buy-write strategy on the S&P 500® Index. The construction methodology of the index includes buying an equity portfolio replicating the holdings of the S&P 500® Index and selling a single one-month S&P 500® Index call option with a strike price approximately at-the-money each month on the Friday of the standard index-option expiration cycle and holding that position until the next expiration.

Market Recap

The S&P 500® Index declined 19.60% in the first quarter of 2020, the worst start to any year in stock market history. The equity market decline accelerated throughout the quarter with monthly declines of 0.04%, 8.23% and 12.35% in January, February and March, respectively. From its all-time high on February 19 through March 23, the S&P 500® Index rapidly entered bear market territory with a decline of 33.79% before staging a partial recovery. Between March 23 and quarter-end, the S&P 500® Index climbed 15.57%.

The 2020's got off to a roaring start, but not in a good way. Investors witnessed the signing of major global trade deals and positive backward-looking economic data, but a global pandemic triggered extreme volatility and ended one of the longest bull markets in history. The emergence of the COVID-19 illness led governments around the world to take unprecedented steps to slow the contagion, effectively shuttering major portions of their economies. Economic data releases toward the end of the first quarter of 2020 began to show the severe impact of these measures. As of March 6, the U.S. unemployment rate was 3.5%, a 50-year low, with nonfarm payroll growth regularly exceeding the top-end of expectations. On March 26, following the previous week in which stringent social distancing guidelines were issued for many parts of the country, initial jobless claims reflected more than 3.2 million new claims. Prior to this upheaval, a tight employment situation and strong consumer confidence led to a year-over-year change for the February Consumer Price Index of 2.3%, at the top of expectations and above the Federal Reserve's (the Fed) 2% target. Also, on March 26, the third estimate of Q4 GDP growth came in at 2.1%, at the top of consensus estimates. Corporate earnings also showed growth and, with more than 86% of companies reporting, over 77% met or beat expectations with fourth quarter 2019 earnings growth nearly 2% quarter-over-quarter and nearly 3% year-over-year.

Policy responses to the pandemic and its impact on capital markets and the economy were significant. The Fed took multiple accommodative steps in a proactive attempt to stem the economic drag of the COVID-19 mitigation measures. On March 3, the Fed cut its benchmark rate by 25 basis points (bps) before cutting it again by 50 bps - on a Sunday. This marks the first time the Fed has moved to cut interest rates on two separate occasions between scheduled meetings. In addition to these actions, the Fed resurrected several crisis-era efforts to address liquidity concerns, including the purchase of Treasury and mortgage-backed securities. As the equity market declined, calls for Congress to enact fiscal stimulus intensified. The market began its partial recovery during the same week that a \$2.2 trillion stimulus package was proposed, debated and passed by both houses of Congress.

The VIX® averaged 31.22 in the first quarter of 2020, well above its historical average of 19.24. The first quarter closing high for the VIX® was 82.69 on March 16, its highest close in history. The intra-day high for the first quarter was 85.47 on March 18, only slightly off its highest-ever intra-day value of 89.53 recorded on October 24, 2008. The VIX® drifted lower to close the quarter at 53.54 as the S&P 500® Index staged a partial recovery during the end of March. The first quarter closing low for the VIX® was 12.10 on January 17. In a reversal of its typical relationship, realized volatility reached 56.95% for the quarter – as measured by the annualized standard deviation of daily returns for the S&P 500® Index – and exceeded average implied volatility for the period. The implied versus realized volatility relationship broke down as the S&P 500® Index selloff intensified in late February and continued into March. In February, S&P 500® Index realized volatility reached 24.77% and, in March, it spiked to 93.44%, the highest reading in history dating back to 1928. The VIX® averages for February and March were 19.63 and 57.74, respectively.

The Agg returned 3.15% in the first quarter of 2020, benefiting from a drastic decline in interest rates. The yield on the 10-year U.S. Treasury Note (the 10-year) started the first quarter at its intra-quarter high of 1.92% and ended the quarter significantly lower at 0.67%. On March 9, the yield on the 10-year declined to an intra-quarter low of 0.54% before briefly spiking to 1.19% on March 18. These swings demonstrated that the bond market was not immune from volatility and losses as, from March 9 through March 19, the Agg declined 6.30%. On the shorter-end of the yield curve, investors witnessed yields dip into negative territory, with one-month U.S. Treasury Notes yielding -0.17% on March 25 before ending the quarter in positive territory.

Gateway IndexRA Composite Performance

The Composite declined 9.95%, net of fees, in the first quarter, providing 965 bps of downside protection relative to the S&P 500® Index. With monthly returns of -0.23%, -4.68% and -5.31% in January, February and March, respectively, the Composite's outperformance in February and March more than recovered its underperformance in January.

The portfolio performance, contributions, annualized standard deviation and portfolio statistics quoted for the Composite in the following paragraphs are those measured by a representative account.¹

1: Represents supplemental information to the GIPS® Composite Report. This representative account was selected as it is the largest account in the Composite.

For the period February 19 through March 23, the Composite declined 16.12% as gains from its option strategy provided 1,767 bps of downside protection relative to the S&P 500® Index. During the partial recovery from March 23 through March 31, the Composite returned 5.37%, lagging the S&P 500® Index by 1,020 bps, as expected when the equity market has sharp short-term advances.

The Composite's underlying equity portfolio returned -19.57% for the quarter, a positive performance differential of three bps relative to the S&P 500® Index. Written index call options contributed positively to return for the first quarter with gains in February and March providing a portion of the Composite's downside protection and more than compensating for a slight loss from written index call options in January. Purchased index put options also contributed positively to return for the quarter, generating gains in all three months with significant gains in February and March providing the majority of the Composite's downside protection. In achieving its low-volatility objective, the Composite's annualized standard deviation of daily returns for the quarter was 22.94%, less than half the 56.95% for the S&P 500® Index. The Composite exhibited a beta to the S&P 500® Index of 0.40 for the quarter.

Gateway's investment team was very active in adjusting the written index call option portfolio throughout the quarter. As equity markets climbed at the start of the year, the investment team exchanged index call option contracts in advance of their expiration for ones with later expiration dates and higher strike prices. As markets began deteriorating from the global pandemic, the team made several trades to lower the portfolio's weighted-average strike price while taking advantage of extremely high shorter-term implied volatility to increase the strategy's cash flow potential. The range of strike prices in the portfolio was widened in response to large intra-day market swings and increased potential for a sharp market move. As the equity market staged a partial recovery at the end of March, select index call option positions were adjusted to maintain market exposure.

Amid heightened equity market volatility fueled by growing concern over the economic impact of the global spread of the COVID-19 illness, Gateway's investment team closed out two index put option positions on February 27, resulting in a put coverage range of 65% to 80%. The team reduced the Composite's index put coverage three additional times in March, on March 6, March 12 and March 25. The Composite ended the quarter with a put coverage range of 40% to 50%. These actions were in an effort to monetize the higher volatility being priced into index put contracts and to preserve index put gains in the event of a sudden and sharp market recovery, while maintaining the Composite's typical risk profile.

As put coverage was reduced, the investment team adjusted the index put option portfolio to maintain a weighted-average strike price closer than usual to the equity market level, in an effort to keep the Composite's risk profile consistent. Prior to the March 23 market low, select shorter-term index put option positions were exchanged for much longer-dated contracts that had similar strike prices and protection characteristics as the contracts that were replaced, but with a much more favorable cost structure. This was a brief and unusual opportunity to manage the cost of the index put portfolio, created by short-term fear reflected in index option prices. This level of fear (as reflected in the VIX®) resulted in a historically wide spread between the level of implied volatility priced into short- and long-term index options with similar characteristics.

At the end of the quarter, index call options were sold against over 95% of the equity portfolio's value and had a weighted average strike price between 1.5% in-the-money and 1.5% out-of-the-money, 29 days to expiration and annualized premium to earn between 50.0% and 55.0%. Index put options covered 40% - 50% of the portfolio and had a weighted average strike price between 5.0% and 7.5% out-of-the-money, 137 days to expiration and an annualized cost between 5.0% and 10.0%. Relative to the beginning of the quarter, this positioning represented significantly higher net cash flow potential and slightly higher market exposure.

Performance Since Market Peak and Put Coverage Reductions	Market Peak to Trough 2/19/20 - 03/23/20	Since Put Coverage Reduction to a 65%-80% range 2/27/20 - 3/31/20	Since Put Coverage Reduction to a 60%-65% range 3/6/20 - 3/31/20	Since Put Coverage Reduction to a 50%-60% range 3/12/20 - 3/31/20	Since Put Coverage Reduction to a 40%-50% range 3/25/20 - 3/31/20
Index/RA Composite Representative Account ¹	-16.12%	-5.88%	-5.99%	1.17%	2.37%
S&P 500 Index [®]	-33.79%	-13.06%	-12.92%	4.30%	4.44%

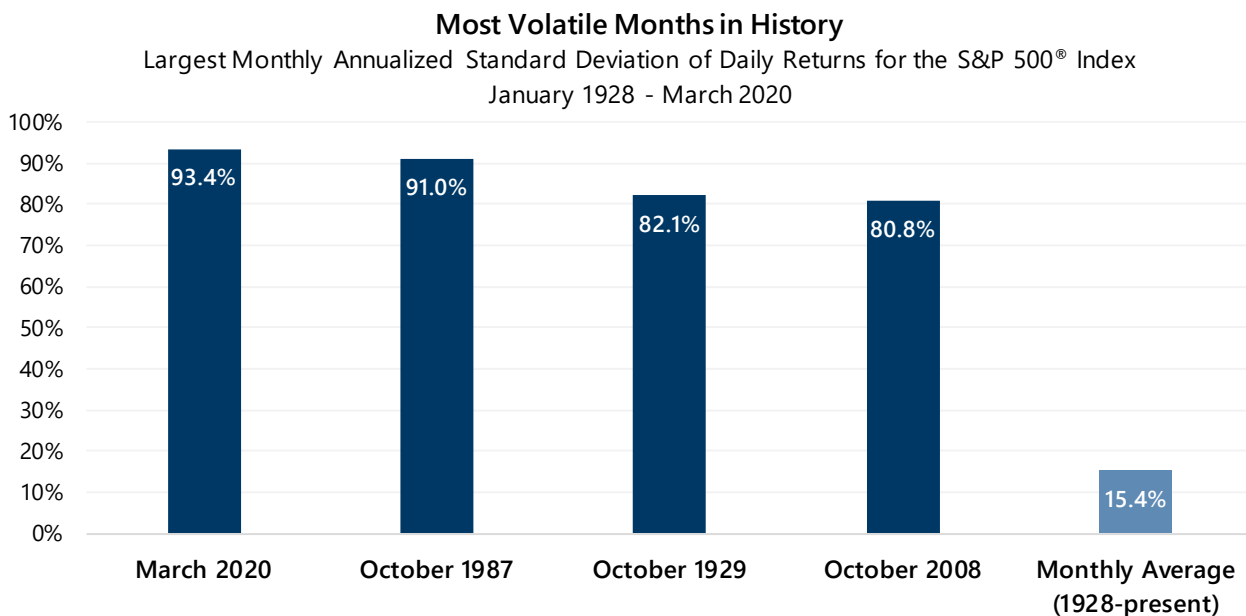
Source: Morningstar DirectSM 2: Represents supplemental information to the GIPS® Composite Report. This representative account was selected as it is the largest account in the Composite. 3: Based on standard deviation of monthly returns since Composite inception of January 1, 1988. All performance data shown represents past performance and is no guarantee of, and not necessarily indicative of, future results.

Performance & Risk	Q1 2020	1 Year	3 Year	5 Year	10 Year	Inception (1/1/1988)	Inception Risk
Gateway Index/RA Composite (net)	-9.95%	-4.61%	0.96%	2.53%	3.73%	6.65%	6.38%
S&P 500® Index	-19.60%	-6.98%	5.10%	6.73%	10.53%	9.95%	14.29%
Bloomberg Barclays U.S. Aggregate Bond Index	3.15%	8.93%	4.82%	3.36%	3.88%	6.28%	3.71%

All performance data shown represents past performance and is no guarantee of, and not necessarily indicative of, future results. Source: Morningstar DirectSM.

Market Perspective

Measures taken to prevent the spread of COVID-19 have caused radical changes to our everyday lives. We have had to adjust how we work, play, shop, eat and travel. Naturally, the restrictions on these activities will have a significant and negative impact on overall economic activity. This impact was reflected in equity market action in the first quarter of 2020. The first quarter witnessed not only the quickest-ever bear market decline, but also the most volatile month in stock market history. The standard deviation of daily returns for the S&P 500® Index in March 2020 was higher than any point in history, including the Great Depression, October 1987 and the financial crisis of 2008.



Source: Bloomberg, L.P.

Are extreme volatility spikes harbingers of tough economic times to come? Not necessarily. The second-most volatile month in history was October 1987. It did not pre-sage economic doom nor the beginning of a protracted equity bear market. In early December 1987, the market started a steady recovery from its Black Monday losses and reached new all-time highs by July 1989. The U.S. economic expansion that began in November 1982 was not interrupted and the next recession did not begin until July 1990.

Rather than being predictive of future outcomes for the equity market and economy, extreme volatility measures are more likely reflective of the kind of uncertainty that makes investment decision-making challenging. In the investment arena, uncertainty and risk are related, but distinct. In crisis environments, volatility becomes a crude measuring stick that encompasses both.

Risk is present when the range of outcomes is known and probabilities can be estimated. Wagering on a game of dice is risky, but odds can be calculated and bets can be sized to fit the likelihood of a favorable outcome. Uncertainty, on the other hand, is suspecting the dice are loaded.

Similarly, wagering on the next card to be drawn from a deck of playing cards is risky but, under the right conditions, information underlying the game improves over time. Knowing what cards have already been drawn from the deck

improves the odds of correctly guessing subsequent cards. However, if the deck of cards is non-standard or consists of an undisclosed number of standard decks, players cannot get an accurate calculation of the odds. A game with these conditions is not merely risky, its outcomes are completely uncertain and only a foolish person would participate.

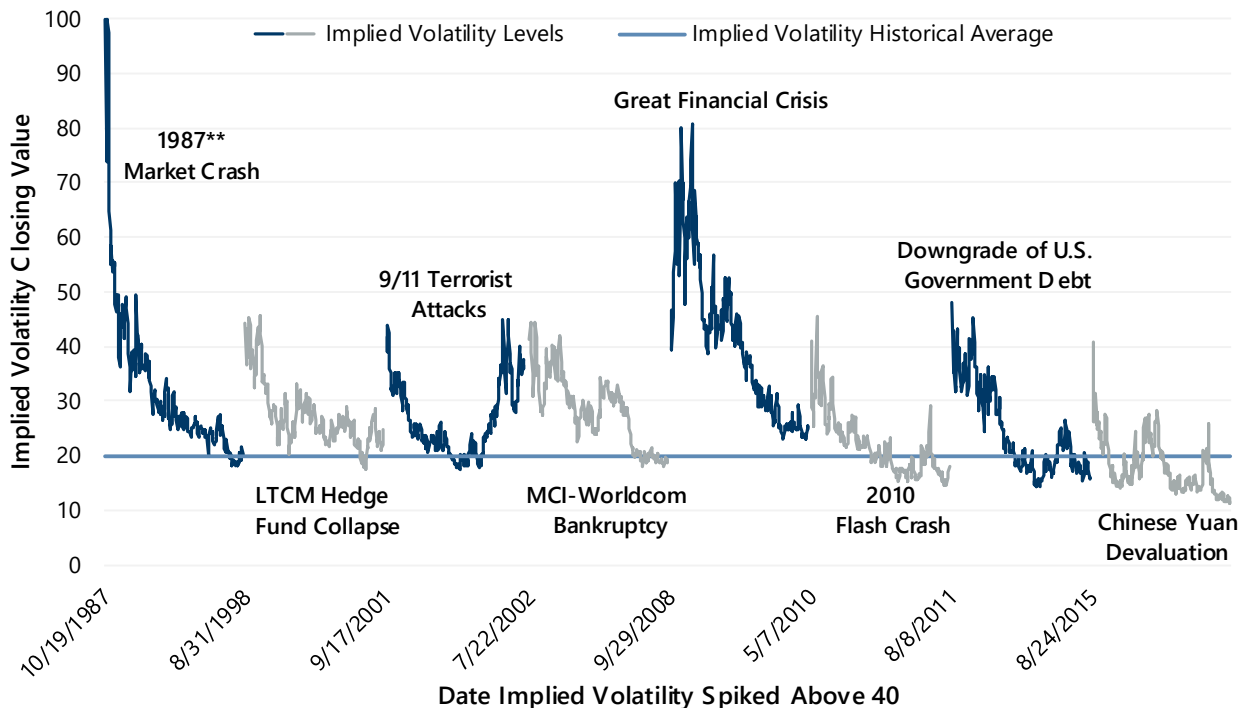
The unprecedented social distancing measures taken in response to the pandemic changed the nature of valuing investments. Investing is always risky, and social distancing measures (and the degree to which they are adhered to) have created a wider range of outcomes for the economy, the market and individual companies than existed prior to the outbreak. On top of that, investing became uncertain, more like a game of dice or cards in which the odds cannot be calculated, because the current circumstances are unprecedented. Parameters for estimating the probability of specific outcomes simply did not exist when policies to slow the spread of the pandemic were put in place.

As time passes, uncertainty may decrease, but risk will remain. Knowing that policymakers can respond promptly with policy countermeasures like stimulus bills and monetary action removes some uncertainty. The effectiveness of countermeasures can be tracked, evaluated and modeled, which is how risk is managed – not eliminated, but managed. The spread of the disease has been frighteningly fast, and infection and fatality rates have differed by location, but the mere fact that a growing data set exists means uncertainty has been reduced and information exists to manage the risks of the pandemic. Healthcare workers, policymakers and investors increasingly have the ability to act based on real information to reduce the risk of adverse outcomes and increase the likelihood of positive outcomes. As the amount of information on the current state of the world increases, uncertainty is removed but risk will persist. Equity markets may remain susceptible to sharp spikes in volatility – particularly if there is severe and unexpected deterioration in statistics relating to the spread of the pandemic, fatality rates and economic activity.

Equity markets have recovered from the losses incurred during volatile periods of the past — sometimes quickly, sometimes slowly. While the future path of the equity market remains uncertain, history suggests that after reaching extreme highs, volatility measures can persist at above-average levels for lengthy periods of time, regardless of market direction. Examining periods following months in which the annualized standard deviation of daily returns for the equity market exceeded 50% shows that realized volatility remained above average for most of the subsequent year, and in some cases much longer, as was the case during volatility spikes associated with the Great Depression and the more recent financial crisis of 2008. Implied volatility, which has been priced since 1985, shows a similar pattern. When implied volatility has spiked above 40 in the past, daily closing values have typically remained above average for most of the subsequent year.

Extreme Implied Volatility* Has Typically been Followed by Persistent Above-Average Volatility

Implied Volatility Levels During the 12-months Following an Extreme Spike
October 1987 - March 2020



*Implied volatility levels displayed are a combination of the Cboe® S&P 100 Volatility Index® (the VXO®) and the Cboe® Volatility Index® (the VIX®). Daily pricing for the VIX® is available from January 2, 1990 to present. VXO® prices are used for dates prior to 1990. **Graph is truncated for readability. The VXO® was priced at 150.19 on Black Monday, October 19, 1987. Source: Bloomberg, L.P.

History suggests that equity market volatility will subside over time. First, as the world becomes less uncertain, the component of market volatility associated with uncertainty will diminish. What remains in the near-term is a higher level of risk, reflecting the grim realities of the pandemic. In time, the risks posed by the pandemic will be managed down as healthcare providers and health policymakers treat the disease and slow its spread. The history of market crises suggest that equity market volatility may also decline as progress is made. At the same time, economic and financial policymakers will have more information and more tools to manage the economic fallout of the pandemic, and investors will have more information to manage the specific risks to which they are sensitive. How long this process will take is unknown. Progress will be made, but the pace will vary and there will likely be setbacks along the way.

Strategies that combine equity market exposure with index option writing may be an attractive solution for investors who need to stay positioned for long-term growth or need a lower risk means of earning back equity market losses. With risk elevated and likely to stay that way for a while, investors may benefit from reliable risk reduction and downside protection. Gateway's index-option based approach to managing risk and pursuing return has a history of generating higher cash flow in periods of elevated equity market volatility. Higher cash flow helps position Gateway strategies for attractive participation in an equity market recovery, but also provides the potential for robust downside protection should additional market declines lie ahead. In this uncertain time, investors can rely on Gateway to stick with the discipline it has maintained for over 40 years.

Important Information

All data as of March 31, 2020 unless noted otherwise.

For more information and access to additional insights from Gateway Investment Advisers, LLC, please visit www.gia.com/insights.

Gateway Investment Advisers, LLC (Gateway) is an independent registered adviser and a successor in interest to Gateway Investment Advisers, L.P. as of February 15, 2008. Performance information for the Gateway Index/RA Composite (the Composite) shown in this illustration is an asset-weighted composite of discretionary accounts under Gateway's management which share the same investment objectives and hedging strategies.

The Composite was created in January 1993. Prior to January 1, 1993, not all fully discretionary portfolios were represented in composites. Results shown for 1988 through 1992 are those of one representative account.

The Composite net of fee performance results reflect the reinvestment of dividends and other earnings, and reflect the deduction of investment advisory and fees.

The effectiveness of Gateway's strategy might be reduced if the portfolio doesn't correlate to the performance of the index underlying its option positions. Rebalancing of a portfolio may involve tax consequences.

Selling index call options can reduce the risk of owning stocks, but limits the opportunity to profit from an increase in the market value of stocks in exchange for up-front cash at the time of selling the call option. Unusual market conditions or the lack of a ready market for any particular option at a specific time may reduce the effectiveness of the Composite's option strategy, and for these and other reasons the Composite's option strategy may not reduce the volatility to the extent desired.

Performance data shown represents past performance and is no guarantee of, and not necessarily indicative of, future results. A more detailed description of Gateway's standardized fees is included in Form ADV, Part 2.

The GIPS® Composite Report for the Gateway Index/RA Composite is included with this document. Additional copies are available upon request by calling 513.719.1100.

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Data sources: Gateway Investment Advisers, LLC, Bloomberg, L.P. and Morningstar DirectSM

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Year End	Annual Performance Results				3-Year Standard Deviation			Number of Composite Accounts	Composite Dispersion	Composite Assets (millions)	Firm Assets (millions)
	Composite		S&P 500® Index	Bloomberg Barclays U.S. Aggregate Bond Index	Composite	S&P 500® Index	Bloomberg Barclays U.S. Aggregate Bond Index				
	Gross	Net									
1993	8.44%	7.75%	10.08%	9.75%	N/A	N/A	N/A	15	0.7	\$348	\$408
1994	6.27	5.62	1.32	-2.92	N/A	N/A	N/A	14	0.5	303	660
1995	12.52	11.75	37.58	18.47	4.07%	8.34%	4.30%	12	1.6	283	473
1996	11.83	11.11	22.96	3.63	4.44	9.72	4.65	27	0.9	329	360
1997	13.34	12.58	33.36	9.65	3.83	11.30	4.06	27	1.1	399	476
1998	13.21	12.49	28.58	8.69	5.53	16.24	3.58	44	1.2	686	805
1999	12.94	12.27	21.04	-0.82	5.39	16.76	3.25	76	1.4	1,348	1,470
2000	6.55	6.08	-9.10	11.63	5.30	17.67	3.06	107	1.2	2,052	2,206
2001	-2.69	-3.28	-11.89	8.44	6.29	16.94	3.40	85	0.5	1,853	1,944
2002	-3.87	-4.45	-22.10	10.25	9.41	18.81	3.40	67	0.4	1,651	1,744
2003	12.53	11.84	28.68	4.10	9.70	18.32	4.26	59	0.4	2,029	2,160
2004	7.84	7.22	10.88	4.34	8.35	15.07	4.34	53	0.5	3,350	3,636
2005	5.86	5.17	4.91	2.43	4.09	9.17	4.12	35	0.5	3,879	6,134
2006	11.06	10.35	15.79	4.33	2.64	6.92	3.25	29	0.5	4,569	6,946
2007	8.67	7.99	5.49	6.97	3.10	7.79	2.80	25	0.5	4,780	7,892
2008	-13.39	-13.95	-37.00	5.24	8.41	15.29	4.03	22	1.0	5,073	7,071
2009	7.37	6.70	26.46	5.93	10.36	19.91	4.17	15	0.4	5,054	7,188
2010	5.76	5.11	15.06	6.54	11.01	22.16	4.22	12	0.1	5,552	7,699
2011	3.82	3.16	2.11	7.84	8.27	18.97	2.82	11	0.3	5,729	8,081
2012	5.41	4.74	16.00	4.22	5.84	15.30	2.42	10	0.2	7,424	10,517
2013	9.35	8.64	32.39	-2.02	4.23	12.11	2.75	11	0.2	8,899	12,475
2014	4.23	3.59	13.69	5.97	3.45	9.10	2.67	10	0.3	8,997	12,239
2015	3.20	2.54	1.38	0.55	3.97	10.62	2.92	11	0.2	8,783	12,210
2016	6.23	5.57	11.96	2.65	4.30	10.74	3.02	10	0.3	8,159	11,601
2017	10.73	10.07	21.83	3.54	4.01	10.07	2.81	10	0.2	9,028	12,559
2018	-3.43	-4.04	-4.38	0.01	5.11	10.95	2.88	10	0.1	8,534	11,641
2019	11.97	11.29	31.49	8.72	5.57	12.10	2.91	9	0.2	8,545	10,950

N/A: The gross three-year annualized ex-post standard deviation of the Composite and benchmarks is not presented as 36-month returns are not available.

Gateway Index/RA Composite contains fully discretionary hedged equity accounts which hold common stock and sell index call options on at least 95% of the underlying stock value. This call activity reduces volatility and provides cash flow. The accounts typically buy index put options that can protect the Composite from a significant market decline that may occur over a short period of time. Indexes utilized for call and put option activity are U. S. domestic equity indexes that include all sectors of the economy. The creation and inception date of the Gateway Index/RA Composite was January 1, 1993. As of June 1, 2009, the Composite definition was refined to more accurately reflect the criteria used to determine membership. No membership changes resulted from the revision.

For comparison purposes the Gateway Index/RA Composite is measured against two indexes, the S&P 500® Index (a popular indicator of the performance of the large capitalization sector of the U. S. stock market) and the Bloomberg Barclays U. S. Aggregate Bond Index (an unmanaged index of investment-grade bonds with one- to ten-year maturities issued by the U. S. government, its agencies and U. S. corporations).

Performance results are based on fully discretionary accounts under management, including accounts that may no longer be with the firm, and are expressed in U.S. dollars.

Performance returns are presented gross and net of management fees and include the reinvestment of all income. Past performance is not indicative of future results. The annual Composite dispersion presented is an asset-weighted standard deviation calculated using gross returns for the accounts in the Composite the entire year. The 3-year standard deviation is calculated using gross returns. Net of fee performance was calculated using actual management fees. The current investment management fee schedule is as follows: 0.85% on the first \$5 million; 0.65% on the next \$5 million; 0.50% on the next \$40 million; and 0.45% on assets in excess of \$50 million. Actual investment management fees incurred by composite accounts may vary.

Gateway Investment Advisers, LLC (Gateway) is an independent registered investment adviser and a successor in interest to Gateway Investment Advisers, L.P. as of February 15, 2008. Gateway claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS® standards. Gateway has been independently verified for the periods January 1, 1993 through March 31, 2020. 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 Gateway Index/RA Composite has had a performance examination for the periods January 1, 1993 through March 31, 2020. The verification and performance examination reports are available upon request.

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Policies for valuing investments, calculating performance and preparing GIPS® reports are available upon request. Gateway's lists of composite descriptions and broad distribution pooled funds are also available upon request.