

# Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero

GLOBAL INVESTMENT PERFORMANCE STANDARDS

## Policies and Procedures

**Effective Date:** 29-Dec-17 Last Revised: 01-Oct-18

**Authority:** Luis Lozano  
Chief Executive Officer

Romina Gras  
Chief Compliance Officer

### INTRODUCTION

Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero (“PFI”) maintains policies and procedures in relationship to the Global Investment Performance Standards (“GIPS®”). The GIPS standards establish required and recommended actions when compiling and presenting composite performance, including documentation of policies and procedures with respect to its compliance efforts.

PFI’s Executive Management has affirmed that PFI is to uphold the GIPS standards and employees must adhere to these Principles and the GIPS standards in the formulation, development and presentation of material representing PFI’s composites.

This Policy and Procedures document is intended to fulfill requirements of full disclosure under the Standards and shall be made available to any requesting party.

### GIPS® COMPLIANCE

Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero (“PFI”) shall adhere to the required aspects of the Global Investment Performance Standards (GIPS®) on a firm-wide level, as well as updates, reports, guidance statements, interpretations, or clarification published by the CFA Institute and GIPS Executive Committee.

Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero (“PFI”) keeps informed of changes to the GIPS standards by subscribing to the GIPS newsletter by the CFA institute, receiving the ACA Performance Services, LLC newsletter, and by attending various industry events. In addition, PFI will search the Q&A database once a quarter to see if there are any new applicable Q&A’s posted to the <http://www.gipsstandards.org> website.

Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero (“PFI”) compliance department keeps informed of changes to applicable laws and regulations regarding the calculation and presentation of performance in the country or countries in which they are domiciled as well as those countries in which they do business. This is accomplished by subscribing to industry newsletters, attending industry events, and completing annual continuing education requirements. Compliance communicates any applicable changes to the performance and/or GIPS teams. Please see PFI compliance manual for additional details.

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Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero (“PFI”) determines that an interested party is a prospective client if the interested party has expressed interest in a specific composite/strategy, and the interest party is qualified to invest in the respective composite. Parties that represent a prospective client are considered to be prospective clients (consultants, solicitors, databases). Current clients may be considered prospective clients if they have expressed interest in an additional strategy. A prospective client will not no longer be considered a prospective client if PFI has not had any communication with the prospective client for 12 months. PFI does not consider an individual prospective investor in a pooled vehicle to be a prospective client for GIPS purposes.

All performance and performance related information is reviewed by the compliance department before distribution to ensure it is not false or misleading.

PFI Must document all policies and procedures the firm follows for meeting GIPS standards, as well as any recommendations adopted.

**Such standards apply to PFI, whether specifically mentioned in this document or not.**

As noted in this document PFI shall follow the recommendations of the GIPS Standards.

In its marketing materials, the firm shall use the following disclosure, provided a fully compliant Annual Disclosure Presentation is included:

**“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero has prepared and presented this report in compliance with the Global Investment Performance Standards (GIPS®).”**

PFI’s Executive Management has affirmed that PFI is to uphold the GIPS standards and all employees must adhere to these Principles and the GIPS standards in the formulation, development and presentation of material representing PFI’s composites.

PFI shall not:

- reference a partial claim of compliance with the GIPS standards
- reference performance or any other part of presentations as being “in accordance with the GIPS standards.”
- reference a particular portfolios performance as being in accordance with the GIPS standards

PFI’s claim of compliance with GIPS commenced on 30 November 2008.

### Scope

These Policies and Procedures shall apply only to the preparation and presentation of information to prospective clients. A **prospective client** is defined as a potential client that has expressed interest in PFI’s services and has either

- (a) requested performance related information from PFI, or
- (b) is provided performance related information by PFI in response to some other request for information.

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Except where specified, this Policy shall not apply to the preparation and presentation of information:

- according to specific requests from prospective clients;
- to existing clients of their existing portfolio; or
- for internal use or internal distribution.

Principal will notify CFA Institute of the firm's claim of compliance with GIPS annually by June 30th. The GIPS Compliance Form will be completed by the performance analyst of Risk team. Principal will ensure timely completion by adding to their annual compliance calendar, and will maintain documentation supporting completion (i.e. screenshots, etc.)"

Principal will submit, on an annual basis, notification to the CFA Institute through the [www.gipsstandards.org](http://www.gipsstandards.org) website of Principal's compliance with GIPS. This will be submitted on or before June 30th of each year, using statistics as of the prior year-end.

### FIRM DEFINITION

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero ("PFI") defines itself as an independent operating division of Principal Financial Group ("PFG") with operations specific to Mexico.

#### Firm History and Structure

PFI began operating in 1993 as a subsidiary of PFG. There have been no changes in organization since 1993 and PFI will not change the organization with the intent to alter historical composite assets.

#### Assets Under Management

PFI's definition of the firm is the foundation for firm-wide compliance and creates defined boundaries whereby total firm assets can be determined. For purposes of determining total firm assets, PFI includes all discretionary, non-discretionary accounts regardless of fee paying status. PFI also includes assets that are subadvised to another firm as long as the PFI maintains discretion over the selection of the subadvisor.

### DEFINITION OF DISCRETION

PFI defines discretion as the ability of PFI, or its portfolio managers or others directly involved in the investment decision making process, to implement its intended strategy consistent with the PFI's investment philosophy. In situations where client specific needs or requests require a deviation from the intended investment philosophy accounts are deemed non-discretionary. While the legal threshold for management discretion is a consideration, not all legally discretionary portfolios will be considered discretionary for the purpose of GIPS compliance.

#### Process for Determining Discretion

##### Client Imposed Restrictions

If documented client-imposed restrictions significantly hinder PFI from fully implementing its intended strategy, PFI shall determine that the portfolio is non-discretionary. In making this determination, PFI shall determine if the restrictions will,

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or could, interfere with the implementation of the intended strategy to the extent that the portfolio is no longer representative of the strategy.

### Portfolio Objectives and Constraints

If client directed needs or requests necessitate a deviation from the manager's investment philosophy or management style PFI shall determine that the portfolio is non-discretionary. In making this determination, PFI shall determine if the characteristics, risk/return profile, cash needs, asset allocation, or composition of the portfolio(s) in question are different to the extent that the portfolio is no longer representative of the manager's investment philosophy or management style.

PFI shall document the reasons for classifying a portfolio as non-discretionary.

PFI shall review each portfolio (both discretionary and non-discretionary) on a quarterly basis to determine whether any portfolios should be re-classified. Such review shall be approved by the GIPS Committee.

## INPUT DATA

Consistency of input data is critical to effective compliance with the GIPS standards and establishes the foundation for full, fair and comparable investment performance presentations

PFI shall:

- capture and maintain the input data needed to support the performance presentations
- value all portfolios for performance calculation purposes at market value
- value all portfolios for performance calculation purposes at least quarterly prior to January 1, 2001 and monthly between January 1, 2001 and January 1, 2012.
- value all portfolios as of the calendar month-end or the last business day of the month.
- use trade date accounting
- use accrual accounting for all fixed income securities with interest paid in a different month than earned
- use accrual accounting for all dividends
- composites will be reported on a calendar year-end
- accrue management fees
- calculate monthly composite returns and geometrically link together to calculate performance for longer time periods
- use only actual assets managed by PFI for firm's composites and total firm assets calculations.
- use the price supplier accredited exchange rate

For a fair valuation and by local regulatory Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero should hire a price supplier accredited before the Comisión Nacional Bancaria y de Valores (CNBV), regulatory body in Mexico. PFI makes daily the valuation of the securities in that each fund invests using the current prices provided by the price supplier. Due to Mexican regulation, PFI deems the valuation policy followed to not materially differ from the GIPS Recommended hierarchy.

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The services of supplying of prices during the period from January 1 to December 31, 2017 were provided by Proveedor Integral de Precios, S.A. de C.V. (PIP).

### CALCULATION METHODOLOGY

Achieving comparability among firms' performance presentations requires uniformity in methods used to calculate returns. The Standards mandate the use of certain calculation methodologies for both portfolios and composites

PFI shall:

- include realized and unrealized gains and losses as well as income derived from ownership of the security to calculate a total return
- calculate all returns after the deduction of the actual trading expenses incurred during the period (use of estimated trading expenses is not permitted)
- use time-weighted rates of return that adjust for external cash flows.
  - External cash flows are defined as cash, securities, or assets that enter or exit a portfolio (capital additions or withdrawals) and are generally client-driven. Income earned on a portfolio's assets is not considered an external cash flow. External cash flows must be treated in a consistent manner with the firm's documented, composite-specific policy
- include cash and cash equivalents in the portfolios for total return calculation
- shall value for all external cash flows of the portfolios every day
- use the monthly rounded NAV into the performance calculation, because it is the data required by the regulator.

#### Calculation Procedures

PFI uses Soluciones as account maintenance software and calculates daily values for funds and portfolios, it calculates the daily NAV with the general rule for rounding (If the number you are rounding is followed by 5, 6, 7, 8, or 9, round the number up). These daily returns are geometrically linked together to get monthly returns and composites are asset weighted on a monthly basis.

Further information is detailed under the **Treatment of Fees and Expenses** section of this document.

#### Composite Calculation Procedures

Composite returns shall be calculated by

- a. asset weighting the individual portfolio returns using beginning-of-period values; or
- b. asset weighting the individual portfolio returns using both beginning-of-period values and external cash flows

In order to get the monthly asset weighting return there must be a price and AUM's at the end of the previous month to get the full month return of the portfolio and accomplish our inclusion criteria otherwise this portfolio will not be considered in the end year total's AUM's.

Due to transfers in share classes accounts monthly time series of AUM's and prices may be discontinuous. This process is called accounts reclassification and it is explained by

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the willing of customers to be reallocated or PFI it's able to reallocate the investment of customers because it does not accomplished the minimum needed.

The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. PFI calculates the external standard deviation based on the 36 month gross returns of the composite and the benchmark and is based on monthly gross returns. The standard deviation is calculated using Microsoft Excel.

PFI selects composite benchmarks based on the overall strategy and style of the composite strategy. Additional broad-market indicators may also be shown as additional information. Benchmark returns are obtained from IDC pricing source.

PFI uses custom blended benchmarks that reflect the average strategic asset allocation mix of our composites. The component benchmark returns are blended on a monthly basis to calculate the monthly custom blend return. The custom blend returns are geometrically linked to calculate quarterly and annual returns.

PFI reviews firm assets and, on a sample basis, selects accounts and confirms that the values included for these accounts include only the assets under PFI's management. Additionally, PFI completes periodic reviews of firm assets to ensure accounts included in firm assets are not included in firm assets more than once.

### Black Rock System-Aladdin

In May-16 PFI acquired BlackRock's trading, portfolio management, and risk reporting system (Aladdin®) that consists of a series of components designed to help facilitate a highly automated, consistent investment process.

PFI uses the system to assist in the on-going management and operations of its asset management activities, and it is used by portfolio managers, traders, compliance officers, risk managers, and operations staff.

The functionality of the system can be grouped into the following broad process categories:

- Risk & Analytics
- Order Management
- Data, Research & Compliance
- Trade Processing & Operations.
- Performance & Attribution.

No.	Module in Aladdin	Description
1	Green Package	Suite of portfolio and risk measurement reports that show risk at various levels of detail, from the aggregate enterprise level as one line item to the lot-by-lot position level, as well as daily compliance reports, Value at Risk and related regulatory risk metrics reports.
2	PRISM	Interactive tool to view risk and exposure for portfolios that allows users to create custom tables and graphs for holdings, view exposures at the sector and/or security level, define custom sectors and bucketing

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		for use in tables and graphs, and create multiple views across Portfolios and Portfolio groups.
3	<b>Portfolio Risk Tools (PRT)</b>	Interactive reporting tool that provides ability to run analytical and historical VaR analyses, supports stress testing using parametric P&L for pre-canned or custom scenarios as well as historical date ranges, implied shocks, specific shocks and macro-economic shocks, and provides ability for users to perform “what if” analyses to measure the impact of new trade ideas on portfolio risk.
4	<b>AnSer</b>	BlackRock’s desktop calculator (AnSer®) allows users to perform full option-adjusted and static analyses for the global universe of fixed income securities, including security, derivative and trade level pricing, relative value, and risk analyses.
5	<b>Portfolio Construction</b>	Tool used by the investment team for portfolio modeling, pre-trade analysis and order generation with the ability to preview resulting exposure changes on a “what-if” basis and evaluate pre-trade compliance.
6	<b>Dashboard</b>	Aladdin Dashboard is a Workflow Monitor that provides users with ability to manage and monitor orders throughout their life cycle. Trades and orders are available in the Aladdin Dashboard in real-time and alerts the risk management team to compliance violations as new trades are posted in Aladdin.
7	<b>Security Master</b>	Database designed to capture a range of securities and derivatives and their characteristics data necessary to adequately model each security within Aladdin.
8	<b>Galileo</b>	Tool used for credit exposure management that captures issuer information, research, compliance approval lists and issuer relationships.
<b>PRESENTATION</b>		<p>PFI will use the appropriate disclosure in reference to PFI’s claim of compliance with the GIPS standards.</p> <p>PFI <u>shall</u>:</p> <ul style="list-style-type: none"><li>▪ provide a compliant presentation to all prospective clients and to ongoing clients at least annually.</li><li>▪ provide the list and description of composites outlined in Appendix A upon request.</li><li>▪ provide a compliant presentation upon request. A sample of a full disclosure presentation is available in Appendix B for each composite.</li><li>▪ clearly define and separate their claim of compliance if PFI is jointly marketing with other Principal firms.</li></ul> <p>PFI <u>shall not</u>:</p> <ul style="list-style-type: none"><li>▪ include assets in any composite that are not part of the firm</li><li>▪ link simulated or model returns with actual performance</li></ul>
<b>REQUIRED DISCLOSURES</b>		<p>PFI will use the appropriate disclosure in reference to PFI’s claim of compliance with the GIPS standards.</p>

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A checklist of required disclosures is available in Appendix C.

### **Disclosure language specific to PFI is as follows:**

“For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.”

“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 31 December 2016. The verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm’s policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.”

A list of composites descriptions is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

### **TREATMENT OF FEES AND EXPENSES**

This Policy Statement is intended to clarify net-of-fee rate of return calculation for PFI. Policies in this section represent best practices, except where GIPS explicitly requires specific practices. Certain other calculation methodologies may be required to suit a specific purpose, for example, client reporting or one-on-one performance presentations. Accordingly, use of other calculation methodologies for such purposes does not infringe on PFI’s conformity with generally accepted calculation methodologies and performance presentation standards of the industry.

This policy covers input data and calculation methodology considerations for account level (portfolio) and composite level returns.

Performance for funds which are carried net of administrative fees, trading costs, management fees, and other fund fees have non trading costs backed out of the return to achieve a gross of management fees only return. Net returns are then reduced by the applicable management fee to arrive at a net of trading costs and management fee only.

### **Fee Types**

#### Administrative Fees

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Administrative Fees are any fees or expenses typically outside the control of PFI, even if such expenses are part of the normal course of business. Administrative Fees include Custody Fees and may also include accounting fees, consulting fees, legal fees, performance measurement fees, and other applicable fees.

### Trading Expenses

Trading Expenses are any expenses, other than management fees, over which PFI has control and relate to the direct cost of buying or selling of assets.

### Management Fee

PFI bills clients based upon assets under management quarterly.

## Calculation and Presentation of Results

### Gross of Fee (“Gross”)

Gross of Fee performance is presented after only the deduction of Trading Expenses. Administrative Fees are outside the control of PFI and, as such, should not reduce the firm’s Gross-Of-Fees or Net-Of-Fees Returns.

### Net of Fee (“Net”)

Net of Fee performance is Gross-of-Fee less the Management Fee. As a prospective client evaluates and compares investment firms, the most universal point of comparison is the Gross-Of-Fees Return less the Investment Management Fee that the prospective client expects to pay. Fees are accrued to the portfolio at the end of each quarter.

### Foreign Withholding

For portfolios where foreign taxes are withheld PFI will show performance net of foreign withholding taxes.

## Please see Annual Disclosure Presentations for stated fee schedule

## COMPOSITE MEMBERSHIP CRITERIA

All actual, fee-paying, discretionary Portfolios must be included in at least one composite. Although non-fee-paying discretionary portfolios may be included in a composite (with appropriate disclosures), nondiscretionary portfolios are not permitted to be included in PFI’s composites. Composites must be defined according to similar investment objectives and/or strategies.

Individual accounts are consistently included and excluded from the composite, while historical performance includes removed accounts, based upon the following criteria.

### **Inclusion Criteria:**

Portfolios will be included in the composite the first full month that the account is invested and actively managed according to the intended strategy.

Portfolios will be included in the monthly total AUM’s composite only if there is a return for that single month. If this month does not have previous NAV nor following and no AUM’s the portfolio will not be included.

### **Exclusion Criteria:**

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Accounts are excluded at the end of the last full month that they are actively managed according to the intended strategy. Accounts are not removed from a composite to another unless changes in client guidelines are documented. Accounts are excluded from the old composite and re-included in the new composite following the same criteria as all other accounts.

### **Minimum:**

The minimum account size for all the composites is 130millions Mexican Pesos. At the end of each month the firm looks after to every share classes of the funds to determine if the fund meets the minimum for inclusion or removal of any composite. Accounts falling below the minimum will be removed at this time and re-enter the composite once above the minimum size. The Composite Inception Date will refer to the date in which the Composite reach this minimum account size for the first time.

The size of the composite is determine by the sum of net assets of every share class of the fund.

### **Change in Mandate:**

Accounts are not removed from a composite to another unless changes in client guidelines are documented. Accounts are excluded from the old composite and re-included in the new composite following the same criteria as all other accounts

### **CLIENT ASSET EXISTENCE**

PFI has documented their policies and procedures in relationship to the GIPS standards in this document as well as the referenced attachments. PFI will ensure the existence and ownership of client assets by the conciliation of the securities in the portfolio of each fund, with the Custodian (INDEVAL).

The treasury area is responsible for performing the conciliation of the securities in the portfolio of each fund, with the Custodian (INDEVAL).

Principal Financial Mexico has a system called Sistema Integral de Fondos (SIIF) that records all trades and positions of every security for each fund. The System (SIIF) generates a report that shows the position of the portfolio of each mutual fund. This report is reconciled daily against the records reported by the Custodian (INDEVAL).

INDEVAL is a private Mexican institution, authorized according to the Securities Market Law to operate as a Central Securities Depository (CSD); it is permitted to deliver the following services: Securities Depository and Management, Domestic Operation, Foreign Operation and Information Services.

The funds are independently valued by Covaf, S.A. de C.V., using the securities prices provided by Valuación Operativa y Referencias de Mercado, S.A. de C.V., a registered price provider. Valuation of the funds is performed on a daily basis and prices are recorded in the Mexican Stock Exchange before 13:00 of the following day for its publication. The funds will not be valued on those days determined as non-working days, as detailed in the calendar issued by the Mexican Banking and Securities Commission (CNBV)

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**ERROR CORRECTION** This Error Correction Policy seeks to address situations where errors are discovered and address in particular the adjustments that should be made to prior period returns and previously reported GIPS-compliant presentations. Although this Policy Statement is targeted to calculation errors, the concepts provided should be applied to all types of errors, and to all performance presentations, regardless of whether those presentations fall under the GIPS standards (Client Reporting, for example.)

Errors in presentations can be caused by, but are not limited to,

- input data errors,
- prior period adjustments,
- system/spreadsheet calculation errors,
- incorrect assignment of portfolios to composites,
- incorrect timing of inclusion and/or exclusion of portfolios to composites,
- missed trades,
- mishandling of corporate actions,
- software error,
- incorrect treatment of cash flows,
- pricing or exchange rate problems,
- incorrect benchmark returns supplied by the benchmark source,
- incorrectly calculated customized benchmark returns,
- inadequate creation or implementation of policies and procedures, and
- poor internal communication.

To deal with errors appropriately PFI has established this error correction policy attending to the materiality of the error and the actions to take in every case

An error is defined as any component of a compliant presentation that is missing or inaccurate

### **PFI's Definition of Materiality**

PFI would determine an identified error to be immaterial and would take no action if the change does not require a change to any data or disclosures in the presentation. One example of this might be a membership change that has no impact on any presented firm or composite statistic.

PFI would determine an identified error to be immaterial and would correct all affected presentations with no disclosure of the change if the change only impacts data in the presentation, and if:

- The error impacts annual performance such that returns were understated in previous presentations. Correction of the error results in improved performance.
- Presented annual performance changes by +/- 25 or fewer basis points for equity or balanced composites. If the error occurred in a performance period more than five years in the past, the threshold for equity and balanced composites is +/- 35 or fewer basis points.
- Presented annual performance changes +/- 25 or fewer basis points for fixed income composites. If the error occurred in a performance period more than five

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years in the past, the threshold for fixed income composites is +/- 35 or fewer basis points.

- Presented benchmark returns are misstated by less than 0.5%.
- Reported annual statistics such as firm assets, composite assets, and the number of accounts in the composite as of year-end changed by less than 5% from the incorrectly stated number.
- Annual dispersion results are misstated by less than 0.5%.
- 3 year annualized ex-post standard deviation results are misstated by less than **0.5%**.

PFI would determine an identified error to be immaterial and would correct all affected presentations with disclosure of the change and no distribution of the corrected presentation if:

- The error had resulted in any overstatement of performance results previously that did not meet our materiality threshold.
- The error was an incorrect or missing required GIPS disclosure that would be unlikely to impact any prospective client's decision to hire our services. The various risk aversions, tax limitations, international exchange issues, etc. of potential prospects should all be considered in determining the likelihood of impact. For example, a missing creation date may be considered unlikely to impact their decision.

PFI would determine an identified error to be material and would correct all affected presentations with disclosure of the change and make every reasonable effort to provide a corrected presentation to all prospective clients and other parties that received the erroneous presentation if

- Presented annual performance changes greater than +/- 25 basis points for equity or balanced composites. If the error occurred in a performance period more than five years in the past, the threshold for equity and balanced composites is greater than +/- 35 basis points.
- Presented annual performance changes greater than +/- 25 basis points for fixed income composites. If the error occurred in a performance period more than five years in the past, the threshold for fixed income composites is greater than +/- 35 basis points.
- Regardless of the number of basis points, presented annual performance changes such that the gross and/or net composite performance moves from being positive to being negative
- Regardless of the number of basis points, presented annual performance changes such that the gross and/or net composite performance moves from being greater than the performance of its benchmark index / indices, to being less than the performance of its benchmark index / indices.
- Presented benchmark returns are misstated by more than 0.5%.
- Reported annual statistics such as firm assets, composite assets, and the number of accounts in the composite as of year-end changed by more than 5% from the incorrectly stated number.
- Annual dispersion results are misstated by more than 0.5%.
- 3 year annualized ex-post standard deviation results are misstated by more than 0.5%.

Any incorrect or missing GIPS required disclosure that would be likely to impact any prospective client's decision to hire our services. For example, a missing disclosure of

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the use of leverage or derivatives would likely to impact the decision of prospects who do not allow the use leverage or derivatives in their account.

### PFI's Error Correction Process

Steps for resolving errors involving incorrect composite returns:

- Recalculate the returns and quantify the error.
- Determine if the error is material based on previously established error correction policies and procedures.
- Decide which action is the most appropriate based on previously established error correction policies and procedures.
- Obtain authorization of approval from the CCO for the action to be taken.
- Document the original return, the corrected return, and the action taken.

Steps for resolving errors involving incorrect disclosure:

- Compare the composite's existing disclosures with those required in the GIPS standards.
- Determine if an error has been made and/or whether any disclosures are missing from the presentation.
- Determine if the error is material based on previously established error correction policies and procedures.
- Decide which action is the most appropriate based on previously established error correction policies and procedures.
- Obtain authorization of approval from the CCO for the action to be taken.
- Document the original information, the corrected information, and the action taken.

### SUPPLEMENTAL INFORMATION

The GIPS standards encourage firms that claim compliance with the Standards to present all relevant information to fully explain their performance. Because this supplemental information could have the potential to be misleading in relation to the firm's claim of compliance, this Policy Statement defines and addresses the proper use of supplemental information.

### Definitions

#### Supplemental Information

Supplemental Information is defined as any performance-related information included as part of a compliant performance presentation that supplements or enhances the required and/or recommended disclosure and presentation provisions of the GIPS standards. Supplemental information provides users of the composite presentation with the proper context in which to better understand the performance results.

Examples of supplemental information include, but are not limited to:

- Carve out returns that exclude cash
- Non-portable returns
- Model, hypothetical, backtested, or simulated returns
- Representative account information, such as:
  - Portfolio-level country weightings
  - Portfolio-level sector weightings
  - Portfolio-level risk measures
- Attribution
- Composite or portfolio-level specific holdings
- Peer group comparisons

# Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero

GLOBAL INVESTMENT PERFORMANCE STANDARDS

## Policies and Procedures

- Risk-adjusted performance

Required and recommended information under the GIPS Standards is **not** considered supplemental information.

### Non-Performance Related Information

Non-Performance Related Information is defined as any information included as part of a compliant performance presentation, but is not directly related to the calculation and presentation of performance and is not included in the definition of Supplemental Information. Non-performance information includes but is not limited to general information regarding the firm, a description of the investment strategy, or details about the investment process.

### **Presentation and Reporting of Supplemental Information**

PFI shall:

- Ensure that supplemental information satisfies the spirit and principles of the GIPS standards: i.e., fair representation and full disclosure.
- Clearly label and identify supplemental information as such and to a particular composite presentation.
- PFI shall provide all prospective clients with a fully compliant presentation prior to or accompanying any supplemental information.

PFI shall not:

- Present supplemental information in contradiction to or in conflict with the information provided in the compliant composite presentation.

This Policy Statement shall not be construed as prohibiting PFI from preparing and presenting information according to specific requests from prospective clients.

## **ADVERTISING**

PFI can choose to advertise its claim using the GIPS Standards. If PFI does advertise its claim of compliance, it must do so in accordance with the GIPS Advertising Guidelines or use the full GIPS disclosure page as indicated in Appendix C.

### **Definition of an Advertisement**

An advertisement includes any materials that are distributed to or designed for use in newspapers, magazines, brochures, letters, media, or any other written or electronic material addressed to more than one prospective client. Any written material (other than one-on-one presentations and individual client reporting) distributed to maintain existing clients or solicit new clients for an advisor is considered an advertisement.

All advertisements that include a claim of compliance with the GIPS Standards Guidelines shall include the disclosures listed in Appendix C.

## **PROCEDURES FOR COMPLIANCE**

### **GIPS Committee**

The purpose of the PFI GIPS Committee is to

# Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero

GLOBAL INVESTMENT PERFORMANCE STANDARDS

## Policies and Procedures

- Establish and maintain a group of personnel within the firm that are knowledgeable about the GIPS Standards and keep abreast of changes to the Standards as well as other industry best practices;
- Suggest, approve, and implement changes to the firm's GIPS Policies and Procedures; and
- Monitor the firm's practices to ensure adherence to the firm's Policies and Procedures.

The GIPS Committee consists of:

- Asset Management
- Sales & Distribution
- Risk Management
- Marketing
- Compliance

### Periodic Reviews

On a monthly basis, PFI should:

- Ensure composites have been constructed in accordance with the Policies and Procedures in this document
- Ensure all newly developed marketing material contains the appropriate disclosure language, or include the most recent Disclosure Presentation (Quarterly or Annual) with the material for the appropriate composite
- Maintain a list of prospective clients that have received marketing material, and a description of the material provided
- Review that accounts that have entered or exited the composite have client directed instructions noted

On a quarterly basis, PFI should:

- Review the firm's list of composites and descriptions to ensure they are up to date
- Prepare a Quarterly Disclosure Presentation as needed for the most frequently marketed composites
- Maintain a list of prospective clients that have received marketing material, and a description of the material provided

At least annually, PFI should:

- Review the Definition of the Firm to ensure it is accurate in light of any recent or anticipated changes to the organization
- Review composite fee schedules to ensure they are current
- Review and modify this GIPS Policies & Procedures document to ensure it is current and reflects any recent or anticipated changes in the Standards or any recent or anticipated changes in the firm's business practices
- Prepare Annual Disclosure Presentations (Appendix B) for all composites

# PFI INVESTMENT MANAGEMENT, LLC

PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

## Appendix A – List and Description of Composites

### COMPOSITES (8 Active Composites)

<b>Active Composites</b>	<b>Description</b>
<b>C-1</b> Short Term Fixed Income	<ul style="list-style-type: none"><li>• Composite Description: Includes portfolios that invest in short term fixed income securities, primarily in Government securities and banking notes of Mexico. The portfolios at all times seek to achieve a return commensurate to short term rates of the Mexican market.</li><li>• Creation Data: March, 2004</li><li>• Composite Inception Date: May, 2003</li><li>• Termination Date: N.A.</li><li>• Benchmark: PiPCetes-28d 65% and PiPCetes-70-90d 35%</li><li>• Currency used to express performance: Mexican Pesos</li><li>• Minimum Account size: 130 million Mexican Pesos</li><li>• Domestic Holdings</li></ul>
<b>C-2</b> Intermediate Term Fixed Income	<ul style="list-style-type: none"><li>• Composite Description: Includes portfolios that hold medium term fixed income securities, primarily in Government, banking issues and corporations of Mexico. The portfolios at all times seek to achieve a return commensurate to medium term rates of the Mexican market.</li><li>• Creation Data: May, 2003</li><li>• Composite Inception Date: May, 2003</li><li>• Termination Date: N.A.</li><li>• Benchmark: PiPG-Cetes 100%</li><li>• Currency used to express performance: Mexican Pesos</li><li>• Minimum Account size: 130 million Mexican Pesos</li><li>• Domestic holdings</li></ul>
<b>C-4</b> Government Fixed Income	<ul style="list-style-type: none"><li>• Composite Description: includes portfolios that invest exclusively in short term government fixed income issues. The portfolios at all times seek to invest 100% their assets in securities issued by the Mexican Government, like Cetes, Bondes, BPAS, BPAT and UDIS, primarily in Government securities of short term in Mexican pesos or UDIS.</li><li>• Creation Data: November, 2005</li><li>• Composite Inception Date: February, 2004</li><li>• Termination Date: N.A.</li><li>• Benchmark: PiPCetes-28d 65% and PiPCetes-70-90d 35%</li><li>• Currency used to express performance: Mexican Pesos</li><li>• Minimum Account size: 130 million Mexican Pesos</li><li>• Domestic holdings</li></ul>
<b>C-8</b> Domestic Equity	<ul style="list-style-type: none"><li>• Composite Description: includes portfolios that invest in domestic equities. Portfolios invest not less than 80% of its assets in Mexican equity market and may hold some debt instruments as the portfolio looks for favorable</li></ul>

# PFI INVESTMENT MANAGEMENT, LLC

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## PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

### Appendix A – List and Description of Composites

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- equities to hold, seek investment results that correspond to the return of the Índice de Precios y Cotizaciones (IPC).
- Creation Data: February, 2008
  - Composite Inception Date: June, 2006
  - Termination Date: N.A.
  - Benchmark: IPC (Índice de Precios y Cotizaciones)
  - Currency used to express performance: Mexican Pesos
  - Minimum Account size: 130 million Mexican Pesos
  - Domestic holdings
- C-9** Medium Term Fixed Income
- Composite Description: includes portfolios that hold medium term fixed income securities. The fund seeks to provide investors higher revenues than an investment in short term, but with a lower level of volatility than long term rates. Portfolios utilize active asset allocation strategies; invest mostly in Government Securities, Quasi-Government and to a lesser proportion in banking notes and Corporates securities of Mexico.
  - Creation Data: August, 2009
  - Composite Inception Date: July, 2009
  - Termination Date: N.A.
  - Benchmark: PiPG-Cetes 90% and PiPG-Real5A 10%
  - Currency used to express performance: Mexican Pesos
  - Minimum Account size: 130 million Mexican Pesos
  - Domestic holdings
- C-10** Conservative Target-Risk Fund
- Composite Description: includes portfolios that invest in a mix of fixed income securities and equity. (The maximum investment in equity is 35 %.) The portfolios seek to invest majority of its assets in fixed income securities complementing its investment with equity, investing in foreign and local funds managed by Principal and ETF's. The portfolios belong to Lifecycle Funds with conservative Target Risk.
  - Creation Data: August, 2010
  - Composite Inception Date: August, 2008
  - Termination Date: N.A.
  - Benchmark: BOFA MERRILL LYNCH GLOBAL HIGH YIELD INDEX 22%, FTSE EPRA/ NAREIT DEVELOPED 3%, MSCI World Net Total Return 10%, MSCI EMERGING MARKETS 4%, IPC 6%, PiPReal-5A 3.30%, PiPCetes-28d 29.70%, PiP-Real10A 11% and PiP-Fix10A 11%
  - Currency used to express performance: Mexican Pesos
  - Minimum Account size: 130 million Mexican Pesos
  - Domestic and Foreign holdings.
- C-11** Moderate Target-Risk Fund
- Composite Description: includes portfolios that invest in a mix of fixed income securities and equity. (The maximum investment in equity is +65 %.) The portfolios seek to invest its assets in a balance between fixed income and equity, investing in foreign and local funds managed by

# PFI INVESTMENT MANAGEMENT, LLC

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## PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

### Appendix A – List and Description of Composites

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- Principal and ETF's. The portfolios belong to Lifecycle Funds with moderate Target Risk.
  - Creation Data: November, 2010
  - Composite Inception Date: August, 2008
  - Termination Date: N.A.
  - Benchmark: BOFA MERRILL LYNCH GLOBAL HIGH YIELD INDEX 14%, FTSE EPRA/ NAREIT DEVELOPED 2%, MSCI World Net Total Return 25%, MSCI EMERGING MARKETS 10%, IPC 15%, PiPReal-5A 2%, PiPCetes-28d 18%, PiP-Real10A 7% and PiP-Fix10A 7%
  - Currency used to express performance: Mexican Pesos
  - Minimum Account size: 130 million Mexican Pesos
  - Domestic and Foreign holdings
- C-12 Aggressive Target-Risk Fund**
- Composite Description: includes portfolios that invest in a mix of fixed income securities and equity. (The minimum investment in equity is +65 %.) The portfolios seek to invest its assets in a balance between fixed income and equity, investing in foreign and local funds managed by Principal and ETF's. The portfolios belong to Lifecycle Funds with Aggressive Target Risk.
  - Creation Data: March, 2012
  - Composite Inception Date: August, 2008
  - Termination Date: N.A.
  - Benchmark: BOFA MERRILL LYNCH GLOBAL HIGH YIELD INDEX 5%, FTSE EPRA /NAREIT DEVELOPED 1%, MSCI World Net Total Return 42%, MSCI EMERGING MARKETS 16%, IPC 23%, PiPReal-5A 0.8%, PiPCetes-28d 7.2%, PiP-Real10A 3% and PiP-Fix10A 2%
  - Currency used to express performance: Mexican Pesos
  - Minimum Account size: 130 million Mexican Pesos
  - Domestic and Foreign holdings
- C-13 Real Rate Composite**
- Composite Description: includes portfolios that invest in Long Term Inflation-protected securities. (The minimum investment in Long Term Inflation-protected securities+70%). The portfolios seek to invest its assets in domestic debt instruments issued by Federal Government and banks of high credit quality regarding three first rates, mainly in AAA.
  - Creation Data: April, 2014
  - Composite Inception Date: June, 2013
  - Termination Date: N.A.
  - Benchmark: PiPG-REAL5A 60%, PiPG-REAL3A 30%, PiPG-Bpa182 10%
  - Currency used to express performance: Mexican Pesos
  - Minimum Account size: 130 million Mexican Pesos
  - Domestic and Foreign holdings

# PFI INVESTMENT MANAGEMENT, LLC

PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

## Appendix A – List and Description of Composites

### C-14 Long Term Composite

- Composite Description: includes portfolios that invest in Long Term nominal rates and real rates. The minimum investment in debt instruments will be 70% issued by Federal Government or banks. The portfolios seek to invest its assets in domestic debt instruments issued by Federal Government and banks of high credit quality regarding three first rates, mainly in AAA.
- Creation Date: July, 2014
- Composite Inception Date: June, 2013
- Benchmark: PiPG-FIX5A 75%, PiPG-FIX30A 15%, PiPG-REAL5A 10%
- Currency used to express performance: Mexican Pesos
- Minimum Account size: 130 million Mexican Pesos
- Domestic and Foreign holdings

### C-15 Emerging Markets Composite

- Composite Description: includes portfolios that invest in equities of ETF's or TRAC's focused on emerging markets which are registered in SIC. Furthermore it can invest in mutual funds of Principal Financial Group.
- Creation Date: October, 2014
- Composite Inception Date: May, 2010
- Benchmark: MSCI Emerging Markets Index
- Currency used to express performance: Mexican Pesos
- Minimum Account size: 130 million Mexican Pesos
- Domestic and Foreign holdings

# PFI INVESTMENT MANAGEMENT, LLC

PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

## Appendix A – List and Description of Composites

**C-16** Global Fixed Income Opportunities Composite

- Composite Description: Includes portfolios that invest in debt instruments that replicate the performance of the main debt instrument index, issued in foreign stock markets; and seeks to offer their investor clients higher returns than those observed by an internal index made up of following ETF's in the indicated proportions. These debt instrument indices are composed mainly of government debt instruments of different countries and, to a lesser extent, corporate debt instruments, mainly with investment grade (above BBB on an international scale), and to a lesser extent in debt instruments. Debt that are below investment grade.
- Creation Data: September, 2016
- Composite Inception Date: January, 2016
- Benchmark: IEI 50%; HYG 10%, LQD 20%; EMB 20%
- Currency used to express performance: Mexican Pesos
- Minimum Account size: 130 million Mexican Pesos
- Domestic and Foreign holdings-

# PFI INVESTMENT MANAGEMENT, LLC

PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

## Appendix B – Annual Disclosure Presentations

### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO SHORT TERM FIXED INCOME COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite 3Yr St Dev	Benchmark 3Yr St Dev
				Gross	Net			
2017	25,114	1,002	1	6.99%	5.15%	6.91%	0.44%	0.47%
2016	24,087	1,780	1	4.44%	2.95%	4.08%	0.19%	0.19%
2015	22,063	1,273	1	3.44%	1.97%	3.12%	0.14%	0.14%
2014	17,621	1,050	1	3.74%	2.24%	3.18%	0.16%	0.16%
2013	10,058	1,218	1	4.27%	2.83%	3.98%	0.12%	0.19%
2012	9,482	1,255	1	4.78%	3.32%	2.86%	0.09%	0.11%
2011	7,442	1,058	1	4.76%	3.28%	2.66%	0.24%	0.21%
2010	7,378	1,251	1	4.93%	3.40%	2.95%	0.87%	0.38%
2009	6,060	1,526	1	5.77%	4.36%	3.54%	0.90%	0.38%
2008	5,390	1,156	2	6.07%	4.91%	4.87%	0.87%	0.28%
2007	3,219	582	1	7.85%	6.63%	5.58%	0.31%	0.30%
2006	2,029	631	1	7.89%	6.88%	5.55%	N.A.1	N.A. 1
2005	1,593	564	1	10.03%	8.88%	7.65%	N.A.1	N.A. 1
2004*	1,223	211	1	5.67%	4.71%	4.03%	N.A. 1	N.A. 1

\* Performance shown for 2004 is from April 1, 2004 through December 31, 2004.

N.A. <sup>1</sup> - The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2004 through 2006 due to less than 36 months of composite and benchmark data.

***The Short Term Fixed Income Composite*** includes portfolios that invest in short term fixed income securities, primarily in Government securities and banking notes of Mexico. The portfolios at all times seek to achieve a return commensurate to short term rates of the Mexican market

For comparison purposes, the composite is compared to the PiPCetes-28d 65% and PiPCetes-70-90d 35% Index. PiPCetes-28d Index invest all its assets in one security Cetes 28 days (27 or 29 when there are non-business days). PiPCetes-70-90d Index it's a portfolio that is composed of CETES securities which term is between 70 and 91 days to maturity for the start date. Both Indexes are available in the website; <https://www.piplatam.com>.

Old Benchmark changed since January 2013 in order to be more representative than older one. Instead of using ISICP (Índice de Sociedades de Inversión de Corto Plazo) it was chosen PiPCetes-28d 65% and PiPCetes-70-90d 35% which investment Objective is more appropriate and representative to the investment strategy of this Composite.

The Short Term Fixed Income Creation Date was March , 2004. (The rebalancing of the benchmark is annual). The minimum account size for this composite is 130 million Mexican pesos.

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

# PFI INVESTMENT MANAGEMENT, LLC

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PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

## Appendix B – Annual Disclosure Presentations

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“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 29 December 2017. The verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm’s policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.”

A list of composites descriptions is available upon request.

The firm’s composites and total firm assets properly reflect only actual assets managed by the firm

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example for individuals the fee schedule is 1.20% for assets between 150 and 500 thousand Pesos, and 0.60% for assets more than 500 thousand. Actual investment advisory fees incurred by clients may vary.

**PFI INVESTMENT MANAGEMENT, LLC**

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PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

**Appendix B – Annual Disclosure Presentations**

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# PFI INVESTMENT MANAGEMENT, LLC

PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

## Appendix B – Annual Disclosure Presentations

### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO INTERMEDIATE TERM FIXED INCOME COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite 3Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net			
2017	25,114	1,205	1	7.23%	6.88%	6.80%	0.60%	0.48%
2016	24,087	963	1	4.42%	3.86%	3.80%	0.39%	0.24%
2015	22,063	916	1	3.02%	2.20%	3.28%	0.51%	0.20%
2014	17,621	655	1	4.19%	3.15%	3.49%	0.55%	0.22%
2013	10,058	461	1	4.62%	3.46%	4.26%	0.61%	0.24%
2012	9,482	392	1	6.30%	5.04%	2.86%	0.65%	0.11%
2011	7,442	424	1	5.45%	4.13%	2.66%	0.97%	0.21%
2010	7,378	551	1	5.12%	3.67%	2.95%	1.10%	0.38%
2009	6,060	643	1	4.85%	3.37%	3.54%	1.03%	0.38%
2008	5,390	424	1	7.24%	5.88%	4.87%	0.57%	0.28%
2007	3,219	1,239	1	7.77%	6.45%	5.58%	0.31%	0.30%
2006	2,029	1,204	1	7.96%	6.66%	5.55%	0.40%	0.38%
2005	1,593	856	1	10.02%	8.83%	7.65%	N.A. 1	N.A. 1
2004	1,223	747	1	7.45%	6.12%	5.03%	N.A. 1	N.A. 1

N.A. 1. - The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2004 through 2005 due to less than 36 months of composite and benchmark data.

***The Intermediate Term Fixed Income Composite*** includes portfolios that hold medium term fixed income securities, primarily in Government, banking issues and corporations of Mexico. The portfolios at all times seek to achieve a return commensurate to medium term rates of the Mexican market.

For comparison purposes, the composite is compared to the PiPG-Cetes 100%. PiPG-Cetes Index takes all outstanding Cetes. The index is available on <https://www.piplatam.com>.

Old Benchmark changed since January 2013 in order to be more representative than older one. Instead of using ISICP (Índice de Sociedades de Inversión de Corto Plazo) it was chosen PiPG-Cetes 100% which investment objective is more appropriate and representative to the investment strategy of this Composite.

The Intermediate Term Fixed Income Creation Date was May, 2003. The minimum account size for this composite is 130 million Mexican Pesos.

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión

# PFI INVESTMENT MANAGEMENT, LLC

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PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

## Appendix B – Annual Disclosure Presentations

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Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 29 December 2017. The verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation."

A list of composites descriptions is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example for individuals the fee schedule is 2.05% for assets less than 50 thousand Pesos, 1.85% for assets between 50 and 150 thousand Pesos, 1.65% for assets between 150 and 500 thousand Pesos, 1.35% for assets between 500 thousand and 1 million Pesos, and 0.90% for assets over 1 million Pesos. Actual investment advisory fees incurred by clients may vary.

# PFI INVESTMENT MANAGEMENT, LLC

PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

## Appendix B – Annual Disclosure Presentations

### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO GOVERNMENT FIXED INCOME COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite 3Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net			
2017	25,114	9,049	1	7.07%	6.42%	6.91%	0.46%	0.47%
2016	24,087	9,478	1	4.36%	3.76%	4.08%	0.19%	0.19%
2015	22,063	10,540	1	3.34%	2.74%	3.12%	0.16%	0.14%
2014	17,621	9,849	1	3.58%	2.80%	3.18%	0.18%	0.16%
2013	10,058	4,433	1	4.30%	3.46%	3.98%	0.12%	0.19%
2012	9,482	4,397	1	4.85%	4.02%	2.86%	0.08%	0.11%
2011	7,442	3,375	1	4.86%	3.88%	2.66%	0.30%	0.21%
2010	7,378	3,218	1	4.93%	3.88%	2.95%	0.43%	0.38%
2009	6,060	2,736	1	6.15%	4.67%	3.54%	0.35%	0.38%
2008	5,390	3,376	1	7.91%	6.06%	4.87%	N.A 1	N.A. 1
2007	3,219	1,062	1	7.87%	5.80%	5.58%	N.A 1	N.A. 1
2006*	2,029	153	1	1.27%	1.15%	0.85%	N.A1	N.A. 1

\* Performance shown for 2006 is from November 1, 2006 through December 31, 2006.

N.A. <sup>1</sup> - The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2006 through 2008 due to less than 36 months of composite and benchmark data.

***The Government Fixed Income Composite*** includes portfolios that invest exclusively in short term government fixed income issues. The portfolios at all times seek to invest 100% their assets in securities issued by the Mexican Government, like Cetes, Bondes, BPAS, BPAT and UDIS, primarily in Government securities of short term in Mexican pesos or UDIS.

For comparison purposes, the composite is compared to the PiPCetes-28d 65% and PiPCetes-70-90d 35% Index. PiPCetes-28d Index invest all its assets in one security Cetes 28 days (27 or 29 when there are non-business days). PiPCetes-70-90d Index it's a portfolio that is composed of CETES securities which term is between 70 and 91 days to maturity for the start date. Both Indexes are available in the website <https://www.piplatam.com>.

Old Benchmark changed since January 2013 in order to be more representative than older one. Instead of using ISICP (Índice de Sociedades de Inversión de Corto Plazo) it was chosen PiPCetes-28d 65% and PiPCetes-70-90d 35%, which investment Objective is more appropriate and representative to the investment strategy of this Composite.

The Government Fixed Income Creation Date was November, 2005. (The rebalancing of the benchmark is annual) .The minimum account size for this composite is 130 million Mexican Pesos.

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión

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Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 29 December 2017. The verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation."

A list of composites descriptions is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example, for individuals the fee schedule is 1.75% for assets less than 150 thousand Pesos, 1.75% for assets between 150 and 500 thousand Pesos, 1.40% for assets between 500 and 1 million Pesos, and 0.70% for assets over 1 million Pesos. Actual investment advisory fees incurred by clients may vary.

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### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO DOMESTIC EQUITY COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		IPC Index	Composite 3Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net			
2017	25,114	1,014	1	8.14%	7.39%	6.43%	9.45%	9.30%
2016	24,087	1,095	1	9.28%	8.04%	6.74%	10.63%	10.25%
2015	22,063	1,326	1	2.97%	1.41%	(0.01%)	10.85%	10.53%
2014	17,621	1,193	1	3.82%	1.94%	0.14%	10.13%	10.20%
2013	10,058	715	1	8.55%	6.38%	(1.75%)	10.34%	11.03%
2012	9,482	580	1	25.40%	22.50%	17.58%	12.02%	12.12%
2011	7,442	492	1	0.13%	(1.98%)	(2.76%)	18.74%	19.02%
2010	7,378	469	1	24.82%	21.79%	17.86%	N.A1	N.A. 1
2009	6,060	313	1	45.56%	41.53%	44.73%	N.A1	N.A. 1
2008*	5,390	241	1	(21.46%)	(23.37%)	(25.59%)	N.A1	N.A. 1

\* Performance shown for 2008 is from February 29, 2008 through December 31, 2008.

N.A.1. - The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2008 through 2010 due to less than 36 months of composite and benchmark data.

***The Domestic Equity Composite** includes portfolios that invest in domestic equities. Portfolios invest not less than 80% of its assets in Mexican equity market and may hold some debt instruments as the portfolio looks for favorable equities to hold, seek investment results that correspond to the return of the Índice de Precios y Cotizaciones (IPC).*

*For comparison purposes, the composite is compared to the IPC (Índice de Precios y Cotizaciones) Index. The **Prices and Quotations Index (IPC)** is the main indicator of the Mexican Stock Exchange, it expresses the yield of the stock market based on the prices variations of a balanced, weighted and representative group of stocks of the ones that are listed in the Stock Exchange.*

*For 2008 the Gross Returns are Pure Gross Returns and are shown as Supplemental Information, because the Mexican regulation did not required at that time to separate the Trading Costs.*

*The Domestic Equity Composite Creation Date was February, 2008. The minimum account size for this composite is 130 million Mexican Pesos.*

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 29 December 2017. The verification report(s) is/are available upon request.

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Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.”

A list of composites descriptions is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Polices for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example for individuals the fee schedule is an annual fee of 3.00% for assets over 10 thousand Pesos. Actual investment advisory fees incurred by clients may vary.

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### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO MEDIUM TERM FIXED INCOME COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite 3Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net			
2017	25,114	2,597	1	7.06%	6.55%	6.75%	0.73%	0.60%
2016	24,087	2,212	1	4.62%	4.05%	4.32%	0.61%	0.46%
2015	22,063	1,943	1	2.94%	2.31%	3.04%	0.67%	0.40%
2014	17,621	1,677	1	4.24%	3.41%	3.76%	0.67%	0.31%
2013	10,058	1,637	1	4.22%	3.36%	3.97%	0.72%	0.26%
2012	9,482	1,805	1	5.43%	4.55%	4.43%	0.57%	0.49%
2011	7,442	1,690	1	5.43%	4.52%	4.43%	N.A1	N.A. 1
2010	7,378	1,461	1	5.91%	4.63%	4.59%	N.A1	N.A. 1
2009*	6,060	586	1	2.00%	1.81%	1.53%	N.A1	N.A. 1

\* Performance shown for 2009 is from August 31, 2009 through December 31, 2009.

N.A.<sup>1</sup> – The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2009 through 2011 due to less than 36 months of composite and benchmark data.

***The Medium Term Fixed Income Composite*** includes portfolios that hold medium term fixed income securities. The fund seeks to provide investors higher revenues than an investment in short term, but with a lower level of volatility than long term rates. Portfolios utilize active asset allocation strategies; invest mostly in Government Securities, Quasi-Government and to a lesser proportion in banking notes and Corporates securities of Mexico.

For comparison purposes, the composite is compared to the **PiPG-Cetes 90%** and **PiPG-Real5A 10%**. **PiPG-Cetes Index** includes all CETES that are in the market. **PiPG-Real5A** index simulates a fund that invest all its assets in real rate securities, Udibonos, Pic's and CBIC'S with a term to maturity between 1,094 and 2020 days (3 and 5.6 years). Both indexes are available on the website <https://www.piplatam.com>.

The Medium Term Fixed Income Composite Creation Date was August, 2009. (The rebalancing of the benchmark is annual) The minimum account size for this composite is 130 million Mexican Pesos.

Old Benchmarks changed since January 2013 in order to be more representative than older one. Instead of using **ISIMP** (Índice de Sociedades de Inversión de Mediano Plazo) it was chosen **PiPCetes-28d 90%** and **PiPG-Real5A 10%** which investment Objective is more appropriate and representative to the investment strategy of this Composite. Then after looking carefully at **PiPCetes-28d**, it was decided by committee that **PiPG-Cetes** is more suitable as the Benchmark for this composite because it's a portfolio that includes all Cetes outstanding. It's weight is the same as the older one and it's **90%**. So that 2014 return was made with this new Benchmark (**PiPG-Cetes 90%** & **PiPG-Real5A 10%**).

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in

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compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 29 December 2017. The verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation."

A list of composites descriptions is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example for individuals the fee schedule is 2.00% for assets between 10 and 50 thousand Pesos, 1.80% for assets between 50 and 150 thousand Pesos, 1.60% for assets between 150 and 500 thousand Pesos, 1.30% for assets between 500 thousand and over 1 million Pesos, 0.80% for assets over 1 million Pesos. Actual investment advisory fees incurred by clients may vary.

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### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO CONSERVATIVE TARGET-RISK FUND COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite 3Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net			
2017	25,114	4,391	1	8.59%	6.70%	7.90%	3.52%	3.92%
2016	24,087	4,237	1	13.48%	11.59%	14.83%	2.96%	3.18%
2015	22,063	2,674	1	7.01%	5.21%	5.97%	2.62%	2.69%
2014	17,621	1,362	1	10.79%	8.91%	8.73%	2.66%	2.54%
2013	10,058	835	1	6.85%	4.92%	5.57%	N.A1	N.A. 1
2012**	9,482	578	1	9.42%	7.41%	9.99%	N.A1	N.A. 1
1.5.2011 to 31.05.2011	8,640	133	1	0.20%	0.01%	0.10%	N.A.1	N.A.1
1.1.2011 to 28.02.2011	6,732	130	1	(0.17%)	(0.55%)	(-0.27%)	N.A.1	N.A.1
2010*	7,378	145	1	3.24%	2.45%	3.10%	N.A	N.A.

\* Performance shown for 2010 is from August 31, 2010 through December 31, 2010.

From 01.03.2011 to 30.04.2011 and from 1.06.2011 to 31.12.2011 this composite had no the minimum account size.

\*\*Performance shown for 2012 is from January 31, 2012 through December 31, 2012.

N.A.<sup>1</sup>. – The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2010 through 2014 due to less than 36 months of composite and benchmark data.

***The Conservative Target-Risk Fund Composite*** includes portfolios that invest in a mix of fixed income securities and equity. (The maximum investment in equity is 35 %.) The portfolios seek to invest majority of its assets in fixed income securities complementing its investment with equity, investing in foreign and local funds managed by Principal and ETF's.

The portfolios belong to Lifecycle Funds with conservative Target Risk. For comparison purposes, the composite is compared to the PiP-Fix10A 11%, PiP-Real10A 11%, PiPCetes-28d 29.7%, PiPG-Real5A 3.3%, IPC 6%, Bofa Merrill Lynch Global High Yield Index 22%, FTSE EPRA/NAREIT Developed 3%, MSCI World Net Total Return 10% and MSCI Emerging Markets 4% .

**PiP-Fix10A** Index simulates a fund that invests all its assets in securities with nominal rate or fixed nominal coupon of the Mexican market that have a term to maturity between 1,882 and 3,640 days. It includes Cetes and fixed rate Bonds with this term to maturity, **PIPG-Real10A** Index simulates a fund that invests all its assets in securities with real rate of the Mexican market that have a term to maturity between 2,021 and 3,640 days (5.6 to 10 years). It includes Udibonos, Pic's and CBIC's with this term to maturity, **PiPCetes-28d** Index invest all its assets in one security Cetes 28 days (27 or 29 when there are non-business days). **PiPG-Real5A** index simulates a fund that invest all its assets in real rate securities, Udibonos, Pic's and CBIC'S with a term to maturity between 1,094 and 2020 days(3 and 5.6 years); This four Indexes are available on the website <https://www.piplatam.com>. **IPC** (Índice de Precios y Cotizaciones) is the main indicator of the Mexican Stock Exchange, it expresses the yield of the stock market based on the prices variations of a balanced, weighted and representative group of stocks of the ones that are listed in the Stock Exchange. **The BofA Merrill Lynch Global High Yield Index** tracks the performance of USD, CAD, GBP and EUR denominated below investment grade corporate debt publicly issued in the major domestic or eurobond markets. **The FTSE EPRA/NAREIT Developed Index** incorporates Real Estate Investment Trusts (REITs) and Real Estate Holding & Development companies. **The MSCI World Net Total Return Index** is a free float-adjusted market capitalisation weighted index that is designed to measure the equity market performance of developed markets. **The MSCI Emerging**

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*Markets is a free float-adjusted market capitalization index that is designed to measure equity market performance in the global emerging markets.*

*Old Benchmarks changed since January 2013 in order to be more representative than older one. Instead of using PiP-Fix10A 11%, PiP-Real 10A 11%, PIFHYAC 22%, PRINRIVA 6% PIFGPSU 3%, PIFGEIA 10%, PIFEMIA 4% and PRINAMAS 33%, it was chosen PiP-Fix10A 11%, PiP-Real10A 11%, PiPCetes-28d 29.7%, PiPG-Real5A 3.3%, IPC 6%, Bofa Merrill Lynch Global High Yield Index 22%, FTSE EPRA/ NAREIT Developed 3%, MSCI World Net Total Return 10% and MSCI Emerging Markets 4% which investment Objective is more appropriate and representative to the investment strategy of this Composite.*

*The Conservative Target-Risk Fund Composite Creation Date was August, 2010. (The rebalancing of the benchmark is annual). The minimum account size for this composite is 130 million Mexican Pesos.*

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 29 December 2017. The verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm’s policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.”

A list of composites descriptions is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example for individuals the fee schedule is an Annual fee of 2.80%. Actual investment advisory fees incurred by clients may vary.

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### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO MODERATE TARGET-RISK FUND COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite 3Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net			
2017	25,114	2,282	1	12.65%	10.57%	10.57%	5.15%	6.15%
2016	24,087	1,637	1	15.45%	13.43%	17.02%	4.37%	5.28%
2015	22,063	1,249	1	7.63%	5.63%	6.41%	3.93%	4.74%
2014	17,621	674	1	11.66%	9.59%	9.34%	3.45%	3.71%
2013	10,058	324	1	9.86%	7.75%	7.53%	4.30%	4.59%
2012	9,482	248	1	11.13%	8.82%	11.89%	N.A.1	N.A.1
2011	7,442	147	1	6.55%	4.25%	6.86%	N.A.1	N.A.1
2010*	7,378	135	1	3.09%	2.91%	2.19%	N.A.1	N.A.1

\* Performance shown for 2010 is from November 30, 2010 through December 31, 2010.

N.A.<sup>1</sup> – The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2010 through 2012 due to less than 36 months of composite and benchmark data.

***The Moderate Target-Risk Fund Composite*** includes portfolios that invest in a mix of fixed income securities and equity. (The maximum investment in equity is +65 %.) The portfolios seek to invest its assets in a balance between fixed income and equity, investing in foreign and local funds managed by Principal and ETF's. The portfolios belong to Lifecycle Funds with moderate Target Risk.

For comparison purposes, the composite is compared to the PiP-Fix10A 7%, PiP-Real10A 7%, PiPCetes-28d 18%, PiPG-Real5A 2%, IPC 15%, Bofa Merrill Lynch Global High Yield Index 14%, FTSE EPRA/ NAREIT Developed 2%, MSCI World Net Total Return 25% and MSCI Emerging Markets 10%.

**PiP-Fix10A** Index simulates a fund that invests all its assets in securities with nominal rate or fixed nominal coupon of the Mexican market that have a term to maturity between 1,882 and 3,640 days. It includes Cetes and fixed rate Bonds with this term to maturity, **PIPG-Real10A** Index simulates a fund that invests all its assets in securities with real rate of the Mexican market that have a term to maturity between 2,021 and 3,640 days (5.6 to 10 years). It includes Udibonos, Pic's and CBIC's with this term to maturity; the Index is available on the website, **PiPCetes-28d** Index invest all its assets in one security Cetes 28 days (27 or 29 when there are non-business days), **PiPG-Real5A** index simulates a fund that invest all its assets in real rate securities, Udibonos, Pic's and CBIC'S with a term to maturity between 1,094 and 2020 days(3 and 5.6 years).This four Indexes are available on the website <https://www.piplatam.com>. **IPC** (Índice de Precios y Cotizaciones) the Prices and Quotations Index (IPC) is the main indicator of the Mexican Stock Exchange, it expresses the yield of the stock market based on the prices variations of a balanced, weighted and representative group of stocks of the ones that are listed in the Stock Exchange. The **BofA Merrill Lynch Global High Yield Index** tracks the performance of USD, CAD, GBP and EUR denominated below investment grade corporate debt publicly issued in the major domestic or eurobond markets. The **FTSE EPRA/NAREIT Developed** Index incorporates Real Estate Investment Trusts (REITs) and Real Estate Holding & Development companies. The **MSCI World Net Total Return** Index is a free float-adjusted market capitalisation weighted index that is designed to measure the equity market performance of developed markets. The **MSCI Emerging Markets** is a free float-adjusted market capitalization index that is designed to measure equity market performance in the global emerging markets.

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*Old Benchmarks changed since January 2013 in order to be more representative than older one. Instead of using PiP-Fix10A 7%, PiP-Real 10A 7%, PIFHYAC 14%, PRINRIVA 15% PIFGPSU 2%, PIFGEIA 25%, PIFEMIA 10% and PRINAMAS 20%, it was chosen PiP-Fix10A 7%, PiP-Real10A 7%, PiPCetes-28d 18%, PiPG-Real5A 2%, IPC 15%, Bofa Merrill Lynch Global High Yield Index 14%, FTSE EPRA/NAREIT Developed 2%, MSCI World Net Total Return 25%, MSCI Emerging Markets 10% which investment objective is more appropriate and representative to the investment strategy of this Composite.*

*The Moderate Target-Risk Fund Composite Creation Date was November, 2010. (The rebalancing of the benchmark is annual) The minimum account size for this composite is 130 million Mexican Pesos*

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 29 December 2017. The verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm’s policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.”

A list of composites descriptions is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Polices for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example for individuals the fee schedule is an Annual Fee of 2.90%. Actual investment advisory fees incurred by clients may vary.

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### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO AGGRESSIVE TARGET-RISK FUND COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite 3Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net			
2017	25,114	1,343	1	17.18%	14.85%	13.44%	7.37%	8.86%
2016	24,087	844	1	18.03%	15.63%	19.29%	6.45%	7.87%
2015	22,063	1,103	1	8.56%	6.20%	6.88%	5.72%	7.17%
2014	17,621	363	1	12.07%	9.81%	10.08%	N.A.1	N.A.1
2013	10,058	198	1	12.89%	10.59%	9.92%	N.A.1	N.A.1
2012*	9,482	141	1	8.26%	6.50%	8.89%	N.A.1	N.A.1

\* Performance shown for 2012 is from March 30, 2012 through December 31, 2012.

N.A.<sup>1</sup> – The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2012 through 2014 due to less than 36 months of composite and benchmark data.

***The Aggressive Target-Risk Fund Composite*** includes portfolios that invest in a mix of fixed income securities and equity. (The minimum investment in equity is +65 %.) The portfolios seek to invest its assets in a balance between fixed income and equity, investing in foreign and local funds managed by Principal and ETF's.

The portfolios belong to Lifecycle Funds with aggressive Target Risk. For comparison purposes, the composite is compared to the PiP-Fix10A 2%, PiP-Real10A 3%, PiPCetes-28d 7.2%, PiPG-Real5A 0.8%, IPC 23%, Bofa Merrill Lynch Global High Yield Index 5%, FTSE EPRA/NAREIT DEVELOPED 1%, MSCI World Net Total Return 42%, MSCI Emerging Markets 16%.

**PiP-Fix10A** Index simulates a fund that invests all its assets in securities with nominal rate or fixed nominal coupon of the Mexican market that have a term to maturity between 1,882 and 3,640 days. It includes Cetes and fixed rate Bonds with this term to maturity, **PIPG-Real10A** Index simulates a fund that invests all its assets in securities with real rate of the Mexican market that have a term to maturity between 2,021 and 3,640 days (5.6 to 10 years). It includes Udibonos, Pic's and CBIC's with this term to maturity, **PiPCetes-28d** Index invest all its assets in one security Cetes 28 days (27 or 29 when there are non-business days). **PiPG-Real5A** index simulates a fund that invest all its assets in real rate securities, Udibonos, Pic's and CBIC'S with a term to maturity between 1,094 and 2020 days(3 and 5.6 years). This four indexes are available on the website <https://www.piplatam.com>. The composite is compared to the **IPC** (Indice de Precios y Cotizaciones). The Prices and Quotations Index (IPC) is the main indicator of the Mexican Stock Exchange, it expresses the yield of the stock market based on the prices variations of a balanced, weighted and representative group of stocks of the ones that are listed in the Stock Exchange. The **Bofa Merrill Lynch Global High Yield Index** tracks the performance of USD, CAD, GBP and EUR denominated below investment grade corporate debt publicly issued in the major domestic or eurobond markets. The **FTSE EPRA/NAREIT Developed** Index incorporate Real Estate Investment Trusts (REITs) and Real Estate Holding & Development companies. The **MSCI World Net Total Return** Index is a free float-adjusted market capitalisation weighted index that is designed to measure the equity market performance of developed markets.

Old Benchmarks changed since January 2013 in order to be more representative than older one. Instead of using PiP-Fix10A 2%, PiP-Real 10A 3%, PIFHYAC 5%, PRINRIVA 23% PIFGPSU 1%, PIFGEIA 42%, PIFEMIA 16% and PRINAMAS 8%, it was chosen PiP-Fix10A 2%, PiP-Real10A 3%, PiPCetes-28d 7.2%, PiPG-Real5A 0.8%, IPC 23%, Bofa Merrill Lynch Global High Yield Index 5%, FTSE EPRA/NAREIT DEVELOPED 1%, MSCI World Net Total

# PFI INVESTMENT MANAGEMENT, LLC

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*Return 42%, and MSCI Emerging Markets 16% which investment objective is more appropriate and representative to the investment strategy of this Composite.*

*The Aggressive Target-Risk Fund Composite Creation Date was March, 2012. (The rebalancing of the benchmark is annual) The minimum account size for this composite is 130 million Mexican Pesos.*

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 29 December 2017. The verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm’s policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.”

A list of composites descriptions is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example for individuals the fee schedule is an Annual Fee of 3.00%. Actual investment advisory fees incurred by clients may vary.

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### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO REAL RATE COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite 3Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net			
2017	25,114	769	1	6.51%	6.10%	6.76%	2.50%	2.55%
2016	24,087	782	1	7.46%	7.02%	7.76%	N.A.1	N.A.1
2015	22,063	453	1	1.28%	0.99%	1.47%	N.A.1	N.A.1
2014*	17,621	482	1	3.34%	3.06%	3.54%	N.A.1	N.A.1

\* Performance shown for 2014 is from April 30, 2014 through December 31, 2014.

N.A.<sup>1</sup> –. The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2014 through 2016 due to less than 36 months of composite and benchmark data.

***The Real Rate Composite:*** includes portfolios that invest in Long Term Inflation-protected securities. (The minimum investment in Long Term Inflation-protected securities is +70%). The portfolios seek to invest its assets in domestic debt instruments issued by Federal Government and banks of high credit quality regarding three first rates, mainly in AAA.

For comparison purposes, the composite is compared to the **PiPG-Real5A 60%**, **PiPG-Real3A 30%** and **PiPG-Bpa182 10%**. **PiPG-Real5A** Index includes all securities indexed to inflation and backed by the Federal Government including Udibonos, PIC's and CBIC's with a term to maturity between 1,093- 2,020 days. **PiPG-Real3A** includes all securities indexed to inflation and backed by the Federal Government including Udibonos, PIC's and CBIC's with a term to maturity between 366- 1,092 days. **PiPG-Bpa182** Index includes al Bonos de Protección al Ahorro with semi-annual coupon payment. Those indexes are available on the website <https://www.piplatam.com>.

The Real Rate Composite Creation Date was April, 2014. (The rebalancing of the benchmark is annual) The minimum account size for this composite is 130 million Mexican Pesos.

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 29 December 2017. The verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.”

A list of composites descriptions is available upon request.

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Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example, for individuals the fee schedule is 1.50% for assets less than 500 thousand Pesos, 1.00% for assets between 500 and 1 million Pesos and 0.80% for assets over 1 million Pesos. Actual investment advisory fees incurred by clients may vary.

# PFI INVESTMENT MANAGEMENT, LLC

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### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO LONG TERM COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite 3Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net			
2017	25,114	506	1	5.58%	5.56%	6.00%	3.67%	4.12%
2016	24,087	366	1	0.83%	0.81%	0.66%	N.A.1	N.A.1
2015	22,063	261	1	4.01%	3.98%	4.43%	N.A.1	N.A.1
2014*	17,621	163	1	1.65%	1.63%	1.44%	N.A.1	N.A.1

\* Performance shown for 2014 is from July 31, 2014 through December 31, 2014.

N.A.<sup>1</sup>. –The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2014 through 2016 due to less than 36 months of composite and benchmark data.

***The Long Term Composite:*** includes portfolios that invest in Long Term nominal rates and real rates. The minimum investment in debt instruments will be 70% issued by Federal Government or banks. The portfolios seek to invest its assets in domestic debt instruments issued by Federal Government and banks of high credit quality regarding three first rates, mainly in AAA.

For comparison purposes, the composite is compared to the **PiPG-Fix5A 75%, PiPG-Fix30A 15% and PiPG-Real5A 10%**. **PiPG-Fix5A** Index simulates a fund that invests all its assets in securities with nominal rate or fixed nominal coupon of the Mexican market that have a term to maturity between 1,093 and 1,820 days. **PiPG-Fix30A** Index simulates a fund that invests all its assets in securities with nominal rate or fixed nominal coupon of the Mexican market that have a term to maturity between 7,281 and 10,920 days. **PiPG-Real5A** Index includes all securities indexed to inflation and backed by the Federal Government including Udibonos, PIC's and CBIC's with a term to maturity between 1,093- 2,020 days. Those indexes are available on the website <https://www.piplatam.com>.

The Long Term Composite Creation Date was July, 2014 . (The rebalancing of the benchmark is annual) The minimum account size for this composite is 130 million Mexican Pesos.

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 29 December 2017. The verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.”

A list of composites descriptions is available upon request.

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Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example, for individuals the fee schedule is 2.10% for assets less than 50 thousand Pesos, 1.00% for assets between 500 and 1 million Pesos and 0.80% for assets over 1 million Pesos. Actual investment advisory fees incurred by clients may vary.

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### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO EMERGING MARKETS COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite 3Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net			
2017	25,114	724	1	24.88%	24.63%	28.30%	12.80%	14.50%
2016	24,087	524	1	28.69%	28.64%	29.15%	N.A. <sup>1</sup>	N.A. <sup>1</sup>
2015	22,063	324	1	(0.50%)	(0.57%)	(2.38%)	N.A. <sup>1</sup>	N.A. <sup>1</sup>
2014*	17,621	141	1	3.42%	3.38%	3.95%	N.A. <sup>1</sup>	N.A. <sup>1</sup>

\* Performance shown for 2014 is from October 31, 2014 through December 31, 2014.

N.A.<sup>1</sup> – The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2014 through 2016 due to less than 36 months of composite and benchmark data.

***The Emerging Markets Composite*** includes portfolios that invest in domestic equities. Portfolios invest not less than 80% of its assets in Mexican equity market and may hold some debt instruments as the portfolio looks for favorable equities to hold, seek investment results that correspond to the return of the Índice de Precios y Cotizaciones (IPC).

For comparison purposes, the composite is compared to the MSCI Emerging Markets Index and it's designed to measure equity market performance in global emerging markets. The Emerging Markets Index is a float adjusted market capitalization index that consist of indices in 21 emerging economies: Brazil, Chile, China, Colombia, Czech Republic, Egypt, Hungary, India, Indonesia, Korea, Malaysia, Mexico, Morocco, Peru, Philippines, Poland, Russia, .... The index covers approximately 85% of the free float-adjusted market capitalization in each country. The index is available on <https://www.msci.com/>.

The Emerging Markets Composite Creation Date was October, 2014. (The rebalancing of the benchmark is annual)  
The minimum account size for this composite is 130 million Mexican Pesos.

For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

“Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero has been independently verified for the periods 1 January 2003 through 29 December 2017. The verification report(s) is/are available upon request.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.”

A list of composites descriptions is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

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The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example for individuals the fee schedule is an Annual Fee of 3.00%. Actual investment advisory fees incurred by clients may vary.

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### PRINCIPAL FONDOS DE INVERSION, S.A. DE C.V. OPERADORA DE FONDOS DE INVERSION PRINCIPAL GRUPO FINANCIERO GLOBAL FIXED INCOME OPORTUNITIES COMPOSITE ANNUAL DISCLOSURE PRESENTATION

Year End	Total Firm Assets (Mexican Pesos) (millions)	Composite Assets (Mexican Pesos) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite 3Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net			
1.7.2011 to 12.29.2017	25,114	232	1	6.89%	6.87%	-29.27%	N.A.1	N.A.1
1.1.2017 to 05.31.2017	24,564	199	1	-0.91%	-0.94%	-33.58%	N.A.1	N.A.1
2016*	24,087	169	1	2.77%	2.75%	3.38%	N.A. <sup>1</sup>	N.A. <sup>1</sup>

\* Performance shown for 2016 is from September 31, 2016 through December 31, 2016.

From 01.06.2017 to 30.06.2017 this composite had no the minimum account size.

N.A.<sup>1</sup> – The three-year annualized standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. The three-year annualized standard deviation is not presented for 2016 due to less than 36 months of composite and benchmark data.

***The Global Fixed Income Oportunities Composite*** invests primarily in debt instruments issued in foreign stock markets; through foreign collective investment mechanisms (TRACs or ETFs) that replicate the performance of these instruments or composite indexes based on this type of instruments and seeks to offer their investor clients higher returns than those observed by an internal index made up of following ETF's in the indicated proportions:

ETF	%
IEI (iShares Barclays 3-7 Year Treasury Bond Fund)	50%
HYG (iShares iBoxx \$ High Yield Corporate Bond Fund)	10%
LQD (iShares iBoxx \$ Investment Grade Corporate Bond Fund)	20%
EMB (iShares JPMorgan USD Emerging Markets Bond Fund)	20%

This index is made up of fixed income instruments of several countries among which the United States of America, as well as several countries known as "emerging economies". The list of these "emerging economies" is available on <https://www.ishares.com/us/products/239572/ishares-jp-morgan-usd-emerging-markets-bond-etf?qt=EMB>

In addition, ***The Global Fixed Income Oportunities Composite*** may invest in those debt assets issued or guaranteed by the Federal Government, Bank of México, state and municipal governments, credit institutions, direct or repurchased, denominated in Euros, Dollars or national currency. As well as in investment mechanisms (TRACs or ETFs) to replicate the behavior of emerging market currencies Euros and / or Dollars.

***The Global Fixed Income Oportunities Composite*** may invest in debt issued in foreign securities markets either directly or through international investment companies of the Principal Global Investors fund family.

***The Global Fixed Income Oportunities Composite*** Creation Date was September, 2016 (The rebalancing of the benchmark is annual) . The minimum account size for this composite is 130 million Mexican Pesos.

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For the purpose of complying with GIPS, Principal Fondos de Inversión, S.A. de C.V. Operadora de Fondos de Inversión Principal Grupo Financiero defines itself as an independent operating division of Principal Financial Group with operations specific to Mexico.

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Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm’s policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.”

A list of composites descriptions is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The Mexican Peso is the currency used to express performance. Returns are presented gross and net of actual management fees incurred in the management of the portfolios.

The composite does not have sufficient portfolios for any period to present a meaningful measure of dispersion.

Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.

The management fee schedule varies depending upon type and amount of assets managed. As an example for individuals the fee schedule is an Annual Fee of 1.40%. Actual investment advisory fees incurred by clients may vary.

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### **GENERAL DISCLOSURE REQUIREMENTS:**

# PFI INVESTMENT MANAGEMENT, LLC

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## PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

### Appendix C – Disclosure Checklist

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- Definition of the “firm” used to determine total firm assets and firm-wide compliance.
- Composite description.
- Benchmark description.
- If any other fees are deducted in addition to the trading expenses and/or investment management fees.
- When presenting net of fees returns:
  - If model or actual investment fees are used, and
  - If returns are net of any performance-based fees.
- Currency used to express performance.
- Measure of internal dispersion presented.
- Fee schedule appropriate to the compliant presentation.
- Composite creation date.
- List of composite descriptions is available upon request.
- Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request.
- Presence, use, and extent of leverage, derivatives, and short positions, if material, including a description of the frequency of use and characteristics of the instruments sufficient to identify risks.
- All significant events that would help a prospective client interpret the compliant presentation.
- Periods of non-compliance for any performance presented for periods prior to January 1, 2000 that does not comply with the GIPS standards.
- If the firm is redefined, the date of, description of, and reason for the redefinition.
- If a composite is redefined, the date of, description of, and reason for the redefinition.
- Changes to the name of a composite.
- Minimum asset level, if any, below which portfolios are not included in a composite. Also any changes to the minimum asset level.
- Relevant details of the treatment of withholding taxes on dividends, interest income, and capital gains, if material.  
Also if benchmark returns are net of withholding taxes if this information is available.
- For periods beginning on or after January 1, 2011, describe any known material differences in exchange rates or valuation sources used among the portfolios within the composite, and between the composite and the benchmark.
- If the compliant presentation 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.
- For periods prior to 1/1/2010, if carve-outs are included in a composite, the policy used to allocate cash to carve-outs.
- For periods beginning on or after January 1, 2006, the use of a sub-advisor and the periods a sub-advisor was used.
- For periods prior to January 1, 2010, if any portfolios were not valued at calendar month end or on the last business day of the month.
- For periods beginning on or after January 1, 2011, the use of subjective unobservable inputs for valuing portfolio investments (as described in the GIPS Valuation Principles) if the portfolio investments valued using subjective unobservable inputs are material to the composite.
- For periods beginning on or after January 1, 2011, if the composite’s valuation hierarchy materially differs from the recommended hierarchy in the GIPS Valuation Principles.
- If the firm determines no appropriate benchmark for the composite, why no benchmark is presented.
- If the benchmark changes, the date of, description of, and reason for the change.
- If a custom benchmark or combination of multiple benchmarks is used, the benchmark components, weights, and rebalancing process.
- If accounts are removed due to significant cash flows, how the firm defines a significant cash flow for that composite and for which periods.
- The three-year annualized ex-post standard deviation of the composite and/or benchmark is not presented because 36 monthly returns are not available.

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## PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

### Appendix C – Disclosure Checklist

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- If the three-year annualized ex post standard deviation is not relevant or appropriate:
  - Describe why ex-post standard deviation is not relevant or appropriate; and
  - Describe the additional risk measure presented and why it was selected.
- If the performance from a past firm or affiliation is linked to the performance of the firm.
- At least 5 years of composite performance, or since inception if less than 5, that comply with GIPS standards. Once a 5 year history is shown, firms must add an additional year of performance each year so that eventually a 10- year performance record is shown. Firms that previously claimed compliance with the AIMR-PPS standards must continue to show 10 years of composite performance, or since inception.
- Annual composite returns for all years shown. Returns for periods less than one year may not be annualized.
- For composites with an inception date of January 1, 2011 or later, when the initial period is less than a full year, returns from the composite inception date through the initial annual period end.
- For composites with a termination date of January 1, 2011 or later, returns from the last annual period end through the composite termination date.
- Annual benchmark total returns for all years shown.
- The number of portfolios and amount of assets in the composite at year-end for each year shown. If the composite contains five or fewer portfolios the actual number of portfolios is not required.
- Either the total firm assets or the percentage of total firm assets the composite represents at year-end for each year shown.
- A measure of dispersion of individual portfolio returns for each annual period shown (not required if five or fewer portfolios for full year).
- If applicable, the percentage of the composite that is comprised of non-fee-paying accounts at year-end for each year shown.
- For periods beginning on or after January 1, 2006 and ending prior to January 1, 2011, if a composite includes carve-outs, the Firm must present the percentage of composite assets represented by carve-outs as of each annual period end.
- For periods ending on or after January 1, 2011, Firms must present, as of each annual period end:
  - The three-year annualized ex-post standard deviation (using monthly returns) of both the composite and the benchmark; and
  - An additional three-year ex post risk measure for the benchmark (if available and appropriate) and the composite, if the Firm determines that the three-year annualized ex post standard deviation is not relevant or appropriate. The periodicity of the composite and the benchmark must be identical when calculating the expost risk measure.
- Performance track records of a past firm or affiliation must be linked to or used to represent the historical performance of a new or acquiring firm if all the portability requirements can be met on a composite specific basis.

#### **ADDITIONAL DISCLOSURE AND STATISTICAL REPORTING REQUIRMENTS FOR BUNDLED FEE (WRAP) COMPOSITES:**

# PFI INVESTMENT MANAGEMENT, LLC

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## PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

### Appendix C – Disclosure Checklist

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- The various types of fees included in the bundled fee.
- In presentations that include periods prior to the inclusion of actual wrap fee/SMA accounts in the composite, disclose for each year presented that the composite does not contain actual wrap fee/SMA accounts.
- Periods of non-compliance for any performance presented for periods prior to January 1, 2006 that does not comply with the wrap provisions of the GIPS standards.
- When firms present composite performance to an existing wrap sponsor that includes only that sponsor's wrap fee accounts:
  - Disclose the name of the wrap sponsor represented by the sponsor-specific composite; and
  - If the sponsor-specific presentation is intended for the purpose of generating wrap fee business and does not include performance net of the entire wrap fee, disclose that the named sponsor-specific presentation is only for the use of the named wrap sponsor.
- The percentage of composite assets that is bundled fee portfolios at year end for each annual period shown.
- Performance must be shown net of the entire wrap fee when presenting performance to a wrap fee prospective client.
- If presenting gross returns, performance must be reduced by the actual direct trading expenses, the entire bundled fee or the portion of the bundled fee that includes the direct trading expenses (Estimates are not permitted.) If presenting pure gross returns, they are labeled supplemental.
- Cannot link non-GIPS compliant performance for periods beginning on or after January 1, 2006 to GIPS compliant performance. Permitted to link non-GIPS compliant performance to GIPS compliant performance provided that only GIPS compliant performance is presented for periods on or after January 1, 2006.
- When presenting performance to a wrap fee/SMA prospective client, the composite presented must include the performance of all actual wrap fee/SMA portfolios, if any, managed according to the composite investment mandate, objective, or strategy, regardless of the wrap fee/SMA sponsor.

#### GIPS DISCLOSURE AND STATISTICAL RECOMMENDATIONS:

- Material changes to valuation and calculation policies and/or methodologies.
- Material differences between the benchmark and the composite's investment mandate, objective, or strategy.
- Key assumptions used to value portfolio investments.
- If part of a parent company, a list of the other firms contained within the parent company.
- For periods prior to January 1, 2011 the use of subjective unobservable inputs for valuing portfolio investments (if material).
- For periods prior to January 1, 2006, the use of a sub-advisor and the periods.
- If a composite contains proprietary assets.
- Gross of fees returns.
- Cumulative returns of the composite and benchmarks for all periods shown.
- Equal-weighted mean and median composite returns.
- Quarterly and/or monthly returns.
- Annualized composite and benchmark returns for periods longer than 12 months.
- For periods prior to January 1, 2011, the 3-year annualized ex-post standard deviation (using monthly returns) of the composite and the benchmark as of each annual period end.
- The annualized return of the composite and the benchmark for each period the annualized standard deviation of the composite and benchmark are presented.
- The annualized standard deviation (using monthly returns) of the composite and the benchmark for each period the annualized return of the composite and the benchmark are presented.
- Relevant composite level risk measures, i.e. beta, tracking error, modified duration, information ration, Sharpe ration, Treynor ratio, credit ratings, value at risk (VaR), and volatility.

#### ADVERTISEMENTS WITHOUT PERFORMANCE:

# PFI INVESTMENT MANAGEMENT, LLC

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## PERFORMANCE MEASUREMENT – GLOBAL INVESTMENT PERFORMANCE STANDARDS

### Appendix C – Disclosure Checklist

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- The definition of the firm.
- How a prospective client can obtain a compliant presentation and/or the firm's list of composite descriptions.
- The GIPS compliance statement for advertisements: "[Insert name of Firm] claims compliance with the Global Investment Performance Standards (GIPS®)."

#### ADVERTISEMENTS WITH PERFORMANCE:

- The definition of the firm.
- How a prospective client can obtain a compliant presentation and/or the firm's list of composite descriptions.
- The GIPS compliance statement for advertisements: "[Insert name of Firm] claims compliance with the Global Investment Performance Standards (GIPS®)."
- The composite description.
- Composite total returns according to one of the following:
  - 1-, 3-, and 5- year annualized composite returns through the most recent period with the period end date clearly identified (and since inception if the composite has been in existence for less than five years).
  - Period-to-date composite returns in addition to either:
    - o 1-, 3-, and 5- year annualized composite returns with the period end date clearly identified (and since inception if the composite has been in existence for less than five years).
    - o 5 years of annual composite returns with the end-of-period date clearly identified (or since composite inception if less than 5 years).
- Whether returns are presented gross and/or net of fees.
- Benchmark total returns for the same periods for which the composite return is presented.
- The benchmark description.
- The reason why no benchmark is presented if the firm determines no appropriate benchmark for the composite exists.
- The currency used to express performance.
- The presence, use, and extent of leverage, derivatives, and short positions, if material, including a description of the frequency of use and characteristics of the instruments to identify risks.
- If any performance presented for periods prior to 1/1/2000 does not comply with GIPS and the periods of noncompliance.
- If the advertisement conforms with laws and/or regulations that conflict with the requirements of the GIPS standards and/or the GIPS Advertising Guidelines and the manner in which the laws and/or regulations conflict with the GIPS standards and/or Advertising Guidelines.

#### DISCLOSURES REQUIRED BY THE SEC:

- Past performance is not indicative of future results.
- Whether or not returns include the reinvestment of income.
- Whether returns are presented gross and/or net of fees.
- If performance numbers are on a page other than the disclosure page, reference from the performance page to the disclosure page.
- If gross of fees only:
  - The word "reduced" must be used in describing the effect of the management fee on the gross return.
  - There must be a numeric example showing the compounding effect of management fees over a period of years.
- For Advertisements with performance, net performance must be shown. Gross may be shown as well, but net must be equally prominent.