





# FIDUCIARY SUPPORT SERVICES: MITIGATE YOUR RISK

# How Can We Help?

As a plan fiduciary, you have a fiduciary responsibility for prudently selecting and monitoring investment options. This may sound daunting, but you don't have to go it alone.

SWBC Retirement Plan Services, an independent Registered Investment Advisor, offers investment advisory, fiduciary support, and investment management services that are meant to help mitigate the risks of plan fiduciaries.

## Why SWBC?

- Mitigate your fiduciary risk
- Fiduciary investment services at a plan sponsor level
- Choice of 3(21) or 3(38) fiduciary services
- Investment selection and monitoring made easier
- Institutional investment expertise and experience
- QDIA Selection for 3(38) Services

- Commitment to fiduciary responsibilities in writing
- Creation of an Investment Policy Statement for every plan
- · Comprehensive quarterly investment monitoring reports
- No conflicts of interest or bias toward particular funds
- Investment option selection in accordance with ERISA's "prudent expert" rule and diversification requirements

## Who We Are

Headquartered in San Antonio, Texas, SWBC has served financial institutions and businesses across the country for four decades. It is a multi-faceted company with offices across the country.

SWBC Retirement Plan Services (SWBC) is a division comprised of experienced investment professionals who provide unbiased advisory services exclusively to retirement plan sponsors and providers. The investment advisory team that founded SWBC Retirement Plan Services has been providing unbiased advisory and fiduciary services for retirement plan sponsors for more than a decade. SWBC provides these services in order to help plan sponsors fulfill their fiduciary obligations.



### What do we do?

### 3(21) Fiduciary Services

SWBC can act as a limited scope fiduciary under ERISA Section 3(21). Following the recommendations of SWBC can help mitigate your fiduciary risk for prudently selecting, monitoring, replacing, and diversifying investment options that are available under the plan.

### 3(38) Fiduciary Services

SWBC can act as an ERISA Section 3(38) fiduciary to the plan and provide full discretion over the investment selection and monitoring process at the plan level. This service can help you save time and mitigate your fiduciary risk.

	3(21) Fiduciary Services	3(38) Fiduciary Services
Full Written Fiduciary Commitment	Yes	Yes
Investment Policy Statement Provided	Yes	Yes
Investment Selection According to "Prudent Expert" Rule	Yes	Yes
Quarterly Conference Calls	Yes	Yes
Quarterly Monitoring Reports	Customized with the investment options chosen for the plan	Customized with the investment options chosen for the plan by SWBC
Investment Selection and Monitoring	Provided for all investment options on the approved list	Provided by SWBC for the Focus List strategy selected
Investment Replacements	Negative Election	Automatic
Proprietary Funds	No	No
Conflicts of Interest	No	No
Fees	\$75/quarter	0.05%

## WHAT INVESTMENTS SHOULD YOU OFFER YOUR EMPLOYEES?

All plan sponsors are welcome to build their own investment menu from the available investment options when utilizing SWBC's 3(21) fiduciary services. For those plan sponsors needing a little bit of help, or for those who have selected SWBC's 3(38) fiduciary services, we offer plan sponsors three opportunities for constructing your plan's investment menu. You can elect one of the following three directions for the plan under SWBC's 3(21) or 3(38) fiduciary services:

#### 1. The Core Focus List

A preselected list of investments designed to provide participants with a well-rounded selection of investments from the most commonly used asset classes. This list is most appropriate for plans with participants who have a beginning to average level of investment knowledge and understanding of the risks associated with investing. This list currently includes the following investments:

STABLE VALUE/GIC/MONEY MARKET	Federated Capital Preservation R6, GIC, or American Century US Gov't MMkt A
INTERMEDIATE CORE BOND	Vanguard Total Bond Market Index Adm
INTERMEDIATE CORE-PLUS BOND	Dodge & Cox Income
LARGE VALUE	Dodge & Cox Stock I
LARGE BLEND	Vanguard 500 Index Admiral
LARGE GROWTH	JPMorgan Large Cap Growth R6
MID-CAP VALUE	MFS Mid Cap Value R3
MID-CAP GROWTH	MFS® Mid Cap Growth R3
SMALL VALUE	DFA US Targeted Value I
SMALL GROWTH	Franklin Small Cap Growth A
FOREIGN LARGE BLEND	Vanguard Total Intl Stock Index Admiral
FOREIGN LARGE BLEND	American Funds Intl Gr and Inc R6
ALLOCATION-50% TO 70% EQUITY	Vanguard LifeStrategy Moderate Gr Inv
TARGET DATE SUITE	EliteCIT Vanguard

### 2. The Core Plus Focus List

A preselected list of investments designed to provide participants with the greatest assortment of asset classes. This list is most appropriate for plans with participants who have an above-average to advanced level of investment knowledge and understanding of the risks associated with investing, especially as it applies to the more specialized investment categories offered, such as High Yield Bond, Diversified Emerging Markets, and Real Estate. This list currently includes the following investments:

STABLE VALUE/GIC/MONEY MARKET	Federated Capital Preservation R6, GIC, or American Century US Gov't MMkt A
INTERMEDIATE CORE BOND	Vanguard Total Bond Market Index Adm
INTERMEDIATE CORE-PLUS BOND	Dodge & Cox Income
HIGH YIELD BOND	Fidelity Advisor® Capital & Income I
LARGE VALUE	Dodge & Cox Stock I
LARGE BLEND	Vanguard 500 Index Admiral
LARGE BLEND	JPMorgan US Equity R6
LARGE GROWTH	JPMorgan Large Cap Growth R6
MID-CAP VALUE	MFS Mid Cap Value R3
MID-CAP BLEND	Vanguard Mid Cap Index Adm
MID-CAP GROWTH	MFS® Mid Cap Growth R3
SMALL VALUE	DFA US Targeted Value I



SMALL BLEND	Vanguard Small Cap Index Adm
SMALL GROWTH	Franklin Small Cap Growth A
FOREIGN LARGE BLEND	Vanguard Total Intl Stock Index Admiral
FOREIGN LARGE BLEND	American Funds Intl Gr and Inc R6
DIVERSIFIED EMERGING MKTS	DFA Emerging Markets Core Equity I
REAL ESTATE	Virtus Duff & Phelps Real Estate Secs A
ALLOCATION-50% TO 70% EQUITY	Vanguard LifeStrategy Moderate Gr Inv
TARGET DATE SUITE	EliteCIT Vanguard

### 3. The Passive Focus List

A preselected list of investments designed to provide participants with a strictly index-based, low-cost selection of investments. This list is most appropriate for plans looking for the lowest possible investment cost and/or with participants who have very little investment knowledge or understanding of the risks associated with investing. This list currently includes the following investments:

STABLE VALUE/GIC/MONEY MARKET	Federated Capital Preservation R6, GIC, or American Century US Gov't MMkt A
INTERMEDIATE CORE BOND	Vanguard Total Bond Market Index Adm
LARGE BLEND	Vanguard 500 Index Admiral
MID-CAP BLEND	Vanguard Mid Cap Index Adm
SMALL BLEND	Vanguard Small Cap Index Adm
FOREIGN LARGE BLEND	Vanguard Total Intl Stock Index Admiral
ALLOCATION50% TO 70% EQUITY	Vanguard LifeStrategy Moderate Gr Inv
TARGET DATE SUITE	EliteCIT Vanguard

If the plan sponsor has selected SWBC's 3(38) fiduciary services, the Focus List methodology selected by the plan sponsor will be the entirety of their plan's investment offering. In addition, SWBC will designate the target date suite included in the Focus List as the plan's Qualified Default Investment Alternative ("QDIA").

If the plan sponsor has selected SWBC's 3(21) fiduciary services, the plan sponsor may select a Focus List as a standalone menu of investments or in conjunction with other investment options available to their plan. SWBC's fiduciary coverage will extend only to those investments detailed on the approved list as published in each quarter's investment monitoring reports. The Focus Lists include both a target date suite and an allocation fund, both of which serve as potential QDIA investment options. It will be the responsibility of the plan sponsor to designate a QDIA for the plan under SWBC's 3(21) fiduciary services.

Please note that SWBC's recommendations are limited to the universe of investment options currently available on this recordkeeping platform/product. The investments available on each recordkeeping platform/product are selected entirely by the platform provider with no input from SWBC regarding those investments made available or the share class selected for use with each investment. Each platform provider maintains several recordkeeping platforms/products, each with its own costs and expenses, which ultimately dictate the specific share classes made available within each platform/product. The decision regarding the recordkeeping platform/product to be used, and the associated pricing structure that will apply, is solely that of the retirement plan sponsor and SWBC is, therefore, limited in its recommendations as a result of the plan sponsor's platform decision. It is possible that selection of an alternative recordkeeping platform/product would result in the use of alternative investment share classes, reduced cost, and/or increased investment returns.

All three of the Focus Lists are intended to satisfy the diversification requirements of DOL Section 404(c). Advisory services are offered by SWBC Investment Advisory Services, LLC, d/b/a SWBC Retirement Plan Services, a registered investment adviser with the Securities and Exchange Commission. Such registration in no way implies that the Securities and Exchange Commission approves or endorses SWBC Retirement Plan Services, its services, or any of its marketing materials. Information herein is the proprietary property of SWBC. Any reproduction, republication, redistribution and/or modification of any SWBC content is expressly prohibited without SWBC's prior written consent. © 2025 SWBC. All rights reserved. SWBC Retirement Plan Services is a wholly owned subsidiary of SWBC. 1092-A8857. Choice. 02/25



