

Trivalent International Developed Equity Strategy

Composite Performance Notes

Year Ending	Gross Return	Net Return	Benchmark	3yr Annualized Standard Deviation (%) Composite	3yr Annualized Standard Deviation (%) Benchmark	Number of Portfolios	Internal Dispersion	Composite Assets (mm)	Total Firm Assets (mm)
12/31/2019	25.06%	24.29%	22.01%	11.57%	10.81%	≤5	N/M	\$903	\$147,934
12/31/2018	-15.06%	-15.61%	-13.79%	11.66%	11.24%	≤5	N/M	\$164	\$51,500
12/31/2017	26.31%	25.30%	25.03%	11.56%	11.83%	≤5	N/M	\$202	\$60,297
12/31/2016	-1.04%	-1.83%	1.00%	12.07%	12.46%	≤5	N/M	\$167	\$42,934
12/31/2015	4.32%	3.49%	-0.81%	12.37%	12.46%	≤5	N/M	\$159	\$30,889
12/31/2014	-2.55%	-3.13%	-4.90%	13.11%	13.03%	≤5	N/M	\$142	\$33,679
12/31/2013	31.62%	30.91%	22.78%	16.95%	16.25%	≤5	N/M	\$184	N/A
12/31/2012	22.12%	21.62%	17.32%	19.93%	19.37%	≤5	N/M	\$179	N/A
12/31/2011	-12.25%	-12.69%	-12.14%	22.14%	22.43%	≤5	N/M	\$289	N/A
12/31/2010	10.86%	10.38%	7.75%	26.72%	26.23%	≤5	N/M	\$344	N/A

Victory Capital Management acquired composite from Munder Capital Management on 10/31/14. Firm assets prior to 2014 are shown as "N/A" above as the composite was not part of the firm.

1. Victory Capital Management Inc. claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Victory Capital Management has been independently verified for the period from January 1, 2001 through December 31, 2018. Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. The Trivalent International Developed Equity Composite has been examined for the periods January 1, 2014 through December 31, 2018. The verification and performance examination reports are available upon request.
2. Victory Capital Management Inc. (Victory Capital) is a diversified global investment advisor registered under the Investment Advisers Act of 1940 and comprised of multiple investment franchises: INCORE Capital Management, Integrity Asset Management, Munder Capital Management, NewBridge Asset Management, RS Investments, Sophus Capital, Sycamore Capital, Trivalent Investments, USAA Investments, a Victory Capital Investment Franchise; and the VictoryShares & Solutions Platform. Munder Capital Management and Integrity Asset Management became part of the Victory Capital GIPS firm effective November 1, 2014; RS Investments and Sophus Capital effective January 1, 2017; and USAA Investments effective July 1, 2019.
3. The Trivalent International Developed Equity Composite includes all fee paying, non-wrap discretionary portfolios of \$100,000 or more that are managed according to the Trivalent International Developed Equity strategy. The strategy focuses on foreign companies that are characterized by improving business momentum and attractive valuations. Prior to October 2012, the minimum size for inclusion in the composite was \$1 million. Prior to July 2020, the name of the composite was Trivalent International Core Equity. The composite creation date is August 2007.
4. The benchmark of the composite is the MSCI EAFE Index (Net). The MSCI EAFE Index (Net) is a free float-adjusted market capitalization index that is designed to measure developed equity market performance, excluding the U.S. and Canada. The benchmark returns are provided to represent the investment environment existing during the time periods shown and are not covered by the report of independent verifiers. For comparison purposes, the index is fully invested, which includes the reinvestment of income. The returns have been taken from a published source and do not include any transaction fees, management fees, or other costs.
5. The internal dispersion of annual returns is measured by the standard deviation of asset-weighted gross returns of accounts included in the composite for the full year. If less than six portfolios are included in the composite for the full year, no dispersion measure is presented, as it is not considered meaningful (N/M). The three-year annualized ex-post standard deviation measures the variability of the composite and the benchmark returns over the preceding 36-month period. It is not required to be presented for annual periods prior to 2011 or when a full three years of composite performance is not yet available.

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6. Composite and benchmark returns are presented net of non-reclaimable withholding taxes. Gross-of-fees returns are presented before management and custodial fees but after all trading expenses. Net-of-fees returns are calculated by deducting 1/12 of the highest tier of the standard fee schedule in effect for the period noted (the model fee). The composite model fee for each period is either the highest tier of the current fee schedule or a higher value, whichever is required to ensure the model composite net-of-fee return is lower than or equal to the composite net-of-fee return calculated using actual fees. Actual fees may vary depending on, among other things, the applicable fee schedule and portfolio size. Prior to November 2014, net returns for this composite were calculated using actual management fees. The firm's fees are available on request and may be found on Part II of its Form ADV. The complete fee schedule for this product is:

Market Value	Annual Fee
First \$50,000,000	0.60% (Min. Annual Fee: \$60,000)
Next \$50,000,000	0.55%
Above \$100,000,000	0.50%

7. Valuations and returns are stated in U.S. dollars. Past performance should not be considered indicative of future performance. Composite returns reflect the reinvestment of dividends and other earnings. A list of composite descriptions and policies of valuing portfolios, calculating performance, and preparing compliant presentations are available upon request. Registration with the SEC does not imply a certain level of skill or training.
8. The composite is managed by Trivalent Investments, a Victory Capital investment franchise. Performance prior to October 2014 occurred while the team was affiliated with a prior firm. The investment management team has managed the composite strategy since inception and the investment process has not changed. The historical performance has been linked to performance earned at Victory Capital Management.
9. The composite has a policy to temporarily remove accounts from the composite when a significant cash flow occurs. Effective December 2015, a significant cash flow is defined as a cash inflow or outflow of 15% or more of the portfolio value at the beginning of the month. The account is removed from the composite for the month in which that cash flow occurred.