



Proxy Voting Policy

Frontier's Investment Department votes all proxies of securities over which it has discretion. Frontier relies on its custodians to determine the accounts over which it has proxy voting authority. The Investment Department's mandate in voting proxies is to vote them in a manner that is in the best interest of the client for whom they are voted.

All proxy materials received at Frontier are reviewed by the Investment Department and a written recommendation is made regarding the manner in which the proxies are to be voted and the reasons for the recommendation. The recommendations are discussed and approved within the Investment Department. Proxies are then voted by a member of the Investment Department at www.proxyvote.com.

Occasionally, Frontier obtains discretion over securities that are transferred into an account with the understanding that Frontier will sell them as it builds a portfolio for the client. When Frontier receives proxies with respect to such securities, it is our policy to abstain from voting them. In the rare occurrence that we receive a proxy for a security over which we do not have discretion, it is our policy to forward the proxy to the investment advisor or other individual who has discretion over that security. In the event that there is not time to forward the proxy, Frontier will use reasonable efforts to seek direction from the advisor or individual about how the proxy should be voted and will vote accordingly.

In the event that Frontier identifies a potential conflict between its interests and those of a client with respect to the voting of a proxy, Frontier will notify and seek guidance from the client, through that client's investment advisor. The notification will state the nature of the potential conflict and provide any other information necessary to enable the client, through their investment advisor, to provide Frontier with guidance regarding the voting of the proxy. In the event Frontier does not receive timely direction or guidance regarding the voting of the proxy, Frontier will abstain from voting the proxy.

The Investment Department will record all proxies that Frontier receives in the Proxy Vote database. We record: date received, cutoff date, date voted, name of the issuer, control number, how issues were voted, the reasoning behind the vote, and the confirmation of the vote. In any case where a proxy is forwarded to another party, an electronic copy of the accompanying communication is kept in the Proxy Vote database. Frontier saves all proxy material for a period of 5 years or such other period as may be required by law.

Clients may request a copy of the specific details of any proxy that was voted for their account by contacting us at (877) 673-5675, or at info@frontierasset.com.