



Defined Contribution in Review

A Quarterly Briefing for Plan Sponsors: 3Q16

Investment products offered are: NOT FDIC-INSURED MAY LOSE VALUE NO BANK GUARANTEE

What's Inside

Our **Defined Contribution in Review** is designed to help CEOs, CFOs, Treasurers, Human Resource and Benefits Professionals and Investment Committees stay abreast of recent events that could have an impact on plans or plan participants. Inside you will find the following information:

Quarterly Updates: A summary of plans and sponsors making the news

Participants' Corner: Timely insights about the retirement readiness of plan participants

Legislative Review: A summary of new and pending legislation

Regulatory Review: News out of the Department of Labor and other regulatory bodies

Legal Review: An update on high-profile ERISA cases

We hope you will find the information helpful and we are happy to answer any questions you may have.



Quarterly Updates

Trover Solutions, Inc. Revamps Its 401(k)

- > Despite a dollar-for-dollar 6% match, participants at the Louisville, Kentucky-based company were deferring an average between 1% and 2% of their salary
- > To improve their plan's metrics, the company introduced a 6% auto-enrollment program and auto-escalated participant deferrals by 1% to 2% a year, based on their record keeper's retirement readiness analysis
- > In addition, the company changed the vesting schedule to 20% annually over the course of five years, from 0% in the first year and 20% each year thereafter
- > After these changes were instituted, plan participation increased to 96% with an average salary deferral of 5.9%. Further, 91% of those participants remain in the plan's QDIA managed account

Blood Center Enjoys 95% Participation Rate

- > Recognizing that the average participant deferral was low and that some participants lacked sufficient investment diversification, Community Blood Center/Community Tissue Services of Dayton, Ohio, instituted a number of changes including the hiring of a 3(38) investment manager
- > The Center re-enrolled participants who were not deferring enough to take advantage of the plan's matching contribution and defaulted participants who had not chosen their own investments into custom target-date funds
- > Increasing the number of participants maximizing the company match costs the company about \$100,000 a year, and as part of the plan overhaul the company now pays for all administrative costs – another \$100,000
- > Today, 84% of participants save enough to earn the full match and 95% of employees participate in the plan

Plan Sponsor Helps Employees Stay Active, Fit

- > The Methodist Health System in Dallas partnered with FIX (Fitness Interactive Experience) to help employees get healthier and adopt lifestyle habits that promote wellness
- > FIX designed a series of activities appropriate for Health System's work environment that could be performed by participants in 30 to 60 seconds and required no equipment
 - ▶ Examples of the employee activities included standing up from their chairs five times in a row or taking a flight of stairs vs. an elevator to a meeting
 - ▶ An online tool keeps track of activities completed, participants get points, and, when teams or individuals meet a goal, a leaderboard gives recognition and praise
- > Approximately 6,610 of Health System's 7,500 employees use the program

Association Offers Free Financial Wellness

- > The American Nurses Association in Silver Spring, Maryland, recently launched a free financial wellness program to its 187,000 members
- > The program provides members with financial education and information through a variety of formats including articles, newsletters, videos on the association's website and seminars at conferences
- > During the first year, more than 3,500 nurses requested a financial plan that addresses a range of challenges such as saving for college or retirement, estate planning, homeownership, getting the most from work benefits, buying or leasing a car and budgeting

Northwestern University Streamlines Its \$3.1B Defined Contribution Plans

- > The university announced plans to streamline its one 457 and two 403(b) plans that include the elimination of approximately 230 fund choices
- > After the change, the plans in aggregate will offer:
 - ▶ A target-date fund series
 - ▶ Five index funds
 - ▶ Between 12 and 14 actively managed core funds
 - ▶ A self-directed brokerage window

Red Wing Shoe Company De-Risks Using a Pension Buy-In

- > The Red Wing, Minnesota, company decided to de-risk its non-qualified SERP plan using a pension buy-in to eliminate market volatility and longevity risk
- > Although not subject to ERISA's fiduciary requirements, the company used DOL Interpretive Bulletin 95-1 guidance for selecting an annuity provider
- > In a pension buy-in, the annuity becomes an investment of the plan while the company retains responsibility for the plan payments and communications with participants

Pensions & Investments Announces Its 2016 Eddy Award Winners

- > The Eddy Awards were created to identify and reward the best practices in providing investment education to defined contribution plan participants
- > This year 46 DC plan education programs were honored
- > A complete list of the winners, along with judges' comments and other materials, can be found at pionline.com/eddy2016

2016 Eddy Award Winners: Automatic Re-Enrollment

| | Corporate: 5,000+ Employees | Corporate: 1,000-5,000 Employees |
|-----------------------|--------------------------------|-------------------------------------|
| 1 st Place | The PNC Financial Group | Moog |
| 2 nd Place | n/a | n/a |
| 3 rd Place | n/a | n/a |

2016 Eddy Award Winners: Conversions

| | Corporate: 5,000+ Employees | Corporate: 1,000-5,000 Employees | Not For Profit | Public |
|-----------------------|-----------------------------------|--|-----------------|---|
| 1 st Place | Sonepar USA | McGraw-Hill Education | Yale University | Connecticut Office of the State Comptroller |
| 2 nd Place | n/a | n/a | n/a | City of Austin |
| 3 rd Place | n/a | n/a | n/a | University of Colorado |

2016 Eddy Award Winners: Ongoing Investment Education

| | Corporate: 5,000+ Employees | Corporate: 1,000-5,000 Employees | Public |
|-----------------------|-----------------------------------|--|---|
| 1 st Place | AutoNation Inc. | Ring Cos. | Missouri State Employees' Retirement System |
| 2 nd Place | Hilton Worldwide | n/a | County of Los Angeles |
| 3 rd Place | n/a | n/a | n/a |

For additional information, please go to pionline.com/eddy2016

2016 Eddy Award Winners: Plan Transitions

| | Corporate: 5,000+ Employees | Corporate: 1,000-5,000 Employees | Not For Profit |
|-----------------------|-----------------------------------|--|---------------------------|
| 1 st Place | RELX Group | GHD | Ascension Health |
| 2 nd Place | n/a | n/a | Indiana University Health |
| 3 rd Place | n/a | n/a | Cone Health |

For additional information, please go to pionline.com/eddy2016

2016 Eddy Award Winners: Retirement Readiness

| | Corporate | Not For Profit |
|-----------------------|-------------------------|--------------------------------|
| 1 st Place | Eli Lilly and Co. | Los Alamos National Laboratory |
| 2 nd Place | Evening Post Industries | n/a |
| 3 rd Place | n/a | n/a |

2016 Eddy Award Winners: Special Projects

| | Corporate: 5,000+ Employees | Corporate: 1,000-5,000 Employees | Corporate: Less than 1,000 Employees |
|-----------------------|---|--|--|
| 1 st Place | MGM Resorts | BMC Software | Wall Family Enterprises |
| 2 nd Place | J.P. Morgan Chase & American Express | Red Bull North America | Meyer Corp. |
| 3 rd Place | n/a | n/a | United Communication Corp. |

For additional information, please go to pionline.com/eddy2016

2016 Eddy Award Winners: Special Projects

| | Public: 5,000+ Employees | Not For Profit: 5,000+ Employees | Not For Profit: 1,000-5,000 Employees | Not For Profit: Less Than 1,000 Employees |
|-----------------------|------------------------------------|--|---|---|
| 1 st Place | Ohio Deferred Compensation | Franciscan Missionaries of Our Lady Health System | McLaren Health Care Corp. | Online Computer Library Center & Navajo Nation |
| 2 nd Place | TexaSaver | Mountain States Health Alliance & Ascension Health | n/a | n/a |
| 3 rd Place | Nevada System for Higher Education | University of Southern California | n/a | n/a |



Participants' Corner

401(k) Plan Fees Continue to Decline

- > Findings in the Investment Company Institute’s “*The Economics of Providing 401(k) Plans: Services, Fees and Expenses, 2015*” indicate that 401(k) investment fees continue to decline. Specifically, the research illustrates:
 - ▶ In 2015, the average expense ratio for equity mutual funds offered in the United States was 1.3%. 401(k) plan participants who invested in equity mutual funds, however, paid less than half that amount, 0.53%, on average
 - ▶ In 2000, 401(k) plan participants incurred an average expense ratio of 0.77% for investing in equity funds. By 2015, that figure had fallen to 0.53%, a 31% decline. Expenses for hybrid and bond funds also fell from 2000 to 2015, by 25% and 38% respectively
 - ▶ From 2014 to 2015, expense ratios in 401(k) plans declined from 0.54% to 0.53% for equity funds; declined from 0.55% to 0.54% for hybrid funds; and declined from 0.43% to 0.38% for fixed income funds

Survey Finds Plan Governance Playing an Increasingly Important Role

- > According to the Willis Towers Watson U.S. Retirement Plan Governance Survey, organizations with effective retirement plan governance are better equipped to manage potential retirement plan risks, protect against fiduciary liabilities and capture opportunities to improve structures, strategies and metrics
- > Three major trends emerge from the survey findings:
 - ▶ Employers have a growing concern over retirement benefit adequacy and financial well-being
 - ▶ More employers are using third parties to assist with investment-related decisions
 - ▶ Regulatory concerns are prevalent

DCIIA Paper Offers New Perspective on Automatic Plan Features

- > A paper by the Defined Contribution Institutional Investment Association (DCIIA), “*Automatic Plan Features in Defined Contribution Plans: What’s in it for Plan Sponsors?*”, highlights several potential benefits to employers and profiles plan sponsors who have experienced these benefits
- > Key findings of the paper include:
 - ▶ Automatic features improve employee satisfaction and engagement, as well as the ability to negotiate for lower fees, including reduced recordkeeping and asset management fees due to greater plan participation
 - ▶ Empowering employees to retire on their time schedule also facilitates workforce planning efforts
 - ▶ Sponsors reported that a benefits program which includes a generous stretch match can help attract and retain employees, which reduces rates of turnover and results in lower training costs

Academic Paper Finds Most Savers Can Benefit From Roth Accounts

- > Researchers from the University of Arizona and the University of Missouri at Columbia concluded that the optimal asset allocation policy for most retirement savers involves diversifying between traditional pre-tax and Roth after-tax vehicles
- > The research also concluded that the largest economic benefits from Roth investments accrue to high-income investors; the reason is because future tax uncertainty is of greatest concern to the wealthiest investors. The higher the uncertainty, the increased variability of an investor's future consumption, and Roth accounts eliminate a portion of this risk

Majority of Millennials Say They Won't Ever Accumulate \$1 Million

- > According to a Wells Fargo Millennial Survey of 1,000 U.S. adults between ages 22 and 35, nearly two-thirds (64%) say they will never accumulate \$1 million in savings over their lifetime. Other key findings include:
 - ▶ Six in 10 millennials (59%) have started saving for retirement, and of the millennials not saving, 64% say they are “not making enough money to save for retirement”
 - ▶ When comparing men and women, 56% of men don't believe they can accumulate \$1 million in savings, compared to 73% of women
- > The survey also found that many millennials are open to receiving help to prepare for retirement:
 - ▶ 73% support auto-enrollment but only 29% are offered that option
 - ▶ 71% would value a financial coach



Legislative Review

New Bill Introduces Universal Retirement Plan

- > U.S. Representative Joe Crowley (D-NY), vice chair of the Democratic Caucus, introduced the “Secure, Accessible, Valuable, Efficient Universal Pension Accounts (SAVE UPs) Act.” The details of the plan include:
 - ▶ Employers with 10 or more employees are required to open individual retirement accounts for every employee, if they do not already offer a retirement plan
 - ▶ Employees will automatically begin contributing 3% of their pre-tax income, with contributions gradually increasing over time unless the employee opts out
 - ▶ Employers would also be required to contribute specific, inflation-adjusted amounts per hour for every worker
 - ▶ To help with the cost of employer contributions, a tax credit would be available for small businesses

Senate Finance Committee Approves Pension Bill

- > The Finance Committee unanimously approved the “Retirement Enhancement and Savings Act of 2016.” Key provisions of the bill include:
 - ▶ Allow unrelated employers to participate in a multiple employer plan
 - ▶ Require that Defined Contribution participants receive an estimate of the amount of monthly annuity income their balance could produce in retirement
 - ▶ Create new fiduciary safe harbors for employers who opt to include a lifetime income investment option in their Defined Contribution plan
 - ▶ Permit participants to make direct trustee-to-trustee transfers of “lifetime income investments” that are no longer authorized to be held as investment options in their employer’s Defined Contribution plan

Details Emerge About Oregon State-Run Retirement Program

- > The Oregon Retirement Savings Plan will begin enrolling workers in July 2017. The program will be phased in over several years, with workers at smaller employers and annual auto-escalation starting at a later date
- > Employers will be required to participate, unless they already provide their employees with a retirement plan
- > The format of investment will be a Roth Individual Retirement Account and the initial savings rate will be 5% of wages for enrollees, unless workers choose a different level
- > Unless chosen otherwise, money will be invested in target-date funds; a stable value fund and stock index growth option will also be available



Regulatory Review

Reminder: Fourth Quarter Compliance Calendar

October

October 15:

- > Deadline for adopting a retroactive amendment to correct an IRC Section 410(b) coverage or IRC 401(a)(4) nondiscriminatory failure in 2015

October 17:

- > Extended deadline for filing Form 5500
- > Extended deadline for filing tax returns for unincorporated business and final contribution deadline

December

December 1:

- > Deadline for sending annual 401(k) and (m) safe harbor notice
- > Deadline for sending annual QDIA notice
- > Deadline for sending automatic contribution arrangement notice

December 15:

- > Extended deadline for distributing SAR to participants

December

December 31:

- > Deadline for processing corrective distributions for failed 2015 ADP/ACP test with 10% excise test
- > Deadline for correcting a failed 2015 ADP/ACP test with a QNEC
- > Deadline for amendment to convert existing 401(k) plan to safe harbor design for next plan year
- > Deadline for amendment to remove safe harbor status for next plan year
- > RMDs due under IRC 401(a)(9)

Money Market Reform Becomes Effective

- > Beginning on October 14, 2016, new money market rules become effective
- > These rules will create three types of money market funds:
 - ▶ Institutional Prime: These funds will be priced daily rather than have their net asset value (NAV) fixed at \$1. In addition, these funds will impose redemption fees in certain cases and will need to suspend redemptions for up to 10 business days if the fund's liquidity falls below certain thresholds
 - ▶ Retail Prime: The NAV of these funds will not float, but the funds will be required to impose redemption fees and gates under certain conditions
 - ▶ Retail Government: These funds must invest 99.5% of their assets in U.S. Treasury securities. The NAV will not float, and the funds will not be required to impose redemption fees or gates
- > Defined contribution plans are eligible for all three options but “pooled” plans such as defined benefit plans are only eligible for Institutional money market funds

Determination Program Officially Curtailed

- > The IRS issued Revenue Procedure 2016-37 which eliminates the staggered five-year remedial amendment cycle for individually designed plans
 - ▶ As of January 1, 2017, sponsors of individually designed plans will be permitted to submit determination letter applications only for newly established plans or terminating plans
- > The IRS intends to publish a Required Amendments List each year, which will list any amendments that must be adopted for plans to maintain their qualified status; the deadline for amending plans will generally be the end of the second calendar year following the year in which the list was issued
- > Finally, plan sponsors may only rely on an existing determination letter with respect to a plan provision that is not subsequently amended or that is not subsequently affected by a change in law

New Form 5500 Rules Proposed

- > The Department of Labor, Internal Revenue Service and Pension Benefit Guaranty Corporation proposed changes to the forms and regulations governing the Form 5500 annual reporting process
- > If adopted on schedule, the revised reporting requirements would generally apply to plan years beginning on or after January 1, 2019
- > Some of the proposed changes include:
 - ▶ Additional information would be required about participant accounts, contributions and distributions and new questions would be asked about participation rates, matching contributions and nondiscrimination
 - ▶ A separate Schedule C would be filed for each service provider, and revisions would more closely align the schedule with the service provider fee disclosure rules
 - ▶ Small welfare benefit plans that were previously exempt from 5500 filing requirements would be subject to those requirements

Recent DOL Audits Focused on Required Minimum Distributions

- > The DOL has expanded its audit activities to investigate whether plans have made reasonable attempts to find terminated vested participants who are subject to the required minimum distribution rules
- > The department has found that some plan sponsors either do not have procedures in place to distribute benefits or locate missing participants, or if they do, are not followed
- > While directed at terminating defined contribution plans, the guidance provided in Field Assistance Bulletin 2014-10 may provide plan sponsors a helpful starting point for locating missing plan participants

PBGC Proposes Expansion of Missing Participant Program

- > On September 20, 2016, the PBGC issued proposed regulations that would expand the Missing Participant Program. In addition to covering single-employer DB plans, the proposed regulations would:
 - ▶ Require multiemployer plans to use the program
 - ▶ On a voluntary basis, offer the program to DC plans and small professional services DB plans, neither of which are insured by the PBGC
- > In order to participate in the program, sponsors must first conduct a diligent search for missing participants within six months before transferring a participants' balance to the PBGC
- > The new rules would apply to plans terminated after calendar year 2017

SEC Registration Not Required for Employer Stock Purchased Through a Brokerage Window

- > The SEC Division of Corporate Finance issued a Compliance and Disclosure Interpretation (CDI) clarifying that a 401(k) plan sponsor that does not offer an employer securities fund but offers a brokerage window through which purchases of employer securities can be made, does not require Securities Act registration
- > Under the CDI, the employer's involvement must be limited to making the self-directed brokerage window available, making payroll deductions and paying administrative expenses

DOL Announces Final Rule on State Payroll Deduction IRA Accounts

- > On August 25, 2016, the DOL issued final regulations establishing a safe harbor for certain state-based savings programs providing for IRAs established pursuant to state payroll deduction programs so these programs are not subject to ERISA
 - ▶ The final rule largely adopts the proposed rule originally issued in November 2015
- > The DOL also issued proposed regulations that would permit a limited number of cities and other local governments to establish similar programs

IRS Finalizes Favorable Roth Rollover Guidance

- > Under the final regulation, if part of a distribution from a designated Roth account is provided to the participant and the rest to a Roth IRA or designated Roth account in a direct rollover, pretax amounts will be allocated first to the direct rollover, rather than on a pro rata basis to both disbursements
- > While the IRS made the final rule retroactive to January 1, 2016, taxpayers may optionally apply it beginning September 18, 2014
- > Plan sponsors will need to update the “safe harbor” rollover explanation (402(f) notice) given to recipients of eligible rollover distributions from designated Roth accounts

IRS Issues Help for Taxpayers Who Miss the 60-Day Rollover Deadline

- > On August 24, 2016, the IRS issued Announcement 2016-113 and Revenue Procedure 2016-47 which provide a self-certification procedure that permits taxpayers to inadvertently miss the 60-day deadline to complete a rollover under certain conditions
 - ▶ Historically, a recipient who missed the deadline would have to request a private letter ruling from the IRS
- > The guidance provides a list of acceptable reasons why the 60-day deadline was missed and requires the rollover be completed as soon as practicable after the cited reason no longer prevents the rollover; this requirement is deemed satisfied if the rollover is made within 30 days

IRS Provides Relief to Louisiana Flood Victims

- > The IRS has streamlined the hardship distribution and loan rules for Louisiana flood victims and their families, allowing people to access their money more quickly with a minimum amount of red tape
- > In addition, the six-month ban on 401(k) and 403(b) contributions that normally affects employees who take hardship distributions will not apply
- > Ordinary income taxes and the 10% premature distribution penalty rules will still apply
- > To qualify for this relief, distributions must be made by January 17, 2017



Legal Review

Edison Case to Be Reheard by Ninth Circuit

- > In April 2016, a three-judge panel ruled that the plaintiffs who sued over the company's 401(k) fees forfeited their claim that plan fiduciaries failed to monitor these fees
- > The court announced on August 5 that this decision will be reheard in front of a full panel of Ninth Circuit judges
- > This dispute went to the U.S. Supreme Court in 2015, resulting in a plaintiff-friendly ruling regarding a plan sponsor's fiduciary responsibility to monitor plan expenses on an ongoing basis

New Lawsuit Over Target-Date Fund Fees, Performance

- > A new ERISA class action lawsuit accuses Fujitsu Technology and Business of America of breaching its fiduciary responsibility in the design and implementation of its \$1.3B plan target-date funds
- > According to the lawsuit filed in the U.S. District Court for the Northern District of California, the plan incurred at least \$7M per year in excess fees when compared with the average plan of similar size. In addition, the custom target-date fund investments used a “fundamentally flawed” asset allocation as three-quarters of the funds underperformed their benchmark indices

Other Excessive Fee Cases in the News

- > A judge in the case of Novant Health Inc. has approved a \$32M settlement; the lawsuit accuses Novant of breaching its fiduciary duty by causing plan participants to pay million of dollars in fees for excessive recordkeeping and administrative expenses
- > Chevron Corp. convinced a federal judge to dismiss class action claims challenging the fees and investment options associated with its 401(k) plan such as the inclusion of a money market fund instead of a stable value fund and the use of mutual funds instead of lower-fee vehicles such as separate accounts and collective trusts
- > A second lawsuit has been filed against Safeway involving allegations that it violated ERISA. In July 2016, Safeway was accused of selecting “opaque, high-cost and poor performing investment options” in its retirement plan; in August 2016 a second lawsuit accused the supermarket chain of using high-priced target-date funds when less expensive funds were available

Excessive Fee Suits Hit Colleges

- > A number of excessive fee suits have been brought against colleges and universities including MIT, Yale, New York University, Columbia, Northwestern, Emory, Vanderbilt and Duke
- > In summary, these cases generally allege the plaintiffs failed to consider or offer cheaper investment alternatives for employees' retirement savings and some of the investments made available had a history of poor performance

Small Plans Not Immune to Excessive Fee Suits

- > A new lawsuit was filed on July 14, 2016, in the U.S. District Court for the Southern District of Ohio alleging that the loan servicing company Checksmart Financial breached its ERISA fiduciary responsibility by allowing excessive administrative fees and imprudent investment options in the company's \$25M plan
- > In May 2016, a similar lawsuit involving a plan with \$9M in assets was filed. In June, that lawsuit was dismissed at the participant's request

Stock Drop Suits Yield a Mixed Bag

- > Cases against a number of plan sponsors have recently been dismissed including RadioShack Corp., Sanofi-Aventis U.S., Whole Foods Corp. and British Petroleum Corp
- > A Georgia bank formerly known as First Citizens Bankshares Inc. must defend claims that it failed to investigate whether its employees should continue to invest in company stock after a judge dismissed its motion to dismiss
- > The U.S. District Court of the Southern District of New York has preliminarily approved a \$6.25M settlement between Avon Products and participants in its defined contribution retirement plan



Defined Contribution Capabilities

Janus Defined Contribution Capabilities

- > 45+ years of industry experience
 - > Retirement excellence and leadership
 - > Three highly specialized investment managers: Janus, INTECH and Perkins
 - > Experience in:
 - ▶ Fiduciary responsibility
 - ▶ Industry trends
 - ▶ Legislative and regulatory updates
- ▶ \$23.442 Billion in DC Assets Under Management as of 6/30/16
 - ▶ Products utilized by the top 25 DC record keepers in the industry
 - ▶ Availability on over 200 recordkeeping platforms

Janus Capital Group Inc. is a global asset manager offering individual investors and institutional clients complementary asset management disciplines. Janus Capital Management LLC, Perkins Investment Management LLC and INTECH Investment Management LLC serve as investment advisers. Perkins and INTECH are indirect subsidiaries of Janus Capital Group Inc.

Janus QDIA Capabilities

| | Dynamic Allocation | | Risk-Based | | |
|---------------------------------------|---|--|--|--|--|
| | Janus Balanced Fund | Perkins Value Plus Income Fund | Janus Global Allocation Fund - Conservative | Janus Global Allocation Fund - Moderate | Janus Global Allocation Fund - Growth |
| | A: JDBAX C: JABCX S: JABRX I: JBALX R: JDBRX T: JABAX | A: JPVAX C: JPVCX S: JPVSX I: JPVIX T: JPVTX | A: JCAAX C: JCACX S: JCASX I: JCAIX T: JSPCX | A: JMOAX C: JMOCX S: JMOSX I: JMOIX T: JSPMX | A: JGCAX C: JGCCX S: JGCSX I: JGCIX T: JSPGX |
| Manager(s) | Marc Pinto, CFA Darrell Watters Jeremiah Buckley, CFA Mayur Saigal | Theodore Thome, CFA Darrell Watters | Ashwin Alankar, Ph.D. Enrique Chang | | |
| Description | Equity and fixed income product capitalizes on Janus' uniquely integrated firmwide research | Flexibly allocates between Perkins income-focused equity and Janus fundamental-informed fixed income | Diversified portfolios of Janus, Perkins and INTECH mutual funds with target risk determined allocations across global equity, fixed income and alternatives | | |
| Asset Class Allocation Process | Ongoing at the discretion of the portfolio management team | Ongoing at the discretion of the portfolio management team | Long-term strategic asset allocations with ongoing monitoring and rebalancing of underlying funds. Oversight provided by Janus' asset allocation committee | | |
| Allocation Ranges | Equity 35-65% Fixed Income 35-65% Alternatives 0% | Equity 40-60% Fixed Income 40-60% | Equity 30-50% Fixed Income 50-65% Alternatives 0-20% International Allocation: ~40% | Equity 45-65% Fixed Income 30-45% Alternatives 5-20% International Allocation: ~40% | Equity 70-85% Fixed Income 10-25% Alternatives 5-20% International Allocation: ~40% |
| Fund Inception Date | 9/1/92 | 7/30/10 | 12/30/05 | | |
| Benchmark | S&P 500® Index | Russell 1000® Value Index | Barclays Global Aggregate Bond Index | MSCI All Country World Index SM | MSCI All Country World Index SM |

S&P 500® Index measures broad U.S. equity performance.

Russell 1000® VALUE Index measures the performance of those Russell 1000® companies with higher price-to-book ratios and higher forecasted growth values.

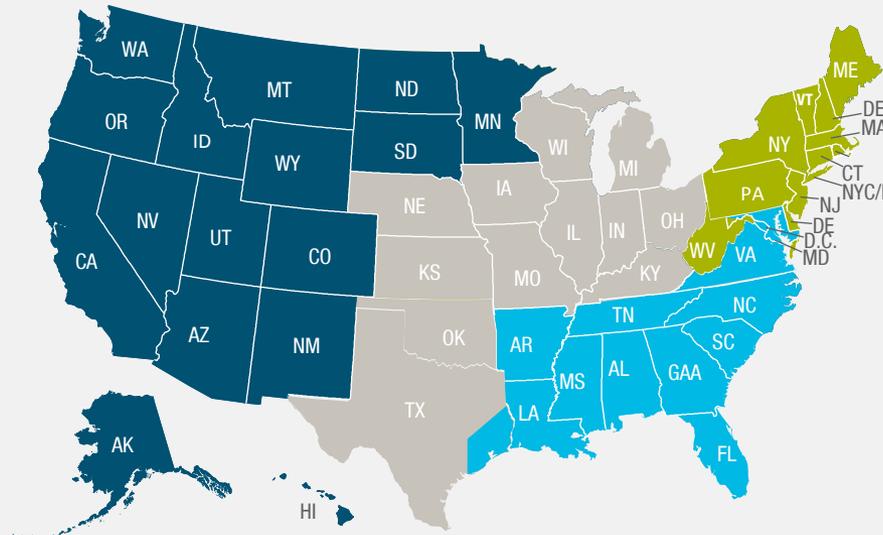
Barclays Global Aggregate Bond Index is a broad-based measure of the global investment grade fixed-rate debt markets.

MSCI All Country World IndexSM is an unmanaged, free float-adjusted market capitalization weighted index composed of stocks of companies located in countries throughout the world. It is designed to measure equity market performance in global developed and emerging markets. The index includes reinvestment of dividends, net of foreign withholding taxes.

Continuing Education

- > Janus offers accredited continuing education seminars for financial advisors, CPAs, human resources professionals and other retirement and financial industry participants
- > Each seminar qualifies for one credit hour of continuing education (CE) credit
- > Live, in-person, on-demand and webcast options available
- > Available for CFP®, CIMA®, CPWA®, CRPC®, CRPS®, CRC®, AIF®, CPA®, HR and CEBS designations

Additional Support Provided by Janus



Experience in:

- > Fiduciary Responsibility
- > Wealth Management
- > Industry Trends
- > Legislative and Regulatory Updates

DEFINED CONTRIBUTION & WEALTH ADVISOR GROUP

| WESTERN U.S. | CENTRAL U.S. | EASTERN U.S. | SOUTHERN U.S. |
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| NATIONAL AND RIA SUPPORT | INTERNAL SUPPORT | INTERNAL SUPPORT |
|---|--|---|
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Matt Sommer, CFP®, CPWA®, CFA®

Vice President, Retirement Strategy Group

Matt Sommer is Vice President and leads the Defined Contribution and Wealth Advisor Services team at Janus. In this role, he provides advice and consultation to Financial Advisors surrounding some of today's most complex retirement issues. His expertise covers a number of areas including regulatory and legislative trends, practitioner best practices, and financial and retirement planning strategies for HNW clients.

Prior to joining Janus, Matt spent 17 years at Morgan Stanley and its predecessors. Matt held a number of senior management positions including Director of Financial Planning at Citi Global Wealth Management and Director of Retirement Planning at Smith Barney.

Matt received his undergraduate degree in finance from the University of Rhode Island and received a Master's of Business Administration with a specialization in finance from the Lubin School of Business at Pace University. Matt currently serves on the Investment Management Consultant Association (IMCA) Wealth Management committee and CPWA examination sub-committee.





Please consider the charges, risks, expenses and investment objectives carefully before investing. For a prospectus or, if available, a summary prospectus containing this and other information, please call Janus at 877.33JANUS (52687) or download the file from janus.com/info. Read it carefully before you invest or send money.

A Fund's performance may be affected by risks that include those associated with nondiversification, non-investment grade debt securities, high-yield/high-risk securities, undervalued or overlooked companies, investments in specific industries or countries and potential conflicts of interest. Additional risks to a Fund may also include, but are not limited to, those associated with investing in foreign securities, emerging markets, initial public offerings, real estate investment trusts (REITs), derivatives, short sales, commodity-linked investments and companies with relatively small market capitalizations. Each Fund has different risks. Please see a Janus prospectus for more information about risks, Fund holdings and other details.

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No investment strategy can ensure a profit or eliminate the risk of loss.

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For more information contact your financial advisor.

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