

BNYM NEWTON DYNAMIC VALUE COMPOSITE COMPOSITE REPORT

Performance				3-Yr Standard Deviation		Composite Totals					Firm Totals		
Year	Composite (“Pure” Gross of Fees) (%) ^(a)	Composite (Net of fees) (%)	Russell 1000 Value Index (%)	Composite Ex-Post Standard Deviation (%) ^(d)	Benchmark Ex-Post Standard Deviation (%) ^(d)	Number of Portfolios in Composite	Composite Dispersion (%) ^(c)	Composite Assets (\$M) ^(e)	Strategy Advisory-only Assets (\$M) ^(f)	Strategy Assets (\$M) ^(f)	Total Firm Assets (\$M)	Advisory-Only Assets (\$M) ^(f)	Total Firm and Advisory Assets (\$M) ^(f)
2024 ^(b)	-6.65	-6.87	-6.84	--	--	6	--	1.93	551.87	554.42	401.75	6,737.67	7,139.42

(a) “Pure” gross-of-fees returns are supplemental to net-of-fees returns and do not reflect the deduction of wrap fee portfolio program fees and transaction costs.

(b) Partial year beginning 12/1/2024.

(c) Less than five accounts were open during the full-year period. Composite Dispersion is not applicable.

(d) Three-year annualized ex-post standard deviation is not required for composites in existence for less than three full calendar years.

(e) 100% of composite assets represented by wrap fee portfolios as of each annual period end.

(f) Composite strategy advisory-only assets, composite strategy assets, firm advisory-only assets, total firm and advisory assets are supplemental information. Supplemental information is not covered by the reports of the independent accountants.

BNY Mellon Securities Corporation (“BNYSC” or the “Firm”) claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. BNYSC has been independently verified for the periods calendar years 2002 through 2024. A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards. Verification provides assurance on whether the firm’s policies and procedures related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. The BNYM Newton Dynamic Value Composite (the “Composite”) has had a performance examination for the periods December 1, 2024 through December 31, 2024. The verification and performance examination reports are available upon request. A list of the Firm’s composite descriptions is available upon request.

1. BNYSC is a registered investment adviser. BNYSC is a wholly owned subsidiary of BNY Mellon Investment Adviser, Inc. (“BNYIA”)⁸ and an indirect subsidiary of The Bank of New York Mellon Corporation (“BNY”). BNYSC offers wrap fee portfolio strategies managed by the Firm and other investment advisers. The Firm is defined as encompassing those accounts, with respect to its Intermediary SMA business, for which BNYSC serves as the discretionary asset manager, plus those discretionary accounts in the BNY Mellon Managed Asset Program, sponsored by BNYSC, for which BNYSC acts as Portfolio Manager.
2. Past performance is not indicative of future results and any portfolio could suffer losses as well as achieve gains. Performance returns are based in U.S. dollars, and are shown both before the deduction of wrap fee portfolio program fees (“pure” gross of fees), and after the deduction of wrap fee portfolio program fees (net of fees). Net-of-fee performance figures demonstrate the compounding effect of fees and are derived by using the highest model, all-inclusive fee (“wrap fee”). Net-of-fees returns shown are using a fee of 2.80%, which is the highest actual annual fee charged for this strategy. Returns include realized and unrealized gains and losses plus accrued income. The performance of the Composite is based in U.S. dollars and is net of non-reclaimable withholding taxes on dividends, interest income and capital gains where applicable. Valuations are computed and all information is reported in U.S. dollars. Generally, equity securities held in the Composite that are listed on a major U.S. exchange are valued using the last sale price reported by the primary exchange. Policies for valuing investments, calculating performance, and preparing GIPS reports are available upon request.
3. The Composite was created in December 2024 with an inception date of December 1, 2024. From inception, the Composite consists of all fully discretionary equity accounts subject to a wrap fee for which Newton Investment Management North America LLC, an affiliate of the Firm, has served as sub-adviser to BNYSC. Accounts in the Composite

are invested in large-capitalization U.S. value companies selected through bottom-up fundamental research, to identify consistent thematic investment ideas that possess long-term secular growth misinterpreted by the market. The core of the investment philosophy is the belief of active investment opportunities available within large-capitalization equity markets. The composition of the portfolios is primarily large-capitalization companies with a market capitalization within the same general range as the issuers included in the benchmark. The portfolios may invest in foreign securities up to 20% of the total assets.

4. The standard wrap fee charged to accounts included in the Composite generally ranges from 1.00%-3.00%, depending on assets and plan sponsor, and typically includes transaction charges, custody, administrative, advisory, servicing and consulting fees. Fees charged to individual accounts may vary outside of this range based on arrangements between the Sponsor and clients.
5. Accounts are included in the Composite in the first full calendar month under management and, if terminated, remain in the historical Composite record through the last full calendar month under management.
6. Performance figures for each account within the Composite are calculated monthly on a trade-date basis. Monthly market values include all dividends, interest and accrued income, and realized and unrealized gains or losses, if any. Returns are calculated daily and are geometrically linked to create a monthly return. Monthly returns are geometrically linked to create quarterly and annual returns. The Composite performance results are asset-weighted on a monthly basis using beginning-of-the-month market values of accounts. Accounts are excluded from composites for the month when a client-initiated significant cash flow or security transfer in-kind exceeds 30% of the prior business day market value. The account is removed temporarily from the Composite for the month of the significant cash flow or security transfer in-kind, and returned to the Composite the following month. Extended periods of composite performance are computed by linking monthly returns. Dispersion measures the variability of account returns within a composite and is calculated using asset-weighted standard deviation for any time period in which at least five accounts have been open for the entire year. Gross returns were used to calculate all risk measures presented in the GIPS Composite Report.
7. The benchmark for the Composite is the Russell 1000® Value Index. The Russell 1000® Value Index measures the performance of the large-cap value segment of the US equity universe. It includes those Russell 1000 companies that are considered more value-oriented relative to the overall market as defined by Russell's leading style methodology. The Russell 1000® Value Index is constructed to provide a comprehensive and unbiased barometer for the large-cap value segment. The index is completely reconstituted annually to ensure new and growing equities are included and that the represented companies continue to reflect value characteristics. Investors cannot invest directly in any index. An investor cannot invest directly in any index. Benchmark returns are not covered by the reports of the independent accountants.
8. Firm advisory-only assets are assets for all strategies within the firm for which BNYSC provides investment recommendations but has no control over the implementation of investment decisions or trading authority for the assets. Composite strategy assets are assets of discretionary and non-discretionary accounts in the SMA strategy described in this presentation. Total firm and advisory assets are assets within the firm for which BNYSC provides investment recommendations for. These assets are presented as supplemental information.
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