SERVICE PROVIDER FEE DISCLOSURE

Lifecycle Select Target Date Funds

WILSHIRE ADVISORS INVESTMENT PROGRAM | VESTWELL PLATFORM

The Lifecycle Select target date funds are a series of collective investment trusts ("CITs") trusteed by Great Gray Trust Company, LLC and sub-advised by Wilshire Advisors, LLC. Among their underlying investments, the funds hold a Guaranteed Interest Contract ("GIC") issued by Teachers Insurance and Annuity Association of America ("TIAA").

In connection with non-fiduciary administrative and recordkeeping services that Vestwell provides related to the operation and administration of the TIAA GIC, TIAA pays Vestwell Holdings, Inc. ("Vestwell") a service fee. Per Vestwell's agreement with TIAA, the basis of this compensation is for ongoing support services related to the administration and operation of a TIAA guaranteed interest contract utilized as an underlying investment of the Great Gray Lifecycle Select Index Series. These services include call center support for participant and sponsor inquiries, operational support for market value adjustment processing, data and reporting services, and recordkeeping at the plan, account, and participant level.

These services are incorporated into an agreement between Vestwell and TIAA.

PAYER	Teachers Insurance and Annuity Association of America (TIAA)
RATE	0.75% per annum (75 basis points)
BASIS	Calculated daily on the balance of the TIAA GIC held within the fund; paid quarterly
REFLECTED IN EXPENSE RATIO?	No, the compensation is paid directly by TIAA to Vestwell; not deducted from fund assets or reflected in the fund's stated expense ratio
WHO CONTROLS THE GIC ALLOCATION?	The fund's sub-advisor, Wilshire Advisors, LLC; not Vestwell.

The GIC allocation varies across target date vintages and may change over time as Wilshire manages the fund series. Because the allocation is not fixed, the dollar amount of the fee cannot be stated in advance. It is determined by multiplying 0.75% by the TIAA GIC balance, which fluctuates based on Wilshire's investment management decisions and participant activity. Upon request, Vestwell can provide the amount of fees it received in connection with the Lifecycle Select target date series for your Plan. The fees Vestwell receives are also disclosed in the Plan's Form 5500 as required.

Affected funds (all current and future vintages): Lifecycle Select 2015, 2020, 2025, 2030, 2035, 2040, 2045, 2050, 2055, 2060, 2065, 2070.

For a complete description of the fund's current holdings and allocations, please refer to the fund's fact sheet and offering memorandum, available from your plan sponsor or Vestwell.

Note on Conflicts of Interest

This fee creates a financial relationship between Vestwell and TIAA and a potential conflict of interest. TIAA, or an affiliate, is an investor in Vestwell. However, for purposes of this disclosure and to mitigate against the potential conflict or financial incentive, Vestwell serves solely as the Plan's non-fiduciary recordkeeper and has no authority to select these funds, retain them in the lineup, or allocate assets within them. All of those decisions are made exclusively by the plan's fiduciary investment manager to mitigate any potential conflict of interest. Accordingly, this fee does not create a conflict of interest with respect to any investment decision affecting the Plan.

Form 5500 Schedule C Reporting

The compensation described in this disclosure constitutes indirect compensation for purposes of Schedule C of the Plan's annual Form 5500 filing.

This document is intended to serve as the written disclosure that enables the Plan to use the Eligible Indirect Compensation (EIC) alternative reporting method on Schedule C. Under the EIC method, the Plan sponsor may satisfy Schedule C reporting by confirming that appropriate written disclosures were received from the covered service provider, rather than itemizing the details of each indirect compensation arrangement. The Plan sponsor should retain this disclosure and make it available upon request in connection with any audit or regulatory inquiry. Vestwell will account for this compensation in preparing the Plan's annual Form 5500.

This disclosure is provided in connection with Vestwell's obligations as a covered service provider under ERISA Section 408(b)(2) and in connection with participant fee disclosure requirements under ERISA Section 404(a)(5). It supplements the Investment Comparison Chart for the Plan.