



YOUR ANNUAL SHAREBUILDER 401K INVESTMENT ROSTER FUND REVIEW

Four Fund Changes Coming Soon to Your Plan

ShareBuilder 401k
800-919-2450
401ksuccess@sharebuilder.com

Securities and services are: Not FDIC insured · Not bank guaranteed · May lose value · Not a deposit · Not insured by any Federal Government Agency

This review is intended for the responsible fiduciary of your company's 401(k) plan. For Plan Sponsor Use only. Not for distribution to participants or the public.

Advisory services are provided by Capital One Advisors, LLC, an SEC registered investment advisor and a subsidiary of Capital One Financial Corporation.

ShareBuilder 401k and Spark 401k are the marketing names for Capital One Advisors, LLC.

© 2016 Capital One. Capital One and ShareBuilder 401k are federally registered service marks. All rights reserved.

TABLE OF CONTENTS

Greetings	3
An Investment Philosophy Designed to Deliver a Great 401(k) Plan	4
Selection and Monitoring Process	5
2016 Annual Fund Review Results	6
Fund Change Overview	7
The Watch List	12
Communicating the Fund Changes to Plan Sponsors and Employees	14
Appendix A: ShareBuilder 401k Investment Roster	15
Appendix B: The Capital One Advisors Investment Committee	17
Appendix C: The Capital One Advisors Investment Committee Bios	18
Appendix D: Additional Resources	19

We are happy to provide you with the 2016 annual fund review of your ShareBuilder 401k investment roster.

The goals of this review are to help you and your employees have the best investment roster to select from for your retirement, and to ensure the roster is aligned with the plan Investment Policy. Every employer is responsible for ensuring their 401(k) is run in the best interest of employees. When it comes to the investment offerings, a regular review of investments is required to provide a diverse, cost-effective line-up that helps minimize the chance of large losses.

One of the benefits of ShareBuilder 401k as your provider, our Investment Committee manages the investment roster for you (aka ERISA 3(38) advisors). No need to do it yourself or pay other providers to help you – Investment Committee services are included as part of your plan. Probably more important, this both maximizes the fiduciary protection for your business and saves you the time and money of managing these reviews for your plan.



Stuart Robertson
President
Capital One Advisors, LLC

AN INVESTMENT PHILOSOPHY DESIGNED TO DELIVER A GREAT 401(k) PLAN

Beyond the important need of meeting regulatory requirements –

As outlined in the Investment Policy, your 401(k)'s investment selection and monitoring process is founded on our Investment Philosophy. The core tenets of the philosophy are:

- 1. Investing is a long-term proposition.** An approach based solely on short-term trends, momentum or performance is not our “investment philosophy.” The risk of large price declines and investors’ inability to successfully time the markets consistently is too significant a hazard for most employees.
- 2. We believe that asset allocation and diversification are musts.** Research suggests that the most important investment decision is not the specific investments you select, rather it is your asset allocation; the mix of stocks, bonds, and cash you recommend. Additionally, the fine tuning within the stocks and bonds is important: value and growth, domestic and international, large and small capitalization stocks. Being broadly diversified, with exposure to all parts of the stock and bond markets, reduces the amount of risk your portfolio is exposed to, but of course can’t guarantee against any market losses.
- 3. Costs matter.** All else being equal, investments with consistently low management fees and transaction costs can give employees a head start in achieving competitive returns. While there are costs for professional management, large or excessive fees create a drag on returns that can make it more difficult for the fund manager to add value. Every dollar paid in expenses is one less dollar invested in the market. High fund turnover can drive up transaction costs. Exchange Traded Funds (ETF’s), a type of index fund, typically offer low expenses.

ShareBuilder 401k takes an indexing approach to your 401(k) plan line-up leveraging Exchange-Traded Funds (ETFs). In addition, we offer one money market fund. ShareBuilder 401k helped pioneer the use of ETFs in 401(k) plans given the low-expense funds and diverse asset classes these options provide as part of a portfolio.

SELECTION AND MONITORING PROCESS

Capital One Advisors' rigorous review process helps deliver a quality fund line-up for you and your employees.

In keeping with its fiduciary responsibilities as an ERISA 3(38) advisor, the Capital One Advisors Investment Committee conducted a thorough review of the 401(k) investment roster.

Initial screen: The Investment Committee begins the process with a broad screen of Exchange Traded Funds (ETF) by asset category or style, with each asset category further filtered by multiple variables including:

Inception date of 3+ years: A fund must have a minimum of three years of performance history to be considered. Keep in mind, performance data represents past performance and is no guarantee of future results.

Assets under management > \$1Billion: Helps to ensure liquidity and likeliness of fund survivorship over the long term.

Selecting best fund option by category or style: ETFs which pass the first screen are evaluated in much greater detail, including these core criteria:

1. Fund Performance – historic performance over one to ten years with performance over longer periods given greater consideration
2. Well-Managed – reasonable tracking error of the fund versus its benchmark index and the fund is from a trusted, reputable firm
3. Expense Ratio – all else equal, cost matters and low-expense is rated better
4. Bid/Ask Spread – this helps to gauge an ETF's liquidity; a lower spread may indicate that the ETF can handle large orders without significant price movement
5. Average Trading Volume – this also helps to gauge an ETF's liquidity, with greater volume indicating the ETF is more likely to handle large orders without significant price movement

2016 ANNUAL FUND REVIEW RESULTS

Four funds will be switched out in August of 2016.

The four funds offer lower expense ratios than the incumbent funds while maintaining and/or improving on other criteria we evaluated as you will see in the pages that follow. Of the four funds scheduled for replacement two were placed on the Watch List as a result of 2015's annual review. Two funds will remain on the watch list and will continue to be monitored over the next year. Below is an executive summary of the review:

- All 20 ETFs were compared to other ETFs in the same or very similar asset categories that met the stated fund consideration criteria.
- The money market fund was not compared to other options due to its role as a sweep account in servicing our plans. It is reviewed at times and was replaced in January 2015.
- There will be a change in the large-cap blend asset category; Vanguard S&P 500 (VOO) will replace SPDR S&P 500 (SPY).
- There will be a change in the mid-cap blend asset category; Vanguard mid-cap blend (VO) will replace iShares mid-cap blend (IJH). IJH was placed on the Watch List in 2015
- There will be a change in the small-cap blend asset category; iShares S&P 600 small-cap blend (IJR) will replace iShares Russell 2000 small-cap blend (IWM). IWM was placed on the Watch List in 2015.
- There will be a change in the short term government bond asset category; Schwab short term U.S. Treasury (SCHO) will replace iShares 1-3 year Treasury (SHY).
- No change will occur for the other 16 funds given how they fared across all the criteria.
- One fund will be added to the Watch List and two funds will remain on the Watch List
- One fund will be removed from the Watch List.

FUND CHANGE OVERVIEW

Introducing Vanguard S&P 500 and mid-cap blend funds, iShares S&P 600 small cap fund, and Schwab's short-term US Treasury bond fund

During the analysis process, these funds compared better across most, if not all criteria versus the incumbents. In the case of the mid-cap and small cap analysis, there are differences in the funds' underlying benchmarks versus the incumbents. In these instances the benchmarks were reviewed and deemed a better fit.

The following pages provide a more detailed recap of the analysis of the fund changes as well as the Watch List.

FUND CHANGE OVERVIEW (CONTINUED)

The Vanguard VOO fund outperformed across many of the criteria monitored versus the current SPDR SPY fund in your plan.

While tracking the exact same benchmark, VOO returned better historic performance across all periods, had less tracking error and lower expense ratio; in our evaluation VOO was the preferred ETF. It is important to note that there are no guarantees the new fund will outperform the previous fund in the future. However, we will continue to review and monitor like we do all funds and make changes based upon analytics and prudent investing principles.

Criteria	SPDRs S&P 500 (SPY)	Vanguard S&P 500 (VOO)	Commentary
Benchmark	S&P 500	S&P 500	Same benchmark
\$1 Billion+ Assets Under Management	\$169B	\$40B	Both have assets under management well above the minimum
Fund Performance		Better over 1, 3 and 5 years	Outperforms SPY over all periods
Tracking Error	0.403	0.311	VOO has better tracking error vs. the benchmark index
Expense Ratio	0.094	0.05	VOO is 4.4 bps lower in expense
Market Hours Bid/Ask Spread*	0.01	0.03	SPY has a slightly smaller spread
Volume (Avg 6m)	145M	2.8M	SPY has more volume, but VOO has good volume

*Based on Bid/Ask spreads sampled during market hours the weeks of 1/4/2016, 2/15/2016, and 3/21/2016

You should carefully consider information contained in the fund's prospectus, including investment objectives, risks, charges and expenses. For a prospectus containing this and other important information, please visit the fund's detailed quote page at ShareBuilder401k.com or contact us. Please read the prospectus carefully before investing.

Although the money market fund seeks to preserve the value of your investment at \$1.00 per share, it is possible to lose money by investing in the fund. An investment in the money market fund is not a deposit in a bank, and is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency.

FUND CHANGE OVERVIEW (CONTINUED)

The Vanguard VO fund outperformed across many of the criteria monitored versus the current iShares IJH fund in your plan.

While these funds track different benchmarks, both funds track the mid-cap blend asset category. VO returned better historic performance, had less tracking error and a lower expense ratio. Additionally, VO's benchmark outperformed IJH's benchmark. In our evaluation VO was the preferred ETF. It is important to note that there are no guarantees the new fund will outperform the previous fund in the future. However, we will continue to review and monitor like we do all funds and make changes based upon analytics and prudent investing principles.

Criteria	iShares S&P Mid-Cap (IJH)	Vanguard Mid-Cap (VO)	Commentary
Benchmark	S&P Mid-Cap	CRSP Mid-Cap	They track different indexes, but both indexes track the mid-cap blend asset category
\$1 Billion+ Assets Under Management	\$23.9B	\$12B	Both have assets under management well above the minimum
Fund Performance		Better performance in 1, 3, 5 and 10 year	VO outperforms IJH in all periods
Benchmark Performance		Better performance in 1, 3 and 5 year	VO's benchmark outperforms IJH's benchmark in all common periods
Tracking Error	0.484	0.343	VO has better tracking error vs. its benchmark index
Expense Ratio	0.12	0.09	VO is 3 bps lower in expense
Market Hours Bid/Ask Spread*	0.04	0.04	Both have the same spread
Volume (Avg 6m)	1.1M	530k	IJH has more volume, but both have the same spread

*Based on Bid/Ask spreads sampled during market hours the weeks of 1/4/2016, 2/15/2016, and 3/21/2016

FUND CHANGE OVERVIEW (CONTINUED)

The iShares IJR fund outperformed across many of the criteria monitored versus the current iShares IWM fund in your plan.

These two funds track different benchmarks for the small-cap blend asset category. IJR returned better historic performance, had less tracking error and a lower expense ratio. Additionally, IJR's benchmark outperformed IWM's benchmark. In our evaluation IJR was the preferred ETF. It is important to note that there are no guarantees the new fund will outperform the previous fund in the future. However, we will continue to review and monitor like we do all funds and make changes based upon analytics and prudent investing principles.

Criteria	iShares Russell Small-Cap (IWM)	iShares S&P Small-Cap (IJR)	Commentary
Benchmark	Russell 2000	S&P 600 Small-Cap	They track different indexes, but both indexes track the small-cap blend asset category
\$1 Billion+ Assets Under Management	\$23.3B	\$15.4B	Both have assets under management well above the minimum
Fund Performance		Better performance in 1, 3, 5 and 10 year	IJR outperforms IWM in all periods
Benchmark Performance		Better performance in 1, 3, 5 and 10 year	IJR's benchmark outperforms IWM's benchmark in all periods
Tracking Error	0.535	0.484	IJR has better tracking error vs. its benchmark index
Expense Ratio	0.20	0.12	IJR is 8 bps lower in expense
Market Hours Bid/Ask Spread*	0.01	0.06	IJR has a bigger spread, but it has good volume
Volume (Avg 6m)	38M	1M	IWM has more volume, but IJR's volume is good

*Based on Bid/Ask spreads sampled during market hours the weeks of 1/4/2016, 2/15/2016, and 3/21/2016

FUND CHANGE OVERVIEW (CONTINUED)

The Schwab SCHO fund outperformed across many of the criteria monitored versus the current iShares SHY fund in your plan.

These funds track the exact same benchmark, and SCHO returned better historic performance, had a nearly similar tracking error and a lower expense ratio. In our evaluation SCHO was the preferred ETF. It is important to note that there are no guarantees the new fund will outperform the previous fund in the future. However, we will continue to review and monitor like we do all funds and make changes based upon analytics and prudent investing principles.

Criteria	iShares 1-3 Year Treasury (SHY)	Schwab Short-Term U.S. Treasury (SCHO)	Commentary
Benchmark	Barclays US Treasury 1-3 year	Barclays US Treasury 1-3 year	At the time of the analysis they both tracked the same index
\$1 Billion+ Assets Under Management	\$12.9B	\$1.2B	Both have assets under management above the minimum
Fund Performance		Better performance in 1, 3 and 5 year	SCHO outperforms SHY in all periods
Tracking Error	0.225	0.231	SHY has slightly lower tracking error
Expense Ratio	0.15	0.08	SCHO is 7 bps lower in expense
Market Hours Bid/Ask Spread*	0.01	0.02	SHY has a slightly tighter spread
Volume (Avg 6m)	2.6M	295k	SHY has more volume, but additional analysis confirmed SCHO has sufficient liquidity

*Based on Bid/Ask spreads sampled during market hours the weeks of 1/4/2016, 2/15/2016, and 3/21/2016

THE WATCH LIST

The PowerShares DBC fund will be removed from the Watch List, and three funds will be more closely monitored

The PowerShares DBC fund will be removed from the Watch List due to a lack of qualifying alternatives. A summary of the analysis is presented here:

Asset Category	Incumbent	Contender	Commentary
Commodities Broad Basket	DBC	None	No other ETF meets our AUM requirement. Previous contender, DJP, is an Exchange Traded Note (ETN) which is a debt instrument.

THE WATCH LIST (CONTINUED)

Three funds will be closely monitored to see if replacement is deemed necessary over the coming year and potentially longer dependent upon future analysis. A summary of the analysis is presented here:

Asset Category	Incumbent	Contender	Notes	Commentary
Large Blend (Social)	KLD	DSI	DSI has the same expense ratio, better performance over 1, 3 and 5yr and more AUM, but DSI's spread is significantly wider than KLD's spread	DSI's benchmark is very similar to KLD's benchmark. Watch to determine if better metrics continue and watch the spread to see if it tightens or at least is similar to KLD's spread
Intermediate Term Bond	BND	AGG	AGG has a slight edge in performance, a lower tracking error, the same spread and more AUM, but BND has a lower expense ratio	AGG's benchmark is similar, but not exactly the same. Watch metrics to determine if replacement is warranted.
REIT	VNQ	SCHH	SCHH has lower expense ratio, better performance over 1, 3 and 5 yr, VNQ has slightly smaller tracking error, VNQ has slightly tighter spread, liquidity analysis determined that exiting VNQ and entering SCHH would be costly to participants	The benchmarks are different, but similar. Watch to determine if better metrics continue and if the cost to clients reduces.

COMMUNICATING THE FUND CHANGES TO PLAN SPONSORS AND EMPLOYEES

We've got you covered.

ShareBuilder 401k and our supporting third-party administrators helped ensure notifications were sent out to you and your employees to meet the regulatory requirements. Regulations require notification of plan related changes at least 30 days but not more than 90 days from when the change will occur. We first emailed the date of the change to plan sponsors listed on your plan and have also emailed the first of two additional notifications to your employees. The first email to employees occurred 30-40 days prior to the change to pre-announce the switch in funds and the other will be on the day the change occurs. There is nothing an employee needs to do whether they are holding the fund that will be switched or not. If holding, the fund change will occur automatically. If not, no change happens to their investment holdings. Employees have the ability to switch funds in their own account any day the markets are open.

These communications only go to employees you have listed as eligible in your company's plan. If there are others that are eligible but for whatever reasons not listed as so in our third-party administrators' systems, you will want to forward both notifications to these employees.

Be on the lookout for these communications coming soon. If you have any questions, please give us a call at 800-919-2450 and we will be happy to go over it with you.

Wishing you great success.

APPENDIX A: SHAREBUILDER 401K INVESTMENT ROSTER

Equity Funds

Symbol	Fund Description	Category	Expense Ratio
SPY*	SPDR S&P 500 ETF Trust	Large-Cap Blend	0.10%
V00*	Vanguard 500 ETF	Large-Cap Blend	0.05%
VUG	Vanguard Growth ETF	Large-Cap Growth	0.09%
QQQ	PowerShares QQQ	Large-Cap Growth	0.20%
DIA	SPDR Dow Jones Industrial Average	Large-Cap Value	0.17%
VTV	Vanguard Value ETF	Large-Cap Value	0.09%
KLD	iShares MSCI USA ESG Select	Large-Cap Blend	0.50%
IJH*	iShares Core S&P Mid Cap	Mid-Cap Blend	0.12%
VO*	Vanguard Mid-Cap ETF	Mid-Cap Blend	0.08%
DVY	iShares Select Dividend	Mid-Cap Value	0.39%
IWM*	iShares Russell 2000	Small-Cap Blend	0.20%
IJR*	iShares Core S&P Small-Cap	Small-Cap Blend	0.12%

*Changing from SPY to V00, from IJH to VO and IWM to IJR as of 8/1/16.

APPENDIX A: SHAREBUILDER 401K INVESTMENT ROSTER (CONTINUED)

Fixed Income Funds (Bond Funds)

Symbol	Fund Description	Category	Expense Ratio
IEF	iShares 7-10 Year Treasury Bond	Intermediate-Term Gov Bond	0.15%
BND	Vanguard Total Bond Market	Intermediate-Term Bond	0.07%
TIP	iShares TIPS Bond	Inflation Protected Bonds	0.20%
SHY*	<i>iShares 1-3 Year Treasury Bond</i>	<i>Short-Term Government Bond</i>	<i>0.15%</i>
SCHO*	Schwab Short-Term US Treasury ETF	Short-Term Government Bond	0.08%
BWX	SPDR Barclays International Treasury Bond	World Bond	0.50%
PCY	PowerShares Emerging Markets Sovereign Debt	Emerging Markets Bond	0.50%

*Changing from SHY to SCHO as of 8/1/16.

Specialty Funds

Symbol	Fund Description	Category	Expense Ratio
VNQ	Vanguard REIT	Real Estate	0.12%
VWO	Vanguard FTSE Emerging Markets	Diversified Emerging	0.15%
VEA	Vanguard FTSE Developed Markets	Foreign Large Blend	0.09%
DBC	PowerShares DB Commodity Index Tracking Fund	Commodities Broad Basket	0.89%
IAU	iShares Gold Trust	Commodities Precious Metals	0.25%

Stable Value Fund

Symbol	Fund Description	Category	Expense Ratio
DGCXX	Dreyfus Govern Cash Mgmt	Money Market	0.20%

APPENDIX B: THE CAPITAL ONE ADVISORS INVESTMENT COMMITTEE

The Capital One Advisors Investment Committee does the heavy lifting of managing your company's investment roster for you.

ShareBuilder 401k is an offering of Capital One Advisors, LLC. The Capital One Advisors Investment Committee conducts investment and model portfolio reviews in support of all ShareBuilder 401k plans. Our Committee is made up of seven industry experts including three CFA charterholders and two CFPs. The Committee uses sophisticated investment models and analysis to manage the investment roster and model portfolios offered in every ShareBuilder 401k plan.

ShareBuilder 401k takes an indexing approach to your 401(k) plan line-up leveraging Exchange-Traded Funds (ETFs) and one money market fund. The team works to keep fund expenses low so more of your and your employees' money stays invested in the markets and has the opportunity to grow over time. Cost matters when it comes to investing, and a difference of even 1% in fees can make an impact.

We also take a fiduciary role in supporting your plan, something not always offered by other providers. To minimize the issues employers face and to offer what we believe is a better 401(k) plan, we share the fiduciary responsibilities for the investment line-up of every ShareBuilder 401k plan with our customers. This is known as an ERISA 3(38) advisor. Our investment approach is based on long-term investing fundamentals for most any company's 401(k).

APPENDIX C: THE CAPITAL ONE ADVISORS INVESTMENT COMMITTEE BIOS



Garrett Silver

Head of Business Analytics, CFA

Appointed to the committee in 2008, Garrett has over 15 years of industry experience and has been at Capital One Investing since 2004. He is FINRA licensed with a Series 7, 24 and 99. He has a BA in Sciences from Western Washington University.



Brian Serfass

Head of Product Management

Appointed to the committee in 2016, Brian has over 19 years of industry experience and has been at Capital One Investing since 2014. He is FINRA licensed with a Series 7, 24 and 66. He has a BS in Accounting from King's College, an MS in Marketing from Temple University and is completing an MPhil degree at the University of Pennsylvania.



Jeff Sills

Head of National Sales, CFP®

Appointed to the committee in 2015, Jeff has over 28 years of industry experience and has been with Capital One since 2014. He is FINRA licensed with a Series 7, 8, 24, 63 and 65.



Tom Mudlaff

Head of Supervision and Controls

Appointed to the committee in 2015, Tom has over 20 years of industry experience and has been at Capital One Investing since 2010. He is FINRA licensed with a Series 6, 7, 24, 51, 63 and 66. He has a BA from Bradley University and an MBA from DePaul University.



Stuart Robertson

Head of Proprietary 401(k)

Appointed to the committee in 2008, Stuart has over 10 years of industry experience and has been at Capital One Advisors since 2006. He is FINRA licensed with a Series 7, 24 and 66. He has a BA in Economics from the University of Colorado and an MBA in Marketing and minors in Finance and Entrepreneurship from Indiana University's Kelley School of Business.



Yvette Butler

Head of Digital Product

Appointed to the committee in 2015, Yvette has over 20 years of industry experience and has been at Capital One Investing since 2013. She is FINRA licensed with a Series 7, 9, 10, 24 and 66. She has a BS in Finance and Management IS from the University of Virginia and an MBA from the Stanford Graduate School of Business.



Daryl Redmond

Product Management, CFA

Appointed to the committee in 2011, Daryl has over 13 years of industry experience and has been at Capital One Investing since 2008. He is FINRA licensed with a Series 4, 7, 24, 66 and 99. He has a BA in Psychology from the University of Washington.

APPENDIX D: ADDITIONAL RESOURCES

shareBUILDER 401K Capital One

YOUR 401(k) SHOULDN'T BE RISKY BUSINESS

A guide to managing fiduciary duties and risks for employers and administrators

© 2013 Capital One, Capital One and ShareBuilder 401K are trademarks registered service marks. All rights reserved.
Advisory services are provided by ShareBuilder Advisors, LLC, an SEC-registered investment advisor and a subsidiary of Capital One Financial Corporation.
401(k) plans are: Not FDIC insured • Not bank guaranteed • May lose value

Fiduciary Guide

See the benefits of leveraging an ERISA 3(38) investment manager to handle the investment aspects of your plan.

shareBUILDER 401K Capital One

EXCHANGE TRADED FUNDS: A great fit for 401(k) plans

Our goal at ShareBuilder 401K is to empower 401(k) savers with the right fund options at the least amount of expense. We believe this gives participants more control in reaching their financial goals.

© 2013 Capital One, Capital One and ShareBuilder 401K are trademarks registered service marks. All rights reserved.
Advisory services are provided by ShareBuilder Advisors, LLC, an SEC-registered investment advisor and a subsidiary of Capital One Financial Corporation.
401(k) plans are: Not FDIC insured • Not bank guaranteed • May lose value

ETFs a Great Fit for 401(k) Plans

Exchange Traded Funds (ETFs) have grabbed the attention of investors given some unique advantages over mutual funds. Learn more about them in this guide.

shareBUILDER 401K Capital One

CHECKLIST FOR 404(c) FIDUCIARY SUCCESS

**Help your employees save smart and reduce your fiduciary liability!
That's what running a 404(c) compliant 401(k) plan is all about.**

All ShareBuilder 401K plans are designed to be ERISA 404(c) compliant. It's good for you and your employees. ERISA section 404(c) partially relieves you and your company's fiduciaries (sponsors, vendors, internal investment committee members, etc.) from investment losses your employees could experience. Simply empower your employees to direct their own investment decisions in line with their financial goals and you will be on the road to less liability while helping your employees save for a comfortable future.

We help make it easy for you with intuitive online tools and communications that are fully supported by experienced Customer Care agents. There are three main categories to managing 404(c) best practices:

- Investment Line-up:** Diversify across asset classes with ranges of risk tolerance
- Employer Empowerment:** Investment education, notifications and guidance
- 404(c) Notifications and Disclosures:** 404(c); Fiduciary and fee disclosures

Investment Line-up
ERISA 404(c) states you must offer a broad range of investment alternatives with differing potential for investment risk and return. Only three investment options are required to meet the requirements, and it is satisfied by offering funds that cover equity, fixed income, and capital preservation asset classes.

All ShareBuilder 401K plans satisfy this requirement with an array of stock, bond, money market, specialty funds and model portfolios. We even cover other asset classes including a real estate fund. In fact, you will already have satisfied the investment line-up checklist simply by offering your employees a ShareBuilder 401K.

Investment options enable employees to materially affect potential returns as well as degree of investment risk within their accounts.

© 2013 Capital One, Capital One and ShareBuilder 401K are trademarks registered service marks. All rights reserved.
Advisory services are provided by ShareBuilder Advisors, LLC, an SEC-registered investment advisor and a subsidiary of Capital One Financial Corporation.
401(k) plans are: Not FDIC insured • Not bank guaranteed • May lose value

404(c) Guide

You'll get a good sense for best practices. Most providers should be supporting 404(c), just ensure it is being done well.

Capital One

Investment Policy

The purpose of this investment policy statement is to establish investment objectives, and create performance guidelines for evaluating investment decisions and investment options.

It is the intent of the plan to satisfy the requirements under ERISA Section 404(c) and the Department of Labor (DOL) regulations thereunder, which limit the liability of plan fiduciaries for investment losses resulting solely from participant direction of their individual plans.

Purpose
Help employees build a financially secure future by providing a source of retirement income.

1. Statement of objectives for designated investment alternatives

A) To provide a broad range of designated investment alternatives, currently a set of twenty (a minimum of 3 diverse alternatives), with varying investment characteristics and degrees of risk to provide plan participants with the opportunity to:

- Materially affect the potential return on the amounts in their individual accounts.
- Control the degree of risk to which such amounts are subject, and
- Achieve results commensurate with aggregate risk and return characteristics within the range appropriate for each participant.

B) To prudently select and monitor investments and investment providers and to incur only expenses that are reasonable based on the quality of the services provided and the nature and extent of the services needed.

© 2013 Capital One, Capital One and ShareBuilder 401K are trademarks registered service marks. All rights reserved.
Advisory services are provided by ShareBuilder Advisors, LLC, an SEC-registered investment advisor and a subsidiary of Capital One Financial Corporation.
Investment and services are: Not FDIC insured • Not bank guaranteed • May lose value • May be subject to investment risk • Not covered by any Federal Government Agency

Investment Philosophy

An investment policy simply states the philosophy on which the plan will be monitored and run to meet your employees' needs.