
SunTrust Institutional 401(k)
Disclosure of Investment Compensation

CMA Group Salary Deferral Plan
250431-01
As of May 31, 2020

Plan Assets \$15,782,047
Plan Participants 632



Introduction

This report is provided to communicate investment expenses and compensation received by SunTrust ("Bank") as a service provider. It is meant to supplement and update specific investment information reported in existing documents including the:

- Master Service Agreement (MSA)
- Disclosure, Consent to Compensation, and Direction Regarding Investment
- Fee Schedules
- Service Invoices
- And related appendices, addendum or supplemental documentation

In response to the need for improved clarity about fees and expenses, the United States Department of Labor ("DOL") has introduced a requirement (See ERISA § 408(b)(2) fee disclosure requirements; www.dol.gov/ebsa) for certain service providers that receive more than \$1,000 in compensation to make explicit disclosures to certain retirement plans that they serve.

The DOL requires that the disclosure contain four essential elements:

- ✓ Who the service provider is
- ✓ A description of the services provided
- ✓ A declaration of the fiduciary status of the provider
- ✓ The fee or expense charged by the provider

As an agent of the Plan Administrator, we make payments to other parties on behalf of the plan. We are not responsible for the disclosures of any unrelated service providers.

Investment Expenses and Compensation

Plan fees paid either by the plan sponsor or participant for the services provided by the Service Provider as set forth in the Schedule of Services or group annuity contract.

Investment Expenses_____ Section 1

SunTrust Proprietary Investments_____ Section 2

Other Investment Products and Services_____ Section 3

Disclosures_____ Section 4

Section 1: Investment Expenses

The investments offered by the plan have related expenses. The amounts listed are the annual percentages deducted from funds and the annual percentage revenue received from the funds (where applicable) based on the value of the plan's investment in the fund. More information is provided in the following table, and may depend on the type of fund being utilized.

Please see the Prospectus for more detailed information on fees, services, and receipt of fees among affiliates, if applicable.

Investment-Related Fee:

The investment funds offered by the plan may have fees that are retained by the fund company/other investment provider as payment for ongoing management of the fund and other services. The fee amounts will vary from fund to fund and are generally charged as a percentage of the fund's value.

Please refer to the latest investment materials, such as **prospectuses and other regulatory disclosures for each of the funds** held by the plan (as provided by your plan's investment advisor or directly from the fund companies/investment firms), for details regarding services and fees.

The latest prospectus and other regulatory documents for each of the funds held by the plan can be found by logging in to the Plan Service Center website and selecting the Online Prospectus link located on the Retirement Plan Administration page.

This list of investment fees is intended to give the plan a list of the most important fees being charged to the plan or its participants. It is intended to provide information regarding all material fees, but may not be comprehensive and may not include information on fees such as Personal Portfolio Accounts, Life Insurance, Employer Stock, etc. For other fee information, please refer to all other plan documents including service agreement, prospectus, etc.

SunTrust Retirement and other proprietary investment fee and expense details are specifically reported in Sections 2 and 3.

Mutual Fund Expense Ratio:

The Bank or its agent has entered into agreements whereby the Bank or its agent supplies shareholder services and receives compensation from funds based on the value of the plan's investment in the funds as disclosed above. This compensation may include fees for administrative and other expenses and/or fees paid under a plan of distribution under SEC Rule 12b-1 ("12b-1 fees"). The fees received by the Bank are part of the fees already paid to the fund as disclosed in the prospectus or similar disclosure document, and are not in addition to fees being charged at the fund level.

Float:

The Bank uses central, omnibus accounts to process incoming plan contributions and outgoing distributions for all record kept clients. Monies in these accounts which are not currently allocated to a specific Plan's account are invested overnight. The earnings on these investments is called "float". The amounts received are used to offset the costs of maintaining these accounts and any excess amounts are retained by the Bank as part of our compensation. The two primary sources of these overnight balances are contributions that are received after the trade cutoff for that day, or that do not balance to the participant data received and distribution balances which remain in these accounts until the check is presented for payment and processed. While it is not possible to determine the exact amount of float earned for a specific plan, we can estimate the amount of float the Bank receives due to activity in your plan. For the 12 months ending December 31, 2019, the gross amount (prior to deducting the costs associated with the accounts) was approximately 0.5442 basis points (0.005442%) of contributions and 3.8093 basis points (0.038093%) of distributions.

Additional Fund Compensation:

The Bank may also receive additional amounts in the form of conference sponsorship fees from non-affiliated fund companies to defray training and education costs of staff.

Investment Selections:

		PAID TO FUND COMPANY FROM FUND ASSETS	REVENUE PAID FROM THE NET EXPENSE RATIO		
Investment Name	Gross Expense Ratio	Net Expense Ratio	Revenue Type	Revenue Amount	Revenue Last Updated
American Century Small Cap Value A	1.50%	1.50%	12b-1	0.25%	08/31/2011
			Administrative	0.35%	05/31/2016
BlackRock Equity Dividend A	0.97%	0.97%	12b-1	0.25%	03/31/2016
			Administrative	0.25%	03/31/2016
Dodge & Cox International Stock	0.63%	0.63%	Administrative	0.10%	02/28/2015
Federated Government Obligations SS	0.58%	0.45%	Administrative	0.20%	05/31/2020
Federated Capital Preservation Fund ISP	0.77%	0.77%	Administrative	0.30%	08/31/2016
ClearCourse	1.52%	1.52%			
Invesco Oppenheimer Developing Markets A	1.24%	1.24%	12b-1	0.25%	05/31/2019
			Administrative	0.25%	05/31/2019
Invesco Small Cap Growth A	1.17%	1.17%	12b-1	0.25%	07/31/2014
			Administrative	0.25%	07/31/2014
J P Morgan Equity Income A	1.01%	1.00%	12b-1	0.25%	09/30/2019
			Administrative	0.25%	08/31/2012
Western Asset Core Plus Bond FI	0.82%	0.82%	12b-1	0.25%	02/28/2015
			Administrative	0.20%	11/30/2015
Loomis Sayles Investment Grade Bond A	0.81%	0.76%	12b-1	0.25%	03/31/2019
			Administrative	0.20%	03/31/2019
SunTrust Bank FDIC Insured Account					
T. Rowe Price 2015 Adv	0.80%	0.80%	12b-1	0.25%	06/30/2014
			Administrative	0.15%	06/30/2014
T. Rowe Price 2025 Adv	0.87%	0.87%	12b-1	0.25%	06/30/2014
			Administrative	0.15%	06/30/2014
T. Rowe Price 2035 Adv	0.93%	0.93%	12b-1	0.25%	06/30/2014
			Administrative	0.15%	06/30/2014

Investment Name	Gross Expense Ratio	Net Expense Ratio	Revenue Type	Revenue Amount	Revenue Last Updated
T. Rowe Price 2045 Adv	0.96%	0.96%	12b-1	0.25%	06/30/2014
			Administrative	0.15%	06/30/2014
T. Rowe Price 2055 Adv	0.96%	0.96%	12b-1	0.25%	06/30/2014
			Administrative	0.15%	06/30/2014
T. Rowe Price Balanced Adv	0.75%	0.75%	12b-1	0.25%	06/30/2014
			Administrative	0.15%	06/30/2014
T. Rowe Price Capital Appreciation - Adv	1.00%	1.00%	12b-1	0.25%	02/29/2012
			Administrative	0.15%	02/29/2012
T. Rowe Price Growth Stock Fund - Adv	0.92%	0.92%	12b-1	0.25%	06/30/2014
			Administrative	0.15%	06/30/2014
T. Rowe Price Mid-Cap Growth Fund - Adv	1.01%	1.01%	12b-1	0.25%	06/30/2014
			Administrative	0.15%	06/30/2014
Vanguard 500 Index Fund - Admiral	0.04%	0.04%			
Vanguard Developed Markets Index Admiral	0.07%	0.07%			
Vanguard FTSE Social Index Admiral	0.14%	0.14%			
Vanguard Mid Cap Index Adm	0.05%	0.05%			

Blank fields in the table above can be assumed to be non-applicable or zero.

Fees for stock trades typically range from \$0.03 - \$0.06 per share traded. Fees for readily traded securities, with high daily trading volume, are as low as \$.003 per share. Stock is traded via ConvergeEx. Currently trades are executed for a plan at \$0.03 per share for most equities trading on a major exchange.

Certain investment information may be reported in later sections of this document or in the Disclosure, Consent to Compensation, and Direction Regarding Investment.

Section 2: SunTrust Proprietary Investments

The following SunTrust proprietary investments are generally made available to plans within the SunTrust Institutional 401(k) product. These investments may or may not be available or used in your specific plan. See the applicable disclosure documents for details on each investment.

INVESTMENT NAME	TOTAL EXPENSE / FEE	PAYEE	FEE	REVENUE LAST UPDATED
Other Investments:				
SunTrust Bank FDIC Insured Account ¹	.107%	SunTrust	.107% on assets	1/1/2012

¹FDIC Insured Deposit Account. This deposit account pays depositors a variable rate of interest. Bank deposits are generally a net expense to the Bank. The ability of the Bank to earn compensation on this deposit account is dependent upon the Bank achieving investment returns on deposit accounts in excess of the rate of interest paid to the deposit accounts, plus the cost of all reserves and expenses on those accounts that are mandated by the federal and state regulatory agencies under various banking statutes.

Section 3: Other Investment Products and Services

The following investment products and services are generally made available to plans within the SunTrust Institutional 401(k) product. These investment products and services may or may not be available or used in your specific plan currently.

INVESTMENT NAME	TOTAL EXPENSE / FEE	PAYEE	FEE	REVENUE LAST UPDATED
ClearCourse® Flexible Premium Deferred Annuity ¹	1.69%	Genworth Life & Annuity	.95% on assets ²	1/1/2010
		Vanguard	.24% on assets ³	1/1/2010
		SunTrust	.50% on assets ⁴	4/1/2010

¹ Investment was closed to new plan investors 3/1/2011. Effective January 1, 2014, ClearCourse® will no longer be available for contributions by a participant unless the participant has a balance in ClearCourse on January 1, 2014 and maintains a balance in ClearCourse after that date.

² Genworth Life & Annuity ClearCourse fee.

³ Portfolio expense attributable to the underlying Vanguard Balanced Index Fund Investor Shares (VBINX). See current prospectus for details.

⁴ SunTrust fee for support of the administrative and other services SunTrust provides to the retirement plan related to the investment.

Overnight/ACH/Wire requests may be subject to a fee of up to \$40 per transaction.

Section 4: Disclosures

Unallocated Plan Assets (UPA):

A portion of fees described in Investment Expenses may be deposited in the UPA on a quarterly basis to pay plan expenses. The Plan Sponsor is obligated to determine if and how any remaining UPA assets at plan year end should be allocated after expenses are paid. This money is not revenue to the Service Provider or its affiliates.

5500 Schedule C

As applicable, the disclosures herein are intended to satisfy the eligible indirect compensation ("EIC") requirements for Form 5500 Schedule C purposes.

Direct Compensation:

All direct compensation received by the Bank for trustee and administrative services, including any fees related to the termination of services, performed pursuant to the SunTrust Master Service Agreement and the Agreement for Selection and Monitoring of 401(k) Investment Options is detailed in the Annual Schedule of Fees or herein.

Indirect Compensation:

The Bank receives certain indirect compensation as described in the previous sections of this document and the Disclosure, Consent to Compensation and Direction Regarding Investment.