

BNYM NEWTON GLOBAL EQUITY INCOME ADR COMPOSITE COMPOSITE REPORT

Performance				3-Yr Standard Deviation		Composite Totals					Firm Totals		
Year	Composite ("Pure" Gross of Fees) (%) ^(a)	Composite (Net of fees) (%)	MSCI World 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 (\$) ^(f)	Advisory- Only Assets (\$M)	Total Firm and Advisory Assets (\$M) ^(f)
2023	11.95	10.27	23.79	14.36	16.75	3	--	1.74	5.12	6.85	419.21	5,704.82	6,124.03
2022	-0.94	-2.43	-18.14	18.17	20.43	3	--	1.21	3.62	5.12	350.60	4,924.99	5,275.59
2021	16.41	13.35	21.82	16.12	17.06	3	--	2.95	2.35	6.04	465.68	2,015.69	2,481.37
2020	5.04	1.88	15.90	16.16	18.27	3	--	2.00	0.26	2.91	341.45	1,686.90	2,028.35
2019	26.49	22.69	27.67	--	--	6	0.09	2.94	0.13	3.07	372.55	1,337.15	1,709.70
2018	-4.50	-7.36	-8.71	--	--	5	--	2.03	0.81	3.25	358.02	1,124.92	1,482.94
2017 ^(b)	10.28	8.06	13.38	--	--	2	--	0.60	1.00	1.60	452.66	1,072.40	1,525.06

(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 5/1/2017.

(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 ("BNYMSC" 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. BNYMSC has been independently verified for the periods calendar years 2002 through 2023. 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 Global Equity Income Composite (the "Composite") has had a performance examination for the periods May 1, 2017 through December 31, 2023. The verification and performance examination reports are available upon request. A list of the Firm's composite descriptions is available upon request.

1. BNYMSC is a registered investment adviser. BNYMSC is a wholly owned subsidiary of BNY Mellon Investment Adviser, Inc. ("BNYMIA")⁸ and an indirect subsidiary of The Bank of New York Mellon Corporation ("BNY"). BNYMSC 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 BNYMSC serves as the discretionary asset manager, plus those discretionary accounts in the BNY Mellon Managed Asset Program, sponsored by BNYMSC, for which BNYMSC 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 above through September 30, 2021, reflect a fee of 3.00%, which is the highest historical fee in the wrap account industry. Effective October 1, 2021, net-of-fees returns shown are using a fee of 1.50%, which is the highest actual annual advisory 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. For foreign equity and ADR positions that trade over the counter, an imputed price may be used, based on the last sale price reported on the primary foreign exchange, converted to U.S. dollars using the current currency exchange (or “spot”) rate. Policies for valuing investments, calculating performance, and preparing GIPS reports are available upon request.
3. The Composite was created in May 2017 with an inception date of May 1, 2017. From inception, the Composite consists of all fully discretionary global equity income accounts subject to a wrap fee for which Newton Investment Management Limited, an affiliate of the Firm, has served as sub-adviser to BNYMSC. Accounts in the Composite are invested in stocks selected through a bottom-up process within a global thematic framework that have a yield premium to their benchmark. The composition of the portfolios is limited to Depository Trust and Clearing Corporation (DTCC)-eligible securities of global companies, inclusive of U.S. equities and American Depository Receipts (ADRs), and index based exchange traded funds. The portfolios will invest predominantly in developed markets, at least 80%, but may at times invest up to 30% of their total assets in emerging markets.
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, 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. Through March 31, 2018, monthly returns reflected the daily weighting of cash flow using the modified Dietz method; effective April 1, 2018, 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. Through March 31, 2018, portfolio valuation and calculation of returns occurred when cash flows or security transfers in-kind exceeded 10% of the beginning-of-the-month market value, and accounts were excluded from composites for the month when a client-initiated significant cash flow or security transfer in-kind exceeded 30% of the beginning-of-the-month market value. As of April 1, 2018, 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 10% rule no longer applies due to implementation of daily return calculation. 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.
7. The benchmark for the Composite is the MSCI World Index, which is a free float-adjusted, market capitalization-weighted index that is designed to measure the equity performance of developed markets. While the MSCI World Index does not contain any ADRs, the BNYM Newton Global Equity Income ADR wrap fee portfolios are primarily composed of ADRs along with U.S. equities and DTCC-eligible securities of global companies. Benchmark performance is net of withholding taxes using the highest tax rates applicable to non-resident individual investors. An investor cannot invest directly in any index. Benchmark returns are not covered by the reports of the independent accountants.

8. Effective June 3, 2019, as part of a BNY Mellon branding initiative, the corporate names of MBSC Securities Corporation and The Dreyfus Corporation were changed to BNY Mellon Securities Corporation and BNY Mellon Investment Adviser, Inc., respectively, and the name of the Dreyfus Global Equity Income Composite was changed to the BNYM Newton Global Equity Income ADR Composite.
9. Firm advisory-only assets are assets for all strategies within the firm for which BNYMSC 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 BNYMSC provides investment recommendations for. These assets are presented as supplemental information.
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