

ON A QUARTERLY BASIS, BNY MELLON ADVISORS MAKES INQUIRIES OF THOSE PORTFOLIO MANAGERS THAT TRADE AWAY WITHIN BNY MELLON ADVISOR'S WRAP FEE PROGRAMS.

EACH PORTFOLIO MANAGER IS ASKED TO RESPOND TO A SET OF QUESTIONS, SET FORTH BELOW.

ALL OF THE DATA HEREIN, AND ANY DESCRIPTION AND CONCLUSIONS CONCERNING BEST EXECUTION, WERE DIRECTLY SUPPLIED BY THE PORTFOLIO MANAGER.

\*\*Minor text edits and data summation have been performed by BNY Mellon Advisors in some circumstances to keep the data in a uniform fashion for disclosure, as each Portfolio Manager provides details in various forms.

The costs listed are listed in cents per share, unless otherwise indicated as basis points ("BPS").

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***Section I: Frequency***

For each investment style, Portfolio Managers are asked to supply the frequency and volume of each style, for their trade aways:

- |       |                               |     |                                      |
|-------|-------------------------------|-----|--------------------------------------|
| (i)   | total number of trades        | vs. | total number trades done away;       |
| (ii)  | total numbers of shares/units | vs. | total number shares/units done away; |
| (iii) | total dollar value of trades  | vs. | total dollar value trades done away. |

***Section II: Total Cost***

Total of all added fees/costs associated with the stepped out trade.

(i.e. the mark-up, mark-down, added commissions, added fees, conversion fees or related costs)

***Section III: Assessment***

For EACH step out trade, please indicate the following:

- (i) Benefit Sought
- (ii) Benefit Realized

***Section IV: Conclusion***

An overall written assessment indicating if best execution was achieved (or not), with such conclusion explicitly in terms of the benefits sought/realized given the costs that were incurred.

Trade Away Disclosure  
covering the period

October 1, 2023 - December 31, 2023

ALL DATA HEREIN HAS BEEN DIRECTLY SUPPLIED BY THE MANAGER

Portfolio Manager	Investment Style	Total Trades # of executions	Away Trades # of executions	Total Trades # of Shares/Units	Away Trades # of Shares/Units	Total Trades Dollar Value	Away Trades Dollar Value	Total Cost (Cents per Share or BPS)
Advisors Asset Management	Advisors Asset Core Plus Portfolio	111	35	1140955	1116000	\$1,550,901.00	\$1,095,300.00	\$0.00
Advisors Asset Management	Advisors Asset Core Tax Exempt Portfolio	45	45	1815000	1815000	\$1,872,171.00	\$1,872,171.00	\$0.00
What was the benefit sought for trading away:	Manager failed to provide an explanation as to the benefit sought for trading away.							
What was the benefit realized for trading away:	Manager failed to provide an explanation as to the benefit realized for trading away.							
Provide a written assessment indicating if best execution was achieved (or not):	AAM executed block trades in the AAM SMA Average Price Account at Pershing and leverages a third party system (The Karn Group) for fulfilling our best execution requirements. These trades all passed the review and had no markups, concessions or commissions included.							
Atlanta Capital Management Company	High Quality Small Cap (Hard Close-Trans Only)	56	1	5492	2050	\$319,909.00	\$47,222.00	\$0.00
What was the benefit sought for trading away:	Manager indicated that the benefit sought was, "best execution".							
What was the benefit realized for trading away:	Minimize market impact from information leakage and signals to the market of our position on a trade by limiting the number of trading partners working the same security. The majority of the securities traded away and stepped back in are low liquidity securities. Exercising the step out option allows us to allocate a consistent average execution price across all accounts for the greatest amount of our clients which results in consistent performance across our Institutional and SMA programs and has benefited our efforts in achieving best execution							
Provide a written assessment indicating if best execution was achieved (or not):	Throughout the trading process, the Atlanta Capital trading desk, in the exercise of its reasonable judgment and in the client's interests taken as a whole, will determine if best execution is best maximized by executing directly with the sponsor or by trading away from the sponsor's desk and stepping back in to the sponsor with no additional fees (i.e. no commission fees, markup or markdowns). This decision is influenced by many factors including but not limited to market dynamics, stock specific characteristics, liquidity and execution capabilities of trading partners. Leveraging our relationship with our institutional broker/dealers allows access to "dark liquidity pools" that may reveal a natural contra trading partner. By merging the wrap order with our institutional block order and executing with a single broker, Atlanta Capital trading desk feels this process leads to better execution by limiting the number of trading partners working the same security which in turn significantly limits the possibility of information leakage and signals to the market of our position on a trade.							
Belle Haven Investments, L.P.	Belle Haven Ladder Plus	968	968	28700	28700	\$29,101,253.00	\$29,101,253.00	\$0.00
Belle Haven Investments, L.P.	Belle Haven Taxable Ladder Plus	318	318	7303	7303	\$6,956,124.00	\$6,956,124.00	\$0.00
What was the benefit sought for trading away:	We will trade away 100% of the time as we utilize our own broker/dealer to execute trades, which has allowed us to provide best execution as we do not charge mark-ups, mark-downs or commissions. Belle Haven is a fully registered Broker/Dealer as well as a Registered Investment Advisor. Our Broker/Dealer is utilized to service our RIA by allowing us access to the wholesale market. While traditional money managers must source their bonds through several Broker/Dealers via institutional coverage, each charging a mark-up (or mark-down), we are able to eliminate the need for such an inefficient process and directly source our bonds on the bid side of the market. We are effectively removing a middleman from the transaction. By exploiting this inherent inefficiency in the fixed income space, we are able to generate alpha without having to rely solely upon elevated credit or interest rate risk for increased alpha generation.							
What was the benefit realized for trading away:	We will trade away 100% of the time as we utilize our own broker/dealer to execute trades, which has allowed us to provide best execution as we do not charge mark-ups, mark-downs or commissions. Belle Haven is a fully registered Broker/Dealer as well as a Registered Investment Advisor. Our Broker/Dealer is utilized to service our RIA by allowing us access to the wholesale market. While traditional money managers must source their bonds through several Broker/Dealers via institutional coverage, each charging a mark-up (or mark-down), we are able to eliminate the need for such an inefficient process and directly source our bonds on the bid side of the market. We are effectively removing a middleman from the transaction. By exploiting this inherent inefficiency in the fixed income space, we are able to generate alpha without having to rely solely upon elevated credit or interest rate risk for increased alpha generation.							
Provide a written assessment indicating if best execution was achieved (or not):	We will trade away 100% of the time as we utilize our own broker/dealer to execute trades, which has allowed us to provide best execution as we do not charge mark-ups, mark-downs or commissions. Firm has an obligation to provide best execution for its customers' orders, whether executed internally or routed to other broker-dealers. "Best execution" refers to using reasonable diligence to determine the best market to buy or sell a security and obtaining a price as favorable as possible under prevailing market conditions. The Firm's obligation to provide best execution also extends to handling and executing orders for customers of other broker-dealers routed to the Firm (but not orders that simply execute the order against the Firm's quote). Factors for using "reasonable diligence" include: The character of the market for the security, e.g., price, volatility, relative liquidity, and pressure on available communications; The size and type of transaction; The number of markets checked; Accessibility of the quotation; and The terms and conditions of the order. The term "markets" is broadly defined, including market centers that are trading a particular security.							
Brandes Investment Partners, L.P.	Brandes European Equity	25	5	6192	1805	\$85,300.00	\$13,794.00	15 BPS
Brandes Investment Partners, L.P.	Brandes Global Balanced	21	1	47465	6652	\$989,517.00	\$103,274.00	15 BPS
Brandes Investment Partners, L.P.	Brandes Global Equity	32	2	144594	39541	\$3,061,165.00	\$554,881.00	15 BPS
Brandes Investment Partners, L.P.	Brandes International Equity	55	8	125150	80080	\$1,803,717.00	\$741,465.00	14 BPS
What was the benefit sought for trading away:	Although we manage each client account individually, we will often aggregate, for execution as a single transaction, orders for the purchase or sale of a particular security when we are provided the discretion to direct brokerage. We do this for best execution purposes. This helps enable us to prevent information leakage by directing the entire order to a discreet institutional broker(s), leverage the large order size to get in touch with large sellers/buyers, reduce our foot print in the market, utilize principal trading when needed, and negotiate better commission rates.							
What was the benefit realized for trading away:	Benefits of aggregation manifest themselves in our best execution monitoring effort. Using a third-party execution quality analysis package provided by IHS Markit, we see consistency in the performance of stepouts relative to measures of market and price impact. To ensure our explicit costs are in line with the industry, we contrast our commission rates at least annually against industry levels using data from Greenwich Associates and make adjustments accordingly.							
Provide a written assessment indicating if best execution was achieved (or not):	As per our Best Execution policy, we review discretionary/step-out trades on a regular basis using the Transaction Cost Analysis (TCA) reports provided by LiquidMetrix. We can confirm that we have followed our best execution policy during the quarter. The reports and data compiled by our Operational Risk Management Group and reported to the firm's Trade Management Oversight Committee (TMOC) support our conclusion that the step-out trades helped us achieve our efforts in seeking best execution.							
Breckinridge Capital Advisors, Inc.	Breckinridge Intermediate Tax-Exempt Municipal National	401	401	24755	24755	\$26,483,509.85	\$26,483,509.85	\$0.00
Breckinridge Capital Advisors, Inc.	Breckinridge Intermediate Tax-Exempt Municipal State Preferre	401	401	24755	24755	\$26,483,509.85	\$26,483,509.85	\$0.00
What was the benefit sought for trading away:	We believe that having the widest possible window of dealer access is necessary to ensure we meet our best execution objectives.							

What was the benefit realized for trading away: Provide a written assessment indicating if best execution was achieved (or not):	Trading away allowed us to trade with a broad network of dealers, helping us achieve best execution. We believe that having the widest possible window of dealer access is necessary to ensure we meet our best execution objectives. Trading away allowed us to trade with a broad network of dealers, helping us achieve best execution.							
Carret Asset Management	Carret Municipal Bond	1562	1540	111963151	111620000	\$114,722,251.00	\$113,574,717.00	0.2 BPS - 1 BPS
Carret Asset Management	Carret Taxable Bond	1591	1502	49047542	49000000	\$48,063,378.00	\$47,641,236.00	0.2 BPS - 1 BPS
What was the benefit sought for trading away: What was the benefit realized for trading away: Provide a written assessment indicating if best execution was achieved (or not):	Manager failed to provide an explanation as to the benefit sought for trading away. Manager indicated that the benefit realized was, "best execution". Pursuant to CAM's Best Execution Policy, best execution was achieved.							
Crossmark Global Investments, Inc.	Crossmark Municipal Fixed Income	77	77	1175000	1175000	\$1,182,589.00	\$1,182,589.00	\$0.00
What was the benefit sought for trading away: What was the benefit realized for trading away: Provide a written assessment indicating if best execution was achieved (or not):	Crossmark utilizes step-out transactions when appropriate, if allowed by the custodian, to achieve better execution in the marketplace. Trading away allows us to trade with a broad network of dealers, helping us improve execution quality. Crossmark Global Investments Municipal Fixed Income team strives for best execution to each transaction and does not mark up the buy side nor mark down the sell side and does not carry inventory as a firm making all transactions for the benefit of the client.							
Cullen Capital Management	Schafer Cullen International High Dividend (ADR)	266	10	20370	1171	\$487,198.15	\$19,051.66	\$0.00
What was the benefit sought for trading away: What was the benefit realized for trading away:  Provide a written assessment indicating if best execution was achieved (or not):	Best execution & access to local market trading Best execution & access to local market trading  The US Equity Execution Desk notified us a few quarters ago they would no longer be able to facilitate order flow meant for the local overnight market. They are apparently only able to transact in local markets during US trading hours - so they will essentially miss the entire Asian market flow and most of the European opens. They are able to access markets in Europe & Latam which overlap with US hours - and they are able to use the OTC markets. We do not believe that OTC trading is in the client's best interests (except in the case of emergencies or small orders). To avoid this small window of market availability we are using MAXIM as an international broker - who is one that the US equity desk uses as well. This gives us the ability to access a full trading day in many markets - and MAXIM is not charging additional costs for these executions. US orders are traded through the US Equity Execution Desk and no tradeaways were done during the quarter. One ADR order was done with Cowen as part of an ADR conversion. No additional fees were charged (other than the normal ADR conversion fees which would have been charged for a conversion anywhere). The goal was to get the order done in as short a time as possible - so a conversion order was placed with Cowen and blocked for as many relationships as possible.							
Cumberland Advisors Inc.	Cumberland Total Return Tax-Free Municipal	20	20	860000	860000	\$761,854.45	\$761,854.45	\$0.00
What was the benefit sought for trading away: What was the benefit realized for trading away: Provide a written assessment indicating if best execution was achieved (or not):	Bonds are block traded. Block trading allows access to institutional markets. Block trading and having access to institutional markets is done for execution purposes.							
Dana Investment Advisors	Dana Social ESG Bond	11	11	250000	250000	\$226,586.83	\$226,586.83	\$0.00
What was the benefit sought for trading away: What was the benefit realized for trading away:  Provide a written assessment indicating if best execution was achieved (or not):	We sought to obtain a greater number of bid/ask offers for each trade away transaction which would further help Dana obtain best price and execution. Dana was able to sell securities at higher prices and purchase securities at lower prices. For purchase transactions, Dana contacted multiple institutional fixed income broker/dealers to "negotiate" the purchase of the security. The decisions to purchase with the executing brokers were primarily based upon a combination of client specific needs, security price and specific security characteristics that Dana deemed to be desirable. For sale transactions, Dana received multiple competitive bids for all securities that were sold. Sale transactions were then placed with the broker/dealers bidding the highest price for the bonds being sold. As a result, Dana determined that it was able to achieve best price and execution for the client on all trade away transactions.							
Davidson Investment Advisors, Inc.	SeaCap Intermediate Taxable Fixed Income	10	10	350000	350000	\$335,325.83	\$335,325.83	\$0.00
What was the benefit sought for trading away:  What was the benefit realized for trading away:  Provide a written assessment indicating if best execution was achieved (or not):	DIA generally utilizes step-out transactions if allowed by the custodian, as we typically achieve better execution in the competitive marketplace than solely utilizing a proprietary trading desk. The fixed income markets lack a central exchange and as a result, while some pieces of the market are automated, on the whole it is not. Our goal is to utilize available information and resources to seek the broker that provides the best possible bids and offers on all fixed income trades while doing so in a timely manner with appropriate documentation. Manager failed to provide an explanation as to the benefit realized for trading away. Per trade documentation including bid/offer markets, the time of the trade and bid wanted results including trade price, cover bid and total number of bids from sources such as Bloomberg, Thomson Financial and MarketAxess, we believe best execution was achieved, with no additional transaction costs incurred by the client.							
Eagle Asset Management	Eagle High Quality Tax Free Bonds	85	85	1280000	1280000	\$1,398,741.11	\$1,398,741.11	\$0.00
Eagle Asset Management	Eagle High Quality Taxable Bonds	570	570	1666000	1666000	\$1,380,264.61	\$1,380,264.61	\$0.00
Eagle Asset Management	Eagle Strategic Income	1250	1250	7214000	7214000	\$6,895,759.32	\$6,895,759.32	\$0.00
Eagle Asset Management	Eagle Strategic Income - Tax Advantaged	111	111	2468000	2468000	\$2,547,770.60	\$2,547,770.60	\$0.00
Eagle Asset Management	Eagle Asset Tax Aware Fixed Income	12	12	34000	34000	\$33,044.36	\$33,044.36	\$0.00
What was the benefit sought for trading away: What was the benefit realized for trading away: Provide a written assessment indicating if best execution was achieved (or not):	To add value based on Bloomberg's Trade Cost Analysis. Eagle will provide Bloomberg Trade Cost Analysis on demand. Based on Bloomberg's Trade Cost Analysis we lost 9.99 bps of value compared to Bloomberg's Execution Far Touch benchmark (which measures performance by comparing our execution to the observed CBBT-Bloomberg Real-time Composite price) on our execution in the 4th quarter for all trades done away.							
Franklin Templeton Private Portfolio Group, LLC	Franklin Intermediate Fixed Income SMA	363	363	2790489	2790489	\$2,688,177.00	\$2,688,177.00	\$0.00
Franklin Templeton Private Portfolio Group, LLC	Franklin Intermediate Municipal SMA	78	78	3315000	3315000	\$3,475,406.00	\$3,475,406.00	\$0.00
Franklin Templeton Private Portfolio Group, LLC	ClearBridge All Cap Value	54	54	670	670	\$26,340.16	\$26,340.16	\$0.01
Franklin Templeton Private Portfolio Group, LLC	ClearBridge Appreciation	91	69	2030	1875	\$209,989.15	\$179,730.28	\$0.01
Franklin Templeton Private Portfolio Group, LLC	ClearBridge International Growth ADR ESG	166	54	23401	18525	\$674,997.83	\$494,298.71	\$0.01
Franklin Templeton Private Portfolio Group, LLC	ClearBridge International Value ADR	92	13	10191.5	9704	\$229,721.69	\$221,294.66	\$0.01
Franklin Templeton Private Portfolio Group, LLC	ClearBridge Large Cap Growth	295	31	8600	6881	\$1,196,902.11	\$881,950.58	\$0.01
Franklin Templeton Private Portfolio Group, LLC	ClearBridge Multi Cap Growth	208	28	7195	3269	\$738,849.00	\$470,984.88	\$0.01

Franklin Templeton Private Portfolio Group, LLC	Franklin Small Cap Growth	66	65	472	468	\$19,134.10	\$18,284.25	\$0.00
Franklin Templeton Private Portfolio Group, LLC	Franklin Templeton Balanced Income	10985	56	17663137.03	9161	\$55,983,195.99	\$653,291.74	\$0.00
Franklin Templeton Private Portfolio Group, LLC	Franklin Templeton All Cap Blend (MDAO)	194	187	3105.5	3026	\$184,835.87	\$172,316.14	\$0.01
What was the benefit sought for trading away:	As is more fully described in Item 12 of Franklin Templeton Private Portfolio Group, LLC's (FTPPG), Form ADV brochure, FTPPG executes all or substantially all "model change" trades on behalf of its managed account program clients as an aggregated block trade through a single broker-dealer instead of executing such trades with each client's sponsor firm or designated broker as FTPPG believes that handling such trades in such manner enhances its ability to obtain best execution for client accounts. Item 12 of FTPPG's Form ADV brochure also describes the trade cost analysis that FTPPG does on significant block trades in an effort to monitor that the block trading method utilized by FTPPG is consistent with its obligation to seek best execution for client transactions. The trade cost analysis includes any implied commissions paid as such charges are reflected in the total security price or proceeds.							
What was the benefit realized for trading away:	Manager failed to provide an explanation as to the benefit realized for trading away.							
Provide a written assessment indicating if best execution was achieved (or not):	Manager failed to provide an explanation whether best execution was achieved.							
GW&K Investment Management, LLC	GW&K Core Bond	95	95	1590422.67	1590422.67	\$1,444,592.11	\$1,444,592.11	\$0.00
GW&K Investment Management, LLC	GW&K Municipal Bond	1980	1980	76935000	76935000	\$82,107,857.02	\$82,107,857.02	\$0.00
GW&K Investment Management, LLC	GW&K Total Return Bond	120	120	478539.55	478539.55	\$429,120.17	\$429,120.17	\$0.00
What was the benefit sought for trading away:	GW&K will step-out portions of its trades when it determines doing so may potentially facilitate better execution for client orders. There are no additional explicit costs for client's step-out trades in fixed income securities. As GW&K is an investment advisor and not a broker/dealer, we neither receive any economic benefit from trading activity, nor do we directly control the degree of mark-up or mark-down that may be applied by brokers we engage on behalf of our fixed income clients. That said, we have high conviction that our greatest opportunity to achieve best execution in municipal and taxable bond trading is to leverage institutional trading relationships, aggregate trade volume influence, regional and sector expertise, and other factors made available through having discretion over such transactions. Moreover we believe, through trading large blocks of bonds with institutional trading partners when compared to what most program sponsor desks may execute in smaller increments, perhaps even on an account by- account basis, GW&K is not only not adding additional cost, but that clients are benefiting from our trading expertise and paying less.							
What was the benefit realized for trading away:	As mentioned previously, GW&K will step-out portions of its trades when it determines doing so may potentially facilitate better execution for client orders. There are no additional explicit costs for client's step-out trades in fixed income securities. As GW&K is an investment advisor and not a broker/dealer, we neither receive any economic benefit from trading activity, nor do we directly control the degree of mark-up or mark-down that may be applied by brokers we engage on behalf of our fixed income clients. That said, we have high conviction that our greatest opportunity to achieve best execution in municipal and taxable bond trading is to leverage institutional trading relationships, aggregate trade volume influence, regional and sector expertise, and other factors made available through having discretion over such transactions. Moreover we believe, through trading large blocks of bonds with institutional trading partners when compared to what most program sponsor desks may execute in smaller increments, perhaps even on an account by- account basis, GW&K is not only not adding additional cost, but that clients are benefiting from our trading expertise and paying less.							
Provide a written assessment indicating if best execution was achieved (or not):	As a registered investment adviser, GW&K has a duty to seek best execution in its trading on behalf of client accounts. GW&K has implemented a series of policies, procedures and controls designed to ensure that the firm places client trades in a manner that achieves the most favorable overall execution and cost that can reasonably be obtained under the circumstances. GW&K evaluates a number of considerations in determining the best potential execution opportunity for each trade. While GW&K is not obligated to choose the most favorable level of any single criterion, such as commission rate, the firm considers a range of factors such as the broker's or counterparty's execution capability (including access to or capacity to accept desired securities) and other factors, including the firm's financial stability; security price; commission or spread rates; the value of research provided, if any; the firm's ability to obtain volume discounts; the firm's effectiveness in trade settlement; and the firm's responsiveness to GW&K. To facilitate GW&K's oversight and review of brokerage practices, the firm maintains a brokerage committee, which meets quarterly to review trading related matters including best execution, broker utilization, soft dollar usage, directed brokerage, trade errors (if any), and other items as applicable. The committee is comprised of GW&K's Chief Compliance Officer, General Counsel and other members of the Legal & Compliance team, investment team leaders, and trading personnel. In addition, GW&K uses a recognized, independent third-party service to review and analyze trade execution data, and these reports are reviewed and analyzed by the brokerage committee.							
Kayne Anderson Rudnick Inv. Mgmt.	Kayne Anderson Mid Cap Core	844	122	63311	44997	\$3,430,868.00	\$1,228,802.00	\$0.02
What was the benefit sought for trading away:	KAR utilizes step out trades as a means of sourcing liquidity and to guard against information leakage. The executing brokers we use are familiar with the types of names we trade. Using "high-touch" capabilities, they are able to source, sometimes, very difficult to find opportunities. By consolidating our trade executions to a limited number of brokers, KAR can more efficiently transact on behalf of many of our clients while at the same time limiting leakage.							
What was the benefit realized for trading away:	Consolidated trade executions to a limited number of brokers and efficiently transacted on behalf of many of our clients while at the same time limiting leakage.							
Provide a written assessment indicating if best execution was achieved (or not):	We believe best execution was achieved as we were able to successfully consolidate trade executions to a limited number of brokers and efficiently transacted on behalf of many of our clients while at the same time limiting leakage.							
Lazard Asset Management	Lazard Emerging Markets Equity Select ADR	1781	448	1758113	145291	\$24,880,954.00	\$1,121,424.00	\$0.04
Lazard Asset Management	Lazard European Value	1985	991	147055	71450	\$4,951,796.00	\$1,860,615.00	\$0.04
Lazard Asset Management	Lazard International Equity Select ADR	1800	920	147899	113030	\$4,013,683.00	\$2,151,578.00	\$0.04
Lazard Asset Management	Lazard International Equity Select with Emerging Markets	109	60	8230	5655	\$225,051.00	\$117,227.00	\$0.04
What was the benefit sought for trading away:	Lazard Asset Management LLC seeks to execute transactions for Clients in such a manner that the Client's total cost or proceeds in each transaction is the most favorable under the circumstances in accordance with its duties pursuant to SEC guidance regarding best execution.							
What was the benefit realized for trading away:	Lazard Asset Management LLC seeks to execute transactions for Clients in such a manner that the Client's total cost or proceeds in each transaction is the most favorable under the circumstances in accordance with its duties pursuant to SEC guidance regarding best execution.							
Provide a written assessment indicating if best execution was achieved (or not):	On a quarterly basis, the firm sends all wrap trading data to Virtu Financial (f/k/a) Investment Technology Group, Inc., ("Virtu") for forensic review of the cost associated with wrap trading and step-outs. This review is designed to test whether the firm's trading of model portfolios adhere to best execution with reference to a combination of metrics: (a) basis points deviation from the benchmark (2-day VWAP) and (b) dollar amount impact fields. We review Virtu's output for trade outliers that are represented in the bottom 2% with reference to the benchmark and incur a trading loss of over \$2500. The results of our review indicate that the cost Lazard achieves is more favorable than our wrap program sponsors. Thus far, none of our step-out trades have been identified as an outlier. The results of our review suggest that Lazard's current trading of model portfolios is adequately designed to achieve best execution.							
Loomis, Sayles & Company, LP	Loomis Intermediate Term Municipal Bond (5 Yr Avg)	29	29	600000	600000	\$631,008.00	\$631,008.00	3.03 BPS
Loomis, Sayles & Company, LP	Loomis Medium Term Muni Bond (10 Year)	122	122	2265000	2265000	\$2,407,712.00	\$2,407,712.00	3.03 BPS

Consistent with its obligation to seek best execution, Loomis Sayles executes virtually all fixed income trades through broker-dealers other than the managed account program sponsor. Loomis Sayles participates in multiple managed account programs and also manages institutional and other "non-SMA" accounts, and it is responsible for identifying bonds that best fit its fixed income taxable and municipal bond strategies. When deemed to be in the best interests of its clients, orders for the same security are combined or "batched" to obtain more favorable execution including better pricing and enhanced investment opportunities than would otherwise be available if such orders were not aggregated. In order to satisfy its obligation to seek best execution, Loomis Sayles selects broker-dealers which it believes have the ability to achieve the most favorable net price and execution for transactions under the circumstances. The firm trades with over 100 fixed income dealers. Both qualitative and quantitative criteria are used to evaluate and select between the various dealers that are capable of executing a trade. Execution considerations may include the size and breadth of the market for the security; size and difficulty of executing an order; block positioning; net price; quality of execution, market intelligence and knowledge regarding trading activity; reliability, willingness and ability to commit capital; willingness to execute difficult transactions; financial strength; and maintaining confidentiality and anonymity of trading activity. Loomis Sayles does not execute trades through affiliates.

In our view, Loomis Sayles is realizing its obligation of seeking best execution for its clients. Loomis Sayles is responsible for identifying bonds that best fit its municipal bond and taxable fixed income strategies. Every bond that trades in the market has a "bid/ask spread." When Loomis Sayles steps out a trade for a bond to a dealer, it is buying the bond for the client at the "ask" price and selling the bond at the "bid" price. The difference between the "bid" and "ask" prices is the "spread." This spread which is imbedded in the net price and is not disclosed by the dealer, could be viewed as an additional imbedded cost that a client may incur. However, the client would incur this spread regardless of whether Loomis Sayles steps out the trade to another dealer or executes the trade through sponsor/custodian. The data shown in the table for "added fees and costs attributed to trade away executions" reflect the potential additional spread cost for the respective Loomis Sayles strategies for which trade data is provided.

Loomis Sayles has implemented Brokerage Allocation Policies and Procedures that are designed to reasonably ensure that the firm complies with the regulatory requirements relating to Best Execution. The following is a brief description of how the firm satisfies these requirements: Loomis Sayles' trading processes were developed in an effort to satisfy its fiduciary duty to achieve best execution for its clients. Trading is a very important part of the portfolio management process at Loomis Sayles, and the firm commits considerable resources to its Portfolio Managers (PM)/Traders and trading systems. To maximize coordination and execution, Loomis Sayles has centralized municipal trading in the Chicago office. The firm employs experienced Fixed Income PM/Traders that specialize in municipal fixed income. Loomis Sayles believes that centralized trading creates economies of scale, commands optimal brokerage coverage, and facilitates equitable distribution of trading opportunities. Together, these trading advantages can significantly contribute to best execution and overall portfolio performance. The centralized trading desks ensure absolute control and efficiency in the firm's trading process. The Portfolio Management/Trading and Credit Research teams generally meet each morning to discuss market conditions and to identify trade opportunities that represent relative value. Transactions are then generated and executed by the PM/Traders using the firm's Charles River Trading System. The PM/Traders determine the appropriate strategy for trade execution, which is primarily determined by assessing the characteristics of the proposed security. The PM/Traders are in constant communication with a large number of dealers so they are able to locate the dealer who is able to make a market in the particular security to be traded. Additional benefits of centralized trading include: Leverage of asset base to achieve best execution for clients; Increase in the firm's ability to structure deals; Confidentiality and better control of proprietary information - reduces risk of others knowing Loomis Sayles' research opinions; Better internal control as all trades are executed by centralized desks through the firm's automated order management system (Charles River) which has investment guideline compliance functionality; and Ability of Portfolio Managers to focus on security selection and client guidelines/objectives.

Lord, Abbett & Co.	Lord Abbett 1-10 Year Laddered Muni	98	98	4965000	4965000	\$5,299,995.00	\$5,299,995.00	\$0.00
Lord, Abbett & Co.	Lord Abbett 1-15 Year Laddered Muni	60	60	840000	840000	\$887,692.00	\$887,692.00	\$0.00
Lord, Abbett & Co.	Lord Abbett 1-20 Year Laddered Muni	1	1	25000	25000	\$25,446.00	\$25,446.00	\$0.00
Lord, Abbett & Co.	Lord Abbett 1-5 Year Laddered Muni	11	11	665000	665000	\$707,660.00	\$707,660.00	\$0.00
Lord, Abbett & Co.	Lord Abbett 5-10 Year Laddered Muni	25	25	525000	525000	\$555,355.00	\$555,355.00	\$0.00
Lord, Abbett & Co.	Lord Abbett Intermediate Municipals	292	292	13235670	13235670	\$15,636,328.00	\$15,636,328.00	\$0.00

Trades away do not incur any additional costs and typically provide the opportunity to reduce transaction costs. For selling bonds, each year we complete trades with over one hundred dealers so we can put them in competition to produce the best bid rather than relying on just one firm to provide liquidity. Similarly when we buy bonds we have access to the same number of dealers so we are able to select from the full range of new issues and bonds offered in the secondary market. Lord Abbett does not mark up or charge commission for trades, so we do not collect any profits from completing the transactions. The dealers we trade with include the size of their commission in the net price they are paying us so we do not control their markup but are able to monitor them through market data in order to make sure they are fair. Commissions are typically smaller for larger institutional size trades and when dealers are put in competition for business, but we review the net prices to us to determine if the bid or offer is attractive for our clients. Any commissions that are charged generally come from the client's custodian, if they are charged at all.

Manager failed to provide an explanation as to the benefit realized for trading away.

Manager failed to provide an explanation whether best execution was achieved.

Madison Investment Advisors, LLC	Madison Government Bond	5	5	808000	808000	\$776,296.00	\$776,296.00	\$0.00
Madison Investment Advisors, LLC	Reinhart Active Intermediate Fixed Income	12	12	309000	309000	\$293,237.00	\$293,237.00	\$0.00
Madison Investment Advisors, LLC	Reinhart Limited Duration Fixed Income	10	10	45000	45000	\$43,506.00	\$43,506.00	\$0.00
Madison Investment Advisors, LLC	Madison Taxable Fixed Income - A or Better	1	1	2065697	2065697	\$1,937,156.00	\$1,937,156.00	\$0.00

Trades we conduct for BNY Mellon Advisors program accounts invested in our fixed income strategies are executed as step-outs to avoid conflicts with principal/agency status of sponsor firms and to seek best execution for clients. When we step-out trades for fixed income accounts, trading lists are sent to multiple dealers with the goal of achieving best execution. Dealers are not paid a fee for bond transactions, but instead are compensated by the bid/ask spread. As such, there are no additional costs beyond the bid/ask spread that are charged as a result of step-out fixed income transactions. We seek to buy/sell full positions, but markets occasionally require us to buy/sell partial positions. In such cases, allocation post-trade occurs and we will apply securities/proceeds pro rata across effective accounts. By aggregating the purchases or sales of a broader base of clients, including those who use other brokers and/or custodians, we may be able to find additional bonds available in larger blocks, resulting in better overall prices.

We believe to have achieved best execution for the trades we conducted on behalf of BNY Mellon Advisors accounts invested in our fixed income strategies at no additional cost to clients.

We believe to have achieved best execution for the trades we conducted on behalf of BNY Mellon Advisors accounts invested in our fixed income strategies at no additional cost to clients.

Natixis Advisors, L.P.	Natixis / Loomis Intermediate Duration	23	12	106000	81000	\$102,701.41	\$78,121.78	0-1 BPS
What was the benefit sought for trading away:	Manager indicated that the benefit sought was, "best execution".							
What was the benefit realized for trading away:	Manager indicated that the benefit realized was, "best execution".							

Provide a written assessment indicating if best execution was achieved (or not): There were no additional commissions paid on the fixed income trading activity, but the implicit spread or venue toll charges could be viewed as additional compensation.

New York Life Investment Management, LLC	New York Life Convertible Securities	482	451	1163599	1163126	\$1,560,380.04	\$1,528,805.30	\$0.00
What was the benefit sought for trading away:	Manager failed to provide an explanation as to the benefit sought for trading away.							
What was the benefit realized for trading away:	Manager failed to provide an explanation as to the benefit realized for trading away.							

The MacKay Shields convertible strategy employs the use of trade-aways for the majority of the trading done for all clients across all sponsor platforms. This is not limited to a particular quarter or a period of time, but has been and will be consistent as part of our trading strategy. The portfolio composition of convertible bonds varies between 80% and 90% of the model portfolio with the remainder being convertible preferred stock. We trade all the listed preferred that have sufficient liquidity with the sponsor platforms but trade the bonds exclusively with market makers with whom MacKay Shields has an established relationship with the convertible trading desks and who make markets for our securities. This is a specialized product and we aggregate the securities across accounts as well as sponsor firms to build larger blocks and get better pricing for all of our clients. Because many of the convertible bonds are difficult to execute, we employ this strategy to achieve best execution. As these transactions are mainly bonds or over the counter preferred stock there were no additional mark ups or commissions on these transactions beyond the structure of the customary bid / offer prices and we believe that these transactions were executed on behalf of our clients in such a manner that the clients' total cost or proceeds in each transaction was the most favorable under the circumstances. It should be noted that in seeking to maintain best execution on behalf of our clients, we may consider factors beyond simply price, commission rates or spreads, including the full range and quality of a broker's services in placing brokerage. These factors might include, among other things, the value of research provided, execution capability, financial responsibility, and responsiveness. The convertible portfolio does not generate soft dollar commissions.

Nuveen Asset Management	Nuveen 1-10 Year Municipal Ladder	26	26	485000	485000	\$812,711.58	\$812,711.58	\$0.00
Nuveen Asset Management	Nuveen 1-15 Year Municipal Ladder	53	53	2790000	2790000	\$3,011,913.45	\$3,011,913.45	\$0.00
Nuveen Asset Management	Nuveen Intermediate Term Municipal - National	620	620	30290000	30290000	\$31,590,996.38	\$31,590,996.38	\$0.00
Nuveen Asset Management	Nuveen Limited Maturity Municipal Bond	63	63	2355000	2355000	\$2,420,866.65	\$2,420,866.65	\$0.00
Nuveen Asset Management	Nuveen Long Term Municipal Bond	141	141	3160000	3160000	\$3,223,723.70	\$3,223,723.70	\$0.00
Nuveen Asset Management	Nuveen Municipal Bond Ladder 1-7 Year	33	33	1485000	1485000	\$1,535,587.55	\$1,535,587.55	\$0.00
Nuveen Asset Management	Nuveen Municipal Bond Ladder 5-15 Year	30	30	1030000	1030000	\$1,108,544.50	\$1,108,544.50	\$0.00
Nuveen Asset Management	Nuveen Municipal Total Return	8	8	285000	285000	\$294,168.30	\$294,168.30	\$0.00
Nuveen Asset Management	Nuveen Preferred Securities	979	88	14969	2458	\$347,106.00	\$61,417.00	\$0.00

When Nuveen Asset Management believes that the broker-dealer serving as managed account program sponsor or custodian or a broker-dealer that is otherwise designated by a client cannot provide best execution, Nuveen seeks to trade away from such broker-dealer to the extent necessary and if permitted under the relevant agreement. Nuveen defines best execution as a responsibility to our clients to seek the best price when trading municipal securities under prevailing market circumstances. Nuveen Asset Management has established a Municipal Separately Managed Accounts ("SMA") Best Execution Committee, which is responsible for reviewing, evaluating and reporting its conclusions regarding the quality of Nuveen Asset Management's municipal trading activities with respect to SMA accounts to ensure that such client accounts receive execution quality consistent with standards established by Nuveen Asset Management. The Municipal SMA Best Execution Committee meets periodically and its responsibilities include, but are not limited to, the review of internally prepared reports analyzing execution of securities and making any necessary recommendations to address deviations from the execution standards set forth, including communicating with sponsors to address. Corporate Bond Ladders When Nuveen Asset Management believes that the broker-dealer serving as managed account program sponsor or custodian or a broker-dealer that is otherwise designated by a client cannot provide best execution, Nuveen seeks to trade away from such broker-dealer to the extent necessary and if permitted under the relevant agreement. Corporate bond trades are then executed over broadly used electronic trading platforms with several dealers in competition. Nuveen defines best execution as a responsibility to our clients to seek the best price when trading securities under prevailing market circumstances. Nuveen Asset Management has established a Fixed Income Best Execution Committee, which is responsible for reviewing, evaluating and reporting its conclusions regarding the quality of Nuveen Asset Management's taxable trading activities with respect to SMA accounts to ensure that such client accounts receive execution quality consistent with standards established by Nuveen Asset Management. The Fixed Income Best Execution Committee meets periodically and its responsibilities include, but are not limited to, the review of internally prepared reports analyzing execution of securities and making any necessary recommendations to address deviations from the execution standards set forth, including communicating with sponsors to address. Preferred Securities Many strategy trades (trades done across all accounts in the SMA strategy) are done as step-outs as we often get better execution than if we were direct trades to each sponsor within the SMA strategy. This is because many exchange-traded preferred securities, while liquid in smaller sizes, don't have the depth to handle the larger order size needed to reposition accounts across the strategy. Participation in new issue and trading to-be-listed securities are additional reasons why we do step-out trades. Last, broker selection is specific to the situation at hand, where we always strive to get the best execution for all clients. Preferred Securities Select For the purpose of overall best execution, and at the request of certain program sponsors, Nuveen Asset Management trades away from broker-dealer serving as managed account program sponsor or custodian or a broker-dealer that is otherwise designated by a client. Nuveen seeks best execution in order to obtain the best price, when buying and selling preferred securities for client accounts.

What was the benefit realized for trading away: Manager failed to provide an explanation as to the benefit realized for trading away.

Provide a written assessment indicating if best execution was achieved (or not):	<p>The firm believes it has met its best execution obligations with the best execution procedures currently in place. As part of our best execution process, we review internally generated trade reports and assess trade price, block size, security level characteristics (credit quality, calls, sector, etc.) and prevailing market conditions, among other factors. We also review other trades that are executed for the same bond. Trade execution is reviewed by the head of our SMA portfolio management team. On a semi-annual basis, our compliance team will prepare and review internal reports analyzing the trade execution for Discretionary SMAs and will report such information to the relevant NAM Best Execution Committee for further review. IMPORTANT DISCLOSURES This communication is in response to a request for proposal (RFP), request for information (RFI), diligence, information, portfolio review, analysis or similar information or analysis request regarding certain Nuveen Asset Management products and/or services ("Information Request"). Nuveen Asset Management's responses are intended to provide information regarding the products and/or services responsive and relevant to the Information Request, and are not tailored to the particular underlying needs or circumstances of the recipient or any particular client type. These responses are not provided in a fiduciary capacity and are not, and should not be considered as, investment advice or a recommendation or suggestion as to any specific course of action. Any such action, including investment in the product or use of the service described in the Information Request, should be made based on the recipient's own needs and circumstances and in consultation with its own independent advisors. Nuveen Asset Management regularly communicates with financial advisors and other professionals ("advisors") on relevant matters, including Information Requests regarding Nuveen Asset Management products and services. To the extent that these advisors provide advice to a Nuveen Asset Management client or prospective client that is an ERISA plan, participant, beneficiary or IRA, it is expected that the advisor will function as a fiduciary to such party, capable of independently evaluating the merits and risks of Nuveen Asset Management's products and services and responsible for exercising independent judgment in evaluating Nuveen Asset Management's products and services, and such parties should look to their own advisors for advice regarding any specific course of action. Outside of a formal advisory relationship, Nuveen Asset Management's communications do not undertake to provide impartial investment advice or give advice in a fiduciary capacity. DISCLAIMER This information represents the opinion of Nuveen Asset Management and is not intended to be a forecast of future events, a guarantee of future results, or investment advice. It is not intended to provide specific advice or to be construed as an offering of securities or a recommendation to invest. The factual information has been obtained from sources believed to be reliable but is not guaranteed as to accuracy or completeness. Investing in securities involves risk of loss that clients should be prepared to bear. There is no assurance that an investment will provide positive performance over any period of time. Past performance is no guarantee of future results and different periods and market conditions may result in significantly different outcomes. Nuveen Asset Management, LLC is a registered investment adviser and an affiliate of Nuveen, LLC.</p>								
Pacific Income Advisers	Pacific Income Advisers Limited Duration SMA	37	37	517000	517000	\$487,642.11	\$487,642.11	0.2 BPS	
Pacific Income Advisers	Pacific Income Advisers Market Duration SMA	71	47	578000	541000	\$552,849.09	\$519,586.48	0.2 BPS	
What was the benefit sought for trading away:	Manager indicated that the benefit sought was, "best execution".								
What was the benefit realized for trading away:	Manager indicated that the benefit realized was, "best execution".								
Provide a written assessment indicating if best execution was achieved (or not):	We do not track benefits sought/realized but trade away in order to ensure best execution. We believe that we have achieved best execution for our clients by choosing the best price available for our trades, from brokers who are able to execute and settle trades in a timely manner.								
Reaves Asset Management	Reaves Long Term Value (Utility/Energy Infrastructure)	459	459	208338	208338	\$11,360,259.00	\$11,360,259.00	\$0.00	
What was the benefit sought for trading away:	Trading away allows Reaves Asset Management to aggregate executions with other accounts. There are no additional costs to any client; any execution costs were absorbed by the Adviser.								
What was the benefit realized for trading away:	As stated above we can aggregate executions with other clients.								
Provide a written assessment indicating if best execution was achieved (or not):	Best execution was achieved; there were no added costs to any account. Please Note: Transaction details are for all BNY Mellon Advisors accounts, combined, managed by Reaves. Also, trade totals are for the BNY Mellon Advisors execution blocks, not the allocations.								
Riverfront Investment Group LLC	Riverfront Conservative Income Builder	9	6	431	385	\$24,449.00	\$19,480.00	\$0.00	
Riverfront Investment Group LLC	Riverfront Dynamic Equity Income	350	2	15602	5914	\$921,180.00	\$408,235.00	\$0.00	
Riverfront Investment Group LLC	Riverfront ETF Dynamic Equity Income	263	2	14762	3113	\$862,147.00	\$215,385.00	\$0.00	
Riverfront Investment Group LLC	Riverfront ETF Global Allocation	51	2	1891	1142	\$129,286.00	\$78,966.00	\$0.00	
Riverfront Investment Group LLC	Riverfront ETF Moderate Growth & Income	43	3	1481	1384	\$63,443.00	\$56,929.00	\$0.00	
Riverfront Investment Group LLC	Riverfront Moderate Growth & Income	152	6	15747	13191	\$748,481.00	\$553,751.00	\$0.00	
What was the benefit sought for trading away:	Manager indicated that the benefit sought was, "best execution".								
What was the benefit realized for trading away:	Manager indicated that the benefit realized was, "best execution".								
Provide a written assessment indicating if best execution was achieved (or not):	Best Execution was sought and achieved in all instances where we stepped out trading from Pershing.								
Thornburg Investment Management, Inc.	Thornburg Intermediate Muni Wrap	35	35	2325000	2325000	\$2,419,931.10	\$2,419,931.10	\$0.00	
Thornburg Investment Management, Inc.	Thornburg Limited Term Muni Wrap	10	10	700000	700000	\$739,502.39	\$739,502.39	\$0.00	
What was the benefit sought for trading away:	Manager indicated that the benefit sought was, "best execution".								
What was the benefit realized for trading away:	Manager indicated that the benefit realized was, "best execution".								
Provide a written assessment indicating if best execution was achieved (or not):	Best execution was achieved.								