

**PARTICIPANT FEES
ANNUAL DISCLOSURE STATEMENT**

Becket Academy 403(b) Plan (“Plan”)

To: Plan Participants and Beneficiaries
From: Becket Academy, Plan Sponsor
Date: November 11, 2021

This disclosure statement advises you of information regarding fees associated with your participation in the Plan. Part I provides general information regarding the operation of the Plan. Part II provides information regarding charges for administrative expenses the Plan may incur. Part III provides information regarding individual expenses you may incur as a Plan Participant or Beneficiary. The Plan will also distribute an Investment Comparative Chart (“Comparative Chart”) which will inform you about the Plan’s investment alternatives.

Part I. General Plan Information

1. Giving investment instructions.

- In order to initially direct your Plan investments, you must complete an Enrollment and Change Form or make your election on the following website:
<https://www.retirementlogin.net/fpavt/default.aspx>
- After your initial election you should make any investment changes using the website
<https://www.retirementlogin.net/fpavt/default.aspx>:
- You may direct the investment of all funds held in your plan account.

2. Limitations on instructions.

- You may give investment instructions on any day the New York Stock Exchange is open for business. There may be a cutoff time after which trades will be processed on the next business day. Check the website: <https://www.retirementlogin.net/fpavt/default.aspx> for the cutoff time.

3. Voting and other rights.

- The trustee will exercise any voting or other rights associated with ownership of your investments held in your plan account.

4. Designated investment alternatives.

- The Plan provides designated investment alternatives into which you can direct the investment of your plan funds. The Comparative Chart lists these designated investment alternatives and provides information regarding the alternatives.

Part II. Administrative Expenses. The Plan pays outside service providers for Plan administrative services, such as legal, accounting and recordkeeping services, unless the plan sponsor elects, at its own discretion, to pay some or all of the Plan administrative expenses. The cost for these services fluctuates each year based on a variety of factors. To the extent these expenses are not paid by the plan sponsor the Plan may charge these expenses against your account on a pro-rata basis or per-capita basis. These expenses will be deducted directly from your account.

Part III. Individual Expenses. Your Plan imposes additional charges if you elect to use certain services or features. These charges are imposed specifically against your account, and are not imposed on a plan-wide basis.

The fees listed below apply if you use any of the services or features below:

Fee type	Amount
Distribution Processing Fee	\$100
Distribution Processing Fee with Roth	\$140
QDRO Review Fee	\$125 per hour

Please visit <https://www.retirementlogin.net/fpavt/default.aspx> for a glossary of investment terms relevant to the investment options under this plan.

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

This document includes important information to help you compare the investment options under your retirement plan. If you want additional information about your investment options, you can go to the specific Internet Web site address shown below or you can contact the plan administrator. A free paper copy of the information available on the Web site(s) can be obtained by contacting your plan administrator.

Performance Information

The table below shows how plan investment alternatives have performed over time and allows you to compare them with an appropriate benchmark for the same time periods. Past performance does not guarantee how the investment option will perform in the future. Your investment in these options could lose money. Information about an option's principal risks is available on the Web site(s).

Plan Investment	Average Annual Total Return as of 09/30/2021				Benchmark Returns			
	1yr.	5yr.	10yr.	Inception	1yr.	5yr.	10yr.	Inception
Oppenheimer Developing Markets DIVERSIFIED EMERGING MKTS http://www.tcrfund.com/fund/FUT100/00143W875	15.05	9.78	7.34		20.04	9.99	6.86	Morningstar Emerging Markets Target Mark
HARTFORD SCHROEDERS INTERNATIONAL S1 FOREIGN LARGE BLEND http://www.tcrfund.com/fund/FUT100/41665H441	26.38	13.07		9.83	28.15	13.76	12.49	10.72 Morningstar Global Target Market Exposur
MFS International Diversification R4 FOREIGN LARGE BLEND http://www.tcrfund.com/fund/FUT100/55273G140	18.53	10.86	9.66		28.15	13.76	12.49	Morningstar Global Target Market Exposur
AMG Managers Cadence Emerging Companies FOREIGN SMALL/MID GROWTH http://www.tcrfund.com/fund/FUT100/00170L503	17.88	6.81	13.30		25.62	9.73	8.62	Morningstar Global Markets ex-US GR USD
Metropolitan West Total Return Bond I INTERMEDIATE CORE-PLUS BOND http://www.tcrfund.com/fund/FUT100/592905509	0.15	3.51	4.17		-0.98	2.92	2.97	Morningstar US Core Bond TR Hedged USD
Columbia Contrarian Core LARGE BLEND http://www.tcrfund.com/fund/FUT100/19766M709	31.17	16.22		16.05	30.20	17.18	16.76	16.10 Morningstar US Large-Mid Cap TR USD
MFS Research R4 LARGE BLEND http://www.tcrfund.com/fund/FUT100/552981524	27.16	16.46	16.15		30.20	17.18	16.76	Morningstar US Large-Mid Cap TR USD
Vanguard 500 Index LARGE BLEND http://www.tcrfund.com/fund/FUT100/922908710	29.98	16.86	16.60		30.20	17.18	16.76	Morningstar US Large-Mid Cap TR USD
Harbor Capital Appreciation Inst LARGE GROWTH http://www.tcrfund.com/fund/FUT100/411511504	24.00	24.61	20.23		28.57	22.00	19.25	Morningstar US Large-Mid Cap Broad Growt
JP Morgan Large Cap Growth LARGE GROWTH http://www.tcrfund.com/fund/FUT100/48121L841	22.36	26.99	20.42		28.57	22.00	19.25	Morningstar US Large-Mid Cap Broad Growt
American Century Value Inst LARGE VALUE http://www.tcrfund.com/fund/FUT100/025076605	42.70	9.91	12.73		32.00	12.37	14.19	Morningstar US Large-Mid Cap Broad Value
Dodge & Cox Stock Fund LARGE VALUE http://www.tcrfund.com/fund/FUT100/256219106	50.41	15.17	16.13		32.00	12.37	14.19	Morningstar US Large-Mid Cap Broad Value
Vanguard Mid Cap Index MID-CAP BLEND http://www.tcrfund.com/fund/FUT100/922908645	36.09	14.59	15.55		37.13	15.21	16.07	Morningstar US Mid Cap TR USD

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

Plan Investment	Average Annual Total Return as of 09/30/2021				Benchmark Returns			
	1yr.	5yr.	10yr.	Inception	1yr.	5yr.	10yr.	Inception
BLACKROCK MID-CAP GROWTH EQUITY MID-CAP GROWTH http://www.tcrfund.com/fund/FUT100/091928861	34.43	24.44	20.65		32.46	18.88	17.16	Morningstar US Mid Cap Broad Growth TR U
Goldman Sachs Growth Opportunities Inst MID-CAP GROWTH http://www.tcrfund.com/fund/FUT100/38142Y401	29.75	19.96	17.36		32.46	18.88	17.16	Morningstar US Mid Cap Broad Growth TR U
Fidelity Mid Cap Value MID-CAP VALUE http://www.tcrfund.com/fund/FUT100/316128701	49.07	9.24	13.07		42.30	11.22	14.75	Morningstar US Mid Cap Broad Value TR US
RidgeWorth Mid-Cap Value Equity MID-CAP VALUE http://www.tcrfund.com/fund/FUT100/92837F458	37.76	11.33	13.89		42.30	11.22	14.75	Morningstar US Mid Cap Broad Value TR US
Wells Fargo Special Mid Cap Value MID-CAP VALUE http://www.tcrfund.com/fund/FUT100/94987W513	40.44	11.30		11.77	42.30	11.22	14.75	11.71 Morningstar US Mid Cap Broad Value TR US
PIMCO Income Instl MULTISECTOR BOND http://www.tcrfund.com/fund/FUT100/72201F490	7.00	5.33	7.08		-0.98	2.92	2.97	Morningstar US Core Bond TR Hedged USD
Vanguard Small Cap Index SMALL BLEND http://www.tcrfund.com/fund/FUT100/922908686	44.06	13.97	15.33		48.76	12.73	14.46	Morningstar US Small Cap Extended TR USD
COLUMBIA SMALL CAP GROWTH INST 3 SMALL GROWTH http://www.tcrfund.com/fund/FUT100/19765Y340	34.27	26.90	20.33		36.48	15.01	15.31	Morningstar US Small Cap Broad Growth Ex
Janus Henderson Triton SMALL GROWTH http://www.tcrfund.com/fund/FUT100/47103C357	33.90	15.78	16.41		36.48	15.01	15.31	Morningstar US Small Cap Broad Growth Ex
FRANKLIN SMALL CAP VALUE SMALL VALUE http://www.tcrfund.com/fund/FUT100/355148669	51.95	11.29		11.01	64.07	10.31	13.51	10.51 Morningstar US Small Cap Broad Value Ext
Northern Small Cap Value SMALL VALUE http://www.tcrfund.com/fund/FUT100/665162400	50.20	7.98	11.86		64.07	10.31	13.51	Morningstar US Small Cap Broad Value Ext
AF Target Date 2055 Retirement Fund - R6 TARGET DATE 2051+ http://www.tcrfund.com/fund/FUT100/02630T217	25.54	13.98	13.55		28.59	11.96	11.55	Morningstar Lifetime Allocation Moderate
T. Rowe Price Retirement 2055 TARGET DATE 2051+ http://www.tcrfund.com/fund/FUT100/74149P747	29.16	13.62	13.28		28.59	11.96	11.55	Morningstar Lifetime Allocation Moderate
AF Target Date 2015 Retirement Fund - R6 TARGET-DATE 2015 http://www.tcrfund.com/fund/FUT100/02630T290	13.04	7.68	8.48		12.85	7.94	7.86	Morningstar Lifetime Allocation Moderate
T. Rowe Price Retirement 2015 TARGET-DATE 2015 http://www.tcrfund.com/fund/FUT100/74149P796	16.17	8.84	9.23		12.85	7.94	7.86	Morningstar Lifetime Allocation Moderate
AF Target Date 2020 Retirement Fund - R6 TARGET-DATE 2020 http://www.tcrfund.com/fund/FUT100/02630T316	13.39	8.36	9.36		14.14	8.58	8.65	Morningstar Lifetime Allocation Moderate

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

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	1yr.	5yr.	10yr.	Inception	1yr.	5yr.	10yr.	Inception
T. Rowe Price Retirement 2020 TARGET-DATE 2020 http://www.tcrfund.com/fund/FUT100/74149P200	17.76	9.76	10.20		14.14	8.58	8.65	
					Morningstar Lifetime Allocation Moderate			
AF Target Date 2025 Retirement Fund - R6 TARGET-DATE 2025 http://www.tcrfund.com/fund/FUT100/02630T324	15.29	9.73	10.87		16.07	9.35	9.57	
					Morningstar Lifetime Allocation Moderate			
T. Rowe Price Retirement 2025 TARGET-DATE 2025 http://www.tcrfund.com/fund/FUT100/74149P788	20.23	10.78	11.14		16.07	9.35	9.57	
					Morningstar Lifetime Allocation Moderate			
AF Target Date 2030 Retirement Fund - R6 TARGET-DATE 2030 http://www.tcrfund.com/fund/FUT100/02630T332	18.14	11.12	11.94		18.97	10.26	10.49	
					Morningstar Lifetime Allocation Moderate			
T. Rowe Price Retirement 2030 TARGET-DATE 2030 http://www.tcrfund.com/fund/FUT100/74149P309	22.89	11.75	11.99		18.97	10.26	10.49	
					Morningstar Lifetime Allocation Moderate			
AF Target Date 2035 Retirement Fund - R6 TARGET-DATE 2035 http://www.tcrfund.com/fund/FUT100/02630T340	22.19	12.79	12.85		22.53	11.10	11.20	
					Morningstar Lifetime Allocation Moderate			
T. Rowe Price Retirement 2035 TARGET-DATE 2035 http://www.tcrfund.com/fund/FUT100/74149P770	25.39	12.57	12.64		22.53	11.10	11.20	
					Morningstar Lifetime Allocation Moderate			
AF Target Date 2040 Retirement Fund - R6 TARGET-DATE 2040 http://www.tcrfund.com/fund/FUT100/02630T357	24.39	13.52	13.30		25.72	11.69	11.58	
					Morningstar Lifetime Allocation Moderate			
T. Rowe Price Retirement 2040 TARGET-DATE 2040 http://www.tcrfund.com/fund/FUT100/74149P408	27.55	13.27	13.13		25.72	11.69	11.58	
					Morningstar Lifetime Allocation Moderate			
AF Target Date 2045 Retirement Fund - R6 TARGET-DATE 2045 http://www.tcrfund.com/fund/FUT100/02630T365	25.02	13.79	13.45		27.69	11.96	11.68	
					Morningstar Lifetime Allocation Moderate			
T. Rowe Price Retirement 2045 TARGET-DATE 2045 http://www.tcrfund.com/fund/FUT100/74149P762	29.00	13.64	13.31		27.69	11.96	11.68	
					Morningstar Lifetime Allocation Moderate			
AF Target Date 2050 Retirement Fund - R6 TARGET-DATE 2050 http://www.tcrfund.com/fund/FUT100/02630T373	25.44	13.99	13.56		28.42	11.99	11.64	
					Morningstar Lifetime Allocation Moderate			
T. Rowe Price Retirement 2050 TARGET-DATE 2050 http://www.tcrfund.com/fund/FUT100/74149P754	29.10	13.66	13.31		28.42	11.99	11.64	
					Morningstar Lifetime Allocation Moderate			
AF Target Date 2060 Retirement Fund - R6 TARGET-DATE 2060 http://www.tcrfund.com/fund/FUT100/02631C320	25.65	13.97		11.55	28.62	11.89	11.45	9.55
					Morningstar Lifetime Allocation Moderate			
AF Target Date 2065 Retirement Fund - R6 TARGET-DATE 2065+ http://www.tcrfund.com/fund/FUT100/02631V591	25.67			38.09	28.62	11.89	11.45	38.15
					Morningstar Lifetime Allocation Moderate			
Blackrock Technology Opportunities Instl TECHNOLOGY http://www.tcrfund.com/fund/FUT100/091929612	29.88	33.30	25.04		32.58	28.05	22.47	
					Morningstar US Technology Sector TR USD			

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

Plan Investment	Average Annual Total Return as of 09/30/2021				Benchmark Returns			
	1yr.	5yr.	10yr.	Inception	1yr.	5yr.	10yr.	Inception
AF New Perspective Fund - R WORLD LARGE-STOCK GROWTH http://www.tcrfund.com/fund/FUT100/648018810	29.71	18.28	15.77		26.01	13.41	11.91	Morningstar Global Markets Large Cap NR
The Standard Stable Asset Fund 0 www.standard.com/					2.11	0.72	0.41	Morningstar Cash Trust

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

Fee and Expense Information

The table below shows fee and expense information for plan investment alternatives. Fees shown below are in addition to Total Annual Operating Expenses.

Plan Investment	Total Annual Operating Expenses		Shareholder Type Fees
	As a %	Per \$1000	
Oppenheimer Developing Markets	0.97%	\$9.70	
HARTFORD SCHRODERS INTERN	0.75%	\$7.50	
MFS International Diversification R4	0.84%	\$8.40	
AMG Managers Cadence Emerging C	1.12%	\$11.20	
Metropolitan West Total Return Bond	0.45%	\$4.50	
Columbia Contrarian Core	0.64%	\$6.40	
MFS Research R4	0.54%	\$5.40	
Vanguard 500 Index	0.04%	\$0.40	
Harbor Capital Appreciation Inst	0.72%	\$7.20	
JP Morgan Large Cap Growth	0.53%	\$5.30	
American Century Value Inst	0.80%	\$8.00	
Dodge & Cox Stock Fund	0.52%	\$5.20	
Vanguard Mid Cap Index	0.05%	\$0.50	
BLACKROCK MID-CAP GROWTH	0.80%	\$8.00	
Goldman Sachs Growth Opportunities	1.02%	\$10.20	
Fidelity Mid Cap Value	0.44%	\$4.40	
RidgeWorth Mid-Cap Value Equity	1.04%	\$10.40	
Wells Fargo Special Mid Cap Value	0.71%	\$7.10	
PIMCO Income Instl	0.62%	\$6.20	
Vanguard Small Cap Index	0.05%	\$0.50	
COLUMBIA SMALL CAP GROWTH	0.89%	\$8.90	
Janus Henderson Triton	0.76%	\$7.60	
FRANKLIN SMALL CAP VALUE	0.69%	\$6.90	
Northern Small Cap Value	1.13%	\$11.30	
AF Target Date 2055 Retirement Fund	0.39%	\$3.90	
T. Rowe Price Retirement 2055	0.64%	\$6.40	
AF Target Date 2015 Retirement Fund	0.30%	\$3.00	
T. Rowe Price Retirement 2015	0.51%	\$5.10	
AF Target Date 2020 Retirement Fund	0.31%	\$3.10	
T. Rowe Price Retirement 2020	0.53%	\$5.30	
AF Target Date 2025 Retirement Fund	0.33%	\$3.30	
T. Rowe Price Retirement 2025	0.55%	\$5.50	
AF Target Date 2030 Retirement Fund	0.35%	\$3.50	
T. Rowe Price Retirement 2030	0.58%	\$5.80	
AF Target Date 2035 Retirement Fund	0.37%	\$3.70	
T. Rowe Price Retirement 2035	0.59%	\$5.90	
AF Target Date 2040 Retirement Fund	0.38%	\$3.80	
T. Rowe Price Retirement 2040	0.60%	\$6.00	
AF Target Date 2045 Retirement Fund	0.39%	\$3.90	
T. Rowe Price Retirement 2045	0.62%	\$6.20	
AF Target Date 2050 Retirement Fund	0.39%	\$3.90	
T. Rowe Price Retirement 2050	0.63%	\$6.30	
AF Target Date 2060 Retirement Fund	0.40%	\$4.00	
AF Target Date 2065 Retirement Fund	0.45%	\$4.50	

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

Plan Investment	Total Annual Operating Expenses		Shareholder Type Fees
	As a %	Per \$1000	
Blackrock Technology Opportunities I	0.93%	\$9.30	
AF New Perspective Fund - R	0.42%	\$4.20	
The Standard Stable Asset Fund			

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

Investment Restrictions

In addition to any restrictions imposed by the plan, the following restrictions are imposed by the plan investment alternative.

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

AF New Perspective Fund - R

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AF Target Date 2015 Retirement Fund - R6

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AF Target Date 2020 Retirement Fund - R6

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AF Target Date 2025 Retirement Fund - R6

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AF Target Date 2030 Retirement Fund - R6

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AF Target Date 2035 Retirement Fund - R6

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AF Target Date 2040 Retirement Fund - R6

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AF Target Date 2045 Retirement Fund - R6

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AF Target Date 2050 Retirement Fund - R6

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AF Target Date 2055 Retirement Fund - R6

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AF Target Date 2060 Retirement Fund - R6

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AF Target Date 2065 Retirement Fund - R6

The series' board determined not to adopt the purchase blocking policy currently employed by the other American Funds. The board made this decision because the nature of the funds does not lend itself to abusive market timing activities. However, American Funds Service Company will monitor for frequent trading in the funds' shares, and all transactions in fund shares are subject to the right of the series, American Funds Distributors and American Funds Service Company to restrict potentially abusive trading. In addition to reserving the right to restrict potentially abusive trading, American Funds Service Company will monitor for other types of activity that could potentially be harmful to the American Funds — for example, short-term trading activity in multiple funds. When identified, American Funds Service Company will request that the shareholder discontinue the activity. If the activity continues, American Funds Service Company will freeze the shareholder account to prevent all activity other than redemptions of fund shares.

AMG Managers Cadence Emerging Companies

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

The Board of Trustees of the Trust has adopted policies and procedures reasonably designed to prevent frequent trading in shares of the Funds. Frequent trading may result from an effort by a shareholder to engage in "market timing." These activities may disrupt management of the Funds' portfolios, increase the Funds' expenses, and have a negative impact on the Funds' performance. The Funds may be subject to additional risks of frequent trading activities because of the potential for time-zone arbitrage relating to the foreign and emerging market portfolio securities held by the Funds. As a result, these Funds may be targets for investors that seek to capitalize on price arbitrage opportunities. AMG Trilogy International Small Cap Fund may be subject to additional risks of frequent trading activities because the securities in which the Fund invests tend to be less liquid and their prices more volatile than the securities of larger capitalization companies. As described previously, the Funds have adopted procedures to minimize these risks, and the Redemption/Exchange Fee for each of AMG Trilogy Emerging Markets Equity Fund, AMG Trilogy International Small Cap Fund and AMG Trilogy Emerging Wealth Equity Fund is intended, in part, to discourage short-term and frequent trading of these Funds' shares. There may be additional risks due to frequent trading activities.

American Century Value Inst

A round trip is defined as a buy and sell that occur within 7 days. Maximum of 1 round trip allowed per 1 year period. American Century Investments uses a variety of techniques to monitor for and detect frequent trading practices. These techniques may vary depending on the type of fund, the class of shares or whether the shares are held directly or indirectly with American Century Investments. They may change from time to time as determined by American Century Investments in its sole discretion. To minimize harm to the funds and their shareholders, we reserve the right to reject any purchase order (including exchanges) from any shareholder we believe has a history of frequent trading or whose trading, in our judgment, has been or may be disruptive to the funds. In making this judgment, we may consider trading done in multiple accounts under common ownership or control. Currently, for shares held directly with American Century Investments, we may deem the sale of all or a substantial portion of a shareholder's purchase of fund shares to be frequent trading if the sale is made: within seven days of the purchase, or within 30 days of the purchase, if it happens more than once per year. To the extent practicable, we try to use the same approach for defining frequent trading for shares held through financial intermediaries. American Century Investments reserves the right, in its sole discretion, to identify other trading practices as abusive and to modify its monitoring and other practices as necessary to deal with novel or unique abusive trading practices.

BLACKROCK MID-CAP GROWTH EQUITY

If as a result of its own investigation, information provided by a Financial Intermediary or other third-party, or otherwise, the Fund believes, in its sole discretion, that your short-term trading is excessive or that you are engaging in market timing activity, it reserves the right to reject any specific purchase or exchange order. If the Fund rejects your purchase or exchange order, you will not be able to execute that transaction, and the Fund will not be responsible for any losses you therefore may suffer. For transactions placed directly with the Fund, the Fund may consider the trading history of accounts under common ownership or control for the purpose of enforcing these policies. Transactions placed through the same Financial Intermediary on an omnibus basis may be deemed part of a group for the purpose of this policy and may be rejected in whole or in part by the Fund. Certain accounts, such as omnibus accounts and accounts at Financial Intermediaries, however, include multiple investors and such accounts typically provide the Fund with net purchase or redemption and exchange requests on any given day where purchases, redemptions and exchanges of shares are netted against one another and the identity of individual purchasers, redeemers and exchangers whose orders are aggregated may not be known by the Fund.

Blackrock Technology Opportunities Instl

If as a result of its own investigation, information provided by a Financial Intermediary or other third-party, or otherwise, the Fund believes, in its sole discretion, that your short-term trading is excessive or that you are engaging in market timing activity, it reserves the right to reject any specific purchase or exchange order. If the Fund rejects your purchase or exchange order, you will not be able to execute that transaction, and the Fund will not be responsible for any losses you therefore may suffer. For transactions placed directly with the Fund, the Fund may consider the trading history of accounts under common ownership or control for the purpose of enforcing these policies. Transactions placed through the same Financial Intermediary on an omnibus basis may be deemed part of a group for the purpose of this policy and may be rejected in whole or in part by the Fund. Certain accounts, such as omnibus accounts and accounts at Financial Intermediaries, however, include multiple investors and such accounts typically provide the Fund with net purchase or redemption and exchange requests on any given day where purchases, redemptions and exchanges of shares are netted against one another and the identity of individual purchasers, redeemers and exchangers whose orders are aggregated may not be known by the Fund.

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

COLUMBIA SMALL CAP GROWTH INST 3

Maximum of 1 round trip allowed per 28 days period. The Board has adopted excessive trading policies and procedures that are designed to deter excessive trading by investors (the Excessive Trading Policies and Procedures). The Fund discourages and does not accommodate excessive trading. The Fund reserves the right to reject, without any prior notice, any purchase or exchange order for any reason, and will not be liable for any loss resulting from rejected orders. For example, the Fund may in its sole discretion restrict or reject a purchase or exchange order even if the transaction is not subject to the specific limitation described below if the Fund or its agents determine that accepting the order could interfere with efficient management of the Fund's portfolio or is otherwise contrary to the Fund's best interests. The Excessive Trading Policies and Procedures apply equally to purchase or exchange transactions communicated directly to the Transfer Agent and to those received by financial intermediaries. Specific Buying and Exchanging Limitations — If a Fund detects that an investor has made two "material round trips" in any 28-day period, it will generally reject the investor's future purchase orders, including exchange purchase orders, involving any Fund. For these purposes, a "round trip" is a purchase or exchange into the Fund followed by a sale or exchange out of the Fund, or a sale or exchange out of the Fund followed by a purchase or exchange into the Fund. A "material" round trip is one that is deemed by the Fund to be material in terms of its amount or its potential detrimental impact on the Fund. Independent of this limit, the Fund may, in its sole discretion, reject future purchase orders by any person, group or account that appears to have engaged in any type of excessive trading activity.

Columbia Contrarian Core

Maximum of 1 round trip allowed per 28 days period. The Board has adopted excessive trading policies and procedures that are designed to deter excessive trading by investors (the Excessive Trading Policies and Procedures). The Fund discourages and does not accommodate excessive trading. The Fund reserves the right to reject, without any prior notice, any purchase or exchange order for any reason, and will not be liable for any loss resulting from rejected orders. For example, the Fund may in its sole discretion restrict or reject a purchase or exchange order even if the transaction is not subject to the specific limitation described below if the Fund or its agents determine that accepting the order could interfere with efficient management of the Fund's portfolio or is otherwise contrary to the Fund's best interests. The Excessive Trading Policies and Procedures apply equally to purchase or exchange transactions communicated directly to the Transfer Agent and to those received by financial intermediaries. Specific Buying and Exchanging Limitations — If a Fund detects that an investor has made two "material round trips" in any 28-day period, it will generally reject the investor's future purchase orders, including exchange purchase orders, involving any Fund. For these purposes, a "round trip" is a purchase or exchange into the Fund followed by a sale or exchange out of the Fund, or a sale or exchange out of the Fund followed by a purchase or exchange into the Fund. A "material" round trip is one that is deemed by the Fund to be material in terms of its amount or its potential detrimental impact on the Fund. Independent of this limit, the Fund may, in its sole discretion, reject future purchase orders by any person, group or account that appears to have engaged in any type of excessive trading activity.

Dodge & Cox Stock Fund

The Funds monitor selected trades on a daily basis. Trade activity monitoring may include: reviewing accounts where a purchase and sale occurs within a short period of time; reviewing transaction amount thresholds; and making comparisons against the Funds' "known offenders" database, which contains information about investors who have violated the excessive trading policy in the past. If the Funds determine that an investor has engaged in excessive trading, the Funds may temporarily or permanently restrict the account from subsequent purchases (including purchases by exchange). In determining whether to take such actions, the Funds seek to act in a manner that is consistent with the best interests of Fund shareholders. The Funds may consider the trading history of accounts under common ownership or control for the purpose of enforcing the excessive trading policy. If a Fund believes that trading activity that appears excessive may be for legitimate purposes, the Fund may permit the investor to justify the activity. Transactions placed through the same financial intermediary on an omnibus basis may be deemed part of a group for the purpose of this policy and may be rejected in whole or in part by a Fund. The Funds or an authorized agent or sub-agent may reject any purchase order (including exchange purchases) by any investor or group of investors indefinitely, with or without prior notice to the investor, for any reason, including, in particular, purchases that they believe are attributable to excessive traders or are otherwise excessive or potentially disruptive to a Fund. Such purchase orders may be revoked or cancelled by a Fund on the next business day after receipt of the order.

FRANKLIN SMALL CAP VALUE

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

The Fund's board of trustees has adopted the following policies and procedures with respect to frequent trading in Fund shares (Frequent Trading Policy). The Fund does not intend to accommodate short-term or frequent purchases and redemptions of Fund shares that may be detrimental to the Fund. For example, this type of trading activity could interfere with the efficient management of the Fund's portfolio or materially increase the Fund's transaction costs, administrative costs or taxes. Through its transfer agent, the Fund performs ongoing monitoring of shareholder trading in shares of the Fund and other Franklin Templeton funds in order to try and identify shareholder trading patterns that suggest an ongoing short-term trading strategy. If shareholder trading patterns identified by the transfer agent through monitoring or from other information regarding the shareholder's trading activity in non-Franklin Templeton funds leads the transfer agent to reasonably conclude that such trading may be detrimental to the Fund as described in this Frequent Trading Policy, the transfer agent, on behalf of the Fund, may temporarily or permanently bar future purchases into the Fund or, alternatively, may limit the amount, number or frequency of any future purchases and/or the method by which you may request future purchases and redemptions (including purchases and/or redemptions by an exchange or transfer between the Fund and any other mutual fund). In considering an investor's trading patterns, the Fund may consider, among other factors, the investor's trading history both directly and, if known, through financial intermediaries, in the Fund, in other Franklin Templeton funds, in non-Franklin Templeton mutual funds, or in accounts under common control or ownership (see, for example, "Buying and Selling Shares - Investment by asset allocators and large shareholders" in the SAI). The transfer agent may also reject any purchase or redemption request, whether or not it represents part of any ongoing trading pattern, if the Fund's investment manager or transfer agent reasonably concludes that the amount of the requested transaction may disrupt or otherwise interfere with the efficient management of the Fund's portfolio. In determining what actions should be taken, the Fund's transfer agent may consider a variety of factors, including the potential impact of such remedial actions on the Fund and its shareholders. If the Fund is a "fund of funds," the Fund's transfer agent may take into account the impact of the trading activity and of any proposed remedial action on both the Fund and the underlying funds in which the Fund invests.

Fidelity Mid Cap Value

A round trip is defined as a buy and sell that occur within 30 days. Excessive trading violation will result in a trading restriction period of 85 days. Maximum of 3 round trips allowed per 12 month period. The Board of Trustees has adopted policies designed to discourage excessive trading of fund shares. Excessive trading activity in a fund is measured by the number of roundtrip transactions in a shareholder's account and each class of a multiple class fund is treated separately. A roundtrip transaction occurs when a shareholder sells fund shares (including exchanges) within 30 days of the purchase date. Shareholders with two or more roundtrip transactions in a single fund within a rolling 90-day period will be blocked from making additional purchases or exchange purchases of the fund for 85 days. Shareholders with four or more roundtrip transactions across all Fidelity® funds within any rolling 12-month period will be blocked for at least 85 days from additional purchases or exchange purchases across all Fidelity® funds. Any roundtrip within 12 months of the expiration of a multi-fund block will initiate another multi-fund block. Repeat offenders may be subject to long-term or permanent blocks on purchase or exchange purchase transactions in any account under the shareholder's control at any time. In addition to enforcing these roundtrip limitations, the fund may in its discretion restrict, reject, or cancel any purchases or exchanges that, in the Adviser's opinion, may be disruptive to the management of the fund or otherwise not be in the fund's interests.

Goldman Sachs Growth Opportunities Inst

Maximum of 1 round trip allowed per 90 days period. Pursuant to the policy adopted by the Board of Trustees of the Trust, Goldman Sachs has developed criteria that it uses to identify trading activity that may be excessive. Excessive trading activity in a Fund is measured by the number of "round trip" transactions in a shareholder's account. A "round trip" includes a purchase or exchange into a Fund followed or preceded by a redemption or exchange out of the same Fund. If a Fund detects that a shareholder has completed two or more round trip transactions in a single Fund within a rolling 90-day period, the Fund may reject or restrict subsequent purchase or exchange orders by that shareholder permanently. In addition, a Fund may, in its sole discretion, permanently reject or restrict purchase or exchange orders by a shareholder if the Fund detects other trading activity that is deemed to be disruptive to the management of the Fund or otherwise harmful to the Fund. For purposes of these transaction surveillance procedures, the Funds may consider trading activity in multiple accounts under common ownership, control, or influence. A shareholder that has been restricted from participation in a Fund pursuant to this policy will be allowed to apply for re-entry after one year. A shareholder applying for re-entry must provide assurances acceptable to the Fund that the shareholder will not engage in excessive trading activities in the future. Goldman Sachs may modify its surveillance procedures and criteria from time to time without prior notice regarding the detection of excessive trading or to address specific circumstances. Goldman Sachs will apply the criteria in a manner that, in Goldman Sachs' judgment, will be uniform.

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

Excessive trading violation will result in a trading restriction period of 90 days. Maximum of 2 round trips allowed per 90 days period. The Boards of Directors of the Funds have adopted policies and procedures with respect to frequent purchases and redemptions of Fund shares by Fund shareholders. It is the Funds' policy to discourage investors from trading in a Fund's shares in an excessive manner that would be harmful to long-term investors. Each Fund reserves the right to reject any purchase order at any time and for any reason, without prior written notice. Each Fund also reserves the right to revoke the exchange privileges of any person at any time and for any reason. In making such determinations, the Fund may consider an investor's trading history in any of the Funds, including the person's trading history in any accounts under a person's common ownership or control. No system for prevention and detection of market timing and other abusive trading activities can be expected to identify, address or eliminate all such activities in Fund shares. Certain qualified plans participate directly in the Funds through omnibus accounts ("Qualified Plan Omnibus Accounts") and, as described above, separate accounts maintained by Hartford Life and the Insurance Companies often establish omnibus accounts in the Funds for their contract or policy holders through which transactions are placed ("Insurance Company Omnibus Accounts" and, together with Qualified Plan Omnibus Accounts, "Omnibus Accounts"). The Boards of Directors of the Funds have adopted policies and procedures relating to excessive trading in shares of the Funds through Omnibus Accounts (the "Policy"). Except as otherwise noted, with respect to investors investing through Omnibus Accounts, it is the Policy of the Funds to permit only two "substantive round trips" by an investor within any single Fund within a 90-day period. A substantive round trip is a purchase of or an exchange into a Fund and a redemption of or an exchange out of the same Fund in a dollar amount set by the Funds' transfer agent, in the reasonable exercise of its discretion. When an additional purchase or exchange order request for the Fund is received within the 90-day period, the requested transaction shall be rejected (unless such transaction was a transaction in an Omnibus Account that was identified, in accordance with the procedures described below, after it had already occurred). In addition, the person requesting such transaction shall be deemed an "Excessive Trader." All exchange and purchase privileges of an Excessive Trader shall be suspended within such Fund for the first violation of the policy for a period of 90 days. For a second violation of the policy, the exchange and purchase privileges of the Excessive Trader shall be suspended indefinitely.

Harbor Capital Appreciation Inst

A round trip is defined as a buy and sell that occur within 30 days. Excessive trading violation will result in a trading restriction period of 60 days. Maximum of 4 round trips allowed per 12 month period. The Board of Trustees has adopted policies and procedures and authorized Harbor Funds to take the following actions to discourage excessive short-term trading activity in the Funds. You may make up to four round trips in the same Fund in a 12-month period. A "round trip" is a purchase into a Fund followed by a redemption out of the same Fund (including by exchange) or a redemption out of a Fund (including by exchange) followed by a purchase into the same Fund within a 30-day period. When a purchase or redemption transaction is paired with another transaction to make one round trip, neither of those transactions is paired with a third transaction to make a second round trip. For example, if a shareholder purchases shares of a Fund on May 1, redeems those same shares on May 15 and then purchases shares in the same Fund again on June 5, the shareholder would have engaged in one round trip. The purchase on May 1 would be paired with the redemption on May 15 because the transactions occurred within a 30-day period. However, the redemption on May 15 would not be paired with the purchase on June 5 to create a second round trip because the May 15 redemption already constituted part of the earlier round trip. Different restrictions may apply if you invest through an intermediary. Harbor Funds will limit, for a period of 60 days, future purchases into a Fund by any investor who makes more than four round trips in the same Fund in a 12-month period.

JP Morgan Large Cap Growth

Excessive trading violation will result in a trading restriction period of 90 days. Maximum of 1 round trip allowed per 60 days period. The Boards of J.P. Morgan Funds have adopted various policies and procedures to identify market timers, including reviewing "round trips" in and out of J.P. Morgan Funds by investors. A "round trip" includes a purchase or exchange into a Fund followed or preceded by a redemption or exchange out of the same Fund. If the Distributor detects that you have completed two round trips within 60 days in the same Fund, the Distributor will reject your purchase and exchange orders for a period of at least 90 days. For subsequent violations, the Distributor may, in its sole discretion, reject your purchase and exchange orders temporarily or permanently. In identifying market timers, the Distributor may also consider activity of accounts that it believes to be under common ownership or control.

Janus Henderson Triton

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

The Trustees have adopted policies and procedures with respect to short-term and excessive trading of Fund shares ("excessive trading"). The Funds are intended for long-term investment purposes, and the Funds will take reasonable steps to attempt to detect and deter short-term and excessive trading. Transactions placed in violation of the Funds' exchange limits or excessive trading policies and procedures may be cancelled or rescinded by a Fund by the next business day following receipt by the Fund. The trading history of accounts determined to be under common ownership or control within any of the Janus Henderson funds may be considered in enforcing these policies and procedures. As described below, however, the Funds may not be able to identify all instances of excessive trading or completely eliminate the possibility of excessive trading. In particular, it may be difficult to identify excessive trading in certain omnibus accounts and other accounts traded through intermediaries. By their nature, omnibus accounts, in which purchases and redemptions of the Funds' shares by multiple investors are aggregated by the intermediary and presented to the Funds on a net basis, may effectively conceal the identity of individual investors and their transactions from the Funds and their agents. This makes the elimination of excessive trading in the accounts impractical without the assistance of the intermediary. The Janus Henderson funds attempt to deter excessive trading through at least the following methods: 1. exchange limitations as described under "Exchanges;" 2. trade monitoring; and 3. fair valuation of securities as described under "Pricing of Fund Shares."

MFS International Diversification R4

Maximum of 2 round trips allowed per 3 month period. The fund is not intended to serve as a vehicle for frequent trading. The Board of Trustees of the fund has adopted the purchase and exchange limitation policy described below, which it believes is reasonably designed to discourage frequent fund share transactions. MFSC seeks to monitor and enforce this policy, subject to oversight by the Board of Trustees. The fund may alter its policies at any time without notice to shareholders. MFSC will generally restrict, reject or cancel purchase and exchange orders into the fund if MFSC determines that an accountholder has made two exchanges, each in an amount of \$15,000 or more, out of an account in the fund during a calendar quarter ("two exchange limit"). This policy does not apply to MFS money market funds or to exchanges initiated by a retirement plan trustee or sponsor rather than by a plan participant, and other similar non-discretionary exchanges (e.g., in connection with fund mergers/acquisitions/liquidations). MFSC may make exceptions to this policy if, in its judgment, the transaction does not represent frequent trading activity, such as purchases made through systematic purchase plans (but not systematic exchange plans), payroll contributions, or distribution investment programs. In applying this policy, MFSC considers the information available to it at the time and reserves the right to consider trading effected through multiple accounts that are under common ownership, control, or influence to be trading out of a single account.

MFS Research R4

Maximum of 2 round trips allowed per 3 month period. The fund is not intended to serve as a vehicle for frequent trading. The Board of Trustees of the fund has adopted the purchase and exchange limitation policy described below, which it believes is reasonably designed to discourage frequent fund share transactions. MFSC seeks to monitor and enforce this policy, subject to oversight by the Board of Trustees. The fund may alter its policies at any time without notice to shareholders. MFSC will generally restrict, reject or cancel purchase and exchange orders into the fund if MFSC determines that an accountholder has made two exchanges, each in an amount of \$15,000 or more, out of an account in the fund during a calendar quarter ("two exchange limit"). This policy does not apply to MFS money market funds or to exchanges initiated by a retirement plan trustee or sponsor rather than by a plan participant, and other similar non-discretionary exchanges (e.g., in connection with fund mergers/acquisitions/liquidations). MFSC may make exceptions to this policy if, in its judgment, the transaction does not represent frequent trading activity, such as purchases made through systematic purchase plans (but not systematic exchange plans), payroll contributions, or distribution investment programs. In applying this policy, MFSC considers the information available to it at the time and reserves the right to consider trading effected through multiple accounts that are under common ownership, control, or influence to be trading out of a single account.

Metropolitan West Total Return Bond I

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

Maximum of 2 round trips allowed per 30 days period. The Trust reserves the right to refuse any purchase or exchange request that could adversely affect a Fund or its operations, including those from any individual or group who, in the Trust's view, is likely to engage in excessive material trading. If a purchase or exchange order into shares of a Fund is rejected, the potential investor will not benefit from any subsequent increase in the net asset value of that Fund. Future purchases into a Fund may be barred if a shareholder effects more than two round trips in shares of that Fund (meaning exchanges or redemptions following a purchase) in excess of certain de minimis limits within a 30 day period. Shareholders effecting a round trip transaction in shares of a Fund in excess of the relevant de minimis threshold more than once within the above-referenced 30-day period may receive a communication from the Fund warning that the shareholder is in danger of violating the Trust's frequent trading policy. Exceptions to these trading limits may be made only upon approval of the Funds' Chief Compliance Officer or his designee, and such exceptions are reported to the Board of Trustees on a quarterly basis. This policy may be revised from time to time by the officers of the Trust in consultation with the Board of Trustees without prior notice.

Northern Small Cap Value

Maximum of 2 round trips allowed per 3 month period. To deter excessive shareholder trading, a shareholder is restricted to no more than two "round trips" in a Fund during a calendar quarter. A "round trip" is a redemption or exchange out of a Fund followed by a purchase or exchange into the same Fund. The Trust is authorized to permit more than two "round trips" in a Fund during a calendar quarter if the Trust determines in its reasonable judgment that the Trust's excessive trading policies would not be violated. Examples of such transactions include, but are not limited to, trades involving: asset allocation programs, wrap fee programs and other investment programs offered by financial institutions where investment decisions are made on a discretionary basis by investment professionals; systematic withdrawal plans and automatic exchange plans; reinvestment of dividends, distributions or other payments; a death or post-purchase disability of the beneficial owner of the account; minimum required distributions from retirement accounts; the return of excess contributions in retirement accounts; and redemptions initiated by a Fund. In addition, the International Equity Fund, Emerging Markets Equity Index Fund, Global Real Estate Index Fund, Global Sustainability Index Fund and International Equity Index Fund each impose a redemption fee on redemptions made within 30 calendar days of purchase subject to certain exceptions. For further information, please see "Redemption Fees" on page 83. As described below and in "Redemption Fees" it should be noted that the Trust's ability to monitor and limit the trading activity of shareholders investing in a Fund through an omnibus account of a financial intermediary may be significantly limited or absent where the intermediary maintains the underlying shareholder accounts.

Oppenheimer Developing Markets

Invesco and certain of its corporate affiliates (Invesco and such affiliates, collectively, the Invesco Affiliates) currently use the following tools designed to discourage excessive short-term trading in the retail Funds: Trade activity monitoring; Discretion to reject orders; Purchase blocking; The use of fair value pricing consistent with procedures approved by the Board. The Funds (except those listed below) have adopted a policy under which any shareholder redeeming shares having a value of \$5,000 or more from a Fund on any trading day will be precluded from investing in that Fund for 30 calendar days after the redemption transaction date. The policy applies to redemptions and purchases that are part of exchange transactions. Under the purchase blocking policy, certain purchases will not be prevented and certain redemptions will not trigger a purchase block, such as: purchases and redemptions of shares having a value of less than \$5,000; systematic purchase, redemption and exchange account options; transfers of shares within the same Fund; non-discretionary rebalancing in fund-of-funds; asset allocation features; fee-based accounts; account maintenance fees; small balance account fees; plan-level omnibus Retirement and Benefit Plans; death and disability and hardship distributions; loan transactions; transfers of assets; Retirement and Benefit Plan rollovers; IRA conversions and re-characterizations; and mandatory distributions from Retirement and Benefit Plans.

PIMCO Income Instl

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

The Board of Trustees of the Trust has adopted policies and procedures reasonably designed to detect and prevent short-term trading activity that may be harmful to a Fund and its shareholders. Such activities may have a detrimental effect on a Fund and its shareholders. For example, depending upon various factors such as the size of a Fund and the amount of its assets maintained in cash, short-term or excessive trading by Fund shareholders may interfere with the efficient management of the Fund's investments, increase transaction costs and taxes, and may harm the performance of the Fund and its shareholders. The Trust seeks to deter and prevent abusive trading practices, and to reduce these risks, through several methods. First, the PIMCO Senior Floating Rate Fund has elected not to impose redemption fees. Second, to the extent that there is a delay between a change in the value of a Fund's portfolio holdings and the time when that change is reflected in the NAV of the Fund's shares, the Fund is exposed to the risk that investors may seek to exploit this delay by purchasing or redeeming shares at NAVs that do not reflect appropriate fair value prices. The Trust seeks to deter and prevent this activity, sometimes referred to as "stale price arbitrage," by the appropriate use of "fair value" pricing of a Fund's portfolio securities. Third, the Trust and PIMCO seek to monitor shareholder account activities in order to detect and prevent excessive and disruptive trading practices. The Trust and PIMCO each reserves the right to restrict or refuse any purchase or exchange transactions if, in the judgment of the Trust or of PIMCO, the transaction may adversely affect the interests of a Fund or its shareholders. Among other things, the Trust may monitor for any patterns of frequent purchases and sales that appear to be made in response to short-term fluctuations in share price and may also monitor for any attempts to improperly avoid the imposition of a redemption fee. Notice of such restrictions, if any, will vary according to the particular circumstances.

RidgeWorth Mid-Cap Value Equity

A round trip is defined as a buy and sell that occur within 30 days. Maximum of 1 round trip allowed per 30 days period. Excessive trading activity is measured by the number of roundtrip transactions in an account. A roundtrip transaction is one where a shareholder buys and then sells, or sells and then buys, shares of any fund within 30 days. Shareholders of the funds are limited to one roundtrip transaction within any rolling 30-day period. Roundtrip transactions are counted at the shareholder level. In considering a shareholder's trading activity, the funds may consider, among other factors, the shareholder's trading history both directly and, if known, through financial intermediaries, in the funds, in other funds within the Virtus Mutual Fund complex, in non-Virtus funds or in accounts under common control or ownership. We do not include exchanges made pursuant to the dollar cost averaging or other similar programs when applying our market timing policies. Systematic withdrawal and/or contribution programs, mandatory retirement distributions, and transactions initiated by a plan sponsor also will not count towards the roundtrip limits. The funds may permit exchanges that management believes, in the exercise of their judgment, are not disruptive. The size of the fund and the size of the requested transaction may be considered when determining whether or not the transaction would be disruptive.

T. Rowe Price Retirement 2015

Excessive transactions and short-term trading can be harmful to fund shareholders in various ways, such as disrupting a fund's portfolio management strategies, increasing a fund's trading and other costs, and negatively affecting its performance. Short-term traders in funds that invest in foreign securities may seek to take advantage of developments overseas that could lead to an anticipated difference between the price of the funds' shares and price movements in foreign markets. While there is no assurance that T.Rowe Price can prevent all excessive and short-term trading, the Boards of the T.Rowe Price Funds have adopted the following trading limits that are designed to deter such activity and protect the funds' shareholders. The funds may revise their trading limits and procedures at any time as the Boards deem necessary or appropriate to better detect short-term trading that may adversely affect the funds, to comply with applicable regulatory requirements, or to impose additional or alternative restrictions. Subject to certain exceptions, each T. Rowe Price Fund restricts a shareholder's purchases (including through exchanges) into a fund account for a period of 30 calendar days after the shareholder has redeemed or exchanged out of that same fund account (the "30-Day Purchase Block"). The calendar day after the date of redemption is considered Day 1 for purposes of computing the period before another purchase may be made.

T. Rowe Price Retirement 2020

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

Excessive transactions and short-term trading can be harmful to fund shareholders in various ways, such as disrupting a fund's portfolio management strategies, increasing a fund's trading and other costs, and negatively affecting its performance. Short-term traders in funds that invest in foreign securities may seek to take advantage of developments overseas that could lead to an anticipated difference between the price of the funds' shares and price movements in foreign markets. While there is no assurance that T.Rowe Price can prevent all excessive and short-term trading, the Boards of the T.Rowe Price Funds have adopted the following trading limits that are designed to deter such activity and protect the funds' shareholders. The funds may revise their trading limits and procedures at any time as the Boards deem necessary or appropriate to better detect short-term trading that may adversely affect the funds, to comply with applicable regulatory requirements, or to impose additional or alternative restrictions. Subject to certain exceptions, each T. Rowe Price Fund restricts a shareholder's purchases (including through exchanges) into a fund account for a period of 30 calendar days after the shareholder has redeemed or exchanged out of that same fund account (the "30-Day Purchase Block"). The calendar day after the date of redemption is considered Day 1 for purposes of computing the period before another purchase may be made.

T. Rowe Price Retirement 2025

Excessive transactions and short-term trading can be harmful to fund shareholders in various ways, such as disrupting a fund's portfolio management strategies, increasing a fund's trading and other costs, and negatively affecting its performance. Short-term traders in funds that invest in foreign securities may seek to take advantage of developments overseas that could lead to an anticipated difference between the price of the funds' shares and price movements in foreign markets. While there is no assurance that T.Rowe Price can prevent all excessive and short-term trading, the Boards of the T.Rowe Price Funds have adopted the following trading limits that are designed to deter such activity and protect the funds' shareholders. The funds may revise their trading limits and procedures at any time as the Boards deem necessary or appropriate to better detect short-term trading that may adversely affect the funds, to comply with applicable regulatory requirements, or to impose additional or alternative restrictions. Subject to certain exceptions, each T. Rowe Price Fund restricts a shareholder's purchases (including through exchanges) into a fund account for a period of 30 calendar days after the shareholder has redeemed or exchanged out of that same fund account (the "30-Day Purchase Block"). The calendar day after the date of redemption is considered Day 1 for purposes of computing the period before another purchase may be made.

T. Rowe Price Retirement 2030

Excessive transactions and short-term trading can be harmful to fund shareholders in various ways, such as disrupting a fund's portfolio management strategies, increasing a fund's trading and other costs, and negatively affecting its performance. Short-term traders in funds that invest in foreign securities may seek to take advantage of developments overseas that could lead to an anticipated difference between the price of the funds' shares and price movements in foreign markets. While there is no assurance that T.Rowe Price can prevent all excessive and short-term trading, the Boards of the T.Rowe Price Funds have adopted the following trading limits that are designed to deter such activity and protect the funds' shareholders. The funds may revise their trading limits and procedures at any time as the Boards deem necessary or appropriate to better detect short-term trading that may adversely affect the funds, to comply with applicable regulatory requirements, or to impose additional or alternative restrictions. Subject to certain exceptions, each T. Rowe Price Fund restricts a shareholder's purchases (including through exchanges) into a fund account for a period of 30 calendar days after the shareholder has redeemed or exchanged out of that same fund account (the "30-Day Purchase Block"). The calendar day after the date of redemption is considered Day 1 for purposes of computing the period before another purchase may be made.

T. Rowe Price Retirement 2035

Excessive transactions and short-term trading can be harmful to fund shareholders in various ways, such as disrupting a fund's portfolio management strategies, increasing a fund's trading and other costs, and negatively affecting its performance. Short-term traders in funds that invest in foreign securities may seek to take advantage of developments overseas that could lead to an anticipated difference between the price of the funds' shares and price movements in foreign markets. While there is no assurance that T.Rowe Price can prevent all excessive and short-term trading, the Boards of the T.Rowe Price Funds have adopted the following trading limits that are designed to deter such activity and protect the funds' shareholders. The funds may revise their trading limits and procedures at any time as the Boards deem necessary or appropriate to better detect short-term trading that may adversely affect the funds, to comply with applicable regulatory requirements, or to impose additional or alternative restrictions. Subject to certain exceptions, each T. Rowe Price Fund restricts a shareholder's purchases (including through exchanges) into a fund account for a period of 30 calendar days after the shareholder has redeemed or exchanged out of that same fund account (the "30-Day Purchase Block"). The calendar day after the date of redemption is considered Day 1 for purposes of computing the period before another purchase may be made.

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

T. Rowe Price Retirement 2040

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T. Rowe Price Retirement 2045

Excessive transactions and short-term trading can be harmful to fund shareholders in various ways, such as disrupting a fund's portfolio management strategies, increasing a fund's trading and other costs, and negatively affecting its performance. Short-term traders in funds that invest in foreign securities may seek to take advantage of developments overseas that could lead to an anticipated difference between the price of the funds' shares and price movements in foreign markets. While there is no assurance that T.Rowe Price can prevent all excessive and short-term trading, the Boards of the T.Rowe Price Funds have adopted the following trading limits that are designed to deter such activity and protect the funds' shareholders. The funds may revise their trading limits and procedures at any time as the Boards deem necessary or appropriate to better detect short-term trading that may adversely affect the funds, to comply with applicable regulatory requirements, or to impose additional or alternative restrictions. Subject to certain exceptions, each T. Rowe Price Fund restricts a shareholder's purchases (including through exchanges) into a fund account for a period of 30 calendar days after the shareholder has redeemed or exchanged out of that same fund account (the "30-Day Purchase Block"). The calendar day after the date of redemption is considered Day 1 for purposes of computing the period before another purchase may be made.

T. Rowe Price Retirement 2050

Excessive transactions and short-term trading can be harmful to fund shareholders in various ways, such as disrupting a fund's portfolio management strategies, increasing a fund's trading and other costs, and negatively affecting its performance. Short-term traders in funds that invest in foreign securities may seek to take advantage of developments overseas that could lead to an anticipated difference between the price of the funds' shares and price movements in foreign markets. While there is no assurance that T.Rowe Price can prevent all excessive and short-term trading, the Boards of the T.Rowe Price Funds have adopted the following trading limits that are designed to deter such activity and protect the funds' shareholders. The funds may revise their trading limits and procedures at any time as the Boards deem necessary or appropriate to better detect short-term trading that may adversely affect the funds, to comply with applicable regulatory requirements, or to impose additional or alternative restrictions. Subject to certain exceptions, each T. Rowe Price Fund restricts a shareholder's purchases (including through exchanges) into a fund account for a period of 30 calendar days after the shareholder has redeemed or exchanged out of that same fund account (the "30-Day Purchase Block"). The calendar day after the date of redemption is considered Day 1 for purposes of computing the period before another purchase may be made.

T. Rowe Price Retirement 2055

Becket Academy, Inc.
Becket Academy 403(b) DC Plan
Investment Comparative Chart As Of 09/30/2021

Excessive transactions and short-term trading can be harmful to fund shareholders in various ways, such as disrupting a fund's portfolio management strategies, increasing a fund's trading and other costs, and negatively affecting its performance. Short-term traders in funds that invest in foreign securities may seek to take advantage of developments overseas that could lead to an anticipated difference between the price of the funds' shares and price movements in foreign markets. While there is no assurance that T.Rowe Price can prevent all excessive and short-term trading, the Boards of the T.Rowe Price Funds have adopted the following trading limits that are designed to deter such activity and protect the funds' shareholders. The funds may revise their trading limits and procedures at any time as the Boards deem necessary or appropriate to better detect short-term trading that may adversely affect the funds, to comply with applicable regulatory requirements, or to impose additional or alternative restrictions. Subject to certain exceptions, each T. Rowe Price Fund restricts a shareholder's purchases (including through exchanges) into a fund account for a period of 30 calendar days after the shareholder has redeemed or exchanged out of that same fund account (the "30-Day Purchase Block"). The calendar day after the date of redemption is considered Day 1 for purposes of computing the period before another purchase may be made.

Vanguard 500 Index

A round trip is defined as a buy and sell that occur within 30 days. Excessive trading violation will result in a trading restriction period of 30 days. Maximum of 1 round trip allowed per 30 days period. Because excessive transactions can disrupt management of a fund and increase the fund's costs for all shareholders, the board of trustees of each Vanguard fund places certain limits on frequent trading in the funds. Each Vanguard fund (other than money market funds and short-term bond funds, but including Vanguard Short-Term Inflation-Protected Securities Index Fund) limits an investor's purchases or exchanges into a fund account for 30 calendar days after the investor has redeemed or exchanged out of that fund account. ETF Shares are not subject to these frequent-trading limits.

Vanguard Mid Cap Index

A round trip is defined as a buy and sell that occur within 30 days. Excessive trading violation will result in a trading restriction period of 30 days. Maximum of 1 round trip allowed per 30 days period. Because excessive transactions can disrupt management of a fund and increase the fund's costs for all shareholders, the board of trustees of each Vanguard fund places certain limits on frequent trading in the funds. Each Vanguard fund (other than money market funds and short-term bond funds, but including Vanguard Short-Term Inflation-Protected Securities Index Fund) limits an investor's purchases or exchanges into a fund account for 30 calendar days after the investor has redeemed or exchanged out of that fund account. ETF Shares are not subject to these frequent-trading limits.

Vanguard Small Cap Index

A round trip is defined as a buy and sell that occur within 30 days. Excessive trading violation will result in a trading restriction period of 30 days. Maximum of 1 round trip allowed per 30 days period. Because excessive transactions can disrupt management of a fund and increase the fund's costs for all shareholders, the board of trustees of each Vanguard fund places certain limits on frequent trading in the funds. Each Vanguard fund (other than money market funds and short-term bond funds, but including Vanguard Short-Term Inflation-Protected Securities Index Fund) limits an investor's purchases or exchanges into a fund account for 30 calendar days after the investor has redeemed or exchanged out of that fund account. ETF Shares are not subject to these frequent-trading limits.

Wells Fargo Special Mid Cap Value

The Board has approved the Covered Funds' policies and procedures, which provide, among other things, that Funds Management may deem trading activity to be excessive if it determines that such trading activity would likely be disruptive to a Covered Fund by increasing expenses or lowering returns. In this regard, the Covered Funds take steps to avoid accommodating frequent purchases and redemptions of shares by Covered Fund shareholders. Funds Management monitors available shareholder trading information across all Covered Funds on a daily basis.