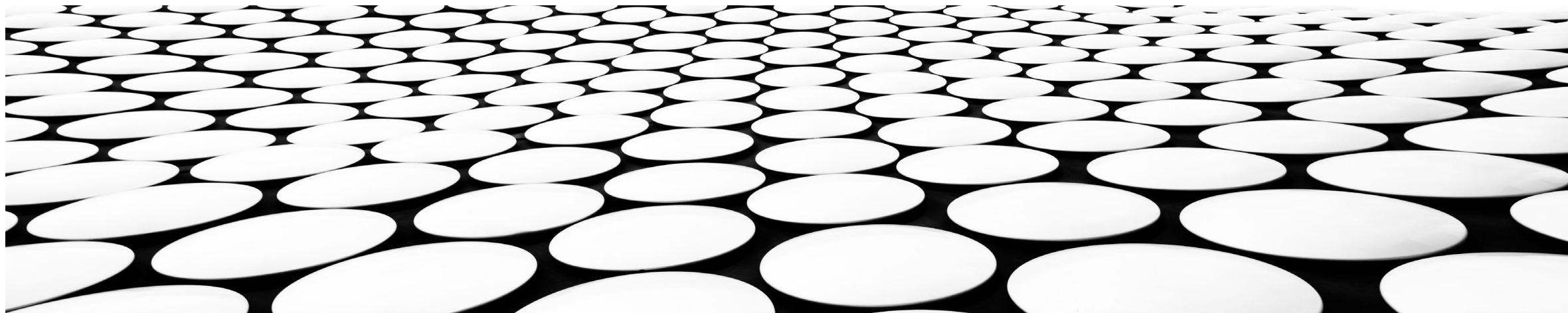


401(K) STEWARDSHIP REPORT OVERVIEW

2024 401(K) WORKSHOP

MAY 21, 2024



STEWARDSHIP REPORT CONTENTS

- Overview of Program Structure and VBA Benefits Corp. Value Proposition
- Independent Investment Review & SageView Response – PRM Consulting conducted an independent review of the current investment line-up
- 2023 Investment Performance – YE highlights, watch list activity and investment fund changes
- Participant Education Enhancements – Dedicated financial advisor; focus on participants' financial wellbeing
- 2023 Plan Design and Fee Benchmarking
- SECURE Act 2.0 Optional Plan Provisions – Available in 2024 & 2025
- Voya Plan Review – Customized utilization report and plan participation data

SBA PROGRAM'S 401(K) STRUCTURE

Entity	Roles & Responsibilities
Employer	Plan Sponsor and Fiduciary
VBA Benefits Corporation	Co-fiduciary and Trust Sponsor
Voya/Voya Institutional Trust Company	Recordkeeper, Trustee and Custodian
SageView Advisory Group	3(38) Investment Manager Fiduciary

SBA plan structure is a Master Trust plan:

- Master Trust allows aggregation of transactions of participating employers' retirement plans to provide simplified plan/trust accounting and governance
- Each member company is considered a single plan; benefit and contribution levels decided at individual plan
- One employer cannot be held liable for any grievances filed against another plan in the program because each plan is considered a single plan within the Master Trust.

SBA PROGRAM'S 401(K) VALUE PROPOSITION



Administration

Plan Design Consulting

- Updates on latest retirement plan trends and legislative changes
- Community bank benchmarking
- Review existing plan documents and recommended best practices
- Keeping plans updated on SECURE Act 2.0 provisions

Workshops & Webinars

- HR Training

Vendor Management

- Due diligence on investment manager and recordkeeper can be provided to auditors and regulators
- Monitor performance standards of vendors



Fees

Commensurate with services

- Regularly review service providers to ensure compliance with DOL's guidance on reasonable fees

Competitive

- Routinely evaluate fees and deliverables for comparison to industry benchmarks

Transparent

- Review and facilitate Plan Sponsor and employee fee disclosure

Independently benchmarked

- Work with independent consultants to conduct fee and investment market analysis



Fiduciary

SageView Participant Help Center

- Dedicated contact for point in time fiduciary level advice

3(38) Investment Manager

- SageView selects, monitors and manages investments
- Adhere to ERISA standards to serve solely in the best interest of plan participants

Formal Investment Policy Statement (IPS) & Investment Committee

- SageView adheres to IPS as directed by VBA Benefits Board
- Investment Committee (subset of Board) meets quarterly to review investment performance and fees

VBA Benefits Corporation Board Oversight

- Board members participate in plan and monitor operations and performance



Legal & Compliance

Plan Documents/IRS & DOL Filings

- VBA files all required IRS documents on behalf of member
- Provide model documents in partnership with ERISA attorney

ERISA and Audit Support/Non-discrimination testing

- Voya completes non-discrimination testing on behalf of member
- ERISA attorney available to assist VBA with member inquiries
- VBA completes a master trust audit on behalf of member

Required Disclosure and Participant Fulfillment

- Participant disclosures/notices prepared by Voya and VBA on behalf of member

Merger & Acquisition Support

- Provide consultation and coordinate potential plan transition items

2024 FINANCIAL WELLNESS INITIATIVES



Employee Financial Stats	
▪	62% of Americans want access to financial planning tools, but don't know where to start
▪	65% want a concrete plan to address spending in their retirement years
▪	66% of Americans feel distracted at work due to financial pressures at home
▪	77% of Americans want a more personalized 401(k) experience (advice)

Retirement Industry Response	
▪	SECURE Act 1.0 & 2.0
▪	Shift from plan design focus to participant education focus
▪	Investment in behavior finance and creating customizable financial wellness solutions
▪	Access to a financial advisor for personalized retirement planning and coaching

SAGEVIEW PARTICIPANT HELP CENTER

A complimentary, direct help line for retirement plan participants managed by Patrick Abelon, a Chartered Retirement Specialist (CRPS®), and Certified Retirement Counselor (CRC®) professional available to offer personal, targeted fiduciary advice on:



401(k) and outside
investment allocation



Rollover assistance



Retirement planning



Insurance



Annuities



Patrick Abelon, CRPS®, CRC®
Retirement Plan Consultant
804.305.7208
pabelon@sageviewadvisory.com

Patrick is a Retirement Plan Consultant, based out of the Virginia office, providing institutional clients with in-depth analysis of retirement plan investment options and other relevant information to assist them in their fiduciary investment decisions on behalf of plan participants.

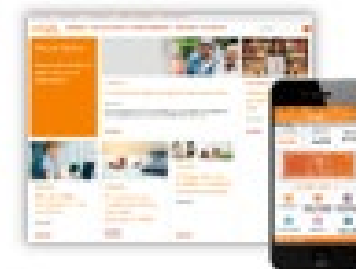
Scan the QR code to schedule a one-on-one appointment with Patrick



2024 PARTICIPANT EDUCATION PLAN

- Voya Quarterly Webinars
 - March 28 – Participant Website Demo (New Dashboard)
 - June 26 – Foundations of Financial Wellness
 - September 24 – Building a Budget
 - December 4 – Saving for College and Prioritizing Debt
- SageView Quarterly Financial Wellness Webinars
 - February 21, March 20 – Healthy Habits (debt management, automating)
 - April 17, May 22, June 26 – Investment Insights (TDF, investment strategies)
 - July 24, August 21, September 18 – Retirement Readiness (taxes and healthcare in retirement)
 - October 23, November 13, December 11 – Financial Fitness (529 plans, HSA, Roth vs traditional)
- SageView Workshop for SBA Members
 - October 10 – Retirement Readiness and Distribution Options
- Digital Resources
 - Content hubs (<https://blog.voya.com> and www.voya.com/voyalearn)
 - Mobile app, myOrangeMoney, financial wellness tools

Digital resources



Voya Learn
Live and On-Demand

COMPETITIVE COMMUNITY BANK BENCHMARKING

- **Plan Design Features**
 - Average employee deferral
 - Average participant account balance
 - Participation rate
 - Eligibility and vesting
 - Roth contributions and rollovers
 - Auto-enrollment and auto-escalation features
 - In-service distribution option (age 59.5)
 - Safe harbor
 - Loan provisions
 - Forfeiture options
- **Fee Comparison – Plan-specific**
 - Recordkeeping - Voya
 - Plan administration – Voya and VBA Benefits Corp, (includes legal and compliance, audit)
 - Trustee – Voya Trust
 - 3(38) Fiduciary – SageView Advisory
 - Mutual fund expenses – charged by mutual fund companies and varies by individual fund

APPENDIX & DUE DILIGENCE ITEMS

- **Fiduciary Duties & Responsibilities** – Listing of responsibilities for each party involved with administering plan
- **Retirement Plan Compliance Calendar** – Listing of compliance items, frequency and entity responsible
- **Cost of Living Adjustments** – Key cost of living adjustments affecting dollar limitations to retirement plans
- **Independent Investment Review** – PRM investment performance analysis on SBA fund lineup
- **4th Quarter 2023 Investment Review** – SageView investment performance analysis for Investment Committee and Benefits Board