



Wilshire Multi-Manager Stable Value Fund

WILSHIRE ADVISORS INVESTMENT PROGRAM | VESTWELL PLATFORM

The Wilshire Multi-Manager Stable Value Fund is a collective investment trust trusteesd by Great Gray Trust Company and sub-advised by Wilshire Advisors, LLC. The fund holds, as underlying investments, Guaranteed Interest Contracts ("GICs") issued by four insurance companies, along with other underlying investments. 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.

Each of the four GIC issuers pays Vestwell Holdings Inc. ("Vestwell") a fee for non-fiduciary administrative and recordkeeping services that facilitate the availability and ongoing administration of that insurer's GIC within the fund. These services are incorporated into an agreement between Vestwell Holdings Inc. and each GIC Issuer and include maintaining sub-accounting records at the plan, account, and participant level; processing participant and plan-level transaction requests (contributions, exchanges, withdrawals); enforcing equity wash provisions; monitoring for excessive trading; and providing periodic reporting to the fund's trustee and insurers.

There are four separate arrangements, one per GIC issuer:

GIC ISSUER	ANNUAL RATE TO VESTWELL	FEE BASIS
Athene Annuity and Life Company	1.00% (100 bps)	Average Daily Balance for the GIC balance in the collective fund
Nationwide Life Insurance Company	1.00% (100 bps)	Average Daily Balance for the GIC balance in the collective fund
Mutual of America Life Insurance Company	1.00% (100 bps)	Average Daily Balance for the GIC balance in the collective fund
Pacific Life Insurance Company	1.00% (100 bps)	Average Daily Balance for the GIC balance in the collective fund

Each fee is paid directly by the applicable insurer mentioned above to Vestwell and is not deducted from the fund's assets or reflected in the fund's stated expense ratio. The Wilshire Multi-Manager Stable Value Fund also includes other investments that do not generate any compensation for Vestwell.

Who controls the allocations? The fund's sub-advisor, Wilshire Advisors, LLC, not Vestwell. The allocation among the four GICs and other components may vary over time based on Wilshire's portfolio management decisions and the fund's liquidity requirements.

Because each GIC's allocation within the fund fluctuates, the dollar amount of each fee cannot be stated in advance. Each fee equals 1.00% multiplied by that insurer's GIC balance, which changes based on Wilshire's investment decisions. Upon request, Vestwell can provide the amount of fees it received in connection with the stable value fund for your Plan. The fees Vestwell receives are also disclosed in the Plan's Form 5500 as required.

Note on Conflicts of Interest

These fees create financial relationships between Vestwell and each of the four GIC issuers. Additionally, an affiliate of Nationwide Life Insurance Company is an investor in Vestwell. The GIC issuers do not have any other relationship or common ownership with Vestwell or its affiliates. However, to mitigate against any potential conflict or financial incentive, Vestwell serves solely as the Plan's non-fiduciary recordkeeper and has no authority to select this or any other fund, retain it in the lineup, or direct the allocation of the fund's assets among its underlying investments. All such decisions are made exclusively by the Plan's investment fiduciary to mitigate any potential conflict of interest. Accordingly, these fees do 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 §408(b)(2) and in connection with participant fee disclosure requirements under ERISA §404(a)(5). It supplements the Investment Comparison Chart for the Plan.