

Trading Policies and Procedures

As a participant in your employer's retirement Plan, you are always in control of your investments, and you are responsible for making all decisions about whether to participate in your Plan and where to invest your account. Vestwell does not provide legal, tax, accounting, or any personal investment advice to any participant. We provide fee disclosures and other notices to help you understand the Plan's benefits, rights, and features. You should read them carefully; they are all located in the participant portal on the platform, and we sent them to you with your welcome email. You may also wish to consult with your own financial or other professionals before making any investment decisions. All transactions on our platform will be subject to these Trading Policies, which may be updated from time to time. If you have any questions about these policies or need technical assistance, please contact help@vestwell.com.

1. All Transactions are Subject to Rules and Procedures

All transactions, including investment changes, loans, and distribution processing, are subject to rules and procedures promulgated by the National Securities Clearing Corporation, the fund provider of any investment you select for your account, as well as our custodian and sub-custodian's rules and procedures regarding excessive trading, marketing timing, and other legal requirements. All transactions initiated after 3:30 pm EST will be processed on the following trading day when the New York Stock Exchange is open for business. Vestwell will not be liable for any losses or decline in value due to market conditions or any other factors between the time a transaction is initiated and processed.

2. Changing Investment Selections and Allocations

After enrolling in the Plan, you can select initial investments using various methods to accommodate participants' comfort levels with choosing their investments. All investment options available to your Plan are selected by your Plan's investment fiduciary and you may or may not have all of the investment methods described below:

- Core Lineup – provides a diverse lineup of low cost funds.
- Age-Based Investments – A set of Target Date Funds or target date models aligned to the year in which the participant plans to retire. We assume that participants intend to retire at age 65 by default if the participant does not indicate a desired age of retirement. Participants can select more or less conservative options from the Age-Based Investment that is displayed to them.
- Risk-Based Investments – A series of model portfolios that allow participants to select from a range of conservative to aggressive strategies.
- Goal-Based Investments - This is Vestwell's Managed Accounts feature that incorporates the investment options that your Plan's investment fiduciary has selected for your Plan. Based on information that you and/or your employer provide to us, the service suggests a possible investment allocation that you can accept or change at any time. This feature is not available for all Plans on our platform at this time.

Investment education materials with information about these options are available on the participant portal of our platform.

After selecting initial investments, you can change your selections at any time by logging into your account. Participants can make one change per day by following instructions on our platform. Changes submitted before 3:30 pm EST and submitted to us in Good Order¹ will usually be executed that same business day; selections submitted after that time will be executed on the following business day. If a participant submits multiple changes in one day, only the last of those changes submitted prior to the cut-off time will be implemented.

The only time participants cannot change their investment selection is when the Plan is in a temporary blackout period and, in that instance, changes cannot be made to Plan assets that are being transferred to our platform from a prior recordkeeper. Participants will receive a Blackout Notice if restrictions apply to them.

3. The Investment Manager's Role in Monitoring and Changing Investments Offered by your Plan

Your Plan's investment fiduciary is identified in fee disclosure notices provided to you with your welcome notice and annually. The investment fiduciary selects and monitors the

¹ Good Order means that all information applicable to the specific transaction at issue has been provided and submitted in the form and format we require.

investment options available to Plan participants and will also review the performance, fees, and other aspects of the investment options and may make changes to the investment menu. If any material changes are made to the investment options available to your Plan, they will be communicated to participants. When your Plan's investment fiduciary makes a change to the allocations of a model strategy or Target Date Fund that you are invested in, your full account balance may be automatically rebalanced to reflect the new allocations.

4. Account Rebalancing

Over time, the investment allocations in your account may drift from the original target allocations that you created when you last made your investment selections. For instance, the Moderate Aggressive Strategy has a target allocation of 20% fixed income and 80% equity. Stocks generally increase in value faster than fixed income instruments, so the stock portion of the model portfolio, for example, could increase in value faster than the fixed income portion.

When drift occurs, you can choose to rebalance your account (either on a one-time or recurring basis) and we will take appropriate steps to buy and sell securities to conform to your selected allocations. You may also enable or disable recurring automatic rebalancing at any time. If you enable automatic rebalancing, we will rebalance your account on a quarterly basis.

If you are using the Managed Account feature of our platform, your account may rebalance if you enter additional information into your profile. Participants using the Managed Account feature are not permitted to turn off automatic rebalancing or access rebalance settings on our platform. Participants using this feature will have their accounts rebalanced on a quarterly basis as well as anytime the account increases by 5% of the account balance or \$5,000.00.

5. Changes to Models and Core Lineup

Our platform requires the investment fiduciary for your Plan to submit the initial investment lineup or changes to it in a specific format. In general, changes made within a model (including fund additions or removals as well as allocation changes) take at least ten business days to process after submission in Good Order. Changes to the core lineup take a minimum of 45 days to process because we are legally required to send a notice to affected participants and eligible employees generally at least 30 days ahead of the change.

6. Investment Performance

You can view investment performance for all holdings in their retirement Plan by logging into your account and accessing the "Portfolio" tab. Our platform will update your account with

the performance of your selected investments shortly after the first full month in which your account has a balance.

Within the “Portfolio” section of the portal, you can also view the names, allocation, market value, and expense ratio of the individual funds in your account. You can also access factsheets for each fund, which provide additional information about investments such as the general strategy and top five holdings. Factsheets are updated on a monthly or quarterly basis.

Investments

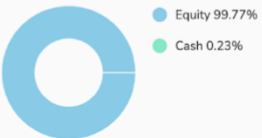
Holdings
Performance

You are invested in the following funds

FUND	PORTION	POSITION	ASSET CLASS	EXPENSE RATIO
IJR iShares Core S&P Small-Cap ETF	50.70%	\$88,962.12 1455.29 Shares	--	--
SCHG Schwab US Large-Cap Growth ETF™	49.30%	\$86,492.47 1414.89 Shares	US Equity	0.04%

Investment
Fund Lineup
Custom Option
[Manage Your Investments](#)

Target Asset Allocation



Additionally, by clicking on “Transactions,” participants can view all activity within their account. This includes contributions, withdrawals, dividends, rebalances, fees, and any other account activity. The Transaction Log is updated as of the close of the previous business day. If you notice any activity that you do not recognize or did not authorize, you must contact us immediately at help@vestwell.com or call (917) 979-5358.

7. Statements

Participants are provided with account statements each quarter. All statements will be posted shortly after the end of each calendar year quarter in the “My Plan” section of the participant portal. These statements provide participants with details regarding the previous quarter's contributions, holdings, investment earnings, and balance. If you notice any activity that you do not recognize or did not authorize, you must contact us immediately at help@vestwell.com or call (917) 979-5358.

8. Loans

Your Plan may allow participants to borrow against their vested retirement Plan account balance to purchase a primary home or for other purposes. Please refer to your Plan document and Loan Policy Statement to confirm whether your employer adopted a loan feature and instructions about obtaining one. Please note that your Plan may impose limits

regarding how many loans one participant can take at any time, as well as the maximum amount of any loan. Participants who wish to borrow against their retirement plan balance can submit an application on our platform. It generally takes seven to ten business days to review a loan application after it is submitted in Good Order. Please note that if you have terminated your employment with the company whose Plan was serviced by Vestwell, you are no longer eligible to take a loan from your account. There is also a fee to initiate a loan and to annually service it; this fee is disclosed to you on fee disclosure notices that are provided to you with your registration and annually.

9. Hardship Withdrawals

Your Plan might also permit participants to withdraw from their vested account balance in case of a financial hardship. The IRS requires certain documentation or confirmation from the participant in order to obtain a hardship withdrawal. We rely solely on your certification and documentation that you submit to us with any hardship withdrawal request and you will be responsible for all penalties, fines, and other losses in the event you submit any false or inaccurate information to us. Participants can submit an application on our platform. It generally takes seven to ten business days to review a hardship application once it is submitted in Good Order. You must be a current employee to be eligible to take a hardship withdrawal.

10. Proxy Voting

We do not provide services with respect to voting proxies for securities held by the Plan nor take other action related to the exercise of shareholder rights regarding such securities.

If you have any additional questions about these Trading Policies, please contact us anytime at help@vestwell.com.